



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, etc.

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 independent data controllers in the context of the processing of your personal data with regard to the processing purposes described in this information notice (i.e., they determine the purposes and means of the processing of your information):

GIE AXA, Groupement d'intérêt économique, organized under french law, with its registered office at 25 avenue Matignon, 75008 Paris, registered with the Registry of Commerce and Companies of Paris sous le numéro 333 491 066,

AXA Epargne Entreprise, Société Anonyme, organized under french law, with its registered office at 313 Terrasses de l'Arche, 92727 Nanterre Cedex, registered with the Registry of Commerce and Companies of Nanterre sous le numéro 428 191 027,

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.

This information notice was last updated on May 23rd, 2025.

WHAT ARE YOUR RIGHTS TO YOUR DATA?

In accordance with 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 (for example when the use of the data is considered unlawful). This means that the Data Controllers may simply keep your data but may not process or use it in any other way,
- **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,

Where the processing of your data is based on AXA's legitimate interest:

- 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.

In any case, You have the option of objecting to the processing of your data and you can refuse commercial prospecting. 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 Epargne Entreprise:
 - service.dpo.aee@axa.fr
 - 313 Terrasses de l'Arche, 92727 Nanterre Cedex
- 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 make a complaint 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 four successive sub-processing:

1. the framing and the steering of Shareplan (GIE AXA being Data Controller)
2. the eligibility phase: due to your employment contract, you will receive an email to be part on the annual Shareplan operation (AXA Epargne Entreprise being Data Controller)
3. the reservation, subscription and cancellation phase: you will be able to buy FCPE units/AXA shares (AXA Epargne Entreprise being Data Controller)
4. the call for funds and investment processing: you will have FCPE units/ AXA shares (AXA Epargne Entreprise being Data Controller)

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

The legal basis for processing your personal data depends on the phase indicated in the previous paragraph:

- **During the eligibility phase, the legal basis is based on legitimate interest:** we apply Article 6.1. (f) GDPR.
- **During the subscription and membership phase of the employee saving plans, the legal basis is the performance of the contract** (your subscription order): we apply Article 6 1. (b) GDPR.



In the country of your AXA Entity, local regulations may provide for your consent for the collection, processing and/or transfer of your personal data in one or both of the above phases¹. In this case, it is an additional requirement under local law, which does not impact the GDPR legal basis.

Where permitted by local law, you may withdraw this consent at any time. If you decide to do so, you will not be able to avail of the service. The withdrawal of your consent does not affect the lawfulness of the processing carried out previously.

 **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), city of birth (only for French AXA Entities' employees), email address, postal address (and province information), zip code (optional), gender, language, social security number (NIR) (only for French AXA Entities' employees), phone number (optional), Identity document in force (identity card, passport, resident's card or residence permit) in specific cases
- **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), IBAN
- **Connection data:** usernames (only for French AXA Entities' employees).

 **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
Eligibility phase	Recommendations of the DPO of GIE AXA and AXA SA regarding French law 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

¹ Law requiring a priori the express consent of employees: Australia, Azerbaijan, Bahrain, Bermuda, Brazil, Canada, Chile, China, Colombia, Côte d'Ivoire, India, Indonesia, Lebanon, Malaysia, Mexico, Morocco, Nigeria, Oman, Panama, Philippines, Senegal, Singapore, South Korea, Switzerland, Taiwan, Thailand, Turkey, United Arab Emirates.



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 and acts as an independent data controller.
 - **Your entity** is in charge of verifying eligible employees and local HR correspondents for AXA Entities located in your country and using AXA France's HR tool and acts as a data processor of AXA Epargne Entreprise.
 - **AXA Epargne Entreprise** is in charge of:
 - On the one hand, the management of the online subscription tool, access to the data of eligible employees for the entire scope of the transaction and the administration of the individual accounts of AXA's savings plans, and acts in these capacities as an independent data controller;
 - On the other hand, the keeping of custody accounts of the units subscribed within the framework of the FCPEs concerned. **In this context, and for processing related to account management and custody, AXA Epargne Entreprise acts as an independent data controller.**

External

- AXA's joint data controllers or data processors, for the following purposes:
 - **SOCIETE GENERALE SECURITIES SERVICES** (joint data controller with AXA Epargne Entreprise) is in charge of the "Akkalia" subscription tool and the "Eligible" tool for collecting and managing eligible candidates.
 - **S2E** is in charge of maintaining accounts of the registered assets of the company savings plans of AXA employees (AXA Company Savings data processor).
 - **UPTEVIA** is in charge of the maintenance of individual registered accounts for certain countries and can access individual transactions (joint Data Controller with GIE AXA).
- Banks, public regulators and lawyers for the purpose of complying with AXA's legal obligations.

Other

- **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.



IS YOUR PERSONAL DATA TRANSFERRED OUTSIDE THE EUROPEAN UNION?

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