



# Privacy Policy

## Responsible for the data processing

Inter Partner Assistance S.A., with its head office at Boulevard du Régent 7 - 1000 Brussels, registered with the Banque Carrefour des Entreprises (Belgian National Crossroads Database for Businesses) under no. 0415.591.055 (hereafter called "AXA Partners")

## Data Protection Officer

The AXA Partners Data Protection Officer can be contacted at the following addresses:

by post: AXA Partners - Data Protection Officer  
Boulevard du Régent 7  
1000 Brussels

by e-mail: [dpo.bnl@axa-assistance.com](mailto:dpo.bnl@axa-assistance.com)

## Purposes of data processing and intended recipients

Personal data, communicated by the data subject or obtained legitimately by AXA Partners from companies of the AXA Group, companies related to them, the employer of the data subject or third parties, can be processed by AXA Partners for the following purposes:

- managing the internal AXA Partners people database:
- managing the insurance policy:
- customer service:
- managing the relationship between AXA Partners and the insurance broker:
- detecting, preventing and combating fraud:
- combating money laundering and terrorism financing
- monitoring the portfolio:
- statistical studies:

Inasmuch as personal data have to be communicated so that the purposes listed above can be performed, personal data may be communicated to other companies of the AXA Group and to companies and/or persons in relation with them (lawyers, loss adjusters, consultant doctors, re-insurers, co-insurers, insurance brokers, service providers, other insurance companies, representatives, pricing monitoring bureau, loss settlement offices and Datassur).

These data may also be communicated to the supervisory authorities, competent public services and any other public or private body with which AXA Partners may exchange personal data in accordance with the applicable legislation.

When the data subject is also a customer of AXA Bank Belgium these personal data can be processed by AXA Partners in shared databases to maintain the customer database and especially to manage and update identification data.

## Processing data for direct marketing purposes

Personal data, communicated by the data subject or obtained legitimately by AXA Partners from companies of the AXA Group, from companies in relation with them or from third parties, may be processed by AXA Partners for direct marketing purposes (commercial activities, personalised advertising, profiling, data coupling, notoriety, etc.) with the intention of improving the company's knowledge of existing and prospective customers, informing them about its products, activities and services and sending them commercial offers.

These personal data can also be communicated to other companies in the AXA Group and companies in relation with AXA Partners and/or the insurance broker for the purpose of their own direct marketing or shared direct marketing processing activities, with a view to improving the knowledge of existing and prospective customers, informing them about its products, activities and services and sending them commercial offers.

In order to provide the most appropriate direct marketing services, these personal data may be communicated to companies and/or persons acting as sub-contractors or service providers for AXA Partners, to other companies of the AXA Group and/or the insurance broker.

These processing activities are necessary to the legitimate interests pursued by AXA Partners for developing its economic activity. If appropriate, these processing activities can be based on the consent of the data subject.

#### **Data transfer outside the European Union**

Other companies of the AXA Group, and companies and/or persons in relation with them who receive personal data, may be located outside the European Union. Where personal data is transferred to third parties located outside the European Union, AXA Partners complies with the legal and statutory provisions in force regarding such transfers. It ensures, especially, a level of protection appropriate to the personal data which is transferred, based on alternative mechanisms introduced by the European Commission, such as standard contractual clauses, or binding corporate rules of the AXA Group in the event of intra-Group transfers (BOG 6/10/2014, p. 78547). The data subject can obtain a copy of measures introduced by AXA Partners to be able to transfer personal data outside the European Union by writing to AXA Partners at the address below ('Contact AXA Partners')

#### **Processing activities of health data**

AXA Partners guarantees the respect of the rules and regulations specifically applicable to processing activities of data subject's health data in taking all technical or organizational measures necessary to that end.

- The processing of these data is only performed with the explicit and written consent of the data subject or, where the data subject is physically or legally incapable of giving consent, to protect the vital interest of the data subject.
- The processing of these data is performed, under the supervision of doctor (medical advisors), subject to medical secrecy, by collaborators specially appointed to that end.
- Medical certificates and other documents containing these data, which are necessary to the negotiation, the conclusion, the execution or the performance of the contract, including the claims handling, are only transmitted to the medical advisors of AXA Partners. These medical advisors only disclose health data that reveal the current state of the data subject and are strictly adequate and relevant with regard to the risks they have been drawn up, to AXA Partners or the persons specially appointed to process health data.
- The transfer of these data is only performed insofar it is necessary and the recipients provide sufficient guarantees to ensure the compliance with the rules and regulations specifically applicable to the processing. Prior to this transfer, AXA Partners shall minimize, pseudonymize or, eventually anonymize these data.

#### **Data storage**

AXA Partners stores the personal data collected relative to the insurance policy throughout the contractual relationship or the claims handling, updating them every time required by the circumstances, extended by the legal storage time or limitation period, so that it can meet the requests or any recourse that may be engaged after the end of the contractual relationship or after the closure of the claim.

AXA Partners stores the personal data relating to offers refused or which were not followed up by AXA Partners for five years after the offer was issued or the rejection was pronounced.

### **Need to provide personal data**

The personal data relating to the data subject requested by AXA Partners are required to conclude and execute the insurance policy. Failure to provide these data can make it impossible to conclude or execute the insurance policy correctly.

### **Confidentiality**

AXA Partners has done everything necessary to protect the confidentiality of personal data and to guard against any unauthorised access and any improper use, modification or deletion of the data.

To this end, AXA Partners follows the service security and continuity standards and assesses regularly the security level of its processes, systems and applications and those of its partners.

### **Rights of the data subject**

The data subject has the right to:

- obtain from AXA Partners confirmation that his personal data are or are not processed and, when they are processed, to access this data;
- rectify and, if appropriate, complete his personal data that are inaccurate or incomplete;
- erase his personal data in certain circumstances;
- limit the processing of his personal data in certain circumstances;
- object, for reasons relating to his particular situation, the processing of personal data based on the legitimate interests of AXA Partners. The data controller no longer processes the personal data, unless he can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject ;
- object the processing of his personal data for the purposes of direct marketing, which includes profiling to the extent that it is related to such direct marketing;
- not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her; nevertheless, where this automated processing is required to conclude or execute a policy, he has the right to obtain human intervention on the part of AXA Partners, express his point of view and contest the AXA Partners decision;
- receive his personal data that he has provided to AXA Partners in a structured, commonly used and machine-readable format; to transmit these data to another data controller when (i) the processing of his personal data is based on his consent or for the contract execution requirements and (ii) the processing is carried out by automated means ; and to have his personal data transmit directly from one data controller to another, where technically feasible;
- withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal , when the processing of his personal data is based on his consent.

### **Contact AXA Partners**

The data subject can also write to AXA Partners to exercise his rights. The signed and dated letter should be accompanied by a photocopy of both sides of his identity card and sent to: AXA Partners, Data Protection Officer, Boulevard du Régent 7, 1000 Brussels.

AXA Partners will process requests within the legal deadlines. Unless the request is clearly unfounded or excessive, no payment will be required to process his requests.

**Lodging a complaint**

Where the data subject believes that AXA Partners is failing to comply with the relevant regulations, he is asked to contact AXA Partners in priority.

The person in question can also lodge a claim to the Personal Data Protection Authority at the following address:

Rue de la Presse, 35

1000 Brussels

Tel. + 32 2 274 48 00 Fax:

+ 32 2 274 48 35

[commission@privacycommission.be](mailto:commission@privacycommission.be)

The data subject can also lodge a complaint with the Court of First Instance of his domicile.