



Data protection provisions AXA.ch

Version February 2019

Switzerland

Preface

The following data protection provisions describe how AXA processes your personal data. Personal data comprises individual items of information that can be assigned to an identified or identifiable person. "Processing" refers to all handling of personal data – with or without the help of automated processes – including the collection, storage, use, disclosure and deletion of data. Please note that for various reasons – for instance the development of our products and services or the implementation of new technologies – it may be necessary for data protection provisions to be amended. We therefore recommend that you view the data protection provisions on our website on a regular basis so as to keep abreast of any changes. This data protection information was last updated in February 2019.

Who is responsible for data processing?

The following AXA companies are responsible for data processing:

- For general data processing and in connection with property insurance:
 - AXA Insurance Ltd., General-Guisan-Strasse 40, CH-8400 Winterthur
- For data processing in connection with life insurance:
 - AXA Life Ltd., General-Guisan-Strasse 40, 8400 Winterthur
- For data processing in connection with legal protection insurance:
 - AXA-ARAG Legal Protection Ltd., Affolternstrasse 42, 8050 Zurich

The companies responsible are hereinafter referred to together as AXA.

Questions and answers on data protection in general

On what legal basis are my data processed?

Your personal data is processed in accordance with the statutory provisions, specifically the applicable provisions governing data protection and the Insurance Contract Act, and, insofar as this is required, with your consent.

How is the data acquired?

We process data acquired from you directly as well as data from third parties.

In so doing, we process, among other things, the following personal data you make available to us:

- Details about your person and contact information
- Details about third parties
- Financial and debt collection data
- Other identification details
- General data from applications and contracts
- Relevant data depending on the insurance product

In addition, we process, among other things, the following data from third parties

- Obtaining of pertinent data from third parties (public authorities, finance companies, etc.) in order that we have the necessary data to conclude or process contracts.
- Obtaining of data from data suppliers and address brokers or third-party website operators and online networks so that we can provide you with the best possible service and offer you optimal advice as well as ensure the accuracy of the data.

Why does AXA process my data?

Personal data that you have provided to us yourself or that we have lawfully received from companies in the AXA Group, from contracting partners such as insurance brokers and other third parties, may be processed by us for the following purposes:

- **Processing of the insurance contract**

The conclusion and performance of the insurance contract are not possible without the processing of your personal data. When applying for insurance coverage you send us personal data; we require this data to assess the risk we are potentially assuming as well as to be able to conclude and subsequently implement the contract, for instance in order to issue a policy or invoice. In the event of a claim you are once again required to send us information; without this we are unable to check whether a claim event has occurred or to determine the amount of the claim. In connection with the risk assessment and processing of a claim it is also possible that we will request your consent – for instance in order to set aside patient confidentiality. If you do not issue the necessary consent with your request, or issue only partial consent, this could make it impossible for us to conclude the contract. This processing is permitted for the handling of the insurance contract on the basis of legal provisions and your consent.
- **Exchange of information within AXA**

To simplify administrative procedures as part of contract fulfillment, AXA Group companies operating in Switzerland and the Principality of Liechtenstein grant each other access to the following data: master data and basic contract data (excluding data particularly worthy of protection). This processing is necessary for the performance of the insurance contract and for the purpose of pursuing AXA's legitimate interests. You may request a list of the group companies from AXA's Data Protection Consul-

tant.

- **Checking your credit rating**

For the purpose of assessing your creditworthiness, we may use credit rating data from external providers. This processing is required to carry out pre-contractual measures, as well as for the purpose of pursuing AXA's legitimate interests.

- **Compliance with legal obligations and the fight against fraud**

We also process your data for the purposes of detecting, preventing and combating insurance fraud, money laundering and the financing of terrorism. This processing is required for the purposes of pursuing AXA's legitimate interests as well as to comply with legal provisions.

- **Statistical analysis**

Personal data may be used by AXA or a third party for statistical analysis purposes. These analyses can involve different subject areas such as road safety, the prevention of accidents in the home, the effectiveness of fire protection measures and potential improvements in contract management. The processing of personal data is necessary for the purpose of pursuing AXA's legitimate interests.

- **Direct marketing**

AXA may use personal data for direct marketing purposes. This term includes promotions and personalized advertising. We use this personal data to improve knowledge about our customers – or prospective customers – and ensure they are given information about our activities, products and services, as well as receive offers. Personal data for direct marketing purposes may also be sent to other companies in the AXA Group, insurance brokers and companies connected to AXA. This processing is permitted based on your consent and the pursuit of AXA's legitimate interests.

- **Data analyses**

So that we can continuously improve our products and services, we analyze the personal data available to us. We may link historical, current and future data, for example to enable us to undertake evaluations in connection with risk profiles. This processing is required for the purpose of pursuing AXA's legitimate interests.

Will my data be disclosed to other recipients?

AXA may send or disclose your personal data to other companies or individuals, but only on the condition that sending or disclosing the information serves one of the above-mentioned purposes or is necessary in connection with the processing of an order.

The recipients of personal data specifically include lawyers, experts, doctors specialized in occupational health, reinsurers, co-insurers, insurance brokers, service providers, other insurance companies, agents and claims adjusters. These recipients may only process your personal data insofar as this is necessary for the performance of their tasks.

Where provided for under current legislation, personal data may also be transmitted to the government offices and authorities concerned.

Will my data be sent to a country outside of the EEA?

We only transmit personal data to recipients outside of the European Economic Area (EEA) if the third country has been recognized by the European Commission as providing adequate protection of data or if adequate data protection guarantees exist – such as the AXA Group's binding internal data protection rules, EU standard contractual clauses and the EU-US Privacy Shield.

The officers responsible for data processing are domiciled in Switzerland and data processing takes place mainly in Switzerland. Switzerland is recognized by the European Commission as a secure third country providing adequate data protection.

AXA is part of the AXA Group. Some of the business processes are carried out in centralized service centers and data processing systems. The processing of data outside of the European Economic Area or Switzerland is done on the basis of the AXA Group's Binding Corporate Rules; these Rules were approved by the European Data Protection Authorities. They ensure an adequate level of protection while data is being processed by AXA companies domiciled outside of the EU.

How long will my data be kept for?

The length of time data is kept varies depending on the type of business transaction involved. AXA determines this on the basis of the following criteria:

- Fulfillment of its purposes
 - Legal parameters
 - Operational needs
 - Safeguarding the interests of the persons affected, e.g. customers, visitors to our websites, prospective customers
 - Taking into account internal procedures and data dependencies
- Once the set storage period expires your personal data will be deleted. AXA stores the personal data obtained to draw up a quotation or an application for five years from the date of issue; this also applies in cases where the insurance is not taken out. It uses this data to improve its products and offers, and to give the applicant other customized product recommendations.

In the case of insurance contacts we retain your personal data throughout the life of the contractual relationship or settlement of the claim, in accordance with statutory retention periods. In this case the retention period is up to ten years and may be extended if legal claims are asserted, exercised or defended.

What are my rights?

Where AXA processes data about your person, you have the following rights:

- **Right of access to information**

You can ask us to confirm whether or not we process data about your person. If that is the case, you have the right to find out more about this data: for example, about which categories of data are involved and the purpose of the data processing.

- **Right to rectification**

Where we have stored incorrect information about your person, you can ask us to correct or complete this.

- **Right to erasure and restriction of processing**

You can ask for your personal data to be deleted or for restrictions to be placed on how it is processed. In some circumstances we will be unable to authorize such a request. For example, erasure is not possible if the data processing is necessary for operating reasons or if the statutory retention period has not yet expired.

- **Right to object**

You can refuse to allow processing or profiling of your data for direct marketing purposes.

Who can I contact at AXA?

Please send any data processing requests **in writing, enclosing a copy of your passport or ID card**, to the Data Protection Consultant:

Data Protection Consultant for property and life insurance

- **Letter:**

AXA Data Protection Consultant
AXA Insurance Ltd. / AXA Life Ltd.
IT Risk, Security & Compliance
Pionierstrasse 3
CH-8400 Winterthur

- **Email:** datenschutzanliegen@axa.ch (unencrypted)

Data Protection Consultant for legal protection insurance

- **Letter:**
AXA-ARAG Data Protection Consultant
AXA-ARAG Legal Protection Ltd.
Legal, Compliance & Risk Management
Affolternstrasse 42
CH-8050 Zurich
- **Email:** info@axa-arag.ch (unencrypted)

Can I also contact a supervisory authority directly?

If you believe AXA has failed to comply with applicable data protection regulations, we would advise you to contact the above-mentioned AXA Data Protection Consultant in the first instance. You can also file a complaint directly with the relevant data protection supervisory authority:

Federal Data Protection and Information Commissioner
Feldeggweg 1
CH-3003 Bern

The EU and EEA (especially Liechtenstein)

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Who is responsible for data processing?

Responsibility for data processing at **AXA Insurance Ltd. / AXA Life Ltd.** and **AXA-ARAG Legal Protection Ltd.** at Landstrasse 60 in Vaduz lies with the following AXA companies:

- For general data processing and in connection with property insurance: AXA Insurance Ltd., General-Guisan-Strasse 40, CH-8400 Winterthur
- For data processing in connection with life insurance: AXA Life Ltd., General-Guisan-Strasse 40, 8400 Winterthur
- For data processing in connection with legal protection insurance: AXA-ARAG Legal Protection Ltd., Affolternstrasse 42, 8050 Zurich

Responsibility for data processing at the **Rofenberg Stiftung für Personalvorsorge** (Rofenberg Employee Welfare Foundation) (Landstrasse 60 in Vaduz) and the **AXA Stiftung Betriebliche Vorsorge** (AXA Foundation for Occupational Benefits) in the Principality of Liechtenstein (Städtle 36 in Vaduz) lies with the following AXA company:

- c/o AXA Life Ltd., Landstrasse 60, 9490 Vaduz

The companies responsible are hereinafter referred to together as AXA.

Questions and answers on data protection in general

On what basis is my data processed?

Your personal data is processed in accordance with the applicable provisions, specifically the provisions governing data protection and the Insurance Contract Act, and, insofar as this is required, with your consent.

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In so doing, we process, among other things, the following personal data you make available to us:

- Details about your person and contact information
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In addition, we process, among other things, the following data from third parties

- Obtaining of pertinent data from third parties (public authorities, finance companies, etc.) in order that we have the necessary data to conclude or process contracts.
- Obtaining of data from data suppliers and address brokers or third-party website operators and online networks so that we can provide you with the best possible service and offer you optimal advice as well as ensure the accuracy of the data.

Why does AXA process my data?

Personal data you have provided to us yourself or we have lawfully received from companies in the AXA Group, from contracting partners such as insurance brokers and other third parties, may be processed by us for the following purposes:

- **Processing of the insurance contract**
The conclusion and performance of the insurance contract are not possible without the processing of your personal data.

When applying for insurance coverage you send us personal data; we require this data to assess the risk we are potentially assuming as well as to be able to conclude and subsequently implement the contract, for instance in order to issue a policy or invoice. In the event of a claim you are once again required to send us information; without this we are unable to check whether a claim event has occurred or to determine the amount of the claim. In connection with the risk assessment and processing of a claim it is also possible that we will request your consent – for instance in order to set aside patient confidentiality. If you do not issue the necessary consent with your request, or issue only partial consent, this could make it impossible for us to conclude the contract.

This processing is permitted for the performance of an insurance contract in accordance with Art. 6 (1) (b) GDPR, for compliance with legal obligations pursuant to Art. 6 (1) (c) GDPR and based on your consent in accordance with Art. 6 (1) (a) GDPR.

- **Exchange of information within AXA**

To simplify administrative procedures as part of contract fulfillment, AXA Group companies operating in Switzerland and the Principality of Liechtenstein grant each other access to master data and contract data (excluding data particularly worthy of protection): This processing is necessary for the performance of an insurance contract in accordance with Art. 6 (1) (b) GDPR and for the purposes of pursuing AXA's legitimate interests in accordance with Art. 6 (1) (f) GDPR. You may request a list of the group companies from AXA's Data Protection Consultant.

- **Checking your credit rating**

For the purpose of assessing your creditworthiness, we may use credit rating data from external providers. This processing is necessary in order to take steps prior to entering into a contract in accordance with Art. 6 (1) (b) GDPR and for the purposes of pursuing AXA's legitimate interests in accordance with Art. 6 (1) (f) GDPR.

- **Compliance with legal obligations and the fight against fraud**

We also process your data for the purposes of detecting, preventing and combating insurance fraud, money laundering and the financing of terrorism. This processing is necessary for the purposes of pursuing AXA's legitimate interests in accordance with Art. 6 (1) (f) GDPR and for compliance with a legal obligation in accordance with Art. 6 (1) (c) GDPR.

- **Statistical analysis**

Personal data may be used by AXA or a third party for statistical analysis purposes. These analyses can involve different subject areas such as road safety, the prevention of accidents in the home, the effectiveness of fire protection measures and potential improvements in contract management. The processing of personal data is necessary for the purposes of pursuing AXA's legitimate interests in accordance with Art. 6 (1) (f) GDPR.

- **Direct marketing**

AXA may use personal data for direct marketing purposes. This term includes promotions and personalized advertising. We use this personal data to improve knowledge about our customers – or prospective customers – and ensure they are given information about our activities, products and services, as well as receive offers. Personal data for direct marketing purposes may also be sent to other companies in the AXA Group, insurance brokers and companies connected to AXA. This processing is permitted based on your consent in accordance with Art. 6 (1) (a) GDPR and for the purposes of pursuing AXA's legitimate interests in accordance with Art. 6 (1) (f) GDPR.

- **Data analyses**

So that we can continuously improve our products and services, we analyze the personal data available to us. We may link historical, current and future data, for example to enable us to undertake evaluations in connection with risk profiles. This processing is necessary for the purposes of pursuing AXA's legitimate interests in accordance with Art. 6 (1) (f) GDPR.

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In the case of insurance contacts we retain your personal data throughout the life of the contractual relationship or settlement of the claim, in accordance with statutory retention periods. In this case the retention period is up to ten years and may be extended if legal claims are asserted, exercised or defended.

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- **Right to rectification**
Where we have stored incorrect information about your person, you can ask us to correct or complete this.
- **Right to erasure and restriction of processing**
You can ask for your personal data to be deleted or for restrictions to be placed on how it is processed. In some circumstances we will be unable to authorize such a request. For example, erasure is not possible if the data processing is necessary for operating reasons or if the statutory retention period has not yet expired.
- **Right to data portability**
In principle, you are entitled to receive the personal data obtained from you in a structured, standard machine-readable format.
- **Right to object**
You can refuse to allow processing or profiling of your data for direct marketing purposes.
- **Right to object in relation to automated decision-making**
In some circumstances you have the right not to be subject to a decision based solely on automated data processing – including profiling.

How does AXA deal with automated individual decision-making?

With various types of business transactions, fully automated individual decision-making is possible on the basis of the available data. Where this decision impacts you negatively – e.g. the premium is increased, a benefit is refused, or you are given notice of termination – we will inform you that the decision was made on a fully automated basis. In this case you have the right to request that a human reviews the case in person and that you are able to state your view.

Statutory data protection information when visiting our website

Are my personal data protected when they are being transmitted?

AXA takes appropriate technical and organizational security measures to protect the personal data you transmit against unlawful or unauthorized access, manipulation, erasure, alteration, forwarding and use. These security measures are constantly enhanced and upgraded in accordance with the latest technological developments. The websites to which you transmit personal data are secured against third-party access by secure socket layer (SSL) encryption technology. You can check whether your connection to AXA's servers is secure by looking in the address line of your browser: If it begins with **https://**, the link is secure.

However, we would point out that the completeness, confidentiality and security of the data and its transmission on the internet cannot be guaranteed in general. We cannot be held liable for the

Who can I contact at AXA?

Please send any applications for data processing in **writing, enclosing a copy of your passport or ID card**, to the Data Protection Consultant:

Data Protection Consultant for property and life insurance as well as the two foundations

- **Letter:**
AXA Data Protection Consultant
AXA Insurance Ltd. / AXA Life Ltd.
IT Risk, Security & Compliance
Pionierstrasse 3
CH-8400 Winterthur
- **Email:** datenschutzanliegen@axa.li (unencrypted)

Data Protection Consultant for legal protection insurance

- **Letter:**
AXA-ARAG Data Protection Consultant
AXA-ARAG Legal Protection Ltd.
Legal, Compliance & Risk Management
Affolternstrasse 42
CH-8050 Zurich
- **Email:** info@axa-arag.ch (unencrypted)

Can I also contact a supervisory authority directly?

If you believe AXA has failed to comply with applicable data protection regulations, we would advise you to contact the above-mentioned AXA Data Protection Consultant in the first instance.

You can also file a complaint directly with the relevant data protection supervisory authority:

Data Protection Office (DSS)
Städtle 38
P.O. Box 684
9490 Vaduz

security of your personal data during transmission, only as of the time your data arrives in our systems.

Can I also visit the AXA website anonymously?

Generally, you do not need to login or identify yourself to use our website. However, in the context of the use of the website, we need to process your IP address in order to enable the functionality of the website and to send you the pages you request. The processing normally takes place based on legal provisions, as well as for the purposes of AXA's legitimate interests (provided GDPR is relevant pursuant to Art. 6 (1) (f)). Our legitimate interest is the operation of a website for advertising purposes and for general information and communication purposes as well as for the presentation of AXA.

If you visit our website in order to look into establishing an insurance contract with us (e.g. to find out about the contract conditions) or to manage or terminate an existing contract, the legal basis for the processing of your data, contrary to the above, is the implementation of pre-contractual measures or Art. 6 (1) (b) GDPR. When you use our premium calculator, your data is saved and further processed for product and service as well as policy issuing purposes. When personal data is entered we are able to identify you personally. This also applies to use of the customer portal www.myaxa.ch, since this requires registration. Registration is used to identify the user – and minimizes the risk of unauthorized parties being able to access data.

Is data on user behavior saved on the website?

The web server automatically saves the pages visited. In so doing, your IP address is also stored, and this history essentially comprises personal data. We use the history of pages visited for technical troubleshooting and to defend and police our systems against attacks. In addition, we evaluate the view history of the website, insofar as it is saved, in order to optimize the web pages. The evaluation as such follows in anonymous form, i.e. by summarizing view data so that the results can no longer be linked to any individuals. The processing normally takes place for the purposes of AXA's legitimate interests, provided GDPR is relevant pursuant to Art. 6 (1) (f). Our legitimate interest is to protect our equipment and systems against attacks and further develop our websites for commercial purposes.

Cookies / tracking

Cookies are used on AXA's websites. These are small files that are stored on your computer or mobile device when you visit or use our internet pages. By using our website, you agree to the use of cookies. Cookies store specific information about your exchange with a particular internet page via your browser. When a cookie is activated, it is assigned an identification number (cookie ID) enabling your browser to be identified and the information contained in the cookie to be used.

Most of the cookies we use are temporary session cookies that are deleted from your computer or mobile device automatically at the end of a browser session. In addition, we also use permanent cookies. These remain stored on your computer or mobile device after your browser session ends. Permanent cookies usually remain on your computer or mobile device for between 30 and 90 days and are deactivated automatically at the end of the set period of time.

Questions and answers on cookies / tracking

Why does AXA use cookies?

The cookies we use are designed to facilitate various functions on our websites. For example, cookies help us store your country and language settings as well as your shopping cart across different pages during an internet session.

By using cookies we can also record and analyze the user behavior of visitors to our internet pages. This enables us to make our internet pages more user-friendly and effective, and your visit to our internet pages as enjoyable an experience as possible. In addition, we can display information tailored to your specific interests.

We also use cookies to optimize our advertising. Cookies enable us to show you advertising and/or specific products and services that may be of particular interest to you based on your use of our website. Our objective is to make our internet service as attractive as possible and to show you advertising that is likely to match your interests.

What cookies does AXA use?

We use

- session cookies, generally required for the standard use of our websites. These cookies are necessary for the functional navigation of the website and to use certain website features, such as our tariff calculator, the email contact form, or the advisor search. This makes it easier for you as a user to navigate the various areas of our website comfortably and to optimal effect. We do this within the framework of our legitimate interest in operating a website with corresponding functionalities, for advertising purposes and for general information and communication purposes as well as for the presentation of AXA. In some cases, the use of these cookies is necessary for the functionality of the website, i.e. disabling these cookies may prevent individual functions from being used.

- Persistent cookies, i.e. function-related, performance-related or advertising cookies
 - Function-related cookies (persistent cookies) allow us to align our website to the personal preferences of our users by storing the entries and selections they make, such as the selection of a preferred advisor to load the respective broker homepage or the video player volume. These settings are only valid for your visit to our website and cannot be used by other internet sites. This is done to allow comprehensive use of the website and a better alignment to the personal preferences of each user.
 - Performance-related cookies (persistent cookies) help us measure the data traffic and the technical functionality of our website. This allows us to identify the areas of our website visited most often by our users and if any error messages appear on these pages. In this way, we improve the level of comfort for the use of our website. The purpose of the processing is therefore the improvement of the quality of the website and technical optimization.
 - We use advertising cookies (persistent cookies) to present the user with customized advertisements. We also use these cookies to monitor how often a user is shown certain ads.

The processing of these cookies takes place for the purpose of AXA's legitimate interests, provided GDPR is relevant pursuant to Art. 6 (1) (f). Our legitimate interest is to improve the user experience through the use of corresponding technologies. The use of cookies basically requires your consent. You issue this by continuing to use the website. You have the option of turning off the use of cookies on the page, cf. the table below (see question "How can the use of cookies and web analysis tools be prevented?").

Storage life

The maximum storage life of these cookies is one year (function-related cookies) or 2 years (performance-related and advertising cookies). They are deleted automatically following expiry of this period.

What data is collected?

Cookies record usage information such as the date and time our website was visited, the names of the internet pages visited, the IP address of your device and the operating system used. For example, cookies provide information about which of our internet pages you visit and the website from which you reached our internet page. We also use cookies to track the subjects you are searching for on our internet pages.

Do you also use third-party cookies?

The cookies or corresponding technologies stored on your computer or mobile device can also come from other companies in the AXA Group or from independent third parties such as advertising partners and internet service providers.

These cookies enable our partner companies to approach you with individualized advertising and to measure its impact. The cookies from partner companies likewise remain stored on your computer or mobile device for the period of time set by the third-party provider and are automatically deactivated at the end of this period. Our advertising partners only have access to data based on an identification number (cookie ID). This comprises online usage information such as which of our internet pages you have visited and the content you have used.

In the case of AXA customers who have registered, the online usage information containing details of the use of AXA products and services as well as demographic data such as age group, location and gender are linked and made usable for advertising partners. Our customers have the right to object to the use of such data by advertising partners by adjusting the settings via the partner company links shown below. See the table below (see question "How can the use of cookies and web analysis tools be prevented?").

What web analysis and tracking technologies does AXA use?

We use web analysis tools to obtain information about the use of our internet pages and to improve our web presence. These tools

usually come from a third-party provider. The information obtained for these purposes is transmitted to the third party's server through the use of cookies. These servers may be located abroad, depending on the third-party provider.

IP addresses are shortened when data is transmitted, so as to prevent individual devices from being identified. The IP address sent by your browser as a result of the use of tools from third-party providers is not linked to other data from this third-party provider.

This information is only transmitted by third-party providers on the basis of statutory requirements or in connection with the processing of order data.

We also use retargeting technologies on our web pages. This also enables us to target users of our internet pages with advertising on third-party websites. The advertising shown on internet pages is based on cookies in your browser, a cookie ID and an analysis of your previous usage.

When you access our internet pages from the European Economic Area (EEA), we only use the following cookies from third-party providers and tracking technologies to identify traffic from the EEA and to manage the use of tools as well as rectify faults and improve our internet pages:

- AT Internet
- Adobe Test & Targets
- Google Analytics
- Hotjar

If you want to block the use of these tools, you can proceed as described in the following section.

How can the use of cookies and web analysis tools be prevented?

By using our website, you agree to the use of cookies.

Most internet browsers accept cookies automatically. However, you can instruct your browser not to accept any cookies or to ask every time before a cookie is accepted on a website you visit. You can also delete cookies on your computer or mobile device by using the corresponding function on your browser.

A list of the technologies used, with information about the providers, the purpose of the technologies concerned, the corresponding options for preventing or restricting their use as well as additional information from the relevant providers can be found here:

Solution / purpose	Provider	Link
Adobe Test & Target / website optimization	Adobe Systems Inc. 345 Park Avenue, San Jose 95110-2704, CA, USA	Data protection Opt-out
AT Internet / website analytics	AT Internet 85 avenue John Fitzgerald Kennedy, 33700 Mérignac, France	Data protection Opt-out
Capture Media / advertising	Capture Media AG Löwenstrasse 3, 8001 Zurich	Data protection Opt-out
DoubleClick / advertising	Google Inc. 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA	Data protection Opt-out
Google AdWords Conversion / advertising	Google Inc. 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA	Data protection Opt-out
Google Analytics / website analytics	Google Inc. 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA	Data protection Opt-out
Google Dynamic Remarketing / advertising	Google Inc. 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA	Data protection Opt-out
Matomo / website analytics	Innocraft 150 Willis St, 6011 Wellington, New Zealand	Data protection Opt-out
Hotjar / website analytics	Hotjar Ltd. 3 Elia Zammit Street, St Julians 1000, Malta	Data protection Opt-out

If you decide not to accept our cookies, or the cookies and tools of our partner companies, you will not see certain information on our websites and will be unable to use some functions.

Social media plugins / pages

General information

We operate sites on the following social media platforms:

- Facebook
- Twitter
- Instagram

As well as ourselves, there is also the operator of the social media platform. This is another responsible party who is processing data but over whom we have only limited influence. Wherever we can influence the data processing parameters, we work, within the framework of the options available to us, toward the privacy-friendly handling of the data by the operator of the social media platform. In many places we are unable to influence the data processing by the operator of the social media platform and also do not know exactly what data is processed.

The purpose of the data processing and legal basis:

The purpose of the data processing by AXA on these social media sites is to inform customers about special offers, products, services, promotions, competitions, themes and company news, and to interact with the visitors to the social media sites on these themes, as well as to respond to questions, praise or criticism. Wherever the provider of the social media platform gives us the opportunity, we ensure that our social media pages are as compliant as possible with data protection legislation. As far as the statistics are concerned that are made available to us by the provider of the social media platform, we have only limited influence on these and cannot deactivate their collection. However, we make sure that we do not avail ourselves of any additional optional statistics.

Recipients:

The data you enter on our social media sites such as comments, videos, images, likes, public messages, etc. are published by the social media platform and are not used or processed by us at any time for any other purposes. We reserve only the right to delete unlawful content, should this be necessary. This includes, for example, posts that violate rights or are unlawful, hate comments, lewd comments (explicit sexual content) or attachments (e.g. images or videos) that may violate copyrights, personal rights, criminal law or our ethics principles. Where appropriate, we share your content on our site if this is a function of the social media platform, and communicate with you via the social media platform. The legal basis is Art. 6 (1) (f) GDPR. The data processing is conducted in the interest of our public relations work and communication with you.

If you send us an inquiry on the social media platform, we may refer you, depending on the required answer, to a different, secure communication channel that guarantees confidentiality. You always have the option of sending us confidential inquiries to the address below under Responsible parties (see question "Who can I contact?").

Retention period:

All personal information that you send us with inquiries (suggestions, praise or criticism) via secure message will be deleted or anonymized by us no later than 90 days after we have sent our final response. The retention period of 90 days is explained by the fact that it may occasionally occur that you as our customer contact us again about the same thing in search of an answer. We can then refer back to the previous correspondence. Experience has shown that, in general, we no longer receive queries about our replies after 90 days.

All public posts by you on this social media site remain in the timeline for an unlimited period unless we delete them due to the update of an underlying theme, a breach of the law or a violation of our guidelines, or you delete the post yourself.

With regard to the deletion of your data by the operators themselves, we are unable to intervene. Here, the data protection provisions of the relevant operator apply additionally.

The purpose of the data processing by the operator of the social media platform:

The operator of the social media platform employs web-tracking methods. Web tracking is also possible regardless of whether you are registered or logged in to the social media platform. As mentioned above, we are unfortunately unable to influence the web-tracking methods of social media platforms. We cannot, for example, turn off the function.

Please be aware: It cannot be excluded that the provider of the social media platform uses your profile and behavioral data, e.g. to evaluate your habits, personal relationships, preferences, etc. We have no influence on the processing or sharing of your data by the providers of social media platforms.

For more information on the processing of data by the providers of social media platforms and further objection options, please refer to the data protection policy of the provider.

Information pursuant to Art. 26 (2) GDPR:

A relationship according to Art. 26 (1) GDPR (joint responsibility) exists with the operator of the social media service. In this context, the operator manages the entire IT infrastructure of the service, maintains its own data protection provisions, maintains its own relationship with you (if you are a registered user of the social media service), and is also responsible, together with us, for the deletion of unlawful or inappropriate posts and content on the page. In addition, the operator is solely responsible for all questions regarding the data in your user profile to which we, as a company, have no access. The operator has no influence on the processing of your data carried out by us in the context of customer communication or competitions.

If you wish to exercise your rights concerning a specific instance of data processing on which we do have influence, please do not hesitate to contact us. We will check your request (e.g. request for information, objection) ourselves or forward it if necessary to the relevant social media platform if your request concerns data processing carried out by the operator of the social media network. On our internet pages we also use social plugins, which are identifiable through the logo of the social networking site concerned. We use social plugins on the basis of our legitimate interests (i.e. the optimization and needs-oriented design of our website, provided GDPR is relevant within the meaning of Article 6 (1) (f)).

How and why does AXA use social plugins?

All plugins used are installed using a 2-click process. This means the plugins concerned are only activated when you click on the provider's icon.

When you visit a page of our website containing an activated plugin, your browser establishes a direct link to the provider's servers. The content of the plugin is directly transmitted to your browser by the relevant provider and incorporated into the page. Through incorporation of the plugin, specific information is sent to and stored by the third-party provider.

Even if they are not a member of the relevant social networking site, they are still able to obtain and store your IP address via the social plugin. When you are logged into one of the social networking sites, the third-party providers can directly assign your visit to our website to your personal profile on the social networking site. If you interact with the plugins, e.g. by clicking the "Like," "+1," "Twitter" or "Instagram" button, the corresponding information is likewise sent directly to and stored on a server belonging to the third-party provider. The information is also pub-

lished on the social networking site, Twitter or Instagram account, and displayed to your contacts there. For information about the purpose and extent of data collection and the further processing and use of data by third-party providers, as well as your associated rights and possible settings for

protecting your privacy, please consult the third-party providers' data protection provisions. A list of the plugins used by us and further information from the respective providers follow here. Please pay particular attention to the data protection provisions on the websites of the respective providers:

Solution	Provider	Link
Facebook	Facebook Inc. 1601 S. California Ave., Palo Alto, CA 94304, USA	Data protection Plugins
Instagram	Instagram LLC 1601 Willow Road, Menlo Park, CA 94025, USA	Data protection Plugins
Twitter	Twitter Inc. 795 Folsom St., Suite 600, San Francisco, CA 94107, USA	Data protection Plugins

If you want to prevent Google, Facebook, Twitter or Instagram from assigning the data collected via our web presence to your personal profile on the social networking site concerned, you need to log out of the relevant social networking site before accessing our website. By using specialized add-ons for your browser, such as NoScript (<https://noscript.net/>) or Ghostery (<https://www.ghostery.com/>), you can completely prevent plugins from being loaded.