

PRIVACY NOTICE

1. Protecting your privacy: **together**, we ensure it

At Agallis, we believe that your privacy is important. Very important. We handle it with the utmost care. We process your personal information transparently and according to the law. In this privacy notice, we explain why and how we do it, as well as what you can do to help us. Because we ensure your privacy's protection together.

Your privacy is an extremely valuable asset

We have the task, within the scope of the services we provide, to collect, store and process certain data pertaining to you. To do so, we always proceed with the utmost care, transparently and, of course, in accordance with the law. We also sometimes ask for your help. Together, we ensure your privacy's protection.

Who are you?

This Privacy Notice concerns all physical persons, whether they are policyholders (or prospects or applicants), the insured, beneficiaries or third parties (for example: prejudiced parties, witnesses, experts, etc.). This Privacy Notice does not concern legal entities.

Who are we?

Agallis, with registered office at Cantersteen 47, B 1000 Brussels, VAT BE 0403.295.712 (RLE – Brussels). From a legal standpoint, Agallis is the “data controller” of your personal data. This means that we determine why (for what purpose) and how (by what method) we process your data. This also means that we are your point of contact, and that of the supervisory authorities, for any questions relating to the use of your data. Do you have questions concerning your privacy? Send us an email or a letter. Our Data Protection Officer, or DPO (that is, our specialist on the subject) will contact you within a month. Agallis, Data Protection Officer, Cantersteen 47, 1000 Brussels, privacy@agallis.be

Which laws are concerned, exactly?

Until 24/05/2018, this concerns the Act of 08/12/1992 on the protection of privacy with regard to the processing of personal data and its implementing decrees.

As of 25/05/2018, this law is replaced by (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, repealing Directive 95/46/EC (General Data Protection Regulation).

2. Your privacy concerns **YOU**

2.1. Why?

The answer is simple: it is about you.

Your name, your photo, your telephone number, your code, your password, your contract number, your email address, etc. are data which belong to you. As a person. It's why they are referred to as “personal data”.

What personal data about you do we store, and why?

Depending on the type of insurance, we store various types of personal data about you.

We do it to: **identify you**

first name, last name, date of birth, address, vehicle registration number, etc., but also technical data such as the identification data of the devices you use (IP address, for example). In short, anything which can help Agallis verify that it's really you.

contact you (securely)

address, telephone number, email, etc.

serve you better

your insurance products and their use, your family status (marital status, children, etc.), your life habits, preferences and interests (hobbies, etc.), your overall financial position (real estate, etc.), your activity (profession, educational background, etc.), your health, your housing characteristics, and your video and audio recordings.

Note: This sometimes involves not only your data, but that of a person you know, too. This could be, for example, your children, your partner, the beneficiary of a life insurance policy, your employees, etc. or a person involved in an incident, such as a victim or a witness. If you share data about these people with us, you must inform them.

We also process your sensitive personal data with the utmost care.

Certain personal data justifiably benefit from special protection. This is the case, notably, for data which indicate racial or ethnic origin, political opinions, religious or philosophical beliefs or union membership, and also genetic data, biometric data for the purposes of uniquely identifying a natural person, health data or data concerning the sex life or sexual orientation of a natural person. We do not process this type of data.

But, when we manage an insurance contract relating to your health (life insurance or hospital insurance, guaranteed income, etc.) or when we handle an incident with bodily injury, we need data relating to your health.

Note: As with your other personal data, we handle this data with the utmost care. Agallis does not, in any case, use this data for marketing purposes. We only process it with your express prior consent. To this end, we include a clause in our contractual documents and standard forms in which we ask for your consent. We may also process this data for the establishment, exercise or defense of legal claims.

Access to this data is limited to those persons who need it to accomplish their tasks. These persons may handle your data exclusively under the responsibility of a health professional and for the purpose for which you have given your consent. If we wish to process data relating to your health for another purpose or without the responsibility of the health professional, we will also ask for your consent.

We also handle personal data relating to criminal convictions and offences with the utmost care. What does this mean?

In order to provide our services, we handle data relating to criminal convictions and offences. We only do so if a law providing adequate safeguards permits us to or if we need the data for litigation management. As with sensitive data, we handle this information with extreme care. We never use this data for marketing purposes.

2.2. What?

A great deal.

If you want, you can consult your data and have it corrected. In certain cases, you may even have it deleted. Sometimes, you may also oppose the use of your data, refuse that your data be handled completely automatically or ask that it be transmitted to you or a third party. You may also refuse, at any time, to receive commercial information about our products and services.

You can consult your data. What does this mean?

You can ask us:

- if we process personal data concerning you or not;
- why (for what purpose) we process it;
- which categories of your personal data we process;
- with which recipient categories we share your data;
- how long we store your data;
- additional information on the rights you can exercise (correction, deletion, etc.) or on the possibility of lodging a complaint with the data protection authority;
- the origin of the processed data;
- the logic behind the automated processing (including profiling) of some of your personal data.

You can have your data corrected. What does this mean?

It means that we do our best to store your data in the most accurate and complete way possible. Nonetheless, if you find that the data is incomplete or incorrect, you can request to have it corrected. We will gladly do so. We must use accurate data.

You can have your data erased. What does this mean?

You have the right to be forgotten.

You can request that we delete the data we keep about you. Deletion is possible if:

- the data is no longer necessary for the purposes for which we have collected it;
- you gave us your consent to process your data and you decide to withdraw your consent;
- you are opposed to the processing of your data and we have no reason to counter your opposition;
- you gave your consent when you were a minor and you wish to withdraw it today because you have understood the risks inherent in processing your data.

Note: in some cases, we have the right, despite everything, to keep your data. For example, if we are required to under a legal obligation or for the establishment, exercise or defense of legal claims.

You can request that the processing of your personal data be limited. What does this mean?

You can ask us to intervene if you feel that:

Certain personal data is incorrect and the time needed for us to verify if it is correct has not yet passed;
your data is no longer necessary, but you need it for the establishment, exercise or defense of legal claims.

Note: in some cases, we have the right, despite everything, to continue processing your data. For example, if you inform us that limiting the processing of your data is no longer necessary, or if your data must be processed for the establishment, exercise or defense of legal claims. It is also possible that the processing of your data is necessary in the public interest or in order to protect the rights of a physical person or legal entity.

You can refuse that decisions be taken based exclusively on automated processing, including profiling. What does this mean?

It means that a decision in your file cannot be based only on the automated processing of data, including profiling, if this decision can have legal effect or similar significant consequences for you. The law provides for it, but we are also firmly committed to this. We feel that optimal service stems from an individual approach to each file.

As we know the impact our decisions can have on your life, Agallis always ensures significant human intervention in each file and guarantees there will be no legal effect or major consequences for you. In other cases, we guarantee that our decisions:

are necessary to conclude or execute a contract between you and us;
are based on your explicit consent; or are legally authorized.

Note: if we make decisions based exclusively on automated processing, including profiling, which have legal effect or similar significant consequences for you, we will inform you. Furthermore, we will explain why we have taken the decision and what the expected consequences are. If you have questions or if you are not in agreement with the decision (unless it consists of a processing permitted by law), let your contact person at Agallis know.

You can request that your data be transmitted to you or a third party. What does this mean?

It means that you can ask us to transmit your data to you or directly to another data controller, on condition that it is technically possible to do so.

Note: You may request this transmission if you have given consent for the processing of your data or if the processing is necessary for the execution of a contract and if processing is automated.

You can withdraw your consent. What does this mean?

Suppose you have given your consent for the processing of your data, but you wish to reverse your decision. It's possible.

Note: If you reverse your decision, it does not mean we will cancel already completed processing of your data. The already completed processing remains valid. It can also mean that, due to the withdrawal of your consent, it will be impossible for Agallis to complete its intended purpose and/or to follow up on your intervention request.

You can oppose the processing of your data. What does this mean?

If you feel that we shouldn't process your data, you can oppose processing at any time. This is the case, for example, if processing your personal data is based on the public interest or a legitimate interest on our part.

Note: In some cases, we cannot take your opposition into account. For example, if our legitimate interest outweighs yours or if the processing of your data remains necessary for the establishment, exercise or defense of legal claims.

You can also oppose the processing of your data for direct marketing purposes. What does this mean?

You can inform us, at any time and at no cost, that you do not want us to process your data for direct marketing purposes. You may also notify us that we cannot use your data for profiling purposes if it involves direct marketing.

To do so, you may proceed in one of two ways:

check the box on the contractual documents, or if need be, notify your intermediary at the conclusion of your contract; or

send us a letter, dated and signed, with a copy of both sides of your identification card attached. Our Data Protection Officer, or DPO (that is, our specialist on the subject), will contact you within a month.

Agallis, Data Protection Officer, Cantersteen 47, 1000 Brussels, private@agallis.be

2.3. How?

It's easy. Send us an email or a letter, with a copy of both sides of your identification card attached. Our Data Protection Officer, or DPO (that is, our specialist on the subject), will contact you within a month.

Agallis, Data Protection Officer, Cantersteen 47, 1000 Brussels, private@agallis.be

You decide!

Always be as precise as possible when you wish to exercise your rights. This will enable us to process your request correctly and exactly as you wish. In order to prevent a third party from exercising your rights, it's important that you attach a copy of your identification card.

3. Your privacy, We take (the utmost) care thereof

3.1. Why?

It's natural that we store your data to be able to reach you quickly and better assist you. However, we also use the data to provide you with commercial information about our products and services which are of interest to you. We also use your data, notably, to comply with our legal obligations, to prevent fraud and to optimize our internal procedures.

We process your personal data for various reasons. During each processing, only the data which is pertinent to achieving the intended purpose is processed. The nature of these purposes and the exact manner in which your data is processed is explained under 3.2 ("What?").

We want to reach you quickly and assist you correctly. What does this mean?

It means that we do everything we can to process your stored data in the most precise manner possible. The manner in which we proceed is explained under 3.3 (“How?”).

3.2. What?

If we use your data, we are responsible for its processing. What exactly do we do with your data? Many things: collection, registration, organization, structuring, storage, adaptation or modification, extraction, consultation, usage, disclosure by transmission, dissemination or otherwise making available, reconciliation or interconnection, restriction, deletion or destruction.

We handle your data with the utmost care. What does this mean?

It means that we process your personal data on a legal basis and for specific purposes.

What are the legal bases?

We process your personal data for contract execution or to take precontractual measures at your request, for example, when we:

- wish to analyse an opportunity to conclude an insurance contract or the conditions which must be attached;
- conclude, manage and execute insurance contracts which are part of the range of services offered by Agallis, including client relationship management and claims management;
- keep a record of contact moments (the most recent ones) in order to know their frequency and to maintain them at an acceptable level;
- save your preferences, to know if and how Agallis can contact you to send you information, advertising or offers;
- perform a service you have requested, for example, by disclosing your data to us online in order to subscribe to our newsletter, apply for a job or request an insurance quote. In this case, we process the data you share with us in order to send you the newsletter, process your application or provide you with the insurance quote you requested.

Furthermore we must fulfil various **legal, regulatory and administrative obligations**, such as:

- preventing money laundering;
- applying the MiFID legislation;
- combatting tax evasion;
- fulfilling Agallis’s tax obligations.

It’s also possible that your personal data is processed for our legitimate interests. In this case, we endeavor to maintain a fair balance between our legitimate interests and your right to privacy. These are situations in which we process your personal data in order to function better and offer you the best service possible.

For example, we process your data to:

- detect and prevent misuse and fraud;
- protect company assets;
- protect assets and persons, but also Agallis’s networks and computer systems;

report any abuse resulting (or which could result) in serious harm to Agallis's financial position, results and/or reputation;

verify the legality of transactions;

monitor and audit;

establish, exercise, defend and protect our rights and those of persons we may represent (during litigation, for example);

use as evidence;

get a global picture of our clients (for example: by producing statistics on our clients so as to know who they are and get to know them better);

follow our activities and our administrative knowledge of different persons in relation with the company and thereby allow, if need be, the identification of files or other players;

test, evaluate, simplify, optimize and/or automate Agallis's internal procedures in order to make them more efficient (for example: optimization/automation of internal risk assessment and acceptance procedures, automation of the procedure for handling your questions and requests, etc.);

test, evaluate, simplify and optimize online systems in order to improve your user experience (for example: fixing bugs on our website; contacting you to solve technical problems when we note that you started filling in your information online to benefit from a service but you weren't able to continue the process, etc.);

As an insurance partner of BNP Paribas Fortis, data can also be exchanged between Agallis and BNP Paribas Fortis insofar as you, as a customer of BNP Paribas Fortis, make use of Agallis services.

manage and adjust authorized products;

prospect;

develop new services which we know will meet your needs and expectations even better.

Finally, we also process your personal data, in certain cases, if you have given **your consent**. We do so for the specific purposes for which you have given your consent.

We process your data for direct marketing purposes. What does this mean?

We process your personal data for direct marketing purposes based on our legitimate interests. We only send you proposals and offers which we are completely convinced will interest you and will be of use to you. A few marketing examples:

If you have purchased a retirement savings product, a private complementary pension for the self-employed or other similar product, we want to inform you of the indexing of tax deductible amounts and thereby optimize your subscribed products with regard to taxes.

if you purchased an investment product, we may wish to inform you of other investment opportunities offering a better return or of investment opportunities after the liquidation of the investment;

if you receive a pension, we may wish to advise you on your options at this important stage in your life; for example, through a financial counselling service.

we may also simply want to inform you of insurance products which may suit you.

Note: Under no circumstances will Agallis transfer your data to a third party for their own direct marketing or send offers or proposals concerning third-party products and services. Direct marketing as meant by Agallis is limited to offers and proposals relating to products and services available from Agallis only.

How does Agallis contact you for direct marketing purposes?

For direct marketing, Agallis may contact you through traditional means (for example, by telephone or post) or by electronic means, such as email. If we contact you by email, we will only send you offers relating to similar products and services, namely insurance products.

What data do we use for direct marketing purposes?

It is important to us that you know that we treat your data with care in this context as well. We only use data for marketing, which:

- you have directly or indirectly disclosed during your contacts with Agallis (for example: if you have informed us you only wish to be contacted for marketing by email or that you only wish to be contacted about non-life insurance products);
- we have obtained during interactions between us (concerning your invoice payment habits, accident rate, etc.)

Note: This data may sometimes be corrected by a professional data provider to ensure that we have correct and current data.

What data do we not use for direct marketing purposes?

Under no circumstances do we use personal data of special categories (for example: data which indicates racial or ethnic origin, political opinions, religious or philosophical beliefs or union membership), or data relating to criminal convictions and offences.

How do we know we are sending you offers which are of interest to you?

In order to ensure that you receive offers which are of interest to you and which are best adapted to your needs and expectations, Agallis may also use your personal data for profiling and to make decisions based on the profile generated for direct marketing purposes. This means that:

we establish general or specific client profiles to better predict your needs, behaviors and/or purchasing potential.

Notably:

- the policyholder category to which you belong;
- your risk profile for investment-type insurance, namely a summary of your skills and experience, your financial stability and/or your investment goals;
- the extent to which your characteristics as a client correspond to a model (for example, your behavior when choosing products tends to indicate that certain insurance products or services could be useful to you);
- a "pivotal moment", for example: your first job, a new job, your marriage, a car or home purchase, the growth of your family or your retirement, where certain insurance products or services could be useful;
- your expectations of Agallis in terms of service. For example: your willingness to always take the initiative in insurance matters, your desire to receive a periodic commentary on your portfolio, etc.

we track the signals you give us about the products offered by Agallis. For example:

- participation in a contest;
- conducting a simulation;
- using an application;
- requesting information (for example, a brochure on housing or succession planning);- future events (for example, a new home or car purchase or the growth of your family).

we proceed to analyses all of the products and services you use in order to potentially offer you similar products and services which could provide an overall benefit;
we measure your (sub-)optimal usage of a product or service to potentially offer you other products or services which are better adapted to your personal situation.

Note: In certain cases, we will explicitly request your consent to send you offers and proposals. This could notably be the case when you request an insurance quote online or participate in a contest.

We process your personal data for profiling for the purposes previously listed under 3.2. What does this mean?

We sometimes process your personal data for profiling purposes and to make decisions based on a given profile, including analyzing data and establishing statistics, models and profiles.

What exactly is profiling?

Profiling is a form of automated personal data processing which consists in using data to assess certain personal aspects of an individual. For example, we analyses or predict elements relating to work performance, financial situation, health, personal preferences, interests, reliability, behavior, location and travel. Insofar as possible, we only use anonymous or pseudonymised data for profiling.

What do we base it on?

It depends on the purpose of the profiling. It can consist of:

the need to execute a contract or take precontractual measures at your request. For example, in order to correctly assess risk (to accept insurance and the extent of the guarantees), we use objective “segmentation criteria” which are in full compliance with all legal requirements. These criteria vary depending on the product and are based on statistical findings which show us they can have an impact on the occurrence of an incident and/or its severity.

a legal, regulatory or administrative obligation;

our legitimate interests. In this case, we endeavor to maintain a fair balance between our legitimate interests and your right to privacy. For example, we can process your data for profiling for direct marketing purposes or to detect and prevent fraud, as well as for automating internal procedures; your consent.

As we know the impact our decisions can have on your life, Agallis always ensures significant human intervention in each file and guarantees there will be no legal effect or major consequences for you. In other cases, we guarantee that our decisions:

are necessary to complete or execute a contract between you and us;
are based on your explicit consent; or are legally authorized.

Note: if we make decisions based exclusively on profiling which have legal effect or similar significant consequences for you, we will inform you. Furthermore, we will explain why we take a decision and what the expected consequences are. If you have questions about this or if you are not in agreement with the decision (unless the processing is permitted by law), let your contact person at Agallis know.

You want to know which data about you we store and process?

You can contact our Data Protection Officer, or DPO, who is our specialist on the subject. Send them an email or letter and they will respond within a month.

Agallis, Data Protection Officer, Cantersteen 47, 1000 Brussels, privacy@agallis.be

3.3. How?

With the utmost care. Agallis's staff don't all have access to your data. Only persons in charge of your file can consult and handle your data. These individuals are held to a strict obligation of confidentiality of which they are fully aware. But that's not all. Our specialized teams ensure that, from a technical standpoint, it's impossible for unauthorized persons to have access to your data. Furthermore, we do not store your data for longer than necessary, or as provided for by law.

How do we collect your personal data?

We collect your personal data when:

you become our client;
you fill out forms and contracts which you submit to us;
you use our services and products;
you subscribe to our newsletters, respond to our invitations (for example, conferences), participate in contests, etc.;

you contact us through the channels at your disposal; your data is published or transmitted by:

- authorized third parties (persons you have specially mandated, the Belgian Official Journal, businesses belonging to Agallis groups); or
- professional data providers;

you are filmed by security cameras in our buildings and their surroundings. This footage is recorded solely for the purpose of guaranteeing the safety of persons and property as well to prevent abuse, fraud and other offences which we and our clients could be victims of (their presence is indicated by stickers with contact information);

you disclose data while using our website. For example, when:

- you disclose data when subscribing to the Agallis newsletter;
- you request an insurance quote online;
- you submit a claim for an accident or request personalized assistance;
- you report a hospitalization.

In some cases, we also use data obtained from external sources, such as employers who enter into insurance contracts for their employees. The source can also be a professional data provider to correct data (the spelling of your address, for example) and for data enrichment (the composition of your family, for example).

Note: When we request your personal data, you have the right to refuse. Your refusal could, however, prevent the creation of contractual relationships, modify their nature or influence their management.

How do we protect your personal data?

We handle your data with utmost care.

We limit access. What does this mean?

Only the persons who require your data to complete their tasks have access to your personal data. Furthermore, these persons are held to a strict confidentiality obligation and must respect all technical and organizational requirements necessary to guarantee the confidentiality of personal data.

Your data may be disclosed not only to our staff, but also to other intervening insurance companies, to their representatives in Belgium, to their international contacts, to claims settlement agencies, to an appraiser, to a lawyer, to a technical advisor, or to a subcontractor.

Agallis's subcontractors are specialized partners in Belgium or internationally whom we rely on for certain services in order to provide you with the best service for your insurance contract. They can be typical insurance sector subcontractors, for example:

private investigators for fraud investigations;
(international) claims settlement agencies;

They can also be other subcontractors. For example:

lawyers and other advisors;
information technology providers;
marketing and communications agencies.

Note: These subcontractors are contractually bound to us and must, consequently, follow our instructions as well as the principles stated in our Privacy Notice. Agallis ensures, in particular, that the subcontractors:

only have access to the data necessary to accomplish their tasks;
commit to Agallis to, on the one hand, process the data securely and confidentially and, on the other, to only use it to complete their tasks.

We also forward your data to other parties if we are required to do so under a contractual or legal obligation or if justified by a legitimate interest. In this case, we ensure that:

they only have access to the data which we must provide under the contractual or legal obligation or which is transmitted by virtue of a legitimate interest which justifies its transmission; and
they commit to Agallis to, on the one hand, process the data securely and confidentially and, on the other, to only use it for the purpose for which it was provided to them.

We DO NOT transmit your data to third parties for commercial use.

We sometimes transmit your data internationally. Why?

It's possible that we may transmit your data outside of the European Economic Area (EEA) to a country which may not be able to guarantee an adequate level of protection for personal data. Nonetheless, in this case as well, Agallis protects your data by, on the one hand, strengthening information security, and by, on the other, contractually requiring an increased level of protection from its international counterparts. If you wish, you may obtain a copy of the relevant contractual clauses by sending a request by post, signed and dated, to Agallis, Data Protection Officer, Cantersteen 47, 1000 Brussels, or by email to privacy@agallis.be

We do everything we can on a technical level to protect your data. What does this mean?

We have technical means and specialized teams dedicated to the protection of your personal data. We want to ensure that unauthorized persons cannot access, process, modify or destroy your data.

Note: Our website may sometimes contain links to third party websites (social networks, event organizers we sponsor, etc.) whose conditions of use do not fall under the scope of this Privacy Notice or our responsibility. We therefore recommend that you carefully read their personal data protection notice to find out how they protect your privacy

How long do we store your data?

No longer than necessary. We only use your personal data if there is a specific purpose and for the time needed to accomplish that purpose. Once the purpose has been achieved, the data is deleted.

As a result, the processed data is kept for the full duration of the insurance contract, the legal limitation period and any other storage periods mandated by applicable legislation and regulations.

Do you have questions about your privacy?

Send us an email or a letter. Our Data Protection Officer, or DPO (that is, our specialist on the subject), will contact you within a month. Agallis, Data Protection Officer, Cantersteen 47, 1000 Brussels, privacy@agallis.be

Do you want to submit a complaint with regard to how we protect your privacy?

Your contact: Data Protection Authority, Rue de la Presse 35, 1000 Brussels, commission@privacycommission.be,

+32 2 274 48 00.

You can stay informed of any changes to this Privacy Notice. What does this mean?

In a changing world where technologies evolve constantly, this Privacy Notice may be subject to modifications. We always ensure that the most recent version of the Privacy Notice can be accessed online www.agallis.be

