

PROTECTION OF PERSONAL DATA

This policy for the protection of personal data is aimed to inform you of the way in which your personal information may, in some cases, be collected and processed by SOGELIFE (hereinafter "We"), sis 11 Avenue Emile Reuter L-2420 Luxembourg, as processing controller.

SOGELIFE has appointed a Personal Data Protection Correspondent who can be reached at the following addresses: lu.sogelife-dpo@socgen.com or SOGELIFE, Correspondant à la protection des données à caractère personnel (Personal Data Protection Correspondent), 11 Avenue Emile Reuter L-2420 Luxembourg.

WHY DO WE COLLECT YOUR PERSONAL DATA?

The personal data that we collect is necessary for the following purposes:

- your identification, the identification of insured parties and beneficiaries,
- examining, accepting, pricing and risk review,
- carrying out transactions which may be necessary for the performance and administration of contracts and the payment of benefits in the event of repurchase or death,
- the administration of appeals, claims and disputes,
- the administration of requests relating to the exercise of the rights described in the paragraph "WHAT ARE YOUR RIGHTS?".

Your data is also processed to meet legislative and regulatory provisions in force such as operational risk management (including the security of IT networks and transactions), fraud prevention, and the fight against money laundering and the financing of terrorism. The legitimate ground for this processing is the need to perform the contract which binds you to SOGELIFE.

In order to provide you with the best service possible, your data may be processed for market prospecting and carrying out actuarial and statistical studies. The legitimate ground for this processing is to carry out the legitimate interests of SOGELIFE which consists in knowing more about its clients and to be able to offer them appropriate services.

WHO MAY HAVE ACCESS TO YOUR DATA?

Your personal data may, as required in relation to the purposes set out above, be communicated to our departments in charge of marketing and contract management and fulfilment, your insurance broker, our partners, representatives, subcontractors or legal entities in the Societe Generale group in relation to carrying out their duties, limited to that which is necessary to carry out the work granted to them, whether established within or outside the European Economic Area. These necessary transfers of data take place under conditions and guarantees to ensure the protection of your personal data and in particular, in the event of their transfer outside of the European Union, by the signature of standard provisions between SOGELIFE and persons receiving the data.

It may also be transferred, where necessary to persons working on the contract such as lawyers, experts, court officers and ministry officials, guardians, administrators and any person approved as an authorised third-party in particular the courts, arbitrators, mediators, legal representatives, guardianship authorities and control bodies, and public authorities which have been approved to receive it as well as audit services such as statutory auditors, auditors and departments in charge of internal control.

WHEN WOULD WE TRANSFER YOUR DATA OUTSIDE OF THE EUROPEAN UNION?

In particular given the international scale of the Societe Generale group to which the data processing controller belongs and given the measures taken to ensure the use of software and the security of IT networks, the processing set out in the paragraph “WHY DO WE COLLECT YOUR PERSONAL DATA?” may involve the transfer of personal data to countries outside the European Union.

In this case, the transfers of your data will be in a precise, demanding context pursuant to standard provisions adopted by the European Commission and which are set up by SOGELIFE and the entity receiving the data outside the European Union as well as appropriate security arrangements ensuring the protection of your transferred personal data.

FOR HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

The length of time that we keep your personal data is limited to the duration of the contract and the period during which data retention is necessary to enable SOGELIFE to comply with its legal obligations and prescription periods.

WHAT ARE YOUR RIGHTS?

You have a right of:

- access (the right to request whether and what information we hold about you),
- correction (the right to request correction of inaccurate information relating to you),
- deletion (the right to request deletion of your data where particular conditions are met),
- limited processing,
- portability of your data.

The right to your data portability is limited to the data you provided us with and which we process in an automated way (paper documents are therefore not included) in fulfilling a contract or where processing depends on your consent. Data which we create, such as a client or contract number or a profile and any processing to meet our legislative obligations and which is in our legitimate interest such as anti-fraud procedures or market prospecting are excluded from portability rights.

You may also:

- withdraw your consent where the processing of your data relies solely on this, with the understanding that this withdrawal may result in SOGELIFE being unable to provide or perform the product or the service requested or subscribed to.

You have a right of opposition:

- on the grounds of your individual situation, where the personal data relating to you is subject to processing carried out by us. In this event, the individual nature of your situation is to be clearly set out.
- without the need to provide reasons for your request, where your data is used or transferred to third parties for market prospecting.

You may exercise these rights, providing proof of your identity:

- By postal mail sent to SOGELIFE, Correspondant à la protection des données à caractère personnel, 11 Avenue Emile Reuter L-2420 Luxembourg
- A downloadable form is available

To enable efficient processing of your request we would ask you to clearly state the right which you wish to exercise and any information enabling you to be identified (contract number)

You also have the right to make a claim to the Commission Nationale pour la Protection des Données: 1, avenue du Rock'n'Roll L-4361 Esch-sur-Alzette

**PROCESSING OF PERSONAL DATA
APPLICATION FOR EXERCISE OF RIGHTS**

Surname: First Name:

Date of Birth: | | | | | | | | | |

If we need to contact you for a better understanding of your application we need your telephone number and email address:

Telephone: Email:

Please attach a copy of currently valid proof of identity.

Where the person in question is under guardianship or supervision or and has asked for authorisation to exercise their rights please attach a copy of the guardian's, supervisor's or representative's proof of identity and their power of attorney.

Where the person in question is underage please attach a copy of a proof of identity from at least one of the parents.

Contract number(s):

NATURE OF YOUR APPLICATION

- Right of access:** I would like you to provide me with details of data relating to me.
- Right to rectification:** I would like to change my personal data.
If you wish to change your personal data please contact:
SOGELIFE Service Gestion 11, Avenue Emile Reuter L-2420 LUXEMBOURG
- Right to erasure:** I would like you to delete my personal data.
Pursuant to Article 17 on the General Regulations for the Protection of Data, the deletion of personal data for contracts which are in force and necessary for the purposes of processing cannot be carried out.
- Right to data portability:** I would like you to return my personal data.
Where you wish to send your data to a third party organisation please state their contract details.

- Right to object:** I am opposed to my personal data being processed for marketing prospectation.

METHODS OF REPLY

- Letter with Acknowledgement of Receipt** (except for the right to data portability)
Postal Address:

- Email** (please provide a mobile phone number for your access code to be sent)

Done in, on | | | | | | | | | |

SIGNATURE