General Personal data Protection Policy of Foyer Group and its insurance subsidiaries



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Executive Summary

Purpose of the policy: To inform, in accordance with the Data Protection Regulation, the data subjects of the processing of their personal data by the Foyer Group. This relates to the processing of data of natural persons outside the Foyer Group. The processing of personal data of natural persons within the Group is governed by a separate policy.

Owner: Legal and Compliance Department/Group DPO

Author: Data Protection Officer (PMC)

Approval: **CACGR with prior validation by the Group Executive Committee**

Main responsibilities of the stakeholders: The data controllers are responsible for processing personal data.

Recipients: website: all data subjects

Validation and approval: Executive Committee and CACGR (Audit, Compliance and Risk Management Committee)

Ratification: Board of Foyer S.A. - boards of insurance entities and of Capitalatwork

Revision: annual according to the standards governance policy

1. Introduction and Background

Foyer SA and its insurance subsidiaries (hereinafter "FOYER" or the "Group" or "We"/"Us") have documented their policy relating to the protection of personal data in the framework of Article 24 of EU Regulation no. 2016/679 of the European Parliament and of the Council dated 27 April 2016 relating to the protection of natural persons, with regard to the processing of personal data and the free movement of such data.

FOYER undertakes to respect an individual's right to privacy when processing their personal data.

This "Personal data Protection Policy" sets out the principles and guidelines for the protection of personal data in all processes, including personal data collected on or via Group websites.

This Policy is published on the Group website.

2. Scope

This Policy is applicable to the processing of personal data by the Group entities (listed below) which are responsible for such processes.

- Foyer Assurances
- Foyer Arag
- Foyer Global Health
- Foyer Vie
- Wealins
- Avise

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- Raiffeisen-Vie
- Nexfin S.A.
- CapitalatWork Group S.A.
- CapitalatWork S.A.

The application of this Policy to CapitalatWork Foyer Group S.A. takes into account the specific nature of its activity as a professional in the financial sector, the specific regulations applicable to it and its presence (through subsidiaries or branches) in the three Benelux countries.

Where applicable, these specific features are reflected in a Policy specific to CapitalatWork Foyer Group S.A., which will comply with the principles defined in this Group Policy.

The same applies to Nexfin S.A..

The processes include personal data collected on or via the Group websites or by virtue of the management of insurance policies and claims.

The term “personal data” means any information relating to an identified or identifiable natural/individual person (the “data subject”). A person is considered to be an “identifiable natural/individual person” when they 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 their physical, physiological, genetic, mental, economic, cultural or social identity.

The term "processing” refers to “any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

The term “non-personal data” refers to information that does not allow a person to be identified.

3. Objective

The Policy is intended to inform all the data subjects (hereinafter “You” or “Your”) of the means by which the Group collects and uses Your personal data, and of how You can check and control such use.

This Policy, along with our statement on our website and all other documents referred to in the said statement as well as our policy relating to cookies http://www.foyer.lu/fr/information-relative-aux-cookies, determine the basis on which all personal data relating to You that we collect or that You send to us will be processed by the Group.

By viewing our website, You consent to the practices described in this Policy.

This Policy is the result of and issued in accordance with Article 24 of EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, hereinafter the GDPR.

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4. Data relating to You that we are likely to collect

The "Personal Data" may include the following:

- identification data relating to clients/affiliates/beneficiaries/third party claims;
- data relating to the personal characteristics of these people:
- data relating to leisure activities;
- data relating to their profession, education;
- data relating to vehicles, accommodation, claims and all data required for canvassing, finalisation and performance of the policy;
- financial data;
- location data (GPS, journey) in respect of specific insurance policies
- driving data in order to calculate a score applied to an insurance premium for a specific product;
- any other Personal Data that could be relevant for the purposes set out hereinafter.

In accordance with the regulations, we only collect special categories of data referred to in Article 9 of EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, within the framework of the exceptions provided for in point 2.a concerning the data subject's consent, and point 2.g concerning the important public interest grounds inherent in insurance and reinsurance contracts under the conditions set out in Article 181-3 of the Law of 7 December 2015 on the insurance sector as amended. Unless for specific legal grounds, or a legal exception, this data includes information relating to health-related questions that are required by the data controllers for pre-contractual or contractual purposes, or for the settlement of bodily injury claims by the data controllers in the pursuit of public interest.

5. Purpose of processing

The Group undertakes only to process the data required for the intended purposes of the process.

More generally, Your data will be used in particular:

- in connection with the pre-contractual steps taken by the Group;
- for marketing purposes based:
    - on the one hand on the legitimate interests of the data controllers, by informing You of products and services that are similar or complementary to the range of requirements for which a business relationship exists, and for any information not of a business nature (e.g. preventing risks relating to the contractual relationship); You will be able to object, simply and directly to such use in accordance with the conditions set out under point 10 of this policy.
    - on the other hand, on Your consent to receive personalised offers and information and/or to be informed of new products, tax benefits and current news relating to insurance; You may, at any time, withdraw Your consent to receive direct marketing in accordance with the conditions set out under point 10 on exercising your rights.
- in connection with the performance, management (including claims management) and assessment of our contractual relationship with You;
- in the framework of our compliance with the legal and regulatory provisions to which we are bound and subject;

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- in connection with data processing for which we have obtained Your explicit consent;
- in the context of processing related to the preservation of a legitimate interest such as the prevention and fight against fraud as well as the fight against money laundering or terrorism, the preparation of studies, models, the development, innovation, the improvement of our products and services in insurance sector practices and the training of our employees or the improvement of our services by recording telephone conversations;
- in connection with actuarial studies, statistics (adopting anonymisation or pseudonymisation techniques) and prudential reporting.

FOYER may use decision support systems that are not exclusively based on automated processing for one or more of the aforementioned purposes.

6. Responsibility for processing

Depending on the data processed, the data controllers are the various entities described in point 2 of the scope.

The Group may call on specialist companies to process Your data on behalf of the Group, according to the instructions of the data controllers, in accordance with the Data Protection Regulation. Only strictly necessary data is shared with these companies (our "sub-contractors"), as explained below in point 9 in accordance with the provisions of Article 300 of the Law of 7 December 2015 on the insurance sector.

7. Cookies

As with a number of websites, our website www.foyer.lu and sites that are linked or related to FOYER may store or retrieve information from the user's internet browser. This generally takes the form of cookies.

Cookies are text files that are stored and used to record personal and non-personal data relating to Your navigation around the Group's websites. Cookies are used to improve Your user experience.

The Group is committed to respecting the privacy of users of its website. FOYER also undertakes not to provide any information to advertisers or third-party sites unless with the express written agreement of the user formalised in a preferential management dashboard.

Where the user has authorised the use of cookies, Foyer undertakes to respect the privacy of the website user by not authorising the association of cookies with information that could allow this user to be identified personally.

Please see our information on cookies at the following URL: http://www.foyer.lu/fr/information-relative-aux-cookies

8. Terms and conditions for processing and storage of personal data

The "processing" of Personal Data includes, in particular, the use, conservation, recording, transfer, adaptation, analysis, modification, disclosure, sharing and destruction of Personal Data as required by circumstances or legal obligations.

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All Personal Data collected are held for a limited period depending on the purposes of the processing and only for the period provided for by the legislation in force.

The storage of Personal Data is subject to a specific data retention policy that defines the periods of retention with regard to the legal and regulatory provisions as well as the purposes of the data processing in question.

9. Transfer of personal data to third parties

The Group may pass Your personal data to its service providers, suppliers and brokers when managing insurance policies.

The FOYER Group shares personal data with its agency network and its subcontractors in the framework of compliance with professional secrecy in accordance with Article 300 of the Law of 7 December 2015 on the insurance sector and obligations relating to the subcontracting of personal data as covered by Article 28 of the GDPR.

As an insurer, the Group may, under certain circumstances, some personal data to other insurers, reinsurers, insurance or reinsurance brokers or other intermediaries and agents, lawyers, experts/technical advisers, repairers, medical advisers, auditors, IT service providers, business partners, and government and mediation authorities located in the Grand Duchy of Luxembourg or abroad.

Your data may also be passed on to public or regulatory authorities or courts.

Your data may be saved on cloud servers managed by a third-party host in connection with particular products in accordance with the general or specific terms and conditions of the products concerned. You are informed of this transfer when taking out this product, for which you have accepted the terms and conditions, as well as on the Group's *Transparency* page: https://groupe.foyer.lu/fr/transparency.

The transfer of Your data for marketing purposes by our partners/third parties can only take place if Your prior consent has been obtained.

The Group may transfer Your personal data outside the European Union subject to ensuring, before the transfer, that the entities outside the European Union offer an adequate level of protection, in accordance with European legislation.

The Group may also transfer Your personal data to third parties if it considers that such a transfer is required for technical reasons (for example, hosting services provided by a third party and performance of the policy) or to protect its legal interests.

The Group may communicate Your personal data if the law requires it to do so, or if it considers in all good faith that such disclosure is reasonably necessary to comply with a legal procedure (for example, a mandate, subpoena, or any other court judgement), or to protect the rights, assets, or personal security of the Group, our clients, or the public.

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10. Right of access and correction of data

In accordance with the GDPR, You have the following rights:

- The right to access and view Your personal data
- The right to rectify or complete Your personal data
- The right to delete Your personal data (in accordance with legal obligations concerning their preservation)
- The right to limit the processing of Your personal data
- The right to portability of personal data, meaning that Your personal data can be provided in a structured format.

To exercise these rights, please fill in the form that is available on our website at the following URL: http://www.foyer.lu/fr/informations-relatives-a-la-protection-de-la-vie-privee and https://www.wealins.com/fr/privacy-fr.

Depending on the scale of the request, the Group reserves the right to invoice the originator a reasonable amount to cover the costs related to the exercise of these rights. In addition, the Group reserves the right to refuse access to the personal data in specific cases provided for by the applicable laws and regulations.

When Your data is processed for commercial purposes in electronic communications, You always have the option to unsubscribe.

11. Security and recipients of the data

The Group provides for the protection and security of the data that are the subject of processing by the data controller, in order to ensure that they remain confidential and prevent them from being corrupted, damaged, destroyed or disclosed to unauthorised third parties.

The Group has implemented measures to ensure the physical, electronic and organisational protection of the data to prevent any loss, fraudulent use, unauthorised access or distribution, modification, or destruction of personal data. These measures of protection implemented by the Group include specially designed technologies to protect the Personal Data during transfer.

However, despite the Group's efforts to protect Your personal data, it cannot guarantee the infallibility of these protective measures because of the inevitable risks that may arise during transmission of the Personal Data.

In the event of a Data Breach (violation of Your Personal Data), the Group undertakes to comply with the notification procedure as provided for by regulations. A Data Breach procedure defines the methodology for assessing the seriousness of the violation and the terms and conditions for notifying the supervisory authority and, if necessary, the data subjects.

As all Personal Data is confidential, access to Your data is limited to employees, service providers, and the agencies that need access to Your data in order for them to perform their processes. All persons

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with access to Your personal data are bound by a duty of confidentiality and shall be subject to disciplinary measures and/or other sanctions if they do not comply with these obligations.

However, it is important that You are very careful to prevent any unauthorised access to Your personal data. You are responsible for keeping Your password confidential, as well as any information appearing on Your page. To ensure the maximum security of Your personal data, it is recommended that You change Your password regularly.

12. Processing of personal data that presents high risks to You

The Group has put in place measures to assess the impact of the protection of personal data (called the "DPIA - Data Privacy Impact Assessment") due to some requirements to process personal data that present high risks to the rights and freedoms of individuals.

A risk assessment relating to personal data processing operations has been carried out to identify the impacts on the individuals, in the case of a high risk, that might require an impact analysis.

A procedure defines the conditions for implementation of the impact analysis in compliance with the regulation relating to the protection of personal data.

13. Appointment of a Data Protection Officer (DPO)

With a view to ensuring the protection of Your personal data and Your rights and freedoms, the Group has appointed a Data Protection Officer (DPO) for all its entities except Capitalatwork.

Capitalatwork has appointed a DPO specific to its activity.

14. Resolution of disputes

Although the Group has put in place organisational and security measures to protect personal data, no data transmission or storage technology is totally infallible.

However, the Group is anxious to guarantee the protection of Personal Data. If You have reason to believe that the security of Your Personal Data has been compromised or that they have been fraudulently used, it is recommended that You contact the Group at the following address:

FOYER

DPO – Compliance Department

12, rue Léon Laval

L-3372 LEUDELANGE

The Group will examine all complaints relating to the use and disclosure of Personal Data and will try to resolve them in accordance with the principles contained within this Policy.

Unauthorised access to Personal Data, or the fraudulent use of such data, may constitute an offence under the terms of local legislation.

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15. Contact

For any further information or should You have any questions relating to this Policy, please contact us by email, at the following email addresses: dataprotectionofficer@foyer.lu or dataprotectionofficer@wealins.com.

16 Review of the policy

This Policy will be reviewed annually.

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POLICY APPROVED

Date:

For the Compliance Department

_____
Clément Villaume –
Legal and Compliance Director
Data Protection Officer

Audit, Compliance and Risk Management Committee of Foyer Group S.A.

_____
Alain Kinsch, Chairman of the CACGR

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Marc Lauer, member of the CACGR

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