

## PERSONAL DATA PROTECTION POLICY

The privacy of your information is of paramount importance to us. This Personal Data Protection Policy explains which data we collect about you and how we use them, as well as your rights in this regard and how you can exercise them. We are committed to implementing sufficient means to protect the confidentiality and the integrity of your personal data.

### 1. Who Are We?

**Media Assurances S.A.** is a brokerage firm, registered with the Luxembourg Business Registers under number B 20.311. It is accredited as a broker by the Luxembourg Insurance Commission under number 2003CM002 and appears on the Register of Accredited Brokerage Companies in the Grand Duchy of Luxembourg, available on the Insurance Commission's website at <http://www.caa.lu/fr/operateurs/intermediaires/societe-de-courtage>. Media Assurances S.A. is authorized to operate in Luxembourg, Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Sweden, under the system of the freedom to provide services.

#### • Role of Controller

Media Assurances S.A. collects your personal data on its own behalf, as a data controller.

“Personal Data” refers to any information about a natural person who is identified or identifiable (by means of the person's name, photograph, telephone number, a contract number, a password, etc.).

As defined by the European regulation on privacy protection, a controller is the party that determines the purposes of and the means for processing the Personal Data.

#### • Role of Processor

Media Assurances S.A. also exercises the role of data processor for the insurance companies with which it works.

As defined by the European regulation on privacy protection, a processor is the natural person or legal entity, public authority, department or any other organization that processes the Personal Data on behalf of the controller.

This Personal Data Protection Policy only concerns the processing of your Personal Data by Media Assurances S.A. in its capacity as controller.

#### • Contact Information

You can reach us by the following means:

- **Mail:** 43, boulevard Pierre Frieden, L-1543 Luxembourg
- **Telephone:** +352 26 35 59 5805
- **Email:** [info@media-assurances.com](mailto:info@media-assurances.com)

You can send your requests for additional information and requests related to your Personal Data to the addresses above.

## 2. Which Personal Data Do We Collect?

We will only process Personal Data that are strictly necessary for the purposes identified below. In the course of our business activities, depending on your particular situation and with regard to your life insurance and/or capitalization insurance, we may need to process the following Personal Data:

- Identifying data (full name, gender, date of birth, nationality, etc.);
- Contact information (email address, cell phone and/or landline number, mailing address, etc.);
- Marital status;
- Financial data and asset information (list of tangible and intangible assets, etc.);
- Data related to your profession (job titles, etc.);
- Composition of your household (marital status, number of children, etc.);
- Tax identification number;
- Any other information that you may spontaneously provide to us.

We may also need to process certain **sensitive data** covered by special protections, such as:

- Your health data (state of health, injuries, disability, medical procedures, medical history, etc.).

We take special care in processing these sensitive data.

We may also use **Personal Data obtained from outside sources**, namely in the following instances:

- Data obtained by the financial partner (bank, financial manager, family office, etc.) that contacted Media Assurances S.A. in the interest of collaborating on your account, with complete transparency for you;
- Data updates (concerning your family's composition, your address, your expired identification, etc.).

In some cases, we may need to use **Personal Data about individuals other than our direct client**, such as:

- The client's ascendants, children and partner, and the insurance beneficiary or beneficiaries;
- Employees, legal/sales representatives, shareholders and partners.

This Personal Data Protection Policy also applies to those individuals.

### 3. How Will We Use Your Personal Data?

#### 3.1. For What Purposes and on What Legal Basis Will We Use Your Personal Data?

First and foremost, we will use your Personal Data to fulfill our **contractual obligations** to you, namely in order to:

- Provide you with the services expected of us, in our role as an insurance intermediary, such as:
  - identifying your needs and your requirements (and, for insurance-based investment products, your complete profile as an investor),
  - providing you with advice,
  - supplying documentation to you on the products with which you have requested our assistance,
  - assisting you in concluding an insurance contract (preparatory work and the subscription itself),
  - helping you manage and execute your insurance contracts (surrender, additional contributions, arbitrage, withdrawals, etc.);
- Save your preferences as to if and how we can contact you to submit information or proposals to you.

We may also need to use your Personal Data to satisfy our **legal obligations**, namely in terms of:

- Preventing money-laundering and terrorist financing;
- Insurance payouts;
- Our tax accounting obligations.

On the basis of our **legitimate interest**, we may process your Personal Data in order to:

- Manage our account base and obtain a global view of our clients (for example, by establishing statistics on our clients, to learn who they are and get to know them better);
- Prevent abuse, fraud and other criminal offenses;
- Protect the company's assets;
- Ensure the safety of property and people, as well as the security of the company's information systems;
- Verify the legitimacy of transactions;
- Ascertain, exercise, defend and protect the rights of the company or of any parties that it may represent, for example, in the case of a dispute;
- Generate proof.

Lastly, we may collect and process your Personal Data with your **consent**. This includes the consent you may have given to be contacted about the use of your health data and about new products and special promotions (such as the products and services offered by Media Assurances S.A. or our business partners), including by means of newsletters. We collect this consent by means of the Broker / Brokerage Service Information Document. You may withdraw your consent at any time, by contacting us as stated above, without this affecting the legality of the processing performed on the basis of that consent prior to its withdrawal.

### **3.2 Will We Use Your Personal Data to Make Automated Decisions?**

We do not use your Personal Data for profiling purposes or to make automated decisions. If, in the future, we should decide to do so, we will notify you in advance, explaining the reasoning behind that decision, as well as the importance and the expected consequences of that data processing.

### **4. Why Do We Need Your Personal Data?**

If you refuse to provide us with the Personal Data requested for certain services (such as assistance with the conclusion of an insurance contract or in the event of payment of a claim), we may be unable to fulfill our role as an intermediary, handle your requests, conclude a contract or continue to execute the contract concluded with you.

### **5. Where and How Will We Transfer Your Personal Data?**

#### **Who Will Have Access to Your Personal Data and to Whom Will They Be Transferred?**

To protect your privacy, the people authorized to access your Personal Data are determined specifically, based on their assigned tasks.

Under no circumstances will we sell your Personal Data to a third party. However, to fulfill the purposes listed above (see point 3.1), we will need to share certain Personal Data with third parties:

- Insurance companies from which you would like to receive a proposal or with which you want to sign a contract;
- In order to correctly perform our duties as an intermediary, your Personal Data may be transmitted to and/or processed by our IT subcontractors;
- To meet our legal obligations, your Personal Data may be transmitted to the competent authorities, including our regulator;
- In the event of a dispute, your Personal Data may be transmitted to our lawyers and used to defend our case in court;
- In order to correctly perform our duties as an intermediary, and in the event of payment of a claim, your Personal Data may be transmitted to experts designated by you, by us and/or by the insurance companies.

If the broker does not transfer any Personal Data outside the EU:

Under no circumstances will we transfer your Personal Data outside the European Economic Area (“EEA”).]

### **6. How Long Will We Keep Your Personal Data?**

We will keep your Personal Data for the duration of our contractual relationship.

In addition, we are subject to various storage and documentation obligations. According to the provisions of the Luxembourg law of August 10, 1915, on companies, the Luxembourg Commercial Code and Luxembourg tax legislation, the storage period is five (5) to ten (10) years after the end of the financial year to which the relevant documents containing your Personal Data relate. Personal Data collected for the purpose of fighting terrorism and money-laundering may be stored for up to five (5) years.

## 7. What Are Your Rights and How Do You Exercise Them?

As a data subject, you have certain rights. Below, you will find a brief description of those rights and how you can implement them.

**Right of information** – You can send us any questions you may have regarding the recording or processing of your Personal Data.

**Right of access** – You can, at any time, obtain confirmation of whether or not your Personal Data are being processed and, if applicable, you can access said Personal Data and obtain a free copy thereof.

**Right to rectification** – You can, at any time, have any incorrect Personal Data corrected, by sending us a written request to do so. In the same way, you can ask that any incomplete Personal Data be completed.

**Right to erasure** – You can, at any time, have your Personal Data erased, by sending us a written request to do so, on condition that one of the following reasons applies:

- The Personal Data are no longer necessary, for the purposes for which they were collected and processed;
- You have withdrawn your consent, on which the processing was based;
- You object to the processing, and there is no compelling legitimate reason for it;
- The Personal Data were unlawfully processed;
- The Personal Data must be erased to satisfy a legal obligation.

**Right to restriction of processing** – Once a restriction of processing is granted, the Personal Data can only be processed with the consent of the data subject, or to establish, exercise or defend any rights in court, or to protect the rights of another natural person or legal entity, or for important grounds of public interest.

You can request the restriction of processing for any of the following reasons:

- You are challenging the accuracy of your Personal Data;
- In the event of unlawful data processing;
- We no longer need your Personal Data for processing purposes, but you still need them to establish, exercise or defend your rights in court;
- You have objected to data processing (which will then be restricted during the period needed to verify whether or not we have any legitimate grounds that take precedence over your reasons).

**Right to object** – You have the right, at any time, to object to the processing of your Personal Data, for reasons related to your specific situation, or to the processing of your Personal Data based on the performance of a task carried out in the public interest or necessary for the purposes of our legitimate interests, by sending us a written request to do so.

We will then no longer process those Personal Data, unless it can be shown that there are compelling legitimate reasons for processing them, which take precedence over your interests and your rights and freedoms, or for establishing, exercising or defending any rights in court.

If your Personal Data are being processed for direct marketing purposes, you have the right to object to that processing at any time.

**Right to data portability** – You have the right to receive the Personal Data that you provided to us, in a structured, commonly used, machine-readable format, and to transmit those Personal Data to another controller, without our being able to impede it, by sending us a written request to do so, in the following scenario:

- The processing is based on your consent or on a contract; and
- The processing is performed by automated means.

**Right to withdraw consent** – For processing based on your consent, you have the right to withdraw it at any time, by sending us a written request to do so. The withdrawal of your consent will not undermine the legitimacy of any processing performed on the basis of your consent, prior to its withdrawal.

**Right to lodge a complaint** – We make every effort to ensure compliance with our legal obligations in terms of Personal Data protection and to handle any complaints submitted to us in that regard, as quickly as possible. If you are not satisfied with the response you receive, you may file a complaint with Luxembourg’s data protection authority (National Commission for Data Protection) or with the data protection authority of another European Union Member State (such as the authority in your country of residence).

National Commission for Data Protection  
1, avenue du Rock’n’Roll  
L-4361 Esch-sur-Alzette  
Tel: +352 26 10 60 - 1  
[www.cnpd.public.lu/en/support/contact.html](http://www.cnpd.public.lu/en/support/contact.html)

## **8. Modifications to the Personal Data Protection Policy**

We reserve the right to modify this Personal Data Protection Policy from time to time, to ensure that you are fully informed of all of our data processing activities and of our compliance with applicable data protection legislation. You will be notified of the changes made to this Personal Data Protection Policy by any appropriate means.