

# Personal Data Protection Policy

Privacy and the protection of personal data builds trust, a value the Groupama Group's companies are particularly attached to. The Group always seeks to observe the fundamental rights and liberties of each individual. This Personal Data Protection Policy reflects the commitments made by Groupama Group companies, in the context of their day-to-day activities, for the responsible use of personal data.

## • *The Data Protection Officer (DPO)*

To ensure the privacy and protection of everyone's personal data, the Groupama Group appointed in 2007 a Data Protection Officer (called *Délégué à la protection des données* in French, formerly *Correspondent Informatique et Libertés*). The DPO carries out duties for all the Group's French companies with full independence.

The DPO is a hallmark of trust. This professional specialised in the protection of personal data is responsible for the proper application of personal data protection rules. The DPO is the Group's designated contact person for French data protection agency *Commission Nationale de l'Informatique et des Libertés* (CNIL) and for all persons involved in the collection or processing of personal data.

## • *Principles applicable to personal data protection*

The Groupama Group companies process personal data in compliance with the laws and regulations in force, and in particular the General Data Protection Regulation (GDPR), the French Data Protection Act of 6 January 1978 as amended and the standards laid down by the CNIL.

Groupama Group companies implement Personal Data Governance Policies and compliance with their provisions is monitored.

### *1) Specific, explicit and legitimate purpose of the processing:*

Personal data is collected for specific purposes, brought to the attention of the individuals concerned. Such data may not be later used in a manner not consistent with these purposes.

The data is collected fairly; no collection shall be made without the individuals' knowledge and without their being informed thereof.

### *2) Proportion and relevance of the data collected:*

The personal data collected is strictly necessary for the purpose for which it is collected. Groupama Group companies endeavour to minimise the data collected and to keep it accurate and up to date by facilitating the rights of the individuals concerned.

### *3) Limited retention period for personal data:*

Groupama Group companies shall keep personal data for a limited period of time, which shall not exceed the time necessary for the purposes of the collection. Data retention periods are brought to the attention of the individuals whose data is being collected and may vary according to the nature of the data, the purpose of the processing, and legal or regulatory requirements.

### *4) Data privacy / security:*

Information System Security Policies (ISSPs) are implemented, in line with the nature of the data processed and the company's activities.

Appropriate physical, logical and organisational security measures are in place to ensure data privacy, including the prevention of any unauthorised access.

Groupama Group companies also require all subcontractors to provide appropriate guarantees to ensure the security and privacy of personal data.

Personal data may be transferred to countries within or outside the European Union. When this is the case, the individuals concerned are precisely informed, and specific measures are taken to supervise these transfers.

### *5) Rights of the individual:*

All necessary means are implemented to guarantee the effective observance of individuals' rights over their personal data:

- Clear and complete information regarding the data processing actions carried out, easily accessible and understandable by all.
- Simple access to information: every individual has rights over the data concerning him/her, which he/she can exercise at any time and free of charge.

Thus, individuals can access their personal data, and in some cases have it rectified (incorrect or incomplete data) or deleted or request the temporary limitation of its processing. Individuals also have the right to the portability of the data they personally provided, whenever this data was provided on the basis of the explicit approval of the individual or for the execution of a contract.

These rights are facilitated online and possible by any other means, according to the procedures brought to the attention of the individuals. Such requests may also be made to the DPO.

### **• *Monitoring of the Personal Data Protection Policy's implementation***

This policy, accessible to all on the Groupama Group companies' websites, is regularly updated to take into account legal and regulatory changes, and any changes in the Groupama Group's organisation or in the products and services offered.

This Personal Data Protection Policy is supplemented by:

- Detailed information on the purposes of the processing of personal data, the recipients of the data, their retention periods, and the procedures for exercising individuals' rights, made available to individuals by any means and in any format;
- Cookies notices on all websites ([notice cookies of Groupama Immobilier's web site](#))
- Where appropriate, general recommendations on security rules affecting users/customers, in particular regarding usernames and passwords.

This Personal Data Protection Policy was approved on 23 March 2017 by the Groupama Group Data Protection Officer (updated in May 2018).

DPO France (Group DPO)

To contact the DPO France (Group DPO): write to GROUPAMA SA – Data Protection Officer - 8-10, rue d'Astorg, 75383 Paris Cedex 08, or email [cil@groupama.com](mailto:cil@groupama.com)