

# INFORMATION NOTICE ON THE PROTECTION OF YOUR PERSONAL DATA SHAREPLAN

April, 2021

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 which also acts as data controller for different purposes and with different means. This notice also applies to you if you are an apprentice, 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.**

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):

**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.

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**YOUR Entity.**

The Data Controllers are hereinafter referred to as "WE", "OUR".

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



WE process the following Personal data about you:

1. Processing necessary for the **performance of a contract with You or 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*".

	Data Categories
Reward & Compensation: Shareplan	- Identification data: name, surname, birth date, birth country (only for French Entities' employees), place of birth (only for French AXA local Entities' employees), gender, language, social security number (only for French AXA local Entities' employees) - Professional data: employee number, employer identification number, hiring date (in the case where personal email is not provided) - Financial and economic information: salary (25% of the annual gross income), t

	- Connection data: usernames (only for French AXA local Entities' employees)
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2. Processing based on **YOUR acceptance and YOUR consent**: article 6 1. (a) of the GDPR: “the data subject has given consent to the processing of his or her personal data for one or more specific purposes”.

Purpose	Data collected
Reward & Compensation: Shareplan <b>For countries whose local legislation requires</b>	<ul style="list-style-type: none"> <li>- Identification data: name, surname, birth date, email address, postal address (including province information), zip code (optional), gender, language, social security number (only for French AXA local Entities' employees), phone number (optional)</li> <li>- Professional data: employee number, employer identification number, hiring and leaving data, type of employee, code establishment, work email address (only in countries where personal email is not provided)</li> <li>- Financial and economic information: salary (25% of the annual gross income)</li> <li>- Connection data: usernames (only for French AXA local Entities' employees)</li> </ul>



## WHAT SPECIAL CATEGORIES OF PERSONAL DATA DO WE PROCESS ABOUT YOU?

To the extent strictly authorized by law, WE also process the following special categories of Personal Data about YOU: social security number (only for French AXA local Entities' employees).

On the basis of legal obligation to which the controller is subject (**article 6 1 (c) of the GDPR**), the processing of this personal data is mandatory on French law (Décret n°2019-341 of 19 April 2019 and the article L3341-7 Labour Code)



## HOW DO WE USE YOUR PERSONAL DATA?

Otherwise and depending the country of YOUR AXA local Entity, those personal data are collected and used for the aforementioned purposes on the basis of the following legal grounds:

- The processing is based on YOUR acceptance and YOUR consent;
  - Article 6 1. (a) of the GDPR: “the data subject has given consent to the processing of his or her personal data for one or more specific purposes”
- The processing is necessary for the performance of a contract with YOU or to take steps at YOUR request prior to entering into a contract (article 6 1 (b) of the GDPR);
  - 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”.



## HOW DO WE COLLECT YOUR 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?

WE communicate YOUR Personal Data mentioned above only to identified and empowered recipients located in France. The identified recipients mentioned above are:

- All existing AXA Entities involved in Shareplan operation (GIE AXA, AXA Epargne Entreprise, AXA France);
- 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.

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

## HOW DO WE KEEP YOUR PERSONAL DATA SECURE?

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?

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.

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:

<b>Purpose</b> Please refer to the purposes and the data collected (categories) defined in the previous pages	<b>Retention period</b> Recommendations of the DPO regarding French law
Shareplan (eligibility phase)	Deletion before the next Shareplan Operation
Shareplan (subscription & adhesion phase)	Deletion: - 5 years after the deposit at the Caisse des Dépôts et Consignations repurchase of all your FCPE units / sale of all your shares - 30 years from the end of the blocking period

## WHAT ARE YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA?

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.

For countries whose local legislation requires consent:

Please note that, when 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 can exercise YOUR rights by contacting YOUR local DPO.

For your information, the email address of the AXA SA DPO is: [privacy@axa.com](mailto:privacy@axa.com)

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

