

## Privacy Notice

We appreciate your interest in our company and thank you for your application and allow ourselves by means of this information to inform you about the processing of your personal data by AXA XL, together with other members of its group (AXA XL or we or us) - and to be informed of the rights to which you are entitled under data protection law.

### Address and Contact Details for AXA XL in Canada:

AXA XL

First Canadian Place  
100 King Street West, Suite 3010  
Toronto, ON, M5X 1C9  
Canada

You may contact our **Data Protection Officer** by post at the addresses given in the document by adding "- DPO -" to the address or via e-mail at: [dataprivacy@axaxl.com](mailto:dataprivacy@axaxl.com).

### **PURPOSES OF PROCESSING AND CATEGORIES OF PERSONAL DATA PROCESSED**

<b>PURPOSES OF PROCESSING OF YOUR PERSONAL DATA</b>	<b>CATEGORIES OF PERSONAL DATA PROCESSED</b>
<b>Purpose n°1):</b> Management of the recruitment process of external candidates	<ul style="list-style-type: none"><li>- Identification data, such as: first name, last name, gender (Mr./Ms.) (optional), photo (optional), date of birth or age (may be collected on your resume), personal phone number, personal email address, personal address, nationality;</li><li>- Personal life data: family status (may be collected on your resume), hobbies (may be collected on your resume);</li><li>- Professional data, such as : interests, skills (a minimum of one topic) or CV (file or link to LinkedIn), professional email, local ID, job title, work site, Contract type (permanent or fixed term contract).</li></ul> <p><b>To the extent strictly authorized by law, Personal Data can be processed on the CV as follow: <b>Health Data</b>, (information concerning disability) in accordance with Article 9-2-b of the GDPR.</b></p>
<b>Purpose n°2):</b> Management of CV bank and Management of the sending of job adverts (newsletter)	<ul style="list-style-type: none"><li>- Identification data, such as: first name, last name, gender (Mr./Ms.) (optional), photo (optional), date of birth or age (may be collected on your resume), personal phone number, personal email address, personal address, nationality;</li><li>- Personal life data: family status (may be collected on your resume), hobbies (may be collected on your resume);</li><li>- Professional data, such as : interests, skills (a minimum of one topic) or CV (file or link to LinkedIn).</li></ul>

<p><b>Purpose n°3):</b> Management of internal mobility of AXA employees</p>	<ul style="list-style-type: none"> <li>- Identification data, such as: first name, last name, gender (Mr./Ms.) (optional), photo (optional), date of birth or age (may be collected on your resume), personal phone number, personal email address, personal address, nationality;</li> <li>- Personal life data: family status (may be collected on your resume), hobbies (may be collected on your resume);</li> <li>- Professional data, such as : interests, skills (a minimum of one topic) or CV (file or link to LinkedIn), employee number, professional email, local ID, job title, manager’s name, professional family and sub-family, work site, business unit, assignment categories (local terms, short or long term assignment), Contract type (permanent or fixed term contract), seniority date (job seniority date, entity seniority date or AXA seniority date), geographic mobility (willing to relocate nationally/internationally), management position, business phone number.</li> </ul>
<p><b>Purpose n°4):</b> Match candidates’ profiles to job positions (“the matching test”) using artificial intelligence</p>	<p>It is the match between the data of the job offer and some data filled in by the candidate which are the following:</p> <ul style="list-style-type: none"> <li>- skills (key words);</li> <li>- job family (i.e. compliance, finance, security etc.);</li> <li>- experiences</li> <li>- desired place of work;</li> <li>- type of contract (fixed-term contract, permanent contract, internship, work experience).</li> </ul>
<p><b>Purpose n°5):</b> Administration of the platform (monitoring of use and functioning and ticket management)</p>	<p>All personal data mentioned in this privacy policy, except authentication (password and passAXA)</p> <p>Logs for security, platform connection data and IP address</p>
<p><b>Purpose n°6):</b> Referral of internal AXA candidates</p>	<ul style="list-style-type: none"> <li>- Identification data, such as: first name, last name, personal email address, personal phone number (optional);</li> <li>- professional data: resume (optional), job category, preference in the location of the job offer (optional).</li> </ul>
<p><b>Purpose n°7):</b> Development of AXA Employees’ expertise &amp; skills (GIG)</p>	<ul style="list-style-type: none"> <li>- Identification data: First name, last name, gender, language;</li> <li>- Professional data: number of years of experience, name of employers;</li> <li>- Personal life: competencies &amp; interests (optional).</li> </ul>

As part of the application process, AXA XL must always be provided with the personal data required to carry out the application process and assess the professional suitability.

The processing of personal data is based mainly on the purpose of taking steps at the request of the data subject (i.e., the job applicant) prior to entering into a contract.

In individual cases, we also process your personal data to protect our legitimate interests or the legitimate interests of third parties. This may be particularly necessary in the following cases:

- to guarantee IT security and IT operations including testing (where not required for the performance of the contract already),
- for the prevention and prosecution of criminal offenses, unless this is already subject to a statutory obligation,
- for risk or business management, internal communication and other administrative purposes, particularly for the further development of internal processes.

The processing of sanction-related information is based on a legal obligation within the meaning of Article 6 (1) (c) GDPR according to which we are required to match the data of our contractual partners (which also includes our employees) against corresponding sanctions lists to ensure that no funds or other economic resources are made available to sanctioned persons.

However, such a processing will only occur if your application has been accepted and the employment contract is about to be concluded.

Where we wish to process your personal data for a purpose not mentioned above, we will inform you in advance within the framework of our legal obligations.

In principle, only the persons and departments (e.g. specialist department, works council, representative for disabled people) receive the personal data that they need for the fulfilment of our contractual and legal obligations.

Additionally, we also rely to certain extent on external service providers to fulfil our contractual and legal obligations.

Furthermore, we may also transmit your personal data to other recipients, insofar as there is a legal obligation to notify. Such recipients include, for instance, licensing and regulatory authorities.

## **MANDATORY NATURE OF DATA COLLECTION AND THE POSSIBLE CONSEQUENCES OF FAILURE TO PROVIDE SUCH DATA**

Some information collected in the application is mandatory in order for the data controllers to be able to evaluate your application or to send you the various job offers offered by the data controllers. Fields marked with an asterisk (\*) in the application are mandatory where others are optional.

If you do not provide this mandatory information, you will not be able to be called back by recruiters or to receive the various job offers presented by the data controllers.

## **THE SOURCE OF THE PERSONAL DATA IN CASE OF INDIRECT COLLECTION**

When you are an employee of an AXA entity, we will collect data relating to you from existing human resources databases.

Another source of data may come from LinkedIn when the candidate applies for job roles in AXA on LinkedIn website.

## **RECIPIENTS OR CATEGORIES OF RECIPIENTS AND NON-EU TRANSFERS**

The data controller will communicate your personal data only to identified and authorized recipients.

In addition to any recipients set out in the relevant Country-Specific Privacy Notices as set out above, these recipients include:

- AXA Group Operations (France) in charge of the integration of the platform and the management of IT support;
- Local AXA entities: authorized persons involved in the recruitment process such as human resources (recruiters only), manager(s) involved in your recruitment process;
- AXA Group Operations (Portugal), subcontractor of AXA Group Operations and in charge of the processing of requests to exercise rights;
- iCIMS (United States, United Kingdom, Germany, Ireland) and its subcontractors, in charge of the implementation, use and maintenance of the platform ;
- LinkedIn Recruiter System Connect (“LinkedIn RSC”);

For countries or jurisdictions that do not provide an adequate level of protection, data controllers provide safeguards to ensure the security and confidentiality of your personal data and frame this transfer either by:

- (i) the Standard Contractual Clauses adopted by the European Commission or similar where required by local regulation (eg. International Data Transfer Agreement in the UK),
- (ii) when your personal data is transferred to other AXA Group entities, by the Group's Binding Corporate Rules (available via the following link - Learn More section: <https://www.axa.com/en/commitments/our-commitments>). These Binding Corporate Rules apply to relationships between entities, including those located in countries that do not provide an adequate level of protection.

In principle, only the persons and departments (e.g. specialist department, works council, representative for disabled people) receive the personal data that they need for the fulfilment of our contractual and legal obligations.

Additionally, we also rely to certain extent on external service providers to fulfil our contractual and legal obligations.

Furthermore, we may also transmit your personal data to other recipients, insofar as there is a legal obligation to notify. Such recipients include, for instance, licensing and regulatory authorities.

## **DATA RETENTION PERIOD**

Personal Information is retained based on internal retention policies. Information is segregated by legal retention requirements and maintained in accordance with various local, state, federal, and other legal requirements. Personal Information will not be retained beyond the reasonably foreseen need to retain the information for legal or business purposes.

## **Contact us**

If you have questions about your rights or concerns regarding the way in which your personal information has been used, please contact our Data Protection Officer at [dataprivacy@axaxl.com](mailto:dataprivacy@axaxl.com).

## Canada Addendum

- 1. Interpretation.** The provisions of the Employee Privacy Notice that are not modified by the present addendum remain in full force.
- 2. Definition of personal information.** Personal information includes any information which relates to a natural person and directly or indirectly allows that person to be identified.

### **3. How we use your personal information and the basis on which we use it**

When you provide your personal information after receiving the information outlined in the Privacy Notice, you consent to its use and communication as described in the said notice. You may withdraw your consent at any time. However, since the personal information is strictly necessary for the employment relationship, AXA XL may terminate your employment contract.

### **4. Your rights over your personal information**

You have the following rights:

**Right to be informed.** You have the right to be informed on what personal information we collect, use, disclose, retain, and delete. Even if this is what the Privacy Notice is meant to achieve, you may request additional information to clarify the extent of your consent.

**Right to rectify.** You have the right to have your personal information corrected if it is inaccurate or misleading and to have it completed if it is incomplete.

**Right to delete.** You have the right to request under certain circumstances the deletion of your personal information that is collected by us.

**Right to withdraw your consent.** In some cases, you may object to restrict or withdraw your consent. However, as described in section 5 of the present addendum, since the personal information is strictly necessary for the employment relationship, AXA XL may terminate your employment contract.

**Right to data portability.** The right to obtain your personal information in a commonly used digital format.

**Right to be notified.** You have the right to be informed of a confidentiality breach involving your personal information that may cause you serious harm. We maintain a register of all confidentiality breaches and assess the harm they may cause.

AXA XL will respond to any request within 30 days of receipt, except where the law permits an extension of that time.

When a request for rectification is accepted, the local DPO or HR manager or shall provide you, at no additional cost, with a copy of the rectified or added personal information. Notice of the rectification is given without delay to every person having received the information in the preceding six months and, where applicable, to the person who provided that information. The same rule applies to an application for rectification, if it is contested.

When a request for deletion is accepted, the local DPO or HR manger shall provide an attestation of deletion.

If AXA XL refuses to provide or rectify the information, it will provide you with the reasons for the refusal, the applicable sections of the law and information about your remedies, all subject to the limitations of the law.

If AXA XL refuses to rectify your personal information, it will allow you to place comments in your file in respect of the personal information for which rectification has been refused. It will also retain the Personal Information that has been the subject of an access request for as long as necessary to allow You to exhaust any recourse provided by law.

### **5. Information Sharing**

We could disclose your personal information to the persons and entities listed in the Privacy Notice.

Please note that when we disclose personal information to subcontractors, affiliates, subsidiaries services providers and other third parties, we ensure that they are bound by contractual obligations to:

- Use only personal information that is necessary for providing the service;
- Refrain from disclosing or communicating personal information without AXA XL consent;
- Implement rigorous security measures;
- Allow AXA XL to audit these measures;
- Notify AXA XL immediately of a confidentiality breach; and
- Destroy personal information at the end of the contract.

Moreover, when we disclose personal information to Asset purchaser for, we ensure that they are bound by contractual obligations to:

- Use personal information only for the purposes of entering into the commercial transaction;
- Implement rigorous security measures;
- Refrain from disclosing or communicating Personal Information without AXA XL's consent;
- Notify AXA XL immediately of a confidentiality breach; and
- Destroy personal information if the commercial is not entered into or the personal information is no longer necessary for entering into the commercial transaction.

## **6. Information security and storage**

In addition to the sections in the Privacy Notice, please note that our internal policies and practices provide for:

A framework applicable to the use, communication, retention and destruction of such information;

the roles and responsibilities of our employees throughout the life cycle of the information; and

A process for handling complaints concerning the protection of the information.

**Status: 05/2025**

## APPENDIX

Retention periods in external recruitment per country

Country	RETENTION PERIOD according to regulation (in months)	RETENTION PERIOD according to regulation (in years)	RETENTION PERIOD according to regulation (in days)	Retention period if you have decided to join AXA community			Retention period if you have not decided to join AXA community		
				# months in active database	Triggering event for archiving :	# months in archiving data base (before purging)	# month in active database	Triggering event for archiving :	# months in archiving data base (before purging)
Algeria	120	10	3650	6	your consent or the last login date	114	starting at application date	closure of the job + 30 days	114
Argentina	120	10	3650	6	your consent or the last login date	114	starting at application date	closure of the job + 30 days	114
Australia	60	5	1825	6	your consent or the last login date	54	starting at application date	closure of the job + 30 days	54
Austria	60	5	1825	6	your consent or the last login date	54	starting at application date	closure of the job + 30 days	54
Bahrain	120	10	3650	6	your consent or the last login date	114	starting at application date	closure of the job + 30 days	114
Barbados	60	5	1825	6	your consent or the last login date	54	starting at application date	closure of the job + 30 days	54
Belgium	60	5	1825	6	your consent or the last login date	54	starting at application date	closure of the job + 30 days	54
Bermudes	60	5	1825	6	your consent or the last login date	54	starting at application date	closure of the job + 30 days	54
Brazil	120	10	3650	6	your consent or the last login date	114	starting at application date	closure of the job + 30 days	114
Cameroon	60	5	1825	6	your consent or the last login date	54	starting at application date	closure of the job + 30 days	54
Canada	120	10	3650	6	your consent or the last login date	114	starting at application date	closure of the job + 30 days	114
Chile	60	5	1825	6	your consent or the last login date	54	starting at application date	closure of the job + 30 days	54
China	60	5	1825	6	your consent or the last login date	54	starting at application date	closure of the job + 30 days	54
Colombia	60	5	1825	6	your consent or the last login date	54	starting at application date	closure of the job + 30 days	54
Czech Republic	18	1,5	548	6	your consent or the last login date	12	starting at application date	closure of the job + 30 days	12
Denmark	12	1	365	6	your consent or the last login date	6	starting at application date	closure of the job + 30 days	6
Egypt	60	5	1825	6	your consent or the last login date	54	starting at application date	closure of the job + 30 days	54
Finland	12	1	365	6	your consent or the last login date	6	starting at application date	closure of the job + 30 days	6
France	60	5	1825	6	your consent or the last login date	54	starting at application date	closure of the job + 30 days	54
Gabon	60	5	1825	6	your consent or the last login date	54	starting at application date	closure of the job + 30 days	54
Germany	11	0,9	336	6	your consent or the last login date	5	starting at application date	closure of the job + 30 days	5
Greece	18	1,5	548	6	your consent or the last login date	12	starting at application date	closure of the job + 30 days	12
Hong Kong	30	2,5	913	6	your consent or the last login date	24	starting at application date	closure of the job + 30 days	24
India	60	5	1825	6	your consent or the last login date	54	starting at application date	closure of the job + 30 days	54
Indonesia	18	1,5	548	6	your consent or the last login date	12	starting at application date	closure of the job + 30 days	12
Ireland	60	5	1825	6	your consent or the last login date	54	starting at application date	closure of the job + 30 days	54
Italy	120	10	3650	6	your consent or the last login date	114	starting at application date	closure of the job + 30 days	114
Ivory Coast	60	5	1825	6	your consent or the last login date	54	starting at application date	closure of the job + 30 days	54
Japan	120	10	3650	6	your consent or the last login date	114	starting at application date	closure of the job + 30 days	114
Korea, Republic of	60	5	1825	6	your consent or the last login date	54	starting at application date	closure of the job + 30 days	54
Lebanon	60	5	1825	6	your consent or the last login date	54	starting at application date	closure of the job + 30 days	54
Luxembourg	60	5	1825	6	your consent or the last login date	54	starting at application date	closure of the job + 30 days	54
Malaysia	30	2,5	913	6	your consent or the last login date	24	starting at application date	closure of the job + 30 days	24
Mexico	84	7	2555	6	your consent or the last login date	78	starting at application date	closure of the job + 30 days	78
Morocco	72	6	2190	6	your consent or the last login date	66	starting at application date	closure of the job + 30 days	66
Netherlands	60	5	1825	6	your consent or the last login date	54	starting at application date	closure of the job + 30 days	54
Nigeria	60	5	1825	6	your consent or the last login date	54	starting at application date	closure of the job + 30 days	54
Norway	12	1	365	6	your consent or the last login date	6	starting at application date	closure of the job + 30 days	6

Oman	120	10	3650	6	your consent or the last login date	114	starting at application date	closure of the job + 30 days	114
Panama	60	5	1825	6	your consent or the last login date	54	starting at application date	closure of the job + 30 days	54
Perou	76	6,33	2312	6	your consent or the last login date	70	starting at application date	closure of the job + 30 days	70
Philippines	30	2,5	913	6	your consent or the last login date	24	starting at application date	closure of the job + 30 days	24
Poland	24	2	730	6	your consent or the last login date	18	starting at application date	closure of the job + 30 days	18
Portugal	60	5	1825	6	your consent or the last login date	54	starting at application date	closure of the job + 30 days	54
Qatar	120	10	3650	6	your consent or the last login date	114	starting at application date	closure of the job + 30 days	114
Saudi Arabia	120	10	3650	6	your consent or the last login date	114	starting at application date	closure of the job + 30 days	114
Senegal	60	5	1825	6	your consent or the last login date	54	starting at application date	closure of the job + 30 days	54
Singapore	30	2,5	913	6	your consent or the last login date	24	starting at application date	closure of the job + 30 days	24
Slovakia	120	10	3650	6	your consent or the last login date	114	starting at application date	closure of the job + 30 days	114
Spain	12	1	362	6	your consent or the last login date	6	starting at application date	closure of the job + 30 days	6
Sweden	60	5	1825	6	your consent or the last login date	54	starting at application date	closure of the job + 30 days	54
Switzerland	72	6	2190	6	your consent or the last login date	66	starting at application date	closure of the job + 30 days	66
Taiwan	120	10	3650	6	your consent or the last login date	114	starting at application date	closure of the job + 30 days	114
Thailand	18	1,5	548	6	your consent or the last login date	12	starting at application date	closure of the job + 30 days	12
Turkey	120	10	3650	6	your consent or the last login date	114	starting at application date	closure of the job + 30 days	114
United Arab Emirates	120	10	3650	6	your consent or the last login date	114	starting at application date	closure of the job + 30 days	114
United Kingdom	9	0,75	273	6	your consent or the last login date	3	starting at application date	closure of the job + 30 days	3
United States	96	8	2920	6	your consent or the last login date	90	starting at application date	closure of the job + 30 days	90