

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 Catlin Japan KK, 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 XL Catlin Japan KK:

XL Catlin Japan KK

Tokyo Sankei Building
1-7-2 Otemachi, Chiyoda-ku
Tokyo
100-0004
Japan

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.

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
Purpose n°1): Management of the recruitment process of external candidates	The legal basis for the processing of your personal data legitimizing this purpose is the execution of pre-contractual measures (Art. 6. 1.b) GDPR) and Articles 17 & 18 of the Japan APPI.	- 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; - Personal life data: family status (may be collected on your resume), hobbies (may be collected on your resume); - Professional data, such as : interests, skills (a minimum of one topic) or CV (file or link to LinkedIn), professional

		<p>email, local ID, job title, work site, Contract type (permanent or fixed term contract).</p> <p>To the extent strictly authorized by law, Personal Data can be processed on the CV as follow: Health Data, (information concerning disability) in accordance with Article 9-2-b of the GDPR.</p>
<p>Purpose n°2: Management of CV bank and Management of the sending of job adverts (newsletter)</p>	<p>The legal basis for the processing of your personal data legitimizing this purpose is the application of consent (Art. 6 1.a) GDPR), and Article 18 (1) of the Japan APPI. 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> <p>2) to enable them to perform analytics on the use of the platform</p>	<ul style="list-style-type: none"> - 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; - Personal life data: family status (may be collected on your resume), hobbies (may be collected on your resume); - Professional data, such as : interests, skills (a minimum of one topic) or CV (file or link to LinkedIn).
<p>Purpose n°3): Management of internal mobility of AXA employees</p>	<p>The legal basis for the processing of your personal data legitimizing this purpose is the execution of contractual measures (Art. 6. 1.b) GDPR) and Articles 17 & 18 of the Japan APPI.</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"> - 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; - Personal life data: family status (may be collected

	<p>2) to enable them to perform analytics on the use of the platform</p>	<p>on your resume), hobbies (may be collected on your resume);</p> <ul style="list-style-type: none"> - 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.
<p>Purpose n°4): Match candidates' profiles to job positions ("the matching test") using artificial intelligence</p>	<p>The legal basis for the processing of your personal data legitimizing this purpose is the application of the legitimate interest (Art. 6 1.f) of the GDPR) and Article 17 and 18 of the Japan APPI. This data processing should help either AXA entities to find the most adapted candidates for a job role or to help the candidate to find the best job positions in AXA.</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"> - skills (key words); - job family (i.e. compliance, finance, security etc.); - experiences - desired place of work; - type of contract (fixed-term contract, permanent contract, internship, work experience).

<p>Purpose n°5): Administration of the platform (monitoring of use and functioning and ticket management)</p>	<p>The legal basis for the processing of your personal data legitimizing this purpose is the application of the legitimate interest (Art. 6 1.f) of the GDPR and Article 17 and 18 of the Japan APPI. 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>Purpose n°6): Referral of internal AXA candidates</p>	<p>The legal basis for the processing of your personal data legitimizing this purpose is the application of the legitimate interest (Art. 6 1.f) of the GDPR and Article 17 and 18 of the Japan APPI. 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"> - Identification data, such as: first name, last name, personal email address, personal phone number (optional); - professional data: resume (optional), job category, preference in the location of the job offer (optional).
<p>Purpose n°7): Development of AXA Employees' expertise & skills (GIG)</p>	<p>The legal basis for the processing of your personal data legitimizing this purpose is the application of the legitimate interest (Art. 6. 1.f) and Article 17 and 18 of the Japan APPI 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"> - Identification data: First name, last name, gender, language; - Professional data: number of years of experience, name of employers; - Personal life: competencies & interests (optional).

As part of the application process, XL Catlin Japan KK 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 and Articles 17 & 18 of the Japan APPI.

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 and Article 17 and 18 of the Japan APPI. We

will ensure that the processing is not excessive in accordance with Article 18 of the Japan APPI. 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 Articles 18, 20 & 21 of the Japan APPI, 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 and Article 20 (2) of the Japan APPI.

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.

These recipients include:

- AXA Group Operations (France) in charge of the integration of the platform and the management of IT support;
- Catlin Singapore Pte Ltd: authorized persons involved in the recruitment process such as human resources;
- 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 Article 33 of the Japan APPI).
- Rectification or completion of inaccurate or incomplete data (see also Art. 16 GDPR and Article 34 of the Japan APPI);
- Immediate erasure of data concerning you (Art. 17 GDPR), or the restriction of the processing in accordance with Art. 18 GDPR and Article 35 of the Japan APPI, if a deletion should not yet be considered for reasons pursuant to Art. 17(3) GDPR and Article 35 (2) of the Japan APPI;

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.

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APPENDIX

Retention periods in external recruitment per country

Country	RETENTION PERIOD (in months)	RETENTION PERIOD (in years)	RETENTION PERIOD (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)
Japan	36	3	1096	6	your consent or the last login date	30	starting at application date	closure of the job + 30 days	30