

## General policy on the protection of personal data

Respect for privacy and the protection of personal data is a matter of trust, a value that is especially important to Groupama Group companies, which strive to ensure that fundamental rights and freedoms are respected.

This policy demonstrates the commitments undertaken as part of daily activities aimed at using personal data responsibly.

- **Data Protection Officer (DPO)**

Since 2007, the Groupama Group has had a Data Protection Delegate (*Correspondant Informatique et Libertés – CIL*) to maintain privacy and safeguard the protection of personal data for everyone. Now called a “Data Protection Officer” (DPO), the DPO performs their duties completely independently for all French companies in the Group.

The DPO stands for trustworthiness: as a contact person specialising in the protection of personal data, they are responsible for ensuring that data protection rules are properly applied, and are the main point of contact for the French data protection authority (*Commission Nationale de l’Informatique et des Libertés – CNIL*) and any data subjects whose data have been collected or processed.

- **Principles applying to the protection of personal data**

Groupama Group companies process personal data in accordance with current legislation, including the General Data Protection Regulation (GDPR); the French Data Protection Act dated 6 January 1978, concerning “data processing, files and freedoms”; and guidelines issued by the CNIL.

Personal Data Governance Policies are implemented within the companies and compliance with their provisions is monitored.

- 1) *Specified, explicit and legitimate purpose for processing:*

Personal data are collected for specific objectives (purposes), which are notified to data subjects. This data may not subsequently be used in a manner that is incompatible with those purposes.

This data shall be collected fairly; no data shall be collected without the data subject’s knowledge and without them being notified.

- 2) *Proportionality and relevance of data collected:*

The personal data collected are absolutely necessary to pursue the purpose for which the data were collected. Groupama Group companies shall ensure that the data collected are only what is needed and are kept accurate and up to date by allowing data subjects to exercise their rights.

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

Personal data shall be kept for a limited period, which is no longer than is required for the purposes for which the data were collected. Data subjects shall be notified about data retention periods, which vary according to type of data, processing purposes, and legal/regulatory requirements.

- 4) *Data confidentiality/security:*

Information System Security Policies (ISSP) shall be implemented and tailored to the nature of the data processed and to company activities.

Appropriate organisational, physical and software security measures shall be put in place to ensure that data remain confidential and particularly to prevent any unauthorised access.

Groupama Group companies shall also require any subcontractor to introduce adequate safeguards to ensure that personal data remain secure and confidential.

Personal data may be transferred to countries within or outside the European Union. If a data transfer occurs, the data subjects shall be informed about it in detail and specific measures shall be taken to supervise the transfer.

### 5) *Data subject rights:*

All necessary means are implemented to guarantee the effectiveness of the rights of data subjects concerning their personal data.:

- Clear and comprehensive information about the data processing carried out, which can be accessed and understood by anyone.
- Ready access to data: data subjects have rights regarding data about them, which they can exercise at any time, free of charge.

Accordingly, data subjects can access all their personal data, and in some cases have it rectified (i.e. inaccurate or incomplete data), deleted, or request for its use to be temporarily restricted. Data subjects also have a right to portability regarding the data they have personally provided and where data have been provided based on their explicit consent or for the performance of a contract.

These rights can be exercised online or by any other means stipulated in the procedures, details of which are given to data subjects. These data subject requests may also be directed to the DPO.

#### • *Monitoring the General Personal Data Protection Policy*

Anyone can access this policy on Groupama Group companies' websites and it is updated regularly to take into account legislative and regulatory developments, and any change in the Groupama Group organisation or in its offerings, products and services.

This General Personal Data Protection Policy is supplemented by:

- detailed information on the purposes of the data processing carried out, the recipients of the data, data retention periods, and the procedures for data subjects to exercise their rights. Data subjects shall be notified of this policy by any means and in any medium. For Groupama Asset Management, this information is available on the website [www.groupama-am.com](http://www.groupama-am.com) in the [The Information leaflet on the General Personal Data Protection policy](#);
- a cookie notice. For Groupama Asset Management, this information is available on the website [www.groupama-am.com](http://www.groupama-am.com) in the section [Legal Notice](#);
- and where necessary, general recommendations on security rules regarding users/customers, with particular regard to usernames and passwords.

#### • *“GDPR Governance” privacy certification label issued by the CNIL*

Respecting fundamental rights and freedoms, particularly privacy and the protection of personal data, are values that are particularly important to Groupama Group companies.

These values are reflected in our everyday activities, particularly through the implementation of personal data protection policies to ensure data are used responsibly and in accordance with the General Data Protection Regulation (GDPR).

In May 2018, the French data protection authority (CNIL) recognised the steps we have taken to ensure that data are protected and our efforts to be compliant with GDPR by issuing a “GDPR Governance” privacy certification label to Groupama Asset Management.



The privacy certification label:

- demonstrates the importance our company places on protecting personal data and privacy;
- acknowledges the effective actions implemented over many years regarding the governance of personal data;
- is proof of the quality of our service and trustworthiness.

General Personal Data Protection Policy approved on 23 March 2017 by the shared DPO (updated May 2018).

The DPO for France

To contact the DPO Groupama for France:

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