

Privacy notice for customers

Swiss Life (Luxembourg) S.A.

Swiss Life Luxembourg S.A. ("Swiss Life") aims to be completely transparent with how we collect and use personal information we gather about our customers ("Personal Data").

This privacy notice describes how and why we will collect and use your personal data during and after your relationship with us in accordance with the EU regulation 2016/679 of 27 April 2016, General Data Protection Regulation ("GDPR"), and other legal provisions applicable in this respect, if any.

We may update this notice at any time, and we will inform you when we make any substantial updates. The privacy notice is available on our website. We encourage you to check it periodically to read the most recent version of this privacy notice. We may also notify you in other ways from time to time about the processing of your personal data.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are aware of how and why we are using such information.

Data Controller

Swiss Life is the Data Controller and is responsible for deciding how we hold and use Personal Data.

If you have any questions, concerns or comments regarding our data processing practices, please contact our Data Protection Officer by email dpo.sli@swisslife.com or by post at 6, rue Eugène Ruppert L-2453 Luxembourg.

Information collected

The categories of Personal Data processed by Swiss Life are the following:

- Identification data (first name, last name, telephone number, image, email address, address, country of residence, ID, IP address, tax identification number etc.)
- Personal characteristics (birth date, gender, marital status, nationality), education and training, profession, and job (place of work, employer, occupation);
- Financial data (bank account, salary, pay slips, solvency of the company and salary of the final beneficiary, amount to be paid, origin of wealth), national identification number;

- Information regarding investigations or lawsuits, judicial measures, convictions, and sentences;
- Special categories of data such as health data and criminal records in some cases;
- Other information regarding hobbies, interests (sport practiced) and life habits.

Purpose and Legal Basis

Swiss Life processes Personal Data in accordance with the provisions of the EU General Data Protection Regulation 2016/679 of 27 April 2016 (GDPR), national laws (such as the Luxembourgish data protection law of 1 August 2018) and all other relevant laws and regulations, only with the proper legal basis and only for lawful purposes.

Personal Data collected directly from you based on the performance of the contract or to take the steps prior to entering into a contract (GDPR, Art 6.1.b) for the following purposes:

- Where processing is necessary for offering and providing products and services and to enable the conclusion of insurance contract and to provide the best Swiss Life customer support.
- To create an account and log-in via the relevant portal as per the following link <https://www.swisslife-global.com> (hereinafter referred to as the "Website").
- For the general administration, technical and daily management of our contracts (including invoicing and accounting, daily communication via email, postal mail or telephone, management of requests, management of complaints and litigation, internal controls, discussions).
- To allow contact via our contact and complaint forms.

Based on explicit consent, we may process Personal Data:

- To allow the use an Advanced Electronic Signature service, in accordance with the eIDAS EU Regulation (REGULATION (EU) No 910/2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 July 2014) in order to sign a contract to which you are a party. The Advanced Electronic Signature process chosen by Swiss Life Global Solutions is essentially based on the use of the crypto based SMS.
- To send advertising by telephone, fax, e-mail and other electronic means.
- Personal Data collected indirectly from you through the Website's cookies. For more information on cookies please read our cookies policy.
- To send invitation to participate in events regarding our products.

We may use Personal Data for compliance with a legal obligation to which we are subject (GDPR art 6.1.c):

- For compliance with Anti-Money Laundering /Know Your Customers obligations.

- For other legal obligations (including FACTA and CRS reporting, Private Equity reporting, tax reporting to authorities of some countries, annual certificate communication to the insured person, audits, court related injunctions).
- We may also process Personal Data for the purpose of protecting our legitimate interest and fulfilling our legal obligations regarding the global monitoring of the Swiss Life Group's legal and reputational risks associated with money laundering and terrorist financing, and for this purpose we may also transmit them to Swiss Life AG, General-Guisan-Quai 40, 8002 Zurich, Switzerland and its auditing company.
- Pursuant to Article 10 of the GDPR, we will only use Personal Data relating to criminal convictions and offences when we are authorized to conduct such processing under EU legislation or applicable Member State law.

We may use Personal Data for the purposes of our legitimate interests (GDPR, art. 6.1.f):

- To allow for the proper execution of the contract and the payment of benefit towards designated beneficiary.
- Where processing is necessary for being able to defend our interests in defense or take legal action, to proceed to investigations in case of potential breach of contracts or violation of law or regulation which would have a negative impact on Swiss Life.
- To be able to address requests from non-contracting parties (including the right to a defense in court).
- For proper performance of our IT monitoring (including with the use of IT components, debugging and testing of software).
- To ensure the security of our premises and visitors under our responsibility with the help of access control and/or surveillance cameras.
- To use service providers and/or subcontractors which will enhance the quality of service provided by Swiss Life or assist in complying with Swiss Life's legal and regulatory obligations.
- Your data is also processed regularly for conducting data analytics studies and surveys to review, better understand the business improving our services.
- We may also process the Personal Data for the purpose of the global financial monitoring of the Swiss Life Group and the relevant legal obligation of the Swiss Life Group. For this purpose we may also transmit them to Swiss Life AG, General-Guisan-Quai 40, 8002 Zurich, Switzerland and its auditing company.

We consider that legitimate interests or fundamental rights and freedoms which require protection of personal data do not override our legitimate interests to process the Personal Data mentioned hereinabove since such Personal Data are either processed to serve your direct or indirect benefits are secured in such a way (via anonymization, pseudonymization or encryption) that no detrimental impact on You can reasonably be expected from such processing.

We will not use Personal Data for new purposes which are yet unforeseen in this Privacy Notice except on the basis of an applicable statutory permission or your valid consent.

Special category of Personal Data

The special categories of Personal Data concern information relating to racial or ethnical origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, health, sex life or sexual orientation.

Pursuant to Article 9 of the GDPR, we will not collect or process any special category of Personal Data relating to you unless you have provided your explicit consent. Such special categories of Personal Data will exclusively be used to the extent necessary for allowing us to ensure the proper performance of our services (including medical underwriting, risk management evaluation, reinsurance, disability claims, premium calculation, and insurance policy pay-out purposes) and may include Personal Data such as information on food restrictions, health issues and the eventual invalidity level.

Automated decision-making

We will not make use of automated decision-making processes, including profiling, unless such decision is either necessary for entering or performance of a contract with you, or authorized by EU legislation or applicable Member State law, or based on your explicit consent. In such case we would inform you about the logic involved in the decision as well as the significance and the envisaged consequences of such processing for you.

Sharing Personal Data and transferring Personal Data to third countries

Certain Personal Data may be shared with the following categories of third parties: the group parent company and its internal monitoring bodies and its audit company, our external IT services provider, public authorities, affiliated companies, other business partners and subcontractors within the scope of outsourced activities. These recipients of Personal Data may act as data controllers or processors and must comply with the legal and/or contractual obligations regarding the protection of Personal Data, including applicable processor contractual clauses (in case of processors), confidentiality obligations.

We will not make the Personal Data available to any third party and shall not publicly disclose the Personal Data unless such transfers are based on your explicit consent, necessary for the performance of a contract between you and us, or when such transfer of Personal Data is otherwise authorized or compulsory by law or by order of an administration or judicial authority.

Please note that whenever Personal Data are transferred to processors, or third parties located outside the European Economic Area in countries which are not considered by the European Commission to guarantee an adequate level of personal data protection, we will ensure that appropriate measures, including applicable processor contractual clauses (in case of processors), confidentiality obligations etc. are implemented according to the applicable national and European legislation relating to data protection. You may obtain a copy of the appropriate safeguards taken or

information as to where they have been made available by sending an email to our data protection officer at the email address mentioned below.

Other Recipients of data

We send some data of customers to our Group only for internal communications, administrative purposes, and other purposes of group management.

We also send Personal Data to other recipients if required to meet our contractual and legal obligations.

These can include official authorities and public administrations and other Insurance and reinsurance companies and service providers and/or subcontractors if applicable.

Retention period

We limit the storage of the Personal Data and delete it once it is no longer needed for the above purposes. After the end of the contract relationship, the Personal Data will be stored if we are legally obligated to do so.

It is also possible that personal data must be retained for the period in which insurance rights and/or claims are asserted against Swiss Life. (Legal period of limitation up to thirty years).

In the limited circumstances where you may have provided your consent to the collection, processing, and transfer of your personal data for a specific purpose, once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to.

Your rights

At any time, you may exercise your right to request access to, or rectification of, and as the case may be, erasure of any Personal Data relating to you or to object to processing, or restriction of processing, as well as your right to data portability in compliance with applicable data protection law by sending a signed request form with a copy of Your ID card or other proof of identity to the attention of the concerned data controller by email or in writing by using the following addresses: Swiss Life (Luxembourg) SA: dpo.sli@swisslife.com or by post to Swiss Life (Luxembourg) SA, 2-6 rue Eugène Ruppert, L-2453 Luxembourg, Grand- Duchy of Luxembourg.

To exercise your right of objection or to revoke your consent to receipt of advertising please send an email to the attention of our data protection officer. In such case, please use the contact details mentioned below and mention “direct marketing opt- out” in the subject of your email. Alternatively, you may use the opt-out procedure provided in any promotional message you receive from us.

As a data subject, you have the right to lodge a complaint with a supervisory authority (in the Member State of the European Union of your usual place of residence, your place of work or the place where the violation occurred) if you consider that the processing of personal data relating to you infringes the applicable legislation relating to data

protection.

Information Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process the Personal Data on our instructions, and they are subject to a duty of confidentiality. Third parties will only process the Personal Data on our instructions and where they have agreed to treat the information confidentially and to keep it secure. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Effective date and changes

This Privacy Notice was created on and has been in effect since 1st July 2023.

We reserve the right, at our complete discretion, to change, modify, add, or remove portions of this Privacy Notice at any time. You should check back periodically at this page to read the most recent version of this Privacy Notice as your continued use of this Website following the posting of changes to these terms will mean you acknowledge these changes.