This Privacy Policy applies to personal information of California residents to the extent the information is subject to the California Consumer Privacy Act of 2018 (CCPA). This privacy policy does not apply to personal information collected pursuant to (i) the federal Gramm-Leach-Bliley Act and its implementing regulations or the California Financial Information Privacy Act; or, (ii) certain medical and health information covered by HIPAA.

**Personal Information We Collect, Use, Disclose, or Sell**

*Categories of Personal Information We Collect, Categories of Sources of Personal Information, Business or Commercial Purposes for Which Personal Information Will Be Used, and Third Parties with Whom Personal Information is Shared*¹

We collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“personal information”). Within the last twelve (12) months, we collected the following categories of personal information from the sources identified below for the business and commercial purposes indicated, and shared such categories of personal information with the specified categories of third parties:
<table>
<thead>
<tr>
<th>Category of Personal Information</th>
<th>Examples</th>
<th>Sources of Personal Information</th>
<th>Business or Commercial Purpose(s) for Which Used</th>
<th>Third Parties Shared With, If Any</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identifiers</td>
<td>A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.</td>
<td>From other insurance companies that we work with, other reinsurers and retrocessionaries, third party claims handlers who are involved in a claim or assist us in investigating or processing claims, including witnesses and external claims data collectors and verifiers, our business partners with whom we work to provide insurance products, public sources, such as public databases (where permitted by law), coverholders, insurance brokers or other intermediaries, third party evidence providers, healthcare service providers, financial institutions, pension processing platforms, individuals that you may be associated with (e.g. joint account holders, company employees or directors, family members, etc.)</td>
<td>We use your personal information to: (a) to provide our services and fulfill our contractual obligations to you and other third parties (b) to review, process and manage claims (c) to conduct data analysis, which helps us assess risks, price our products appropriately and improve our services (d) to help us prevent and detect fraud, money laundering, terrorism and other crimes (e) to help develop new, and improve existing, services (f) to operate and expand our business activities (g) to carry out background checks, where lawful (h) to perform administrative activities in connection with our services (i) to exercise, defend and protect our legal rights or the rights of third parties (j) to comply with legal obligations and to cooperate with regulatory bodies to which we are subject (k) for research and development of new insurance products (l) to audit our business for marketing purposes.</td>
<td>We may share your personal information with third parties under the following circumstances: AXA XL group companies. We operate as a global business, so we may share your personal information with group companies who may use this information for the purposes described in this privacy notice. Insurance companies, coverholders, intermediaries, financial institutions, retrocessionaries and business partners. We may share your personal information with insurance companies, intermediaries, financial institutions, retrocessionaries and business partners that use your personal information in connection with the provision of insurance and processing of claims. For example, we may share your personal information with other reinsurers and insurance brokers for the purposes of settling claims. Service providers. We may share your personal information with service providers that perform services and other business operations for us, for example, IT and analytics providers, actuarial service entities, auditors and advisers. Any law enforcement agency, court, regulator, government authority or professional body. We may share your personal information with these parties where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party. Asset purchasers. We may share your personal information with any third party that purchases, or to which we transfer, all or substantially all of our assets and business. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this privacy notice. Customer companies. We may share your personal information with your company or employer in certain circumstances, for example, if your company has a corporate insurance product with us and you make a claim under that product. Because we operate as part of a global business, the recipients referred to above may be located outside the jurisdiction in which you are located (or in which we provide the services). See the section on “International Data Transfer” below for more information.</td>
</tr>
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<td>Personal Information Categories Listed in the California Customer Records statute (Cal. Civ. Code 1798.80(e))</td>
<td>A name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</td>
<td>See above</td>
<td>See above</td>
<td>See above</td>
</tr>
<tr>
<td>Characteristics of protected classifications under California or federal law</td>
<td>Race, color, age (40 years and older), ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</td>
<td>See above</td>
<td>See above</td>
<td>See above</td>
</tr>
<tr>
<td>Commercial Information</td>
<td>Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies as part of the claim adjustment process;</td>
<td>See above</td>
<td>See above</td>
<td>See above</td>
</tr>
<tr>
<td>Professional or employment-related information</td>
<td>Current and/or past employment history including performance evaluations.</td>
<td>See above</td>
<td>See above</td>
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</tr>
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</table>
Disclosure of Personal Information for a Business or Commercial Purpose

In the preceding twelve (12) months, we have disclosed the following categories of personal information for business or commercial purpose:

- Identifiers, Personal Information, Categories Listed in the California Customer Records statute (Cal. Civ. Code 1798.80(e)), characteristics of protected classifications under California or federal law and/or Commercial Information

We do not sell personal information.

Your Privacy Rights

Right to Know

You have the right to request that we disclose to you personal information we collect, use, disclose, or sell about you.

You can visit our website axaxl.com/privacy-notice or call 1-800-242-5198 to make a disclosure request. You may make up to two requests in any 12-month period.

We do not sell your personal information.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

Making a verifiable consumer request does not require you to create an account with us. If you would like to request access to, or us to take action on, your personal information, subject to local laws and regulations, you can submit a request through the Contact Us section of our online privacy notice at axaxl.com/privacy-notice or you may call 1-800-242-5198.

We will only use personal information provided in a verifiable consumer request to verify the requestor’s identity or authority to make the request.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Right to Request Deletion

You have the right to request that we delete your personal information. You may make such a request by visiting our website at axaxl.com/privacy-notice or calling 1-800-242-5198.

In order to verify your identity, you will be required to provide your address, country of residence, telephone number, date of birth and policy or claim number (if known). We will use this information to research your request before we respond.
You should be aware, however, that California law allows us to retain your personal information under certain conditions, even if you have asked us to delete it, such as when retaining your personal information is necessary for us to complete a transaction with you or provide you with a good or service you have requested. We will notify you of any denial of your deletion request and the reason for such denial.

Right to Non-Discrimination for Exercise of Consumer Privacy Rights

We will not discriminate against you because you have chosen to exercise any of your privacy rights described above.

Authorized Agent

You may use an authorized agent to submit a request on your behalf. To use an authorized agent, you will need to (i) provide written instruction to your agent and verify your identity to us, or (ii) provide a power of attorney pursuant to California Probate Code Sections 4000 to 4465.

If you have questions about this policy, please contact us at:

Phone: 1-800 242-5198
Website: axaxl.com/privacy-notice
Email: dataprivacy@axaxl.com
Address: 100 Constitution Plaza Hartford, CT. 06103
Attn: Brendan McKiernan – North America Data Privacy Officer

Effective: January 2020