# Information notice on the protection of personal data

# Protection of your personal data is a priority for Allianz!

Allianz Life Luxembourg S.A. is an insurance company under Luxembourg law and a member of the Allianz Group. It is approved to provide insurance and capitalisation services on the local market or outside the Grand-Duchy of Luxembourg. Protection of your personal data is an absolute priority for Allianz Life Luxembourg and the whole Allianz Group. This notice explains to you the purpose of collecting your personal data and how we use it. We request that you carefully read the following.

# ARTICLE 1: Who is the "Processing Manager"?

Pursuant to the applicable regulations, Allianz Life Luxembourg S.A. is the Processing Manager of your data that we collect. To this end, we are responsible for the way in which these data are processed, sent and stored.

## ARTICLE 2: What categories of data are processed?

Allianz Life Luxembourg S.A. is already your insurer or is likely to become so to provide you with insurance or capitalisation services or protect you against different risks for your benefit or that of named beneficiaries, where applicable. To successfully complete our insurer work, we must collect some of your personal data.

According to the intended purpose, the categories of data are the following:

- Personal identification data (last name, first name, address(es), telephone number, date of birth, gender, nationality, ID document or other administrative identifiers, signature, etc.)
- Electronic identification data if access is granted to Allianz applications (IP address, email address, etc.)
- Financial data (account number, revenue, etc.);
- Data on your civil or professional status (civil status, family composition, profession, etc.)
- Data on the policies taken out with Allianz Life Luxembourg (policy number, cover, value, movements and changes made, etc.)

In some cases, we also process "special categories of data" within the meaning of European regulations, such as those on health, offences or convictions.

In any case, Allianz Life Luxembourg S.A. ensures that only suitable and relevant data with regard to what is necessary for the purposes declared are collected, processed and stored.

You are not legally obligated to send us the personal data that we request but, if you do not send it, we may not be able to provide the products and services wanted, offer you the services that may interest you, adapt our offers to your needs or manage your insurance policy or capitalisation or even your claims.

ARTICLE 3: How do we obtain and use your personal data?

We gather and use the personal data that you provide to us or that we have received via your insurance broker, advisor or legal representative and this, for the purposes stated below.

We collect and process your personal data exclusively for the following purposes1:

- assessment of the risk to be insured by your policy
- management of the commercial relationship with you, with your insurance broker or with commercial partners, via the Internet and social networks, including the promotion of our insurance products
- management of your insurance policy or any losses covered by your policy<sup>2</sup>
- the sending of information on your insurance situation
- monitoring of our company's insurance policy
- prevention of insurance abuse and fraud

For each purpose listed above, the collection and processing of data is:

- performed pursuant to the regulations on protection of personal data, including European Regulation (EU) 2016/679 of 27 April 2016,
- legally justified
- either on the basis that the processing is required for the execution of a policy in which you have a stake or for the execution of pre-contractual measures taken on your request
- or on the basis that the processing is necessary with respect to a legal obligation to which we are subject
- or through your consent
- or an interest recognised as legitimate by us (prevention of fraud, assessment and monitoring of the portfolio, etc.).

Data sent by you or on our request on health means that you expressly give your consent for their processing within the limits and terms specified in this notice.



<sup>2</sup> Unless data on health are collected, the processing is legally justified due to the fact that the processing is necessary for the execution of a policy in which you have a stake or for the execution of pre-contractual measures taken on your request (article 9 (2) (a) of European Regulation (EU) 2016/679 of 27 April 2016).



# ARTICLE 4: Who has access to your personal data?

We will ensure that your personal data are processed in a way that is compatible with the objectives stated above.

These data are shared with some of our departments strictly in keeping with the tasks entrusted to them. It concerns members of the policy or claims management departments, the legal and compliance department, internal audit and the IT department. Within the limited context of the aforementioned purposes and insofar as this is necessary, we also share your personal data with your broker, any bank with which you have decided to pledge your policy, our re-insurer, our auditors, assessors, legal advisers and with the competent Luxembourg or foreign authorities (e.g. in the event of execution of the tax mandate that you have given us or in relation to our FATCA and CRS reporting).

#### ARTICLE 5: Where will your personal data be processed?

Your data are processed at Allianz Life Luxembourg S.A. For security reasons and backing up your data, the latter are also transferred to an approved Digitalisation and Storage Service Provider located in Luxembourg, also in charge of their back up. For these transfers, Allianz Life Luxembourg S.A. has put in place agreements that are very stringent and comply with European regulations, which set out in a concrete way our commitment to protecting the processing of your personal data in an appropriate manner.

# ARTICLE 6: What are your rights with regard to your personal data?

When the applicable regulations allow it, you have the right to:

- access the data that we hold on you
- rectify them if they are inaccurate or incomplete
- delete them in certain circumstances as, for example, when they are no longer necessary for the purpose required during their collection and processing and when we have not already carried it out under application of our data storage policy
- restrict processing in certain circumstances as for example the restriction on the use of a piece of data, for which you dispute the accuracy during the period when we must verify it
- file a complaint with the competent authority for data protection of your country and/or the Grand-Duchy of Luxembourg (Commission Nationale de Protection des Données CNPD)
- object to the processing if it is based solely on the pursuit of our legitimate interests
- the portability of your personal data, i.e. the right to receive the personal data that you have provided to us in a structured format, commonly used and readable or to have them sent directly to another processing manager
- withdraw at any time your consent to the processing of your data, without this being able to compromise the lawfulness of the processing based on the consent given before this withdrawal and unless the processing is based on a legal basis other than such consent

To exercise these rights, you simply need to follow the procedure stated in point 9 below.

# ARTICLE 7: How and when can you object to the processing of your data?

If the regulations in force allow it, and notably if processing is only justified by the pursuit of our legitimate interests, you have the right to object to the processing of your personal data or to prohibit us from processing them (including for direct marketing). Once you have notified us of this request, we will no longer process your personal data, unless it is authorised by the regulations.

You can exercise this right in the same way as for your other rights by following the contact procedure stated in point 9 below.

ARTICLE 8: How long do we store your personal data?

We will store your personal data as long as required to complete the purposes stated above or as long as required by law. The time limit for storing contractual and claims management data terminates at the end of the legal time limit that follows the closing of the last claim covered by the insurance policy. Therefore, the time limit varies sharply from one insurance policy to another.

# ARTICLE 9: How can you contact us and exercise your rights?

You can send your questions concerning the processing of your personal data and exercise your rights cited above with the Data Protection Officer (DPO) either by email to privacy@allianz.lu, or by letter to: Allianz Life Luxembourg S.A., Direction Juridique et Compliance / DPO, 14, Boulevard F.D. Roosevelt, 2450 Luxembourg, Grand-Duchy of Luxembourg. We will answer you personally. A copy of both sides of your current ID must also be sent to us.

Any complaint concerning the processing of your personal data can be sent to the postal and email addresses stated above or to the data protection authority, namely for Luxembourg the Commission Nationale de Protection des Données (CNPD), 1, Avenue du Rock'n'Roll, at 4361 Esch-sur-Alzette, Grand-Duchy of Luxembourg (www. cnpd.lu).

For further information, please view our "Documents" page on our website at https://www.allianz.lu/Public/GDPR

#### ARTICLE 10: How often do we update this notice?

In order to fully comply with the regulations in force, Allianz Life Luxembourg S.A. undertakes to update this notice each time it proves to be necessary. The latest version is automatically displayed on our website.

After having read the above information notice regarding data protection which is also available on the Internet from Allianz Life Luxembourg S.A. *www.allianz.lu*, I acknowledge to have understood the terms.