

## 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 XL Insurance Company SE, Hong Kong Branch and Catlin Hong Kong Ltd and to be informed of the rights to which you are entitled under data protection law.

### DATA CONTROLLER RESPONSIBLE FOR THE PROCESSING OF YOUR PERSONAL DATA

#### AXA XL entities

##### For Job Applications at Catlin Hong Kong Limited:

Catlin Hong Kong Limited

2401 Dorset House  
Taikoo Place  
979 King's Road  
Hong Kong

##### For Job Applications at XL Insurance Company SE, Hong Kong Branch:

XL Insurance Company SE, Hong Kong Branch

2401 Dorset House  
Taikoo Place  
979 King's Road  
Hong Kong

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: [dataprotectionAsia@axaxl.com](mailto:dataprotectionAsia@axaxl.com).

### PURPOSES OF PROCESSING, LEGAL BASIS AND CATEGORIES OF PERSONAL DATA PROCESSED

PURPOSES OF PROCESSING OF YOUR PERSONAL DATA	LEGAL BASIS	CATEGORIES OF PERSONAL DATA PROCESSED
<b>Purpose n°1):</b> Management of the recruitment process of external candidates	<b>The legal basis for the processing of your personal data legitimizing this purpose</b> is the execution of pre-contractual measures (Art. 6. 1.b) GDPR and/or Hong Kong PDPO Data Protection Principles ("DPPs") DPP3).	- 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

		<p>email address, personal address, nationality;</p> <ul style="list-style-type: none"> <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>
<p><b>Purpose n°2:</b> Management of CV bank and Management of the sending of job adverts (newsletter)</p>	<p><b>The legal basis for the processing of your personal data legitimizing this purpose</b> is the application of consent (Art. 6 1.a) GDPR) and Data Protection Principle 3 (“DPP3”) under Hong Kong PDPO. Please note that you can withdraw this consent at any time. If you decide to do so, you will no longer receive job offers from the Data Controllers. The withdrawal of your consent does not affect the lawfulness of the processing previously carried out, or any processing for which the legal basis is not consent.</p> <p>Your personal data will be shared with recruitment teams from AXA :</p> <p>1) to allow you to have a good visibility of your applications and profiles within all AXA entities and</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).</li> </ul>

	2) to enable them to perform analytics on the use of the platform	
<p><b>Purpose n°3):</b> Management of internal mobility of AXA employees</p>	<p><b>The legal basis for the processing of your personal data legitimizing this purpose</b> is the execution of contractual measures (Art. 6. 1.b) GDPR and/or Hong Kong PDPO Data Protection Principles (“DPPs”) DPP3).</p> <p>Your personal data will be shared with recruitment teams from AXA :</p> <p>1) to allow you to have a good visibility of your applications and profiles within all AXA entities and</p> <p>2) to enable them to perform analytics on the use of the platform</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><b>The legal basis for the processing of your personal data legitimizing this purpose</b> is the application of the legitimate interest (Art. 6 1.f) of the GDPR). This data processing should help either AXA entities to find the most adapted candidates for a job role or to</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> </ul>

	help the candidate to find the best job positions in AXA.	<ul style="list-style-type: none"> <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><b>The legal basis for the processing of your personal data legitimizing this purpose</b> is the application of the legitimate interest (Art. 6 1.f) of the GDPR). The legitimate interests pursued by the data controllers consist in the necessity to maintain the platform to enables recruitment and the provision of additional services to applicants while respecting the principles of security, compliance and necessary technical developments.</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>	<p><b>The legal basis for the processing of your personal data legitimizing this purpose</b> is the application of the legitimate interest (Art. 6 1.f) of the GDPR. The legitimate interests pursued by the data controllers consist in the possibility of obtaining recommendation from its employees on potential internal candidates and helping recruiters in the pre-selection of internal 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>	<p><b>The legal basis for the processing of your personal data legitimizing this purpose</b> is the application of the legitimate interest (Art. 6. 1.f) of the GDPR. The legitimate interest pursued by the data controllers consist in enabling employees to develop additional expertise and skills, as well as utilizing employee skills sets where required across the AXA Group.</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, XL Insurance Company SE, Hong Kong Branch or Catlin Hong Kong Ltd 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. The primary legal basis for this is Art. 6 (1) (b) GDPR, Hong Kong PDPO DPP3 and the guidance provided in the Code of Practice on Human Resource Management issued by PDPC in December 2004 relating to personal information collection.

In individual cases, we also process your personal data to protect our legitimate interests or the legitimate interests of third parties. The legal basis thereof is Art. 6 (1) (f) GDPR. We will ensure that the processing is not excessive in accordance with the DPP3 under the Hong Kong PDPO and the guidance provided in the Code of Practice on Human Resource Management issued by the PDPC. 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 and Section 58 under Hong Kong PDPO, 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.

Subject to the applicability of other legal bases such as Art. 9 (2) (b) GDPR, the processing of special categories of personal data takes place on the basis of your consent as referred to in Art. 9 (2) (a) GDPR.

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**

For the purposes 1) concerning the management of the recruitment process of external candidates, 2) concerning the constitution of a CV-library and the sending of job adverts, , 4) concerning the provision of the matching test, and 6) concerning the referral of internal candidates , the data retention period will usually depend on the country of the AXA entity to which you are applying. . Please refer to the Appendix below according to your country.

For the purposes 1) concerning the management of the recruitment process of external candidates, the retention period is 30 days after the closure of the job advert in the active data base unless you give us your explicit consent to keep it, for potential future job opportunities 2) concerning the constitution of a CV-library and the sending of job adverts, the data retention period is 6 months after your consent in the active database.

For the purposes 3) concerning the internal recruitment, and 7) concerning GIGs, your data will be kept for the duration of your employment contract.

For the purpose n°5) concerning the administration of the platform, the retention period has been defined following the purposes identified above.

There is a restricted data processing (archiving data) before purging your data, meaning that AXA overwrites the email with a pseudo email and changes the person folder to “restricted processing”. That restricted data processing is strictly necessary for evidence purposes in case of litigation. The record stays in the platform based on country retention period and then it is purged.

## **DATA SUBJECT RIGHTS**

You may exercise the following rights against us at one the addresses referred to above:

- Confirmation and access to personal data stored about you (Art. 15 GDPR and DPP6 Hong Kong PDPO).
- Rectification or completion of inaccurate or incomplete data (see also Art. 16 GDPR and DPP6 Hong Kong PDPO);
- Immediate erasure of data concerning you (Art. 17 GDPR), or the restriction of the processing in accordance with Art. 18 GDPR, if a deletion should not yet be considered for reasons pursuant to Art. 17(3) GDPR;
- Reception of the data concerning you, and which have been provided by you, in a structured, common, and machine-readable format as well as transmission of those data to other providers/controllers (Art. 20 GDPR);
- Lodge a complaint with one of the supervisory authorities listed below, if you are of the opinion that the processing of personal data relating to you infringes any of the data protection regulations (Art. 77 GDPR and Hong Kong PDPO Section 37).

## **RIGHT TO OBJECT**

**You have the right to object to the processing of your personal data for direct marketing purposes.**

**Where we process your data to pursue our legitimate interests, you may object to this processing on grounds relating to your particular situation that contradict data processing.**

**For processing with the purpose n°4) Provision of the matching test, n°5) Administration of the platform, the purpose n°6) Referral of internal candidates and the purpose n°7) Development of AXA Employees' expertise & skills (GIG) you also have the right to object, at any time, for reasons relating to your particular situation, to the processing of your personal data.**

**For processing with purpose n°2) Management of CV-library and of the sending of job adverts, please note that you can change your consent type at any time.** If you decide to do so, you will no longer receive information about potential new roles. The withdrawal of your consent does not affect the legality of the processing previously carried out.

You may be asked for information to confirm your identity and/or to assist the Company to locate the data you are seeking as part of our response to your request.

#### **DATA PROTECTION SUPERVISORY AUTHORITIES**

The data protection authority competent for Hong Kong is:

##### **Privacy Commissioner for Personal Data, Hong Kong**

Unit 1303, 13/F,

Dah Sing Financial Centre

248 Queen's Road East

Wanchai, Hong Kong

Main Line: +852 2827 2827

Fax: +852 2877 7026

**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