

DATA PROTECTION POLICY

Verspieren Global Markets (VGM) pays attention to the protection of personal data that are collected for the proper conduct of its business. In accordance with the applicable law, a personal data is any information enabling the identification, directly or indirectly, of a natural person by reference to one or more elements that are specific to them, or by cross-checking information.

1 - Identity of the data controller

The data controller is:

VERSPIEREN GLOBAL MARKETS
60 rue de la Chaussée d'Antin
75 009 PARIS

2 – VGM's commitment

VGM honestly and transparently collects personal data of its interlocutors and stakeholders. VGM is committed to ensuring safety and confidentiality of the personal data entrusted to it. Recent developments in data protection law have reinforced our approach to give greater vigilance to the collection and processing of personal data.

3 - Scope of the Policy

This Policy is intended for all natural persons of VGM constituting or in connection with: insurance companies partners, brokers and business introducers, customers, providers, employees, prospects including via requests of information and online request platform. It applies only to those activities for which VGM is a data controller in accordance with the definitions of applicable law.

4 - What is the applicable law?

VGM is governed by French data protection law and European data protection law. Thus, are applying the law of January 6, 1978 amended, also known as "*Loi Informatique & Libertés*" and the European General Data Protection Regulation n° 2016/679 of April 27, 2016, in effect since May 25, 2018.

5 - What data are collected?

The personal data commonly collected by VGM are as follows: identification and contact details (name, surname, business and/or personal address, date of birth, telephone number, e-mail address) and other contact details provided by data subjects such as data relating to the management of the commercial relationship, transactions and means of payment of premiums and allowances.

Collection of health data: Personal data relating to health corresponds to data relating to the physical or mental state of health, past, present or future of a natural person. The collection of health data is a collection of so-called sensitive data for which special attention is given.

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6 - What are the purposes of the processing of personal data collected?

In accordance with the principle of proportionality, personal data collected by VGM are limited to the data necessary for the purposes pursued as described below. These data can be common to all interlocutors or specific to certain categories of people. Personal data is processed by VGM as part of the management of administrative or commercial operations related to relationships with its various interlocutors in order to allow their proper execution. These purposes are common to all interlocutors.

In addition, the following purposes, which are specific to certain categories of natural persons, are as follows:

Specific purposes related to prospects: administrative and commercial management of subscription requests.

Specific objectives relating to insured/ subscribers, natural persons: transactions relating to administrative and commercial management and the execution of insurance contracts; management of requests for the exercise of rights of access, rectification and opposition; claims payment and management.

Specific purposes relating to brokers and business introducers, natural persons: administrative operations related to contracts, agreements, accounting and the establishment of payment documents.

Specific purposes relating to representatives and staff of insurance companies: management and execution of delegation agreements.

Purposes relating to ongoing disputes with VGM: management of proceedings related to criminal offenses or convictions or security measures, and possibly, preparation, exercise or follow-up of disciplinary action or legal proceedings and, where applicable, execution of the rendered decision. The personal data processing performed by VGM is either necessary for the execution and performance of a contract to which an insured has subscribed or for the performance of pre-contractual measures taken at an insured's request, or necessary for the performance of a legal obligation to which the company is subject. In the absence of such treatment, the actions referred to above could not be legally implemented by VGM.

7 - Recipients of collected personal data

Only recipients duly authorized by VGM because of their duties may access the personal data concerning you, without prejudice to a possible transmission of the data to authorities or agencies in charge of a control or inspection mission under applicable law. These recipients include authorized

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persons responsible for commercial, underwriting, production, administrative and accounting, claims and IT functions.

8 - Is collected personal data shared outside the European Economic Area?

The data processing is carried out within the limits necessary for the completion of the purposes mentioned above. If the purposes of the processing do not require it, collected personal data are not shared outside the European Economic Area. In the opposite case, shares may exist in the context of a sharing of data with specifically named partners in view of the purpose specifically established, in compliance with applicable law.

9 - Non-disclosure of personal data

VGM does not sell, rent, share or distribute collected personal data in any way to third parties outside Verspieren Group, including providers or other non-designated commercial partners, unless applicable law requires so. However, these data may be transmitted to designated third parties in strict compliance with the purposes for which they were collected. When disclosure of personal data to third parties is necessary for such purposes, VGM shall, as data controller, ensure that such third parties provide concerned personal data with the same level of protection as that offered to them by our company, and requires contractual guarantees so that personal data are exclusively processed for the purposes previously authorized by you, with the necessary confidentiality and safety.

10 – Data retention and security

In accordance with the principle of minimization, the retention period of your personal data corresponds to the minimum period strictly necessary for your data processing specific purpose.

We set technical and organizational measures to ensure that personal data are stored in the most secure way possible for the time necessary to fulfil the purposes pursued in accordance with the applicable law and within the limits of the latter.

Data retention periods for non-life insurance contracts comply with statutory limitation periods from the end of the contract, including the termination or settlement of the claim. The retention period of the personal data attached to subscription requests that have not led to the conclusion of an insurance contract corresponds to the rules applicable to the legal limitation period.

11 - Exercise of the rights attached to the personal data

Under applicable law, you have the right to access, oppose and withdraw your consent to your personal data processing. You also have limitation, correction, portability and erasure rights regarding your personal data, which you can exercise at any time, electronically, by sending an e-mail accompanied by an up-to-date national identification document at the following address:

dpo-vgm@vgm-broker.com

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The exercise of your rights can also be done by post by sending a letter to the following address:

Verspieren Global Markets
DPO Compliance
60 rue de la Chaussée d'Antin
75 009 PARIS

VGM will do its best to answer your request within one month after receiving it. If necessary, this period may be extended by two months, given the complexity and the number of requests. You will then be informed within one month after your receiving your request. In addition, under applicable law, you have the right to lodge a complaint with the competent supervisory authority.

12 - Applicable law and competent court

This Data privacy Policy is governed by French law. In the event of a dispute and in the event that an amicable agreement cannot be reached, the competent court will be the one determined according to the applicable rules of procedure.

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