

## **DATA PROTECTION POLICY**

SAAM 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:

SAAM VERSPIEREN GROUP  
60 rue de la Chaussée d'Antin  
75 009 PARIS

### **2 – SAAM's commitment**

SAAM honestly and transparently collects personal data of its interlocutors and stakeholders. SAAM 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 SAAM 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 SAAM is a data controller in accordance with the definitions of applicable law.

### **4 - What is the applicable law?**

SAAM 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 SAAM 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.

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

In accordance with the principle of proportionality, personal data collected by SAAM 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 SAAM 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 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 SAAM: 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 SAAM 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 SAAM.

## **7 - Recipients of collected personal data**

Only recipients duly authorized by SAAM 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 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**

SAAM 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, SAAM 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-saam@saam-assurance.com](mailto:dpo-saam@saam-assurance.com)

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

SAAM VERSPIEREN GROUP  
DPO Compliance  
60 rue de la Chaussée d'Antin  
75 009 PARIS

SAAM 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.

### **SAAM VERSPIEREN GROUP**

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Société par actions simplifiée de courtage d'assurance au capital de 139 261,77 euros

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Garantie Financière et assurance de responsabilité Civile professionnelle conformes aux articles L512-6 et L512-7 du Code des Assurances

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