



INFORMATION NOTICE FOR AXA SHAREHOLDERS

AXA respects your privacy and ensures that all the personal data it handles is processed in accordance with the best confidentiality practices and the applicable laws on data protection, and notably the European Union General Data Protection Regulation n°2016/679 (GDPR).

The objective of this Information Notice is to inform you about the processing of your personal data when you are an AXA shareholder – which means, if you invest in AXA - whether or not you are a member of the Shareholders' Circle (if you want to learn more about the Shareholders' Circle, you can click [here](#)).

If you are an AXA employee shareholder or a former AXA employee shareholder, please refer to the Employee Information Notice for more information about the processing of your personal data.



The processing operations presented in this Information Notice are those carried out by AXA SA (the parent company) and GIE AXA only, without prejudice to the processing operations carried out by the AXA local entity (e.g., AXA France) with which you are in contact.



UPDATE OF THE PRESENT INFORMATION NOTICE

The Data Controllers may update this Information Notice from time to time in response to changing legal, technical, or business developments. When the Data Controllers update this Information Notice, the Data Controllers will take appropriate measures to inform you, consistent with the significance of the changes the Data Controllers make. The Data Controllers will obtain your consent to any material Information Notice changes if and where this is required by applicable data protection laws. This Notice was last updated on January 22, 2024.

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WHO ARE THE DATA CONTROLLERS OF YOUR PERSONAL DATA?

GIE AXA, a European Economic Interest Grouping, organized under French law, with its registered office at 23 Avenue Matignon, 75008 Paris, registered with the Registry of Commerce and Companies of Paris under the number 333 491 066, acts as an **independent data controller** in the context of this processing (i.e., it determines the purposes and means of the processing of your information).

In some cases, **GIE AXA and AXA SA** (excluding subsidiaries), a Société Anonyme, organized under French law, with its registered office at 25 Avenue Matignon, 75008 Paris, registered with the Registry of Commerce and Companies of Paris under number 572 093 920, act as **joint data controllers** in the context of the processing of your personal data (i.e., they jointly determine the purposes and means of the processing of your information).

The data controllers are referred to in this Information Notice as "AXA" or "Data Controllers" or "We" or "Us".



WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?

In accordance with the French "Informatique et Libertés" law n° 78-17 of 6 January 1978 and the GDPR, you have the right to:

- **Access to your personal data:** you have the right to request access to the personal data We process about you, and to obtain a copy of that data,
- **Rectify your personal data:** you have the right to ask AXA to rectify or complete the personal data that We process about you that are inaccurate, incomplete, or not up to date,
- **Request the limitation of the processing of your personal data:** you have the right to ask AXA to limit the processing of your personal data. This means that the Data Controllers may simply keep your data but may not process or use it in any other way,
- **Decide what happens to your personal data after your death:** you have the right to give AXA instructions as to how your personal data should be used after your death.

Based on the legal basis for the processing of your personal data described in the table below, you have also the right to:

- **Request the deletion of your personal data:** you have the right to ask AXA to delete your personal data, except where the processing is based on the performance of a legal obligation of the Data Controllers,
- **Right to portability of your personal data:** you have the right to receive the personal data you have provided to Us in a suitable format and have the right to transfer that data to another data controller without Us interfering but only where the processing is based on your consent,
- **Withdraw your consent** at any time by contacting the following address actionnaires.web@axa.com, but only where the processing of your personal data is based on your consent,

- Where the processing of your data is based on AXA's legitimate interest (see table below on how your data is processed), you also have the **right to object at any time**, but only where the processing of your data is based on the Data Controllers' legitimate interest(s), to the processing of your personal data, unless the Data Controllers can demonstrate the need for further processing or where such data is necessary for the establishment, exercise, or defense of legal claims. Furthermore, information on the balancing test can be obtained on request by contacting the following address: privacy@axa.com.



HOW TO CONTACT THE DATA PROTECTION OFFICER ("DPO") WITH ANY QUESTIONS OR TO EXERCISE YOUR RIGHTS?

If you have any questions, complaints, or comments regarding this Information Notice or to exercise your rights listed above, please contact the DPO. The contact details are as follows: (i) privacy@axa.com and / or (ii) 23 avenue Matignon, 75008, Paris for GIE AXA or 25 avenue Matignon, 75008, Paris for AXA SA.

The Data Controllers may ask you for additional information to confirm your identity and/or to assist AXA to locate the data you are seeking.



HOW TO MAKE A COMPLAINT TO A SUPERVISORY AUTHORITY?

You have the right to raise concerns about how your personal data is being processed with a competent supervisory authority, in particular in the Member State of your habitual residence, place of work or place where you think an alleged infringement to your rights occurred.

In France, the data protection authority is the Commission Nationale de l'Informatique et des Libertés, or "CNIL" whose postal address is 3 place de Fontenoy - TSA 80715 - 75334 Paris CEDEX 07. Its website is accessible here: <https://www.cnil.fr/>



HOW DO WE ENSURE THE SECURITY OF YOUR PERSONAL DATA?

The Data Controllers use appropriate technical and organizational measures to protect personal data. The measures that the Data Controllers implement are designed to ensure an appropriate level of security to the risks of the processing of your personal data, in line with AXA standards.



IS THE PROVISION OF YOUR PERSONAL DATA MANDATORY?

If the provision of personal data is mandatory, this information will be indicated to you at the time of collection of the personal data (e.g., by an asterisk on the collection form). If you do not provide AXA with data identified as mandatory, AXA may not be able to interact with you or provide you with the information or services you require.



FOR WHAT PURPOSES AND IN WHAT WAY IS YOUR PERSONAL DATA PROCESSED BY AXA?

In the context of our relationship with you, your personal data is processed for various purposes. For each purpose, you will find below a table listing the relevant information on the processing of your personal data.

Furthermore, please note that We carry out portfolio analyses on legal entity shareholders. The portfolios received may include data relating to shareholders who hold a certain number of shares and including their last and first names and dates of birth. This data, which is not used by AXA, is deleted upon receipt.



If you are a shareholder, your personal data will be processed as follows:

What is the purpose?	What is the legal basis?	What personal data do We process about you?	How long will your personal data be kept?
These processing operations allow Us to organize our relationship with you			
<ul style="list-style-type: none"> Identification of AXA shareholders and communicating with them to facilitate their participation in the General Assembly, their access to all information concerning AXA business and, in general, the exercise of their rights, and Production of statistics on AXA's shareholders composition 	Our legitimate interests: to enhance the long-term engagement of AXA shareholders by facilitating the exercise of their rights and conducting statistics	Your identification data: last name, first name, age, postal address, personal email, personal phone number, gender. Your other data: number of shares you hold	Your personal data is deleted no later than twelve (12) months after We become aware that you are no longer an AXA shareholder. This list of shareholders is updated every three (3) years.
These processing operations allow Us to invite you to participate in events			
Management and organization of the events to which you are invited and realization of participation statistics.	Our legitimate interests: to gain an in-depth understanding of our shareholders and provide you with quality follow-up	Your identification data: last name, first name, personal email, personal postal address, personal phone number. Your presence at an event	Your personal data is deleted three (3) months after the event.
Management of your participation in the AXA General Assembly	Legal obligation	In case the General Assembly is held in person: Your identification data: last name, first name, civility, postal address, email, data proving your attendance to the General Assembly In case the General Assembly is held remotely: Your identification data: last name, first name, civility, postal address, email, your voice, your image, identity card, photo (for comparison with your identity card), account number, If you ask a question: your voice, your image, Your connection data: IP address, timestamp, votaccess number	For the management of the General Assembly both in person or remotely: Your personal data is processed by BNP Paribas Securities Services (BP2S), our agent. To find out more about how long BNP Paribas Securities Services (BP2S) keeps your personal data, please refer to the BP2S information notice by clicking here . For the management of the Shareholder's General Assembly in person: The personal data relating to your attendance to the General Assembly is deleted three (3) years after its collection to maintain the continuity and quality of service. For the management of the remote General Assembly: Your identification and connection data are deleted by our provider twenty-four (24) hours after the General Assembly. As the General Assembly is intended to be available for replay on the Internet, if you ask questions, your data will be deleted two (2) years after the General Assembly.

If you are a member of the Shareholders' Circle, your personal data is also processed as follows:

Please note that if you are a registered shareholder (your shares are registered in your name in the company's records. Their management has been entrusted to BNP Paribas Securities Services since November 26, 2001), you are automatically registered in the Shareholders' Circle.

What is the purpose?	What is the legal basis?	What personal data do We process about you?	How long will your personal data be kept?
Checking the shareholder status of members of the Shareholders' Circle	Our legitimate interests: to ensure your membership in the Shareholders' Circle	Your identification data: last name, first name, personal postal address, personal email, personal telephone number, Your data related to your status as a shareholder: number of shares you hold, proof of your status as a shareholder, Your attendance data at Circle events: name of the event, date of the event, attendance or not	Your personal data is deleted upon the occurrence of one of two events: <ul style="list-style-type: none"> either when you unsubscribe from the Shareholders' Circle, or when you are no longer an AXA shareholder.



Establishment of a privileged relationship with AXA shareholders by sending newsletters and invitations to various events	Your consent	Your identification data: last name, first name, personal postal address, personal email, personal telephone number, Your data related to your status as a shareholder: number of shares you hold, proof of your status as a shareholder	Your personal data is deleted upon the occurrence of one of two events: <ul style="list-style-type: none">▪ either when you unsubscribe from the Shareholders' Circle, or▪ when you are no longer an AXA shareholder.
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IS AN AUTOMATED DECISION MADE IN THE CONTEXT OF THESE PROCESSING?

No automated decision making is performed for the processing described in this Information Notice.



WHERE DOES YOUR PERSONAL DATA COME FROM?

The personal data We process comes either directly from you or from our service providers facilitating the organization of the General Assembly, the subscription and purchase services for shareholders or from our custodian of financial securities.



TO WHOM DO WE DISCLOSE YOUR PERSONAL DATA?

The Data Controllers communicate your personal data only to identified and authorized recipients which are the following:

Internal

Authorized recipients, within the limits of their respective attributions according to the relevant processing:

- **GIE AXA following Departments:** Group Communication Department, for the purposes of managing the "Shareholders' Circle" and sending out invitations to meetings and events; Group Legal Department, for the purposes of organizing AXA's shareholders' General Assembly; Investor Relations Department, for the purpose of managing interactions with shareholders; Support Services Department, for the purpose of managing and organizing internal and external events,
- **GIE AXA Group Investigation department,** for the purpose of implementing a system for collecting and managing professional alerts. For more information, please refer to the relevant information notice available on axa.com,
- **GIE AXA Group Audit department,** for the purpose of performing internal audits to ensure the adequacy and effectiveness of internal controls and governance. For this processing, We pursue our legitimate interests to ensure a prudent and transparent management of the company through the evaluation of the adequacy and effectiveness of the internal control activities. Where relevant, this may include checking controls over transactions or records containing personal data. The processing of your sensitive data is based on your consent, collected by GIE AXA or other AXA local entities (e.g., AXA France) with which you are in contact. Any personal data required to support the audit conclusion is deleted ten (10) years after the closing of the last issue relating to the audit (or after the issuance of the audit report if no issues have been identified), all other personal data is deleted within ten (10) days following completion of the audit.

For the reasons mentioned in the table above (purposes), your personal data may be communicated by email between the departments mentioned above. Please note that this information is archived for one (1) year before being permanently deleted:

- Information contained in a deleted email (i.e., moved to the "deleted items" category of the mailbox from the date on which the email is deleted),
- Information contained in the mailbox of an employee or consultant who has left GIE AXA / AXA SA / GIE AXA Université (from the date of his or her departure).

External

- Providers facilitating access to any information relevant to the company's business and, generally, the exercise of rights,
- Providers of governance or relationship management tools,
- Providers of management and sending of invitations,
- Providers facilitating the organization of the AXA General Assembly, the subscription and purchase services for shareholders,
- Providers of cloud/data hosting services,
- Providers managing cookie on the Q&A platform and facilitating, if you wish to register on the platform, your subsequent connections,
- Custodian of financial securities.

But also:

- Our advisors, including our lawyers, insurers, reinsurers, brokers, auditors,
- Any competent authority (including courts, judicial or administrative authorities, ACPR, French tax authorities),
- Any potential acquirer or partner in the event that the Data Controllers take part in a merger, acquisition or any other form of transfer of assets. In this case, the Data Controllers undertake to ensure an adequate level of protection of your personal data transmitted to the potential acquirers or partners selected in the context of this operation.

If you wish to get some details on above-mentioned recipients acting as a processor (i.e., these recipients act on Our instructions only) or controller (i.e., these recipients determine the purposes and means of processing), do not hesitate to contact the Data Privacy team at privacy@axa.com.



IS YOUR PERSONAL DATA TRANSFERRED OUTSIDE THE EUROPEAN UNION?

Some of these recipients are in a country outside of the EU which ensures an adequate level of protection (i.e., your personal data is subject to the same level of protection as within the EU):

- **United Kingdom** ([link to the adequacy decision](#)),
- **United-States**, for companies participating in the EU-U.S. Data Privacy Framework ([link to the Adequacy decision](#)) – the list of these organisations is managed and published by the US Department of Commerce.

Your personal data is also transferred to certain countries that do not provide an adequate level of data protection, such as: **United-States**, for companies who are not participating in the EU-U.S. Data Privacy Framework.

In this case, the Data Controllers provide safeguards to ensure the security and the confidentiality of your personal data and frame their transfer(s) with the following guarantees:

- By signing, with the recipient of the data, the Standard Contractual Clauses adopted by the European Commission. You may obtain a copy of the signed Standard Contractual Clauses by requesting it from our DPO, whose contact details are as follows: 23 avenue Matignon, 75008, Paris for GIE AXA (25 avenue Matignon, 75008, Paris for AXA SA) and/or privacy@axa.com,
- Or when your personal data is transferred to other entities of the AXA Group, with Binding Corporate Rules (<https://www.axa.com/en/about-us/our-commitments> - part Find out more).