

Privacy Notice (United States)

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.

Privacy Policy and Notice at Collection for California residents: This Privacy Policy and Notice at Collection applies to personal information of California residents to the extent the information is subject to the California Consumer Privacy Act as amended by the California Privacy Rights Act of 2020 (CCPA). A link to our notice and policy can be found [here](#).

Address and Contact Details for AXA XL in the United States:

AXA XL

100 Constitution Plaza Hartford, CT. 06103

1-800 242-5198

USA

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.

PURPOSES OF PROCESSING AND CATEGORIES OF PERSONAL DATA PROCESSED

PURPOSES OF PROCESSING OF YOUR PERSONAL DATA	CATEGORIES OF PERSONAL DATA PROCESSED
Purpose n°1: Management of the recruitment process of external candidates	<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), professional email, local ID, job title, work site, Contract type (permanent or fixed term contract). <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>
Purpose n°2: Management of CV bank and Management of the sending of job adverts (newsletter)	<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);

	<ul style="list-style-type: none"> - 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>	<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), 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>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>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>	<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>	<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, 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.

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