



## INFORMATION NOTICE ON THE PROTECTION OF YOUR PERSONAL DATA

### SHAREPLAN

AXA Group 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**).

In this context, Personal Data means 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.

In the context of this information notice, as a data subject, you will be hereinafter referred-to as “**you**” or “**your**”.

**The purpose of this Information notice is to inform you of the processing of your personal data that applies or may apply to you.**



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

Act as data controllers in the context of the processing of your personal data (i.e., they determine the purposes and means of the processing of your information):

**AXA SA**, 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, excluding these subsidiaries,

**AND**

**AXA Entities** part to the Processing and to whom you are contractually bound.

The data controllers are referred to in this notice as “**the Data Controllers**” or “**we**” or “**us**”.



#### UPDATE OF THE PRESENT NOTICE ON THE PROTECTION OF YOUR PERSONAL DATA

The Data Controllers may update this Privacy Notice from time to time in response to changing legal, technical, or business developments. When the Data Controllers update this privacy notice, the Data Controllers will take appropriate measures to inform you, consistent with the significance of the changes the Data Controllers make. The Data Controllers will obtain your consent to any material privacy notice changes if and where this is required by applicable data protection laws.

This information notice was last updated on March 23<sup>rd</sup>, 2022.



### WHAT ARE YOUR RIGHTS TO YOUR 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 us 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 us 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 us instructions as to how your personal data should be used after your death.
- **Request the deletion of your personal data:** you have the right to ask us to delete your personal data,
- **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,

For countries whose local legislation requires consent:

- **Withdraw your consent** at any time by contacting your local DPO. 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.

In any case, you have the right to object to the marketing of your data. Please note that AXA Group does not market your personal data.



### HOW TO CONTACT THE DPO OR EXERCISE YOUR RIGHTS?

If you have any questions, complaints, or comments regarding this information notice or to exercise your rights listed above, please contact the DPO. The contact details are as follows:

- For AXA SA and GIE AXA:
  - [privacy@axa.com](mailto:privacy@axa.com)
  - 25 avenue Matignon, 75008, Paris
- For other AXA Entities: please refer to contact details communicated by your AXA Entities part to the processing and to whom you are contractually bound.

The Data Controllers may ask you for additional information to confirm your identity and/or to assist Data Controllers 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/>



### FOR WHAT PURPOSE AND IN WHAT WAY IS YOUR PERSONAL DATA PROCESSED BY DATA CONTROLLERS?

The processing of your personal data is the following: annual subscription to the AXA capital increase offer reserved to its employees worldwide (Shareplan operation).

This processing can be described in two successive sub-processing:

- the eligibility phase: due to your employment contract, you will receive an email to be part on the annual Shareplan operation.
- the subscription & adhesion phase: you will be able to buy AXA shares.



### WHAT IS THE LEGAL BASIS FOR THE PROCESSING OF YOUR PERSONAL DATA?

The legal basis for the processing of your personal data depends on the country of your AXA Entity:

- **when the legal basis is based on consent<sup>1</sup>**, we apply the article 6 1. (a) of the European Regulation no. 2016/679 on data protection – referred to as "GDPR".  
Please note that you may withdraw this consent at any time. If you decide to do so, you will not be able to benefit from the service. The withdrawal of your consent does not affect the lawfulness of the processing carried out beforehand.

<sup>1</sup> Law requiring the express consent of employees: United Arab Emirates, Australia, Bermuda, Brazil, Canada, Switzerland, China, Colombia, Hong Kong, Indonesia, India, South Korea, Morocco, Malaysia, Nigeria, Philippines, Qatar, Singapore, Thailand, Turkey.



- **when the legal basis is the execution of the contract (your employment contract)**, we apply the article 6 1. (b) of GDPR.



#### WHAT PERSONAL DATA DO WE PROCESS ABOUT YOU?

The categories of data processed for the purpose described above include:

- **Identification data:** name, surname, birth date, birth country (only for French AXA Entities' employees), department of birth (only for French AXA Entities' employees), place of birth (only for French AXA Entities' employees), email address, postal address (and province information), zip code (optional), gender, language, social security number (only for French AXA Entities' employees), phone number (optional)
- **Professional data:** employee number, employer identification number, hiring data, leaving data, type of employee, code establishment, work email address (only in the case where personal email is not provided)
- **Financial and economic information:** tax residence (only for French AXA Entities' employees)
- **Connection data:** usernames (only for French AXA Entities' employees).

To the extent strictly permitted by law, the Data Controllers will also process **the NIR (Numéro d'Inscription au Répertoire) (article 6 1 (c) of the GDPR)**. The processing of this personal data is mandatory on French law in accordance with Decree n°2019-341 of 19 April 2019 & article L.3341-7 of the labor.



#### IS THE PROVISION OF YOUR PERSONAL DATA MANDATORY?

Provision of the information is mandatory to enable us to provide you with this service. If you do not provide this information, you will not be able to subscribe to the annual Shareplan operation.



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

No Automated decision making is performed for this processing



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

The source of the collection of your personal data is your AXA Entity during the eligibility phase.

Then, during the subscription & adhesion phase, we will directly collect from you the necessary personal data.



#### 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.



#### HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

Purpose	Retention period
	Recommendations of the DPO of GIE AXA and AXA SA regarding French law
Eligibility phase	Deletion before the next Shareplan operation
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



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

The Data Controllers communicate your personal data only to identified and authorized recipients. The identified recipients mentioned above are:

##### Internal

- All existing AXA Entities involved in Shareplan operation:
  - **GIE AXA** (Group HR) leads the operation. It is the main points of contacts for entities and external parties involved in the Shareplan operation.
  - **AXA Epargne Entreprise** is in charge of the unit custody account-keeper and access to the data of eligible employees for the entire scope of the operation.
  - **AXA France** is in charge of the verification of eligible employees and the HR local correspondents for the AXA Entities located in France and using HR tool from AXA France.

##### External

- Subcontractors of AXA, for the following purposes:



- **CACEIS** is in charge of the subscription tool (Processor of AXA Epargne Entreprise).
- **S2E** is in charge of the tool to host saving plans of AXA employees (Processor of AXA Epargne Entreprise).
- **BNP Paribas Securities Services** in charge for some countries an account keeper and can access to individual transaction (Controller responsible bank).
- Banks, public regulators and lawyers for the purpose of complying with AXA's legal obligations.
- **Any potential buyer or partner**, in the case that the Data Controllers take part in a merger, acquisition or other form of asset transfer, they undertake to ensure an adequate level of protection if your personal data is transferred to potential buyers or selected partners in the context of this transaction.

#### Other



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

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