

## PERSONAL DATA PROTECTION POLICY

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The protection of personal data has evolved since the entry into force of [Regulation \(EU\) 2016/679](#), known as “*GDPR*”, on 25 May 2018.

Crédit Agricole Life Insurance SA (hereinafter CALI Europe) is particularly attentive to offering you the best possible service and we want to preserve the trust you place in us, which is why we place great importance on protecting your personal data.

This notice regarding the protection of personal data is intended to explain how the data are processed for this website. Its purpose is not to provide you with exhaustive information like a data protection clause, but rather to give you a succinct description of the main data processing operations out by CALI Europe.

If you would like to find out more about how we manage cookies, please refer to our Cookies Policy on this website.

Personal data are defined as any information relating to an identified and identifiable natural person or one who can be identified, directly or indirectly. Thus, all data that will allow us to identify you will be regarded as personal data.

CALI Europe uses and stores your personal data for processing as established beforehand by the Data Controller. The processing being understood as any operation carried out or not using automated processes and applied to physical personal data or sets of physical personal data or called to appear in a file.

In accordance with the general principles set forth in the Regulation, or “*GDPR*”, the Company must determine a storage period for such data that is coherent and justified with regard to the purpose of their processing.

### 1. WHAT PERSONAL DATA DO WE USE?

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Within the framework of our activities and in order to offer you a quality service, we collect and use your personal data, as mentioned above, for our operations. These data identify you or make you identifiable. As part of the conclusion, management and execution of a life insurance or endowment policy, we collect different types of personal data, namely:

- **Identification data:** full name, identity (national ID card, passport), nationality, place and date of birth, gender, photo, signature, etc.;
- **Private or professional contact details:** postal and email address, phone number, etc.;
- **Economic, financial and tax data:** salary and other income, total assets (moveable and immovable), tax identification number, tax status and country of residence, etc.;
- **Banking and financial data:** bank details, transfers of funds, investor profile, etc.;
- Data relating to your **professional status:** socio-professional category, profession, etc.;
- Data relating to your **family situation and family life:** marital status, matrimonial regime, number of children and their age, household composition, etc.;
- Data relating to your **habits and preferences:** use of the products and services that you have purchased from us.
- **Data relating to login credentials:** the login credentials that we have assigned to you;
- Data relating to your **connected device:** IP address, technical specifications, etc.;
- **Data collected as part of our communications:** emails, telephone conversations, etc.;
- Where applicable, **video protection system** (video surveillance) data.
- Where strictly necessary, **data relating to your health:** social security No., medical certificates, etc.

## 2. WHY AND ON WHAT GROUNDS DO WE USE YOUR PERSONAL DATA?

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The processing of your personal data may have a legal basis:

▪ Compliance with legal and regulatory obligations:

We use your personal data to comply with our legal and regulatory obligations, namely to (this list is not exhaustive):

- Monitor and report the risks (of a financial or legal nature, or related to compliance, reputation, failure, etc.) that we face,
- Prevent and detect money laundering and financing of terrorism, and - comply with all regulations on international sanctions and embargoes as part of our know-your-customer (KYC) procedure (to identify you, to - verify your identity and information against sanctions lists, and to determine your profile);
- Detect and manage suspicious requests and operations;
- Assessing the suitability of each client and the appropriateness of providing investment services in accordance with regulations on financial instruments markets (IDD);
- Combat tax fraud and meet our tax control and notification obligations;
- Detect and prevent corruption etc.
- Exchange and report different operations, transactions or requests, or respond to an official request from a competent local or foreign judicial, criminal, administrative, tax or financial authority, an arbitrator or mediator, law enforcement authorities, government - or public agencies.

▪ The performance of the contract to which you are party or to take steps prior to entering into a contract:

We use your personal details to conclude and perform our contracts and to manage our pre-contractual relationship, particularly in order to (this list is not exhaustive):

- Assess whether we can offer you a product and under what conditions;
- Underwrite a life insurance or endowment policy;
- Manage client relations.

▪ Legitimate interest:

We use your personal data to serve our legitimate interests, particularly in order to (this list is not exhaustive):

- Keep records of operations or transactions, including in electronic format;
- Manage, prevent and detect abuse and fraud;
- Enforce our rights through legal action and defend ourselves in litigation;
- Compile statistics.

▪ Respect for your consent:

We use your personal data to respect your consent, particularly to include you in marketing campaigns.

## 3. WHO ARE THE POTENTIAL RECIPIENTS OF YOUR PERSONAL DATA?

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To the extent necessary for the purposes listed above, and in accordance with our professional secrecy obligation, your data may be disclosed

- To companies in the Crédit Agricole Assurances Group;
- To CALI Europe's subcontractors;
- To the underwriting intermediary;
- To co-insurers and re-insurers;
- To the legal and tax advisers and auditors of CALI Europe;
- To co-policyholders;
- And to the competent administrative authorities.

#### The special case in terms of international transfers of personal data:

Within CALI Europe, the only special case in terms of international transfers concerns the management of Monegasque life insurance and capitalisation contracts.. CALI Europe may have recourse to intermediaries and/or depositories located in Monaco (a country whose legislation does not provide personal data protection equivalent to that of the European Union) and which rests on the implementation of appropriate safeguards to ensure the protection of your personal data. You have the right to request a copy of these safeguards through the procedure outlined below.

#### **4. FOR HOW LONG ARE YOUR PERSONAL DATA STORED?**

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In accordance with the general principles set forth in the Regulation, or “GDPR”, the storage period for your personal data must be coherent and justified with regard to the purpose of their processing. Accordingly, we store your personal data for the period necessary in view of our legislative or regulatory obligations, or for a period determined based on our operational constraints (effective management of our client relations, our accounting, the possibility of enforcing rights through legal action or responding to requests from supervisory authorities) and the limitation periods provided by the law applicable to the Contract.

#### **5. WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?**

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You hold the rights over your personal data which we collect and process when you use the website, services and make requests. These rights are as follows:

- The right of **access** to data: you can obtain information regarding the processing of your personal data and a copy thereof;
- The right to **rectify** of data: if your data are inaccurate, incomplete, ambiguous or outdated, you can request to have them changed accordingly;
- The right of data deletion : you can, to the extent permitted by law, request the deletion of your personal data;
- The right to **object** to the processing of your data at any time: you can object to the processing of your personal data relating to your particular situation, including where they are used for marketing purposes;
- The right to **restrict the processing** of your data under the terms set out by the regulation;
- The right to data **portability**: where permitted by law, you can request the recovery of the data that you have provided;
- The right to **withdraw your consent** at any time: where you have given your consent, you can withdraw it at any time;
- The right to **lodge a complaint** with a supervisory authority: where applicable, you can lodge a complaint with the Luxembourg National Commission for Data Protection (CNPd) or the French Data Protection Authority (CNIL).

If you have any questions regarding the use of your personal data or you wish to exercise your rights, you may address send your request to our Data Protection Officer either:

- By email:
  - [dpo@calie.lu](mailto:dpo@calie.lu) (Luxembourg)
  - [dpo@calie.fr](mailto:dpo@calie.fr) (France)
- By post:
  - CALI Europe (Luxembourg) - Data Protection Officer – BP 925, L-2019 Luxembourg.
  - CALI Europe (France) - Data Protection Officer - 16-18 boulevard de Vaugirard, 75015 Paris, France

Specifically, in accordance with applicable legislation and in addition to the rights mentioned above, you can file a complaint with a competent supervisory authority.

- The CNPD, with website <https://cnpd.public.lu> and address 15, Boulevard du Jazz L-4370 Belvaux, Luxembourg.
- The CNIL, with website <http://www.cnil.fr> and address 3 Place de Fontenoy, 75007 Paris, France.

Note that you can file complaint with the national authority according to the law applicable to your Policy.