**GIE AXA – PRIVACY NOTICE**

**Employees**

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| **From** Data Privacy Team  **Entity** GIE AXA  **Date** April 29, 2019 |
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AXA Group 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 privacy**, and notably the European Union General Data Protection Regulation n°2016/679 (GDPR).

Is considered to be Personal Data any information relating to an identified or identifiable natural person (a Data Subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

This notice applies to you if you are, are about to become, or were an employee of an AXA Local Entity (different from GIE AXA and AXA Université and AXA SA) which also acts as data controller for different purposes and with different means. This notice also applies to you if you are an apprentice, a trainee, an officer or a manager. All of them will be hereinafter referred to as ‘’YOU” or ‘’YOUR”.

**The objective of this Privacy Notice is to inform YOU about the processing of YOUR Personal Data that applies or may apply to YOU.**

For some of the purposes listed hereafter, the Group acts as controller insofar as it defines the strategy, main orientations and standards that will be applicable / transposable in local entities. This qualification has no impact on the qualification (controller) of AXA entities for the implementation of these objectives and purposes at the local level.

Will be acting as a 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):

**GIE AXA**, economic interest grouping, organized under the laws of France, having its registered office at 23 avenue Matignon, 75008 Paris, registered with the Registry of Commerce and Companies of Paris under number 333 491 066,

or

**AXA UNIVERSITE**, an economic interest grouping, organized under the laws of France, having its registered office at 23 avenue Matignon, 75008 Paris, registered with the Registry of Commerce and Companies of Paris under number 342 312 931,

or

**AXA SA,** a société anonyme, organized under the laws of France, having its registered office at 25 avenue Matignon, 75008 Paris, registered with the Registry of Commerce and Companies of Paris under number 572 093 920.

The Data Controllers are hereinafter referred to as ‘’WE’’, “OUR”.

Where applicable, WE will send YOU additional privacy notices or amendments to this notice for specific types of processing of YOUR Personal Data.

Moreover, processing performed by AXA SA subsidiaries are not presented in this Privacy Notice.

**SUMMARY**

[WHAT PERSONAL DATA (CATEGORIES) DO WE COLLECT AND FOR WHAT PURPOSE? 2](#_Toc5641108)

[A. Whatever your professional position is, WE process the following Personal data about you: 2](#_Toc5641109)

[B. WE might, depending on YOUR situation (including your professional position), process the following Personal data about you: 3](#_Toc5641110)

[WHAT SPECIAL CATEGORIES OF PERSONAL DATA DO WE PROCESS ABOUT YOU? 6](#_Toc5641111)

[HOW DO WE USE YOUR PERSONAL DATA? 7](#_Toc5641112)

[HOW DOES WE COLLECT YOUR PERSONAL DATA? 7](#_Toc5641113)

[WHEN DO WE SHARE YOUR PERSONAL DATA? 7](#_Toc5641114)

[HOW DO WE KEEP YOUR PERSONAL DATA SECURE? 8](#_Toc5641115)

[FOR HOW LONG WILL YOUR PERSONAL DATA BE STORED? 8](#_Toc5641116)

[WHAT ARE YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA? 10](#_Toc5641117)

[UPDATES TO THIS PRIVACY NOTICE 11](#_Toc5641118)

WHAT PERSONAL DATA (CATEGORIES) DO WE COLLECT AND FOR WHAT PURPOSE? 

## **Whatever your professional position is,** WE process the following Personal data about you:

1. Treatment based on the respect **of OUR legal obligation**: article 6 1. (c) of the GDPR: *“processing is necessary for compliance with a legal obligation to which the controller is subject”*.

|  |  |
| --- | --- |
| **Purpose** | **Data collected** |
| **AXA Université Entity** | |
| Support and distribute all learning and training activities for AXA Group Entities employees | - Identification data: name, surname, middle name, preferred name, age, birth country, date of birth, email address, prefix, suffix, national ID, user ID, username, CSOD user ID - Professional data: position, Company home, Company host, Contract Type, Cost center description, Cost Center ID, Country Code, Current cost center start date, Current department start date, Current location start date, Current position start date, Department description, Department ID, Division ID, Dotted Line Manager ID, Email, Employee Status, Entity ID, Entity Location ID, FTE (Full Time Equivalent), Generic position, Global Employee Category, Job code, Last Hire Date, Last Name, Local classification, Local ID, Location description, Manager ID, Original Hire Date, Position ID, Professional Family ID, Professional family name, Regional classification, professional skills, Sub professional family (job cluster), Termination date, Type of assignment, Work Phone, Working location ID  - User status information: Active / Inactive  - AXA learner GLMS data: CSOD user ID, online Course ID, Transcript status, request date/time, Registration date/time, Completion date/time |

1. Treatment based on the pursuit of **OUR legitimate interest**: article 6 1. (f) of the GDPR: *“processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party […]”.*

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| **Purpose and justification** | **Data collected** |
| **Group HR Department (GIE AXA)** | |
| Performance Management | - Identification data: name, surname - Professional data: job description, profile data, performance data |
| Talent Management / People Review and Succession Plan | - Identification data: name, surname - Professional data: job description, profile data, performance data, potential data, risk/impact of loss data, succession planning data, talent pool data, legal entity, position |
| Employee Engagement (Pulse): develop employee engagement strategy | - Identification data: email address, gender, age  - Professional data: legal entity, department |
| Workforce administration, Core HR & Data Quality | - Identification data: name, surname, gender, birth date, birth country, ID cards, passport number, social security number  - Professional data: legal entity, department, business unit, location, grade  - Financial and economic information: annual salary, short term incentives, allowances |
| Perform analyses and statistics on various aspects of human resources management (performance, remuneration, gender equality, etc.) and AXA's global workforce (YES analytics) | - Identification data: name, surname, gender, date of birth, nationality  - Professional data: position, education history, employee number, employer identification number, trainings  - Financial data: salary  - Location data: Location information |
| Reward & Compensation (excluding Shareplan operation) | - Identification data: name, surname  - Professional data: legal entity, position - Financial and economic information: incomes, STIC, LTI  - Other: records and documents regarding the account amount at the moment of the deposit, applicable delays, applicable tax regime, documents allowing to identify the account holder |
| Reward & Compensation: Shareplan  The data Controller is AXA SA. | - Identification data: name, surname, birth date, email address, postal address (and province information), gender, language, social security number, phone number  - Professional data: employee number, employer identification number, hiring data, leaving data, type of employee, code establishment  - Financial and economic information: salary  - Connection data: usernames |
| Identifying vacant jobs, describing their attributes for candidate search, selecting and hiring external candidates for a position in AXA Group | - Identification data: name, surname, email address, telephone number  - Professional data: resume, professional situation |
| **Group Communications & Brand Department (GIE AXA)** | |
| Newsletters communication | - Identification data: name, surname, email address |
| Give access to the media dashboard service | - Identification data: name, surname, given name  - Professional data: professional email address, legal entity, passwords |
| Give access to the brand hub service | - Identification data: name, surname, email address |
| Enable sharing of information between AXA Entities and AXA Group through the WSS tool | - Identification data: name, surname, given name  - Professional data: professional email address, legal entity, passwords |
| **Group Finance Department (GIE AXA)** | |
| Business Continuity Plan internal management control | - Identification data: name, surname, email address  - Professional data: professional phone |

1. Treatment based on **YOUR acceptance and YOUR consent**: article 6 1. (f) of the GDPR: *“the data subject has given consent to the processing of his or her personal data for one or more specific purposes”.*

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| **Purpose and justification** | **Data collected** |
| **Group HR Department (GIE AXA)** | |
| Reward & Compensation: Shareplan  **For countries whose local legislation requires it.**  The data Controller is AXA SA. | - Identification data: name, surname, birth date, email address, postal address (and province information), gender, language, social security number, phone number  - Professional data: employee number, employer identification number, hiring data, leaving data, type of employee, code establishment  - Financial and economic information: salary  - Connection data: usernames |

## **WE might, depending on YOUR situation (including your professional position),** process the following Personal data about you:

1. Treatment based on the respect of **OUR legal obligation**: article 6 1. (c) of the GDPR: *“processing is necessary for compliance with a legal obligation to which the controller is subject”*.

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| **Purpose that MIGHT apply to you** | **Data collected** |
| **Group Compliance Department (GIE AXA)** | |
| Manage the compliance network in all the countries of the AXA Group | - Identification data: name, surname, email address  - Professional data: position |
| Combating money laundering and terrorist financing, vigilance with regard to anti-money laundering regulations and financial crime | If and only if a potential report case is brought to OUR attention from an AXA Entity, WE might have access to, on a case to case basis and depending on local regulations:  - Identification data: name, date and place of birth, gender, nationality, postal address, personal telephone number, ID/passport,  - Professional data: profession, corporate data  - Financial data: Beneficial ownership, source of fund, Financial transaction monitoring and operational behavior monitoring, financial institution account number, salary, taxpayer identification number |
| **Group Legal Department (GIE AXA)** | |
| Establishment of a list of persons with access to inside information | - Identification data: name, first name, surname, birth surname, date of birth, postal address, telephone number - Professional data: position and reason for being an insider, professional postal address, professional telephone number - ID Information: ID number |
| Opening and operating of bank accounts management | - Identification data: name, date and place of birth, nationality, passport photocopy |
| Management of the legal obligations surrounding the corporate credit cards | - Identification data: name, first name, surname, birth surname, date of birth, personal postal address, telephone number, nationality, email address, passport photocopy - Professional data: professional postal address, professional telephone number - Financial data: Bank information |
| Transmission of regulatory filings to ACPR within the Fit&Prosper framework | - Identification data: name, surname, date and place of birth, postal address, nationality, parent’s name, photocopy of ID card or passport - Professional data: resume, Professional situation, Professional skills |
| Management of the questionnaire on Related Party Transactions | - Identification data: name, surname - Financial and economic information: information on agreements between AXA directors/their family members and AXA entities (nature and date of transaction, amount of transaction, amount of any outstanding balance) |
| Publication of Annual Report | - Identification data: name, surname, date of birth, postal address, nationality, gender, photo - Professional data: resume, Professional situation, Professional skills |
| Management of Kbis update, transmission and effective beneficiary declaration | - Identification data: name, surname, date and place of birth, postal address, nationality, parent’s name, photocopy of ID card or passport |
| Regulatory filings in the context of M&A-transactions | Depending on the local requirements, typical requirement would be: - Identification data: name, surname, date and place of birth, postal address, nationality, parent’s name, marital status, spouses' name, military service situation, passport photocopy, Visas |
| **Group Finance Department (GIE AXA)** | |
| Maintain and operate effective organizational and administrative arrangements to prevent clients' conflicts of interest by reception, transmission and execution of client orders | - Recordings of telephone conversations or electronic communications - Transactions concluded  - Provision of client order services |

1. Treatment based on the pursuit of **OUR legitimate interest**: article 6 1. (f) of the GDPR: *“processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party […]”.*

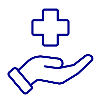
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| **Purpose that might apply to you and justification** | **Data collected** |
| **Group Organizational Transformation Department (GIE AXA)** | |
| Have an overview of the Corporate Center’s modus operandi | - Identification data: name, surname, photo  - Professional data: position, manager’s name, professional email address |
| **Group HR Department (GIE AXA)** | |
| Digital training and sourcing | - Identification data: name, surname, email address |
| Social Data Reporting | - Identification data: last name, first name, email address  - Professional data: SDR responsibility |
| **Group Communications & Brand Department (GIE AXA)** | |
| Manage the relation to the press of the AXA Group | - Identification data: name, surname, telephone number, email address, postal address - Professional data: legal entity |
| Management of the AXA Group's reputation risk | - Identification data: name, surname, email address, country, telephone number - Professional data: position, legal entity |
| Newsroom (sourcing, producing & promoting AXA content internally & externally) | - Professional data: professional email address |
| Give Internet users the means to contact a particular collaborator in charge of a subject | - Identification data: name, surname - Professional data: professional telephone number, professional postal address, professional email address |
| Mention a person in a website content (article, biography, etc.) | - Identification data: name, surname, photo, date of birth, nationality, biography - Professional data: legal entity, position, past and present mandates, number of AXA shares owned - Social media account: twitter, LinkedIn, Facebook |
| Management of AXA entities' relocation projects - analysis of the social impact of transport | - Identification data: name, surname, postal address, email address |
| **AXA Université Entity** | |
| Deliver Face to Face AXA U programs | - Identification data: name, surname, photo, gender  - Professional data: position, professional skills in Finance |
| Collect team or personal assessments from AXA U program participants | - Identification data: name, surname - Professional data: legal entity, position, country, professional email address  - Connection: IP address |
| Collect Face to Face program evaluation / feedback | - Identification data: name, surname, first name, gender  - Professional data: legal entity, position, professional email address |
| **Group Finance Department (GIE AXA)** | |
| Recharging to entities | - Professional ID number |
| Get sufficient information about the managers of AXA's assets. | - Identification data: name, surname - Professional data: resume, professional skills, professional postal address - Internet Data |
| **Group Audit & Investigation Department (GIE AXA)** | |
| Audits to ensure that the adequacy and effectiveness of the system of internal controls and other elements of governance are independently assessed and reported. | - Email address  - identification - connection logs Other subjects: Unfettered access to systems, records, property, and personnel, within the scope of its mission set out in its purpose. By definition, this may potentially include anything held on record in respect of the subjects. |
| Investigations to factually confirm or contradict allegations relating to potential misconduct, business malpractice, or any situation that could be symptomatic of fraud. | Unfettered access to systems, records, property, and personnel, within the scope of its mission set out in its purpose. By definition, this may potentially include anything held on record in respect of the subjects. |
| **Group Risk Management & Group Insurance Office Department (GIE AXA)** | |
| Mitigate the risks underlying to the entities’ activity | - Identification data: name, surname  - Professional data: professional email address, position  - Connection data: Log ins |
| Operational Risk System & Internal Financial Control |
| Survey on emerging risks | - Identification data: email address, country - Professional data: legal entity, internal/external status, seniority - Navigation data: time needed to complete survey |
| Crisis management, business continuity plan and emergencies | - Identification data: name, surname, telephone number |
| In Depth Review of claims files after a disaster |
| Enable the transmission of internal GRM and GIO communications to all local teams | - Identification data: name, surname, email address |
| **Group Compliance Department (GIE AXA)** | |
| Monitoring of Compliance (including Data Privacy) requirements through the management of a network | - Identification data: name, surname, postal address, marital status, nationality, gender, ID cards, passport number, driving license, lifestyle, family situation, social security number  - Professional data: resume, professional situation, professional skills  - Financial and economic information: financial situation, incomes, contract number, behavior  - Internet profiles  - Geo-localization data |
| Records of modifications of Anti-Corruption Clauses | - Identification data: name, surname, email address - Professional data: position, name of third party |
| Organization of seminars, trainings and conferences | - Identification data: name, surname, email address, temporary hosting address, ID / Passport number, nationality, mobile telephone number - Professional data: position, mobile professional telephone number |
| **Group Legal Department (GIE AXA)** | |
| Have a global view of the governance of AXA | 1. For Nemo and Galaxy Users:  - Identification data: name, email address  - Login information: number of connections and date of last connection to the platform  2. For all the others (potentially):  - Identification data: name, email-address  - Professional data: professional postal address, professional telephone number, all functions held within the AXA group (as director, shareholder, auditor and local contact) |

1. Treatment necessary for **the performance of a contract with YOU**: article 6 1. (b) of the GDPR: “*processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”.*

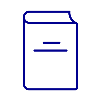
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| **Purpose that might apply to you** | **Data collected** |
| **Group HR Department (GIE AXA)** | | |
| Management of Long-Term Incentives | - Identification data: name, surname, postal address, date of birth, country of birth - Professional data: legal entity, position  - Financial and economic information: Long term incentives |
| Management of Performance Shares dedicated to retirement | - Identification data: name, date of birth, country of birth, family situation - Professional data: legal entity, department, business unit, location, grade - Financial and economic information: annual salary, short term incentives, allowances |
| Management of individual Retirement package |
| **Group Finance Department (GIE AXA)** | | |
| Benefit from Crédit Impôt Recherche | - Professional data: employee ID, Payroll |

# WHAT SPECIAL CATEGORIES OF PERSONAL DATA DO WE PROCESS ABOUT YOU? C:\Users\n-ouamara\Downloads\pie_chart_blue_x4.png

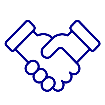
To the extent strictly authorized by law, WE also process the following special categories of Personal Data about YOU (i.e. data revealing the so called “racial” or ethnic origin of an individual, their political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health data or data concerning their sex life or sexual orientation):

* **Health Data**

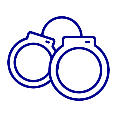
WE process insurance details, social security number, medical information, expert evaluation and disability information for the purposes of:

* + All departments: to, on the basis of **OUR legitimate interest (article 6 1. (f) of the GDPR)**, organize events, because we need to be able to identify prohibited foods and drinks;
  + Group Compliance (GIE AXA): to, on the basis of **OUR legitimate interest (article 6 1. (f) of the GDPR)**, monitor compliance requirements through the management of a network because WE need to ensure that the requests are clear and understandable, and WE also need to be able to control and assess the level of compliance of each of the entities;
  + Group Audit and Investigation: on the basis of **OUR legitimate interest (article 6 1. (f) of the GDPR)**, exceptionally to investigate allegations of fraud because we need to establish their truthfulness.
  + Group HR: on the basis of **OUR legitimate interest** **(article 6 1. (f) of the GDPR),** for Reward & Compensation (specific to Shareplan Operation) to define the eligible employees and for subscription & adhesion.
* **Religious Data**

WE process data related to YOUR religion, in particular:

* Group HR: to, on the basis of **OUR legitimate interest (article 6 1. (f) of the GDPR)**, manage YOUR business trips or YOUR international mobility because some host countries can ask for this type of mandatory information;
* **Political opinions**

Group Compliance (GIE AXA) If and only if a potential report case is brought to OUR attention from an AXA Entity, WE might, on a case to case basis and depending on local regulations processes data related to YOUR political opinions to comply with **OUR legal obligation (article 6 1. (c) GDPR**) of fight against money laundering, terrorist financing and financial crimes.

* **Criminal Record Information** **and due diligence**

Given the nature of our business, WE can ask new employees (depending on their functions and duties) to disclose their criminal record history and WE carry out criminal record checks as part of our background vetting process and in compliance with **OUR legal obligations (article 6 1. (c) of GDPR)** in connection with employment.

The checking is done by Group Compliance and Group Legal through a consultation of the criminal record in paper format provided by employees or by checking public lists to manage the risks of international sanctions and the fight against money laundering, terrorist financing and financial crime.

WE will keep an acknowledgment of receipt mentioning that the criminal record is clean.

In some cases, WE are required to carry out these checks (for example, for regulated roles); WE carry out these checks in accordance with the applicable law.

For regulated roles, the criminal record checks can be repeated periodically during the course of employment in accordance with OUR regulatory obligations.

# HOW DO WE USE YOUR PERSONAL DATA? C:\Users\n-ouamara\Downloads\hacking_blue_x4.png

Please note that data processing activities will be subject to a specific privacy notice, in accordance with applicable regulations, in the following cases:

* If the consent of a member of YOUR family, is required for the processing;
* If the data processing is not in relation with YOUR contract with US but results from a contractual agreement with another entity of AXA Group.

Otherwise, those personal data are collected and used for the afore-mentioned purposes on the basis of the following legal grounds:

* The processing is necessary for the performance of a contract with YOU or in order to take steps at YOUR request prior to entering into a contract;
  + Article 6 1. (b) of the GDPR: *“processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”;*
* The processing is necessary for compliance with a legal obligation;
  + Article 6 1. (c) of the GDPR: *“processing is necessary for compliance with a legal obligation to which the controller is subject”;*
* The processing is necessary for OUR legitimate interests, which means there are necessary to the achievement of OUR business objectives;
  + Article 6 1. (f) of the GDPR: *“processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party […]”.*

# HOW DOES WE COLLECT YOUR PERSONAL DATA? C:\Users\n-ouamara\Downloads\planet_blue_4x.png

Most of the Personal Data that WE process is collected directly from YOU.

In limited circumstances, and subject to applicable Data Privacy laws and regulations; YOUR Personal Data can be provided to us by third parties, such as former employers, official bodies (such as regulators), administrations, medical third parties (in instances of absences and sick leaves compensation and benefits management) or any other party WE might reach out to in order to check references.

In these instances of indirect collection of data, YOU will be informed, within a reasonable period after obtaining the Personal Data, of:

* the categories of Personal Data concerned;
* the purposes of the processing for which the Personal Data are intended as well as the legal basis for the processing;
* the recipients or categories of recipients of the Personal Data, if any;
* the period for which the Personal Data will be stored, or if that is not possible, the criteria used to determine that period;
* the rights YOU have, as a data subject, regarding that Personal Data

In any case, in accordance with the applicable regulation and principles, YOUR Personal Data will be processed lawfully, fairly and in a transparent manner, collected for specified, explicit and legitimate purposes, and will not be further processed in a manner that is incompatible with said purposes. WE will only process adequate and relevant Personal Data, limited to what is necessary in relation to the purposes for which it is processed.

In some cases, the provision of YOUR Personal Data is mandatory. Should YOU decide not to provide YOUR information, WE might not be able to enter into a contractual relationship with YOU, or to make YOU benefit from advantages linked to YOUR employment position.

# WHEN DO WE SHARE YOUR PERSONAL DATA? C:\Users\n-ouamara\Downloads\share_blue_x4.png

WE communicate YOUR Personal Data mentioned above only to identified and empowered recipients.

The identified recipients mentioned above are:

* All existing AXA Entities, for the purpose of continuing and expanding their business activities;
* Subcontractors and Processors of AXA, for the purpose of giving AXA technical support;
* Banks, public regulators and lawyers for the purpose of complying with AXA’s legal obligations;
* External consulting firms and providers for the purpose of analyzing specific subjects described from pages to 2 to 5.

Those recipients are generally located in the European Union (EU). Some of those recipients are located in countries outside the EU, which provide an adequate level of protection (i.e. YOUR Personal Data is subject to the same levels of security as in the European Union):

* Canada ([Decision of adequacy from the European Commission](https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32002D0002));
* United States of America ([Decision of adequacy from the European Commission](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.L_.2016.207.01.0001.01.ENG));
* Switzerland ([Decision of adequacy from the European Commission](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32000D0518));
* Israel ([Decision of adequacy from the European Commission](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32011D0061));
* Japan ([Decision of adequacy from the European Commission](https://ec.europa.eu/info/sites/info/files/research_and_innovation/law_and_regulations/documents/adequacy-japan-factsheet_en_2019_1.pdf)).

YOUR Personal Data can also be transferred to the following countries, which do not provide an adequate level of protection:

* India;
* United Kingdom;
* Guatemala.

In this case, WE provide safeguards to ensure the security and the confidentiality of YOUR Personal Data, by framing these transfers with either (i) the Standard Contractual Clauses adopted by the European Commission or, (ii) when YOUR Personal Data is transferred to other entities of the AXA Group, with Binding Corporate Rules [https://www-axa-com.cdn.axa-contento-118412.eu/www-axa-com%2Fde105875-9eb9-4510-8a05-5eaee9979e56\_axa\_bcr\_october\_2018\_vf.pdf].

# HOW DO WE KEEP YOUR PERSONAL DATA SECURE? C:\Users\n-ouamara\Downloads\padlock_blue_x4.png

WE use appropriate technical and organizational measures designed to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing YOUR personal information in line with AXA standards.

# FOR HOW LONG WILL YOUR PERSONAL DATA BE STORED? C:\Users\n-ouamara\Downloads\clock_blue_x4.png

OUR policy is to retain personal Data for a period no longer than what is necessary to:

* fulfil the purpose(s) for which it was collected,
* or execute YOUR contract or to take steps prior to entering into YOUR contract,
* fulfill OUR legal and regulatory obligations and requirements.

As such, YOUR Personal Data will generally be kept for the period defined above.

Under some circumstances, WE will anonymize YOUR Personal Data to use it for statistical or other business legitimate purposes. As this data can no longer be associated with YOU and, as such, will not constitute Personal Data anymore. WE reserve the right to retain and use such anonymous data.

The collected Data needed for the Processing will be retained according to the following table:

|  |  |
| --- | --- |
| **Purpose**  Please refer to the purposes and the data collected (categories) defined in the previous pages | **Retention period**  Recommendations of the DPO regarding French law |
| Gifts and entertainment pre-approval process | Deletion from the termination of the employment period  In case of controls/audits, retention in active base for the duration of the control/audit, then intermediary archiving in respect of the French statutory limitation period |
| Manage the compliance network in all the countries of the AXA Group (list of Anti-Bribery officers, chief compliance officers and AML and sanctions officers) |
| Have an overview of the Corporate Center’s modus operandi |
| Records of modifications of Anti-Corruption Clauses |
| Opening and operating of bank accounts management |
| Corporate Credit cards management |
| Reward & Compensation | Deletion upon 30 years from the availability of the stock options |
| Establishment of a list of persons with access to inside information | Deletion upon 5 years:   * from the date on which the document is drawn up or updated * unless if a more constraining data retention period applies (where the data relates to an issue subject to the supervision of another competent foreign authority, counterpart of the French Financial Markets Authority) |
| Have a global view of the governance of AXA |
| Transmission of regulatory filings to ACPR within the Fit&Prosper framework |
| Management of the questionnaire on Related Party Transactions |
| Regulatory filings in the context of M&A-transactions |
| Identifying vacant jobs, describing their attributes for candidate search, selecting and hiring external candidates for a position in AXA Group | Immediate deletion after the applicant’s interview if not selected if GIE AXA is not willing to retain the applicant’s file in the event of a future recruitment  In case GIE AXA is willing to retain the said file in the event of a future recruitment, Personal Data contained therein shall be deleted within 2 years from last contact with the applicant:   * + After prior information of the applicant about the retention   + If the said applicant does not oppose the retention of his file   An even longer retention period is possible subject to duly obtaining the consent of the applicant  Deletion upon 13 months for the web analytic statistics (e.g. cookies) |
| Digital training and sourcing |
| Performance Management | Deletion upon 5 years from termination of the employment period |
| Talent Management / People Review and Succession Plan |
| Employee Engagement (Pulse): develop employee engagement strategy |
| Social Data Reporting management |
| Give access to the media dashboard service |
| Give access to the brand hub service |
| Enable sharing of information between AXA Entities and AXA Group through the WSS tool |
| Workforce administration, Core HR & Data Quality |
| Management of the AXA Group's reputation risk | Deletion upon 50 years in active database from collection of the GPS data |
| Crisis management, business continuity plan and emergencies | Deletion from the termination of the employment period |
| Enable the transmission of internal GRM and GIO communications to all local teams |
| Newsletters communication |
| Recharging to entities | Deletion upon 10 years from the closure of the accounting yearfor data retained to fulfil accounting purposes |
| Benefit from Crédit Impôt Recherche |
| Business Continuity Plan internal management control | Deletion upon the expiry of the statutory period during which AXA may be legally required to demonstrate compliance with its control obligations |
| Get sufficient information about the managers of AXA's assets. |
| Investigations to factually confirm or contradict allegations relating to potential misconduct, business malpractice, or any situation that could be symptomatic of fraud. | Deletion upon 10 years from the execution of the operations concerning documents on the operations’ characteristic (except where more stringent provisions apply and in the context of legal claims or disciplinary actions which extend the periods) |
| Audits to ensure that the adequacy and effectiveness of the system of internal controls and other elements of governance are independently assessed and reported. |
| Give Internet users the means to contact a particular collaborator in charge of a subject | Immediate deletion:   * from the termination of the employment period * from the unsubscription request |
| Mention a person in a website content (article, biography, etc.) |
| Manage the relation to the press of the AXA Group |
| Newsroom (sourcing, producing & promoting AXA content internally & externally) |
| Mitigate the risks underlying to the entities’ activity | Deletion upon 5 years   * from termination of the employment period * from termination of the contractual relationship |
| Operational Risk System | Deletion from the termination of the relocation process |
| Internal Financial Control |
| Management of AXA entities' relocation projects - analysis of the social impact of transport |
| Monitoring of Compliance (including Data Privacy) requirements through the management of a network | Deletion from the termination of the employment period  In case of controls/audits, retention in active base for the duration of the control/audit, then intermediary archiving in respect of the French statutory limitation period |
| Talent Management / People Review and Succession Plan |
| Organization of seminars, trainings and conferences |
| Survey on emerging risks | Deletion from the conduct of the next survey |
| Perform analyses and statistics on various aspects of human resources management (performance, remuneration, gender equality, etc.) and AXA's global workforce (YES analytics) | Deletion upon 5 years from termination of the employment period |
| Support all learning activities for AXA Group Entities | Deletion upon 5 years   * from the end of the employment period * from the end of the contractual relationship |
| Collect team or personal assessments from AXA U program participants |
| Distribute the Group L&D offer to all AXA Group entities |
| Deliver Face to Face AXA U programs |
| Collect Face to Face program evaluation / feedback |
| In Depth Review of claims files after a disaster |
| Management of Long-Term Incentives | Deletion upon 10 years after the attribution of the stock options |
| Management of Performance Shares dedicated to retirement |
| Management of individual Retirement package |
| Publication of Annual Report | Deletion upon 5 years from the radiation of the French Commercial Record for the company |
| Management of Kbis update, transmission and effective beneficiary declaration |
| Maintain and operate effective organizational and administrative arrangements to prevent clients' conflicts of interest by reception, transmission and execution of client orders | Deletion upon 5 years in intermediary archiving from the moment of the recording  Deletion upon 7 years in intermediary archiving in case of request from the competent authority |
| Combating money laundering and terrorist financing, vigilance with regard to anti-money laundering regulations and financial crime | Deletion upon 5 years from the execution of the operation  Or  Deletion upon 5 years from the closure of the account or the termination of the relationship for data and documents relating to the identity of clients |
| Shareplan (eligibility phase) | Deletion right after the next Shareplan Operation |
| Shareplan (subscription & adhesion phase) | Deletion 30 years after submission at the *Caisse des Dépôts et Consignations* |

# WHAT ARE YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA? C:\Users\n-ouamara\Downloads\legal_blue_x4.png

In accordance with the French "Informatique et Libertés" law (the law on data protection and civil liberties) n° 78-17 of 6 January 1978 modified and the GDPR, YOU have the right to:

* access YOUR Personal Data and obtain a copy thereof;
* rectify YOUR Personal Data;
* request erasure of YOUR Personal Data, except if the processing is based upon the respect of a legal obligation of the data controller;
* ask the restriction of processing of YOUR Personal Data in certain circumstances; and
* the right to request YOUR Personal Data portability, where applicable.

You are also informed about the possibility to address any demand in relation with YOUR rights and Personal Data to the Data Protection Officer and decide about the whereabouts of YOUR Personal Data after YOUR death.

Please note that, to the extent part of our processing is based on YOUR consent, you can withdraw such consent at any time.

Should YOU decide to do so, YOU won’t be able to access the service.

The opt-out does not undermine the legality of the prior processing done before said withdrawal.

You also have the right to oppose, at any given time, for reasons considering YOUR special situation, to oppose a processing of YOUR Personal Data where the purpose is the pursuit of AXA’s legitimate interest, as well as an opposition right to the marketing of YOUR data.

You can exercise YOUR rights by contacting OUR/YOUR Data Privacy Officer of GIE AXA and AXA Université at [privacy@axa.com](mailto:privacy@axa.com).

YOU are informed that, pursuant to Article L. 561-45 of the Monetary and Financial Code, your right of access is exercised with the Commission Nationale de l’Informatique et des Libertés for the processing of YOUR personal data based on compliance with OUR legal obligations in terms of due diligence in the fight against money laundering and terrorist financing.

You may be asked for information to confirm YOUR identity and/or to assist the Company to locate the data YOU are seeking as part of OUR response to YOUR request.

Finally, YOU have the right to raise any 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” - 3 place de Fontenoy - TSA 80715 – 75334 Paris Cedex 07

# UPDATES TO THIS PRIVACY NOTICE

WE may update this Privacy Policy from time to time in response to changing legal, technical or business developments. When we update our Privacy Policy, we will take appropriate measures to inform YOU, consistent with the significance of the changes WE make. WE will obtain YOUR consent to any material Privacy Policy changes if and where this is required by applicable data protection laws.

You can see when this Privacy Policy was last updated by checking the “last updated” date displayed at the top of this Privacy Policy.