



# PRIVACY POLICY

AXA Partners 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 (hereinafter referred to as the 'GDPR').

The objective of this policy is to present the several processing of your personal data carried out on this website by AXA Partners.





## UPDATE OF THE PRESENT POLICY

AXA Partners may update this privacy policy from time to time in response to changing legal, technical, or business developments. When updating this privacy notice, AXA Partners will take appropriate measures to inform you, consistent with the significance of the changes made. AXA Partners will obtain your consent to any material changes in this privacy policy if and where this is required by applicable data protection laws. This privacy policy was last updated on 10/07/2024.



## WHO ARE THE DATA CONTROLLERS OF YOUR PERSONAL DATA?

**AXA Partners SAS, Credit & Lifestyle Protection (referred to in this policy as "AXA Partners" or "Data Controller" or "we" or "us")**, located at 8-10, rue Paul Vaillant Couturier, 92240 Malakoff, France, and registered at the Registre du Commerce et des Sociétés under the following number 813 778 412, acts in the name and on behalf of AXA FRANCE VIE and AXA FRANCE IARD, data controllers of your personal data. AXA Partners SAS is operating in Ireland through AXA Partners SAS succursal in Ireland, located at Building 7000, Atlantic Avenue, Westpark Business Campus, Shannon, County Clare and registered under the follow number: Branch No: 908621.

## WHAT ARE YOUR RIGHTS TO YOUR DATA?

In accordance with the GDPR, you have the right to:

- **Access your 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 Partners 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 Partners to limit the processing of your personal data. This means that the Data Controller may simply keep your data but may not process or use it in any other way, in the following cases:
  - Your data is inaccurate and require to be corrected or updated,
  - You would rather restrict the processing than delete your data,
  - Your data is no longer necessary to achieve the purpose of processing but still required for the constatation, exercise or defense of your legal rights,
  - You priorly opposed to the processing activity, if applicable.

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

- **Request the deletion of your personal data:** you have the right to ask AXA Partners to delete your personal data, except where data processing is based on legal obligation;
- **Right to oppose to the processing of your personal data:** you have the right to prevent us from processing your personal data, but only where data processing is based on legitimate interest or consent;
- **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 data processed in the context of contract performance or consent;
- **Withdraw your consent** to handle your claims and provide relevant services **at any time** by contacting the Data Protection Officer (DPO) as the processing of your personal data is based on your consent. In such a case, we would not be able to provide the information or services requested;
- The [Cookie Policy](#) is accessible at any time and provides you with information relating to our processing of your data while you browse our website.



## HOW TO CONTACT THE DPO TO ADDRESS ANY REQUESTS 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 address them by sending an email to [clp\\_ie\\_sg\\_dataprivacy@partners.axa](mailto:clp_ie_sg_dataprivacy@partners.axa) or by writing a letter to the following address (in France, where the DPO's office is located):

**AXA Partners SAS, Credit & Lifestyle Protection**  
**Data Protection Officer**  
**8-10, rue Paul Vaillant Couturier**  
**92240 Malakoff**

Your request will then be redirected accordingly to the relevant DPO. AXA Partners may ask you for additional information to confirm your identity and/or to assist locating 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 the Member State of your habitual residence, place of work or place where you think an alleged infringement to your rights occurred.

The list of data protection authorities in the European Union is available through the following link: [https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm). For non-EU countries, please refer to the website of your local data protection authority.



## HOW DO WE ENSURE THE SECURITY OF YOUR PERSONAL DATA?

AXA Partners uses appropriate technical and organizational measures designed to protect your personal information. The measures that AXA Partners use 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 Partners 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 the personal data identified as mandatory, AXA Partners may be unable to properly interact with you or manage properly your request.



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

Your personal data is processed for the different purposes listed in the tables below.

Please refer to the following categories to know the different purposes of your personal data processing but also the legal basis chosen, the categories of personal data processed, and the associated data retention periods:

What is the purpose no. 1?	What is the legal basis?
 <p>Handle claims and provide relevant services</p>	<p><b>Your consent (opt-in)</b>, for the processing of sensitive data accordingly to article 9, 2°, a) of the GDPR, to handle your claim and provide you relevant services</p> <p><b>The contract performance</b> to administer your claim.</p>
What personal data do we process about you?	How long will your personal data be kept? (Retention periods determined in accordance with the legislative and regulatory, statutory, conventional or contractual provisions)
<p><b>Any information related to your claim including:</b> Your general identification and contact information; Your ID documents; Any information relevant to your insurance policy; Your job information relevant to your claim; Any information relevant to any claims made; Information which is available publically; Your financial information.</p> <p><b>If relevant, we will also collect the following “special category data”:</b> Your medical or health information depending on the type of claim you are notifying us.</p>	<p>Deletion or anonymization of policy and account files 7.5 years as from the date on which your policy ends or the date on which a claim is settled, whichever is later, to comply with business and legal requirements.</p>

What is the purpose no. 2?	What is the legal basis?
 <p>Handle complaints</p>	<p><b>Our legitimate interests</b> to handle and to respond to your complaints.</p>
What personal data do we process about you?	How long will your personal data be kept? (Retention periods determined in accordance with the legislative and regulatory, statutory, conventional or contractual provisions)
<p><b>Any relevant information enabling us to process your complaint, among those collected for the performance of your contract or the processing of your claim (see above the categories of data detailed).</b></p>	<p>Deletion or anonymization 7.5 years as from the closure of the complaint, to comply with our regulatory requirements.</p>

What is the purpose no. 3?	What is the legal basis?
 <p>Comply with applicable laws and regulatory obligation, including fraud and money laundering and to carry out sanctions checks</p>	<p><b>Our legitimate interests</b> to prevent any crime or fraud, and to detect unlawful acts.</p> <p><b>Our legal obligations</b> to comply with regulatory requirements related to unlawful acts, and laws related to crimes and fraud.</p>
What personal data do we process about you?	How long will your personal data be kept? (Retention periods determined in accordance with the legislative and regulatory, statutory, conventional or contractual provisions)



**Any information related to your claim including:**

- Your general identification and contact information;
- Your ID documents;
- Any information relevant to your insurance policy;
- Your job information relevant to your claim;
- Any information relevant to any claims made;
- Information which is available publically;
- Your financial information.

Deletion or anonymization 7.5 years as from the date on which your policy ends or the date on which a claim is settled, whichever is later, to comply with business and legal requirements.



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

No automated decision making is performed for processing described in this privacy policy.



**WHERE DO YOUR PERSONAL DATA COME FROM?**

The personal data we process is directly collected from you via your use of our claims portal, and indirectly collected via third parties (such as governmental agencies).



**TO WHOM DO WE DISCLOSE YOUR PERSONAL DATA?**

AXA Partners communicates your personal data only to identified and authorized recipients which are the following:

**Internally**

AXA Partners Credit & Lifestyle Protection authorized personnel who intervene in the process of claims management.

**Externally**

Your personal data will only be communicated to insurance intermediaries, reinsurers, partners, or authorized professional organizations who need access to them to provide our services. Any health-related data collected will only be communicated to authorized partners or subcontractors of the Insurer.



**IS YOUR PERSONAL DATA TRANSFERRED OUTSIDE THE EUROPEAN UNION?**

As a general rule, these recipients are located within the European Union (EU) or in countries outside the EU which provide an adequate level of protection (meaning that your personal data is afforded the same level of security as in the European Union). Where your data are transferred outside of the EU or adequate countries, the Data Controller provides 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 in the third country, the Standard Contractual Clauses adopted by the European Commission. You may obtain a copy of the signed Standard Contractual Clauses by requesting it by sending an email to [clp\\_ie\\_sg\\_dataprivacy@partners.axa](mailto:clp_ie_sg_dataprivacy@partners.axa) or to the following address:

**AXA Partners SAS, Credit & Lifestyle Protection**  
**Data Protection Officer**  
**8-10, rue Paul Vaillant Couturier**  
**92240 Malakoff**

- (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> - "Find out more" section).

**For your information, AXA Partners does not transfer personal data outside the European Union for the purposes of the processing data activities listed in this document.**