



PRIVACY NOTICE

Allia Insurance Brokers Luxembourg SA is the Luxembourg subsidiary of Allia Insurance Brokers SA, a leading global professional services firm offering insurance and reinsurance distribution services as well as risk management services.

Allia Insurance Brokers Luxembourg SA is committed to protecting your privacy. This commitment reflects the value we place on earning and keeping the trust of our customers, business partners, and others who share their personal information with us.

What does this Privacy Notice do?

This Privacy Notice ("Notice") explains Allia's information processing practices. It applies to any personal information you provide to Allia and any personal information we collect from other sources. This Notice is a Notice of our practices and of your rights regarding your personal information. This is not a contractual document, and it does not create any rights or obligations on either party, beyond those which already exist under data protection laws.

Who is responsible for your information?

Allia Insurance Brokers Luxembourg SA is responsible of the content of this Notice. In the direct or indirect collection and processing of information about you, Allia Insurance Brokers Luxembourg SA generally acts as a data controller for the services we provide to our clients.

When and how do we collect your information?

As part of our advisory and brokerage business in insurance and reinsurance, as well as our derivative business, Allia Luxembourg is required to process information about you. For example, by taking out an insurance policy, declaring a claim, registering for an event we organize, browsing our sites, when you apply for a job with Allia, you send us information, some of which may identify you directly or indirectly.

What information do we collect?

The information we ask for varies according to the services we provide to you.

However, some data are common to all of our services:

- Contact information, such as name, e-mail address, postal address, phone number and mobile number;
- How to contact you: email, mail, subscription to a newsletter;
- Any other relevant data such as your business activity, your preferred contact language, your geographical location etc...

The data you give us at the start of the relationship with us

In the course of the various contacts we have with you, you may have to provide us with information which concerns you. They are collected in particular when a contract is signed, or to access any other offer or service.

These data include the following:

- Information about your means of payment (including credit card number);
- Choice in commercial prospecting;
- Any other information you wish to bring to our attention.



The data we collect over the course of the commercial relationship

These include, but are not limited to:

- Information about the history of your commercial relationship with us, insurance contracts taken out, orders for services, invoicing and payment where applicable;
- Your participation in customer loyalty programs, or at some of our events;
- Complaints to our dedicated service.

In connection with the establishment, management and performance of insurance and/or reinsurance contracts

- data relating to the identification of the persons involved in the contract (civil status, contact details, nationality, etc.);
- data on family, economic, wealth and financial situation (income, wealth, etc.);
- data on the employment situation (occupation, socio-professional category, employer, etc.);
- the data needed to assess the risk (geographical situation, data relating to the property to be insured (housing, vehicle, etc.) data relating to the driving license, previous loss of property, past convictions, etc...);
- data related to the establishment, application and management of the contract (means of payment, authorization of withdrawal, RIB, etc.);
- data relating to the determination or assessment of prejudices and benefits (details of claims, data related to victims, etc.);
- data on personal life and lifestyle and use of goods in relation to the risks insured or the services offered (number of children, sports, leisure, etc.);
- data on the location and geolocation of persons or goods in relation to the risks insured or the services offered;
- connection and traceability data (cookies, etc.);
- sensitive data necessary for the execution of contracts or pre-contractual measures or necessary for compliance with legal, regulatory or administrative provisions (sickness reimbursement data, description of bodily harm, production of medical certificates, medical questionnaires, etc.).

Sensitive Data - Data Minimization

We only collect sensitive data strictly necessary for the provision of our services, mainly the tax identification number in the context of reimbursement of medical expenses, medical data, banking data in order to meet contractual requirements or deliver the expected service. To this end, we may need to obtain your agreement to process and share these data, if necessary. If you are required to provide us with sensitive data for other persons such as relatives, employees, you must inform them and obtain their agreement, if necessary.

Data source

We collect data directly from you but also:

- Persons interested in the contract: the policyholder of an insurance contract, the employers of insured persons or employees who benefit from the services taken out by the latter;
- Contract workers (experts, victims, etc.);
- Our privileged contacts with our business partners (insurers, reinsurers, brokers, business indicators, etc.).

Information we collect through our websites

We may be brought, when you register for one of our events, when you subscribe to one of our services, when you want to access content or when you visit one of our websites, to collect one or more of the



following information:

- contact information such as your name, email address, postal address, telephone numbers;
- communication preferences such as subscription to a newsletter;
- search queries;
- contact information about other people (a friend for example when you recommend a site or service) only used to perform the requested communication);
- information posted in connection with public or community discussions and any other online activities.

In some cases, we automatically collect certain types of information when you visit our websites as well as via the emails we exchange. Automated technologies may include the use of server connection logging to collect IP addresses, cookies and web beacons. Further information about the use of cookies is available on our page about the cookies policy within the group.

Mobile Devices:

If you access our websites on your mobile telephone or mobile device, we may also collect your unique device identifier and mobile device IP address, as well as information about your device's operating system, mobile carrier and your location information. We may also ask you to consent to providing your mobile phone number (for example, so that we can send you notifications).

How do we use your personal information?

The following is a summary of the purposes for which we use personal information.

Insurance and reinsurance consulting and brokerage

- Procurement, management and execution of insurance and reinsurance contracts;
- Study of the specific needs of the client/insured;
- Risk review, acceptance, control and monitoring;
- Contract management from pre-contractual to termination;
- Performance of contract guarantees;
- Recourse exercise, claims and litigation management;
- Development of statistics, actuarial studies and data analysis;
- Implementation of research and development actions;
- Administration of administrative, legislative or regulatory provisions including:
 - combating money laundering and terrorist financing;
 - the fight against fraud,
 - freezing of assets and sanctions etc

Customer relationship management, prospects, invoicing

We process data from some of our client representatives to:

- • contact our clients as part of the current or future customer relationship;
- • send information on similar products or services to those subscribed to;
- • invite our clients, business partners to events and manage their participation;
- • conducting satisfaction surveys;
- • managing invoicing, monitoring of outstanding payments and litigation.

Data analysis

We are required to process our clients' data in an aggregated manner in order to establish



investment statistics and develop innovative services for our clients.

If we have to re-use your data for a different purpose than the one for which it was collected, we will ask you for your prior approval.

Customer knowledge and checks related to vigilance and the fight against corruption

Legal basis

All processing (i.e. use) of your personal information is justified by a "lawful basis" for processing. In the majority of cases, processing will be justified on the basis that:

- the execution of pre-contractual or contractual measures to which the client, the insured or the beneficiary is a party, or the employer on behalf of its employees;
- compliance with legal or tax obligations;
- your consent if applicable;
- our legitimate interest, subject to your own interests and fundamental rights.

Do we collect information from children?

We do not collect personal data directly from children.

How long do we retain your personal information?

We store the data according to the purpose for which it was collected.

The retention period of your data depends mainly on the services you subscribe to and the duration of our commercial relationship.

In addition, due to our contractual obligations with risk holders (insurers, reinsurers) as well as the different statutory limitation periods, we have to keep some of your data for a longer period than our contractual relationship.

We have adopted appropriate organizational and security measures to ensure that data is permanently destroyed or archived.

Do we share your personal data?

May have access to your personal data:

- the persons responsible for providing the services within the framework of their respective responsibilities;
- insurers, potential co-brokers and other business partners, management delegates;
- service providers, experts, lawyers, medical consultants, collection service providers;
- health professionals and care networks and third-party payers;
- our subcontractors;
- Allia Group's affiliated companies in the exercise of their tasks;
- persons interested in the contract (person in charge, victims, witnesses, third parties interested in the performance of the contract);
- authorized third parties (courts, supervisory authority, audit services (auditor, audit, internal control)).

Within Allia

We may share your personal information with other Allia entities to serve you, including for the activities listed above.



Business Partners

We do not rent, sell or otherwise disclose personal information about our clients with unaffiliated third parties for their own marketing use.

We may have to communicate information about you to our partners (insurers, co-brokers, reinsurers, etc.) or certain third parties providing specialized services (online payment services, paid third party networks) can access data about you. These trading partners act as separate or joint processors (in the case of management delegation for example) and remain responsible for their own compliance with the protection of personal data.

Authorized Service Providers

We may have to use the services of service providers that we have selected to provide us with services.

These third parties are contractually committed not to communicate or access the personal data entrusted according to the services rendered.

These providers are:

- IT service providers that host, manage our information system (servers and applications), our backups, the supply and maintenance of our networks, our backup servers etc...
- providers of integrated service platforms (customer relationship management, suppliers, etc.)
- service providers in terms of digitalization, desktop publishing, archiving, etc.

Cross-border transfers

Due in particular to the international dimension of the Allia Group and the pooling of certain services (IT, supplier management accounting, etc.) and tools (commercial coordination, statistical analyses, compliance checks, anti-money laundering, etc.), the processing is likely to involve transfers without moving personal data to Member or non-member countries-members of the European Economic Area, whose legislation on personal protection differs from that of the European Union.

In the latter case, Allia Luxembourg or the Allia Group use various legal mechanisms to ensure the maintenance of a system of protection of your rights and your data in accordance with legal requirements and our commitments.

This includes, but is not limited to:

- the implementation of standard contractual clauses approved by the European Commission ensures that personal data is processed with a level of protection equivalent to that of the European Economic Area within the Group;
- the use of providers certified to the Privacy Shield, or of recipients who have adopted a precise and demanding contractual framework, in accordance with the models adopted by the European Commission, as well as appropriate security measures, ensuring the protection of transferred personal data.

Transfers of strictly necessary personal data shall take place under conditions and under guarantees which ensure the confidentiality and security of such data.

Do we have security measures in place to protect your information?

The security of your personal information is important to us and Allia has implemented reasonable physical, technical and administrative security standards to protect personal information from loss, misuse, alteration or destruction. We protect your personal information against unauthorized access, use or disclosure, using security technologies and procedures, such as encryption and limited access. Only authorized individuals access your personal information, and they receive training about the importance of protecting personal information.

Our service providers and agents are contractually bound to maintain the confidentiality of personal



information and may not use the information for any unauthorized purpose.

What choices do you have about your personal information?

When we collect data about you, or about your loved ones, we tell you what is mandatory or optional and what the consequences are of not responding.

Our information policies and our collection forms or questionnaires specify the required fields and the reasons for collecting the data.

We may have to send you proposals for products or services similar to those for which you have contacted us. At any time, you can unsubscribe from our communications by clicking on the links in the emails or sms.

How can you update your communication preferences?

Newsletters

If you request electronic communications, such as an e-newsletter, you will be able to unsubscribe at any time by following the instructions included in the communication.

Other rights regarding your data

➤ Right to Access

You have right to access personal information which Allia holds about you.

You can also contact your usual contact person or ask us, in compliance with the applicable legal provisions, for a copy of the information about you that we hold in our databases.

To do so, you will need to prove your identity by providing us with a copy of a valid piece of identification. If necessary, we may ask you to pay fees in the event of an unfounded or repeated request.

We will provide you with the information in writing or electronically unless you request an alternative method of communication.

You can exercise your right of access:

- ✓ by sending an e-mail to **legal@allia.be** or
- ✓ by sending a letter to the attention of:
Data Protection Officer
Allia Insurance Brokers Luxembourg SA:
1 Rue de la Poudrerie L-3364
Leudelange

Your request will be processed as soon as possible and no later than 30 days. If it is not possible to respond to you within this period, we will inform you and process your request as soon as possible.

If it is not possible for us to respond positively to your request for legal reasons, we will inform you unless it is impossible to do so based on a decision of an administrative or judicial authority or legal obligation.

➤ Right to Rectification

You have a right to request us to correct your personal information where it is inaccurate or out of date.

➤ Right to be Forgotten (Right to Erasure)

You have the right under certain circumstances to have your personal information erased. This applies when the data are no longer necessary for the purposes for which they are collected or processed, or the processing is unlawful, or the deletion corresponds to a legal obligation.

You may also, in certain cases, set guidelines for the retention, erasure and disclosure of your personal data after your death.

➤ Right to Data Portability

You have the right to the portability of the data you have personally provided to us as well as those



resulting from the performance of the contract or contracts that are binding on us or those collected with your consent. It excludes anonymous data and derived or derived data as well as structured data in our information systems.

This right is subject to the technical feasibility of transmission in a structured format, commonly used and readable by another controller's information system.

➤ Right to Object to Processing

You have the right to object the processing of your personal information at any time, but only where that processing has our legitimate interests as its legal basis. If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

➤ Right to limitation of treatment

You may ask us to restrict the processing of your personal data if:

- you question the accuracy of the data and this in the period that will allow us to carry out the necessary checks;
- the treatment is illegal and you are asking for the limitation of treatment rather than its removal;
- we no longer need the data for the purposes of the processing concerned, but the data are necessary for the establishment, exercise or defense of legal rights;
- you object to a treatment based on our legitimate interest, the time required to verify the validity of the reason for treatment.

➤ Automated decision making

In some cases, you can access online pricing tools via Allia sites or partners (comparators, insurers).

In some cases, it is possible, depending on the answers given to the questions, that no pricing proposal is possible or addressed to the user. Generally, these tools alert our teams for verification. However, we inform you that you have the right to request the intervention of one of our employees to review the conditions that led to the rejection of your request.

In addition, you have the right to request information on any logic underlying an algorithm.

➤ **Contact Us**

If you have any questions, would like further information about our privacy and information handling practices, would like to discuss opt-outs or withdrawing consent, or would like to make a complaint about a breach of the Act or this Notice, please contact the Privacy Officer:

Alternatively, you have the right to contact your Data Protection Authority.

If you have any questions relating to this Notice, please contact us at:

Data Protection Officer
Allia Insurance Brokers Luxembourg SA:
1 Rue de la Poudrerie L-3364 Leudelange

Email legal@allia.be

➤ **Complaints**

You have the right to lodge a complaint with the National Commission for the Protection of Data (CNPd), the supervisory authority in charge of compliance with obligations regarding personal data.

Commission Nationale pour la Protection des Données
1, avenue du Rock'n'Roll
L-4361 Esch-sur-Alzette

Tel.: (+352) 26 10 60 -1

Website: www.cnpd.lu



➤ **Changes to this Notice**

We may update this Notice from time to time.

We encourage you to periodically review this Notice so that you will be aware of our privacy practices.

This Notice was last updated on November 13, 2020.