



INFORMATION NOTICE ON THE PROTECTION OF YOUR PERSONAL DATA AS INTERNET USERS

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 visit AXA websites (axa.com, Webcast1, AXA Research Fund, Portail Boursier, Portail Institution, AXA Research Fund Publication Digital) and AXA social media pages administered by AXA on the Internet.



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 NOTICE ON THE PROTECTION OF YOUR PERSONAL DATA

The Data Controllers may update this Information Notice 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 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 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 **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".

Please note that for some processing of personal data on social media, AXA is also joint data controller with the relevant social media:

- **Meta Platforms Ireland Limited (for both Instagram and Facebook)**, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland. For more information, you can consult the main lines of AXA and Facebook agreement [here](#).
- **LinkedIn Ireland Unlimited Company**, Wilton Plaza, Wilton Place, Dublin 2 Ireland,
- **Twitter International Company**, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07 Ireland, and,
- **YouTube**, Google Ireland Limited, 265.com Network Technology Co. Ltd. Ireland.



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.

Furthermore, Facebook, LinkedIn, Instagram, Twitter, YouTube being joint data controllers, you may also exercise your rights with respect to personal data by accessing [Facebook](#), [LinkedIn](#), [Instagram](#), [Twitter](#) or [YouTube Privacy Policies](#).



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 below, please contact the DPO. The contact details are as follows:

- 23 avenue Matignon, 75008, Paris for GIE AXA or 25 avenue Matignon, 75008, Paris for AXA SA,
- privacy@axa.com

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 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 choose not to submit any personal data when requested, you may not be able to participate in certain activities or take advantage of personalized features, and the services offered to you may be limited.



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?
Management of AXA websites and provision of digital content (such as games, conferences, newsletters, etc.)			
To send you newsletters and compile statistics on the opening of these newsletters	Your consent to send you newsletters and collect opening statistics	Your identification data: personal email address (only if you do not provide your professional email address), In addition, Department AXA Research Fund collects your gender and, on an optional basis, your job position.	Your personal data is kept for the duration of your registration and for three (3) years after you have been removed from an objection list.
To handle any questions or complaint you submit Us via our online contact forms	Our legitimate interests: to allow users, customers, prospects, or any individual to contact Us	Your identification data: first name, last name, country, email address, phone number (optional), Your professional life: name of the company/ organization (optional), Your other data: message, date, and time the message has been sent, In addition, Department AXA Research Fund collects your gender.	Your personal data will be deleted three (3) years after the reception of your message.
To allow you to participate to digital events through a dedicated virtual platform	Our legitimate interests: to reach a large audience of journalists, analysts, investors, individual shareholders, opinion leaders, employees, public at large through online events and to allow participants to ask questions to the speakers at live webcasts	Your identification data: first name, last name, personal email address (only if you do not provide your professional email address), Your professional life: professional email address (only if you do not provide your personal email address), name of the company/ organization, Your connection data: IP address, email, logs, Your other data: the content of the questions you asked	Your personal data collected to allow you to ask questions is deleted twenty-four (24) hours after the end of the live broadcast. As an exception, your personal data: <ul style="list-style-type: none"> disclosed during the replay are kept while the replay is online, for certain events, is used to produce statistics and is deleted two (2) months after it was collected.
In link with Liverpool Football Club/ AXA Partnership: <ul style="list-style-type: none"> To allow AXA local entities to send you electronic marketing communication, and To organize contests, sweepstake, lucky draw, events to promote this partnership 	A contract to organize contests, sweepstake, lucky draw, events. Your consent to send you marketing information and newsletter	Your identification data: first name, last name, pseudonym, email address, country, postal address, postcode, phone number, Your personal life data: social media profiles, comments on social media	Your personal data collected to organize contests, sweepstake, lucky draw, events, is deleted once the prizes are delivered. Your personal data collected to send you marketing communication is deleted immediately after its communication to AXA local entities.
Management of the social media pages administered by AXA and display of targeted advertisements on social media (Facebook, Twitter, Instagram, LinkedIn, YouTube)			
To manage the social media accounts (Facebook, Instagram, LinkedIn, Twitter, YouTube) administered by AXA for: <ul style="list-style-type: none"> Publishing institutional content and content relating to AXA products and services, Managing interactions with fans and non-fans on the publications of the AXA pages, Moderating comments and reactions to AXA publications, 	Our legitimate interests: to ensure AXA's presence on social media, to animate a community of fans and to allow customers and prospects to contact the AXA local entities via these social media, Your sensitive data is potentially processed because you have made it public.	Your identification data: first name, last name, pseudonym, postal address, email address, date of birth, place of birth, nationality, gender, Your personal life data: family status, Your location data: country, city, Your sensitive data is not used by AXA but may be available according to your social media settings, Your other data: other data mentioned in your messages, all data you made public. When you ask a question or make a complaint via private messaging, you are requested to provide the following information for transmission to the relevant AXA local entity or customer service team: Your identification data: telephone number,	Your personal data is deleted at the first event that occurs between (i) the deletion of your social media account or (ii) the exercise of your right to erasure or object to the processing of your personal data. In addition, information collected as part of the processing of complaints (emails and related attachments) are deleted five (5) years, after the closure of the request.



<ul style="list-style-type: none">Collecting complaints from AXA customers via private messaging to direct them to the appropriate customer services		Your related claims data (as the case may be): insurance policy number, claim number, country in which this insurance policy was taken out	
To manage AXA reputation monitoring on social media and other internet media	Our legitimate interests: to know the reactions and comments of internet users which may damage AXA's reputation, Your sensitive data is potentially processed because you have made it public.	Your identification data: first name, last name, pseudonym, Your other data (potentially sensitive data): any comment and any category of data made public by the data subjects associated to the key words subject to the analysis on the social media or internet media	Your personal data is deleted, by social media, at the first event that occurs between (i) automatic deletion of your post, (ii) you have decided to switch to a private account, (iii) the deletion of your social media account or (iv) the exercise of your right to erasure or object to the processing of your personal data.
Analysis of Facebook and Instagram insights data (statistics) for pages administrated by AXA. For more information, please note that you can consult the “Data Policy” provided by Facebook here: Page Insights . <u>Please note that We are acting as a joint data controller with Facebook for this purpose.</u>	Our legitimate interests: to measure AXA popularity and the attractiveness of AXA activities and content published on Facebook and Instagram	The actions you take on the pages administered by AXA (you can see such actions in the AXA Page’s Insights section and please note AXA only access to aggregated data): About the content: viewing a Page, post, video, story, or other content associated with a Page, About interactions: interacting with a story, following, or unfollowing a Page, liking or unliking a Page or post, recommending a Page in a post or comment, commenting on, sharing, or reacting to a Page’s post (including the type of reaction), hiding a Page’s post, or reporting it as spam, About your browsing actions: hovering over a link to a Page or a Page’s name or profile picture to see a preview of the Page’s content, clicking on the website, About events: having a Page’s event on screen, responding to an event including type of reaction, clicking on a link for event tickets, starting a Messenger communication with the Page, viewing, or clicking on items in Page’s shop, Some information about your actions: date and time of action, Country/City, language code, age/gender group, website previously visited, whether the action was taken from a computer or mobile device, Facebook user ID	Your personal data is deleted, by social media, at the first event that occurs between (i) the deletion of your social media account or (ii) the exercise of your right to erasure or object to the processing of your personal data.
To display targeted advertising on social media via the advertising management tools offered by Facebook, LinkedIn, Instagram, Twitter, YouTube <u>Please note that We are acting as a joint data controller with social media for this purpose.</u>	Our legitimate interests: to enhance the economic interest of having an increased publicity for AXA services through social media targeting by adapting advertisements to the interests of the data subject and ensuring the relevance of the message passed	AXA selects the following targeting criteria offered by the social media as parameters to identify the target audience to whom its advertisement should be displayed: geographic location available on your public profile, interests (pages followed), gender, age, like on Facebook (as the case may be), keywords used. Please note that, depending on the privacy settings you have made on your profile, the advertisements shown will relate to the pages you visit or your interests. AXA only selects these criteria via the targeting management tools offered by the social media but has no direct or indirect access to users’ personal data held by such social media (AXA does not know which user meets which criteria and does not access user’s profile). Social media and their partners are the only ones who can access the users’ personal data for targeting purposes.	
Managing the exercise of your rights and data breaches			
To respond to any request related to your rights (erasure, objection, modification, etc.) and to manage personal data breaches	Legal obligation	Your identification data: name, last name, address, Any other personal data communicated by you or involved in the data breach	Your personal data is deleted five (5) years, after the closure of the request or after the closure of the data breach.



HOW DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

What are cookies?

A cookie is a small data file (text file) that a website, when viewed by you, asks your browser to store on your device to remember information about you, such as your language preferences or login information. For more information, you can consult the CNIL website [here](#).

a) The different kind of cookies and tracking technologies We use

Strictly necessary cookies: are necessary for the website to function and cannot be switched off in our systems (e.g., your privacy preferences, logging in or filling in forms). You can set your browser to block or alert you about these cookies, but some parts of the site will not then work.

Audience measurement cookies: allow Us to count visits and traffic sources so We can measure and improve the performance of our site. If you do not allow these cookies We will not know when you have visited our site and will not be able to monitor its performance.

Functional cookies: enable the website to provide enhanced functionality and personalisation (e.g., choice of language, username). If you do not allow these cookies, then some or all these services may not function properly.

Social media cookies: are set by a range of social media services that We have added to the site to enable you to share our content with your friends and social media. If you do not allow these cookies, you may not be able to use or see these sharing tools.

Personalized advertising cookies: allow Us to display advertising based on your browsing and profile.

b) Cookies and other tracking technologies on our websites

AXA deposits cookies directly on your terminals and equipment only on the following sites. These sites ask you whether you accept or refuse to accept cookies. For more information about the use of cookies and other tracking technologies by AXA, please consult the relevant AXA Cookies Policy, by clicking on the links below:

- axa.com: [link to axa.com Cookies Policy](#)
- Newsletter Hub: [link to Newsletter Hub Cookies Policy](#)
- Webcast1: [link to webcast1 Cookies Policy](#)
- AXA Research Fund: [link to AXA Research Fund institutional website Cookies Policy](#)
- Portail Boursier: [link to Cookies Policy](#)
- Portail Institution: [link to Cookies Policy](#).

c) Cookies and other tracking technologies used for our advertising activities

We also use cookies for our advertising activities.

These cookies are based on the tag technology also called “tracking pixel”. According to your consent, AXA will process through its service providers some personal data when you visit a website on which an AXA advertising is displayed. To have more information about these cookies and other tracking technologies, please consult the relevant Cookies Policy of publisher websites on which our advertisings are displayed or the relevant Cookies Policy of our service providers.

These processing allow Us to (i) manage online advertising and performance of statistics, (ii) identify and prevent fraud for advertising campaign and brand safety processing, including geo-compliance processing and viewability services and (iii) measure the effectiveness of the brand's digital campaign by comparing unexposed and exposed audiences.

Finally, depending on your advertising preferences on social media, AXA may offer you advertisements based on your profile information, your activities on other websites and applications.

AXA uses this data via the advertising management tools offered by these social media and has no access to the personal data processed by them. Only these social media and their partners have access to this data in the context of advertising activities. To learn more about how advertising on these social media function, please consult these links:

- For [Facebook](#) and [Instagram](#),
- For [LinkedIn](#),
- For [Twitter](#),
- For [YouTube](#).



WHERE DO YOUR PERSONAL DATA COME FROM?

Most of the personal data We process is directly collected from you, whenever you fill out a form on our websites or access our pages on the social media. Where your personal data is not obtained directly from you, the personal data We process come from:

- the content you post on your social media (i.e., this data is made public by you), or
- the cookies deposited on your device if you have accepted their deposit, or
- advertising activities and publishers (the owner or administrator of the platform on which We display our ads).



TO WHOM DO WE DISCLOSE YOUR PERSONAL DATA?

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

Internal:

Authorized recipients, within the limits of their respective attributions in relation to the processing concerned:

- **Following GIE AXA departments:** Group Communication, Group Brand, 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 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,
- **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 AXA storage platform.



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 involved in basic advertising activities and providing tools for the management of advertising activities,
- Marketing agency providers,
- Providers to (i) manage online advertising and performance of statistics, (ii) identify and prevent fraud for advertising campaign and brand safety processing, including geo-compliance processing and viewability services and (iii) measure the effectiveness of the brand's digital campaign by comparing unexposed and exposed audiences,
- Providers transferring cookie ID to GIE AXA in the context of AXA's brand campaigns,
- Providers for the management of newsletters,
- Providers involved in listening and monitoring media and social media,
- Providers for the management of live events,
- Providers for the management of social media account,
- Providers for to organizing contest to promote AXA / LFC partnership,
- Social media to provide a social media platform (as indicated below, they are also joint data controllers with AXA for some data processing, please click here: [Facebook](#), [LinkedIn](#), [Instagram](#), [Twitter](#) or [YouTube](#)).

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 those recipients are in countries outside the European Union (EU), which provide an adequate level of protection (i.e., your personal data is subject to the same levels of security as in the EU):

- **United-Kingdom** ([Link to access 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 does not to provide an adequate level of protection:

- **Australia**,
- **Madagascar**,
- **Singapore**,
- **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 frames their transfer(s) with the following guarantee:

- (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 other entities of AXA, with Binding Corporate Rules (<https://www.axa.com/en/about-us/our-commitments> - part Find out more).