



INFORMATION NOTICE ON THE PROTECTION OF YOUR PERSONAL DATA AS CUSTOMERS OR PROSPECTS

AXA respects your privacy and ensures that all the personal data it handles is processed in accordance with 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 customers or prospects of AXA local entities.



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 Information Notice was last updated on January 22nd, 2024.

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WHO IS THE DATA CONTROLLER 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 **independent data controller** in the context of the processing of your personal data (i.e., it determines the purposes and means of the processing of your information).

In some cases, **GIE AXA** and **AXA SA** (excluding its 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 TO 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 the performance of a contract or your consent,
- **Withdraw your consent** at any time by contacting the DPO at the following address: privacy@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 DPO OR 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 Fontenay – 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 designed to protect the personal information about you. The measures the Data Controllers use are designed to provide a level of security appropriate to the risk of the processing activity of your personal information, in line with AXA standards.



IS THE PROVISION OF YOUR PERSONAL DATA MANDATORY?

Whether or not the provision of your personal data to AXA is mandatory will be indicated to you at the time of collection of such data (e.g., by an asterisk on the collection form). If you do not provide AXA with data identified as mandatory, AXA may be unable to enter a contract with you (or to continue the current contractual relationship) or to provide you with the expected products and/or services.



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

Your personal data is processed for the different purposes listed in the table below. You will also find in the table below, for each purpose, the relevant information relating to the processing of your personal data.

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?
Processing relating to the management of sales of AXA products and/or services				
For Life and Health insurances	Perform statistics on prospects' profile and policies contracted	Our legitimate interests: to improve the underwriting/pricing performance during the sale of products, services and policies offered by relevant AXA local entities to prospects, The processing of your sensitive data is based on statistical purposes .	Your identification data: date of birth, gender, Your personal life: family situation, hobbies, consumption patterns, Your professional data: job position / occupation, Your economic and financial data: salary, sum insure, income, Your sensitive data: health-related data (insurance details, medical information, disability information)	Your personal data is deleted one (1) year after the date of collection, by GIE AXA.
	Provide to AXA local entities a "second opinion" for underwriting and claims	Our legitimate interests: to provide AXA local entities with an expert opinion on underwriting and claims AXA products and/or services. The processing of your sensitive data is based on your explicit consent .	Your identification data: date of birth and/or age, gender, nationality, Your personal life: family situation, hobbies, consumption patterns, Your professional data: resume without any direct identifying information, job position/title, Your economic and financial data: salary, mortgage information, Your location data: location information (trips), Your sensitive data: health related data (genetic information, insurance details, medical information, expert evaluation, investigation results, disability information).	Your personal data is deleted immediately after the analysis.
For property and casualty insurances, analyze and give an approval on underwriting policies as per AXA Groupe Standards and Solvency 2 Policies.		A contract	All personal data allowing to give an approval on underwriting	If your personal data is reported, it is deleted two (2) years after the request from the AXA local entity.
Processing related to insurance claims management				
Control and improve AXA's local entities' management of customer claims linked to insurance guarantees		Our legitimate interests: to support compliance with legal requirements (Solvency II) and AXA standard	Your claims data: date of claim, claim amount, claim type, claim reference	Your personal data is deleted five (5) years after its collection.
Processing performed accordingly to a legal obligation				
Fight money laundering and terrorist financing and, take account of international economic and financial sanctions		A legal obligation, Your sensitive data are potentially processed because you have made it public .	Your identification data: last name, first name, date and place of birth, gender, nationality, postal address, copy of your identity card or passport, Your professional data: profession, Your corporate data: mandates and powers, identity of the partners and agents, copies of all official documents and extracts from official registers, Your financial data: taxpayer identification number, Your sensitive data: political affiliation in case of Politically Exposed Person, criminal conviction for the person listed in the terrorism sanction list, negative media	Your personal data is deleted five (5) years after the date of termination of your relationship with the AXA local entity. However, depending on local legislation, the AXA local entity may ask for a longer retention period. If this situation arises, this retention period is implemented in accordance with local legislation. When you are identified as High-Risk Customer, your personal data is deleted from the active database one (1) month after its collection and five (5) years in intermediate storage once you are no longer considered a High-Risk Customer.



Consultancy, as may be requested by entities, on some high-risk individuals for advice from Group Compliance ABC Central Team to share expertise and guide the entities in their decisions	A legal obligation	Your identification data: Last name, first name, Date and place of birth, Gender, Country of residence, ID/passport Your Personal life data: biographical details, family ties and professional relationships with other individuals (for high-risk individual) Your professional life: company name, position, profession (For Legal persons' representatives), Your sensitive data: party of affiliation, criminal convictions, reputation as portrayed by the media	Your personal data is deleted 3 years after the reception of the consultancy request from the entity.
Quantify AXA solvability and define AXA's risk appetite: analyze the exposure to natural risks, disasters, and catastrophes	A legal obligation	Your insurance policy information: contract number, sum insured of the policy and risks' characteristics (building structure, roof type, occupancy, floor level), Your location data: GPS position (postal address, latitude, longitude).	Your personal data is deleted two (2) years from the end of the contract and retained fifty (50) years in intermediary archives of AXA internal servers.
Comply with regulatory reporting requirements regarding the adequacy of the risks associated with our insurance business and the capital allocated to cover those risks	A legal obligation	Your identification data: last name, first name	Your personal data is deleted five (5) years after the report.
Other			
Conduct an opinion survey on emerging risks	Our legitimate interests: to understand clients/prospects opinions on emerging risks for AXA activity	Your professional data: professional email address	Your personal data is deleted as soon as you object to receiving satisfaction surveys and/or updating our panel of experts.



IS AN AUTOMATED DECISION MADE IN THE CONTEXT OF THIS PROCESSING?

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



WHERE DOES YOUR PERSONAL DATA COME FROM?

The personal data We process about you comes from AXA local entities or when your personal data is made public by you.



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 in relation to the relevant processing:

- **Following GIE AXA departments:** DSI, Security, Group Finance, Group Communication, Group Brand and Group Sustainability,
- **GIE AXA Group Investigation department**, for the purpose of implementing a system for the collection and management of professional alerts. For more information, please refer to the relevant privacy notice available on axa.com,
- **Group Risk Management and Group Compliance Departments of GIE AXA**, to perform or support local AXA entities in performing the due diligence required to comply with AXA Standards and to document compliance with these Standards through an in-depth review. These departments may be called upon to give a second opinion on a particular case at the request of a local AXA entity and based on data provided by that entity. Your personal data will be kept for a maximum of five (5) years after the end of your employment contract.
 - The legal basis for the processing carried out by the **Group Risk Management department** is legitimate interest, to ensure compliance with the Standards resulting from Solvency II regulations and issued by the Autorité de contrôle prudentiel et de résolution (ACPR),
 - The legal basis for the processing carried out by **Group Compliance department** is the AXA Group's legal obligation to comply with the requirements of the French Monetary and Financial Code,
- **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.
- **Following AXA local entities:** depending on the request of the data subject, the relevant(s) AXA local entity(ies): AXA Group Operations, for the purpose of managing the hosting and technical support of the AXA storage platform; AXA GO Business Operations, for the purpose of providing technical support.

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 e-mail (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 for the purpose of providing a cloud/data hosting service,
- Providers for the purpose of improving the AXA products, services, and policies,
- Providers for maintenance purpose,
- Providers for the purpose of ensuring AXA standards implementation,
- Providers for the management of data visualization tool to develop commercial opportunities,
- Providers for the calculation of exposure risks,
- Providers for the purpose of providing geocoding services,
- Providers for the management of surveys,
- Providers for the certification of the accounts of AXA,
- Providers for supporting Us for money laundering and terrorist financing purposes.

But also:

- Our counsel, including our lawyers, insurers, reinsurers, brokers, auditors,
- Any competent authority (including courts, judicial or administrative authorities, ACPR, French tax authorities),
- Any potential buyer or partner, in the case that the Data Controllers take part in a merger, acquisition or other form of asset transfer, they undertake to ensure an adequate level of protection if your personal data is transferred to potential buyers or selected partners in the context of this transaction.

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?

These recipients are located within the European Union (EU).

Some of these recipients are in a country outside 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):

- **Japan**, ([link to adequacy decision](#)),
- **United-Kingdom**, ([link to 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 can also be transferred to the following country which do not provide an adequate level of protection:

- **India,**
- **Madagascar,**
- **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:

- (i) 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,
- (ii) Or when your personal data is transferred to AXA local entities, with Binding Corporate Rules (<https://www.axa.com/en/about-us/our-commitments> - part Find out more).