POLICY

1. Our commitments

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Group entities are committed **to complying with regulations on the protection of personal data**. They guarantee that the use of such data complies with legal and regulatory requirements, and respects the rights of the persons concerned.

The brand's entities have appointed a Data Protection Officer, formerly known as Correspondant Informatique et Libertés (CIL) since 2012, to ensure compliance with requirements and coordinate the actions of the various entities with regard to data protection.

Trained and certified specifically in data protection and the application of the General Data Protection Regulation (EU) 2016/679, of 27/04/2016, known as the "**GDPR**", the Data Protection Officer is declared to the European supervisory authorities, for whom he is the main contact.

All Group entities, whatever their roles and responsibilities in the processing (Data Controller or Subcontractor), undertake to collect (directly or indirectly) and process personal data in a lawful manner, based on the legal grounds provided by the regulations:

- > For precise objectives (explicit, legitimate and specific purposes) made known to the persons concerned,
- > Fairly and transparently; no data is collected without people's knowledge,
- > Strictly limited to what is necessary for the collection of data (minimization),
- > By implementing technical and physical means to guarantee data confidentiality and security,
- By keeping data only as long as necessary for the purposes for which it was collected and processed. However, these periods may be extended in order to comply with legal obligations and time limits applicable to processing.

Group entities ensure that data is treated with the utmost security and confidentiality.

Right from the design stage, they implement all the human, material, logical and physical resources required to ensure a high level of security. These measures are adapted according to the sensitivity of the data processed and the level of risk presented by the processing or its implementation.

Group entities undertake never to sell the personal data they process, whatever the context or purpose of the processing.

POLICY

2. Use of personal data

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Data is kept for as long as is necessary to achieve the purposes for which it was collected and processed. However, these periods may be extended in order to comply with legal obligations and applicable statutes of limitation, depending on the type of processing.

Data is processed mainly for the purposes listed below:

- > Delegation of insurance business management
- Health Services
- > Digital Trust Services
- > Digital Finance Service

3. Data transfer control

Group entities communicate personal data only to duly authorized recipients and in compliance with current regulations. They **contractually** require each sub-contractor to provide the same level of security and compliance with regulations.

If personal data is transferred outside the European Union, Group entities undertake to carry out the transfer in accordance with the applicable regulations and within the framework of standard contractual clauses approved by the European Commission to guarantee data protection.

4. Individual rights

In accordance with the French Data Protection Act no. 78-17 of January 6, 1978, as amended, and the General Data Protection Regulation (EU) 2016/679 of April 27, 2016, the "GDPR, **persons concerned by the processing of personal data may exercise their rights** (right of access, rectification, modification, deletion or portability of data) at any time, by providing proof of their identity. They may also, for legitimate reasons, object in whole or in part to any processing of their data, or withdraw a previously given consent.

Requests to exercise these rights should be made to our Data Protection Officer by sending an e-mail to the address : <u>dpo@be-ys.com</u>

These requests are received by the Data Protection Officer himself in order to guarantee the confidentiality of exchanges. The Data Officer then initiates and steers the processing processes in order to meet the legal deadlines for responding to requests to exercise rights.

If exchanges with Group Entities have not been satisfactory, the person concerned may lodge a complaint with the Commission Nationale de l'Informatique et des Libertés (CNIL), the supervisory authority responsible for compliance with personal data obligations in France, or with any other supervisory authority in another EU member country.

This privacy policy may be amended and updated at any time.