

AYVENS INSURANCE PRIVACY STATEMENT

Last Updated 9 March 2026

Your privacy is important to us and to the Ayvens Group and the Société Générale Group to which Ayvens Insurance belongs. This is a matter of priority for us and we have implemented strong principles in that respect, especially in regards of the EU General Data Protection Regulation and the UK General Data Protection Regulation. Euro Insurances DAC trading as Ayvens Insurance (hereafter “**Ayvens Insurance**”) value the trust of customers, suppliers and business partners and are committed to protecting their personal data. Compliant privacy and information security practices are therefore integral components of Ayvens Insurance’s services, corporate governance, risk management and overall accountability. We only process such personal data as is necessary for our business activities and the provision of the Ayvens Insurance services.

This Privacy Statement (the “**Statement**”) describes our practices in connection with the personal information (“**Personal Data**”) that we process about you and your business relationship with Ayvens Insurance.

Please read this Privacy Statement carefully so that you understand how we collect and use your Personal Data.

Click [here](#) to view the Ayvens Group Global Privacy Statement.

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1. SCOPE OF THIS STATEMENT

1. Website visitors/users (“**Website Visitors**”);
2. Corporate Customers/Policyholders of Ayvens Insurance (“**Customers**”);
3. Customers’ employees/drivers (“**Drivers**”);
4. Suppliers of goods and services (“**Suppliers**”);
5. Any third party, other than a customer, buyer, trader or supplier, with a business relationship or strategic alliance (“**Business Partners**”);
6. Third Party Claimants.
(or prospects in relation to the above; individually and collectively also referred to as “**you**”, “**your**” or “**yours**”).

We collect and use your Personal Data through our various insurance services and in the course of performing our business activities (“**Services**”).

RESPONSIBILITIES OF CUSTOMERS

Insofar as Customers in their capacity as employers have access to Personal Data of their employees, i.e. Drivers, the Customer is the controller responsible for the processing and use thereof in such capacity. This Statement does not apply to the processing and use of Personal Data of Drivers by Customers (employers).

2. WHO ARE WE?

Euro Insurances DAC trading as Ayvens Insurance (“Ayvens Insurance”) is responsible for processing your Personal Data (Controller) for the purposes of the EU General Data Protection Regulation (“EU GDPR”) and, where applicable, the UK General Data Protection Regulation (“UK GDPR”), when we receive your Personal Data from our appointed claim handlers when you, your employer or a third party, claim concerning an accident involving the insured vehicle.

Euro Insurances DAC is a Designated Activity Company incorporated in Ireland with its registered office at:

Second Floor, Central Park, Block C,
Leopardstown
D18 X5T1
Ireland

Euro Insurances DAC also operates in the United Kingdom through Euro Insurances DAC (UK Branch) and forms part of Ayvens Insurance. The UK Branch is authorised by the Prudential Regulation Authority and is subject to regulation by the Financial Conduct Authority and limited regulation by the Prudential Regulation Authority. Details of the extent of our regulation by the Prudential Regulation Authority are available from us on request. Firm Reference Number: 997731.

Ayvens Insurance provides fleet insurance solutions to entities forming part of the Ayvens Group (“Ayvens Entity”) and is an independent Controller with the Ayvens Entity when we receive your Personal Data from the relevant Ayvens Entity to insure your vehicle.

The Ayvens Group is part of Ayvens S.A. headquartered at:
1, Rue Eugène et Armand Peugeot
92500 Rueil Malmaison, France

Ayvens Insurance may also be referred to as “**we**”, “**our**” or “**us**”.

3. HOW DO WE COLLECT YOUR PERSONAL DATA?

We and our service providers collect Personal Data in the following ways:

- **Through sales activities**

We commence the processing of Personal Data if you provide this, directly or indirectly via third parties, e.g. as part of an offline sales lead, registration, online contact form, inquiry by e-mail, telephone, chat and/or application, survey or price competition.

- **Through the Services**

Most of the Personal Data we collect are in relation to the Services we provide or will be providing to you as:

- (i) the customer of the Ayvens Entity or
- (ii) to you as the driver whereby your employer is the customer of the Ayvens Entity .

This starts with the registration of your Personal Data with respect to the commencement of an insurance policy and continues during the period of insurance and when we communicate with you about our services. We also process your Personal Data when the insured vehicle is involved in an accident for which a claim for compensation is made.

In order to provide you with the Services, we work closely with Service Partners and Service Providers. Service Partners are companies which assist us in providing our Services to you and, for example include claim handlers, intermediaries and reinsurers. Service Providers are companies retained by us to support us running our business, for example to maintain our IT network and related infrastructure

- **Online**

We collect Personal Data from you online, when:

- You visit our website; and
- Place an insurance request to one of our appointed insurance intermediaries and make a claim to one of our appointed claim handlers.

- **From other sources**

We receive your Personal Data from other sources, for example:

- Drivers' employers, if you use a company vehicle;
- From our independent Service Partners who assist us in providing our insurance and other services to you, including claim handlers, intermediaries and reinsurers.
- The relevant authority (e.g., police or justice department) where your vehicle was involved in an accident.;
- Public and government authorities, including public and government authorities outside your country of residence, where we are subject to sanctions and embargoes or anti-money laundering and counter terrorism regulations;
- Publicly available databases, credit reference agencies and other sources.

We need to collect Personal Data in order to provide the requested Services to you or to handle queries, comments or complaints related to our Services. If you do not provide the Personal Data requested, we may not be able to provide the Services. If you disclose any Personal Data relating to other persons to us or to our service providers in connection with the Services, you represent that

you have the authority to do so and to permit us to use the information in accordance with this Statement.

Monitoring of communications

Subject to applicable laws, we will monitor and record calls, e-mail, text messages and other communications we have with you. We do this for compliance with regulatory rules, self-regulatory practices or procedures relevant to our business, to prevent or detect crime, in the interests of protecting the security of our communication systems and procedures, and for quality control and staff training purposes.

For example, where we are required by a regulator to record certain telephone lines (as relevant) we will do so. In addition, where appropriate and having regard to applicable data protection law, our monitoring will be to check for inappropriate content in communications. In very limited and specific circumstances we may conduct short term carefully controlled monitoring of your activities where this is necessary for our legitimate interests or to comply with a legal obligation. We may do this for instance where we have reason to believe that fraud or other crime is being committed, where offences are suspected and where the monitoring is proportionate to the type of the disciplinary offence, or where we suspect non-compliance with sanctions and embargoes or anti-money laundering and counter terrorism regulations to which we are subject. In particular, telephone calls may be recorded for these purposes.

4. WHY AND ON WHICH LEGAL BASIS DO WE USE PERSONAL DATA?

4.1 DATA PERTAINING TO WEBSITE VISITORS

4.1.1 WEBSITE

4.1.1.a To communicate with you

What does this purpose entail?

We process your Personal Data when you contact us via one of our online contact forms, for example, when you send us questions, suggestions, compliments or complaints, or when you request a quote for our Services. This processing is done for the entering into or performance of an agreement that you have with us, and to pursue our legitimate interest to be able to respond to a request.

Which Personal Data do we process for this purpose?

For this purpose, we may collect your (business) contact details (for instance your name(s), e-mail address, telephone number), license plate or registration number and any other information that you provide to us in the open text fields of the contact form, where you can, for example, pose your question, describe your suggestion, make a compliment or share a complaint.

With whom do we share your Personal Data?

See section 5 '[WHO HAS ACCESS TO YOUR DATA?](#)'.

4.1.2 COOKIES AND SIMILAR TECHNOLOGIES

Any processing of your Personal Data via cookies and/or similar technologies will take place in accordance with our [cookie statement](#), available on ayvens.com and our Ayvens Insurance local website.

4.1.3 AYVENS BUSINESS PURPOSES

4.1.3.a Management reporting

What does this purpose entail?

Personal Data for various Ayvens Insurance business-related purposes for which we have a legitimate interest to process these data, such as audits, developing new products, enhancing, improving or modifying our websites and Services, data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

To facilitate your use of our online services or applications, we may analyse data that we collect when using our digital media and combine it with information collected via cookies based on your consent. For example, to better understand which digital channel (Google search, e-mail, social media) or device (desktop, tablet or mobile) you prefer, we can optimize or limit our communication by channel and by device.

Which Personal Data do we process for this purpose?

For this purpose, we may process your name, your e-mail address, your IP address, gender, date of birth, place of residence, digits of your postal code and any other information mentioned in this Statement or otherwise provided to us by you, if such is required for one of the purposes mentioned in the previous paragraph.

With whom do we share your Personal Data?

See section 5 '[WHO HAS ACCESS TO YOUR DATA?](#)'.

4.1.3.b Compliance with laws and legal obligations and protection of Ayvens Insurance assets and interests

What does this purpose entail?

To comply with a legal obligation or where we have a legitimate interest, we process your Personal Data as appropriate or necessary:

- (a) under applicable law, including laws outside your country of residence and including sectorial recommendations;
- (b) to comply with legal process;
- (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence;
- (d) to enforce our terms and conditions and other applicable policies;
- (e) to protect our operations;
- (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and
- (g) to allow us to pursue available remedies or limit the damages that we may sustain.

Which Personal Data do we process for this purpose?

For this purpose, we process your name, your contact information, your correspondence with Ayvens, your use of any of our Services and any other information mentioned in this Statement or otherwise provided to us by you, if such is required for one of the purposes mentioned in the previous paragraph.

With whom do we share your Personal Data?

Only if we are required to do so by law or sectorial recommendation to which Ayvens Insurance is subject, or if we have a legitimate interest to that effect, your Personal Data will be provided to supervisory agencies, fiscal authorities and investigative agencies. See also section 5 '[WHO HAS ACCESS TO YOUR DATA?](#)'.

4.2 DATA PERTAINING TO CUSTOMERS

4.2.1 CUSTOMER ACCOUNT MANAGEMENT

4.2.1.a To provide, manage and administer the Customer account

What does this purpose entail?

Our affiliate Ayvens Leasing entities process your Personal Data to handle day-to-day management and administration of the Customer accounts, such as maintaining contracts and keeping you informed of all important developments concerning the Services and other information which is relevant for the Customer contract and account. This processing is based on the performance of the insurance policy that we have with you or based on a legal obligation.

Which Personal Data do we process for this purpose?

For this purpose, we may process business contact details, driver details, license number and vehicle registration details.

With whom do we share your Personal Data?

See section 5 '[WHO HAS ACCESS TO YOUR DATA?](#)'.

4.2.1.b To communicate with you

What does this purpose entail?

You can contact us or our affiliate Ayvens Leasing entities by various means (such as e-mail or telephone, or via our website). In this case we will use your Personal Data to answer your question/request. We or our affiliate Ayvens Leasing entities can also contact you, for example, regarding day-to-day management and administration of your Customer account. This processing is based on our legitimate business interest and relates to the performance of the insurance policy that we have with you, or with your consent.

Which Personal Data do we process for this purpose?

For this purpose, we may process your name, your business contact details, your correspondence with Ayvens Insurance pertaining to your question/request and all other personal information you provide to us and/or which is necessary to appropriately respond to you.

With whom do we share your Personal Data?

See section 5 '[WHO HAS ACCESS TO YOUR DATA?](#)'.

4.2.2 AYVENS PREMISES

4.2.2.a Access to and security control of Ayvens Insurance premises

What does this purpose entail?

We may process your Personal Data when you visit us on our premises for the purpose of ensuring appropriate access controls and security, for which we have a legitimate interest (safety and security of our assets).

Which Personal Data do we process for this purpose?

For this purpose, we may process your name, your contact information and the person you are visiting. We may also process video and/or audio information about you through video/audio recording equipment, such as for instance CCTV.

With whom do we share your Personal Data?

See section 5 [‘WHO HAS ACCESS TO YOUR DATA?’](#).

4.2.3 CUSTOMER REPORTING

4.2.3.a Claims

What does this purpose entail?

We collect your personal information from you when you make a claim to our appointed claim handler. We process your information by recording and administering accidents that you and/or your vehicle may have been involved in, to restore mobility and handle damage. This processing is done based on our legitimate interest when the claim relates to damage to your vehicle and for the establishment, exercise or defence of legal claims or for insurance purposes when the claim relates to a bodily injury suffered by you.

Which Personal Data do we process for this purpose?

For this purpose we may collect your name, contact details, vehicle details, accident details, damage details/photos of the incident, date of birth, profession, marital status, number of dependants, number of passengers in the vehicle, information of witnesses to the accident (if applicable) and any other information you choose to provide in the context of the accident (including any information pertaining to possible injuries).

We collect your personal information from third parties (such as individuals involved in the accident, witnesses, insurance companies and other) through our appointed claim handlers. For this purpose we collect the information of third parties involved in the accident/incident (such as the identity of your passengers, driver and passengers of third-party vehicles, and the insurance information of other third parties involved, information about the incident and third-party claims).

We collect your information from authorities (such as police) through our appointed claim handler. For this purpose, we may collect your name, address, license plate number, information regarding the accident, police reports and witness statements.

You may be required to provide us (through our appointed claim handler) with sensitive personal data e.g. details about your health and/or criminal convictions and the health and/or criminal convictions of third parties. This information is important and will remain confidential. Processing your sensitive personal data may be necessary for the establishment, exercise or defence of legal claims, to enable us to comply with legal obligations to which we are subject or for insurance purposes

With whom do we share your Personal Data?

See section 5 [‘WHO HAS ACCESS TO YOUR DATA?’](#).

4.2.4 AYVENS INSURANCE BUSINESS PURPOSES

4.2.4.a Management reporting

What does this purpose entail?

We process your Personal Data for various business purposes for which we have a legitimate interest to process these data, such as data analysis, audits, developing new products, enhancing, improving or modifying our Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

To facilitate your use of our online services or applications, we may analyse data that we collect when using our digital media and combine it with information collected via cookies based on your consent. For example, to better understand which digital channel (Google search, e-mail, social media) or device (desktop, tablet or mobile) you prefer, we can optimize or limit our communication and marketing activities by channel and by device.

Which Personal Data do we process for this purpose?

For this purpose, we may process various information that we collect in the context of providing our Services (such as your name, contact details, fleet/vehicle details etc.), as needed for one of the purposes set out above.

With whom do we share your Personal Data?

See section 5 '[WHO HAS ACCESS TO YOUR DATA?](#)'.

4.2.4.b Compliance with laws and legal obligations and protection of Ayvens Insurance assets and interests

What does this purpose entail?

To comply with a legal obligation or where we have a legitimate interest, we process your Personal Data as appropriate or necessary:

- (a) under applicable law, including laws outside your country of residence and including sectorial recommendations (e.g. counterparty due diligence (CDD), money laundering, financing of terrorism and other crimes);
- (b) credit checks;
- (c) to comply with legal process;
- (d) to respond to requests from public and government authorities including public and government authorities outside your country of residence;
- (e) to enforce our terms and conditions and other applicable policies;
- (f) to protect our operations;
- (g) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and
- (h) to allow us to pursue available remedies or limit the damages that we may sustain.

Which Personal Data do we process for this purpose?

For this purpose, we process the name, contact information, the date, place and country of birth of the ultimate beneficial owner of the counterparty that Ayvens Insurance want to do business with; we may also process the name, address and the date, place and country of birth of the person(s) who represent the company towards Ayvens Insurance; your correspondence with Ayvens Insurance, your use of Services and any other information mentioned in this Statement, if such is required for one of the purposes mentioned in the previous paragraph. For counterparty due diligence (CDD) purposes we periodically also process investigation data based on sanctions, enforcement, adverse media, politically exposed persons and anti-slavery screening. For this purpose, a risk-based approach is used to ensure only necessary Personal Data is collected. Please note, multiple (trained) employees are involved to evaluate the screening results in case of a 'hit' (human intervention).

With whom do we share your Personal Data?

Only if we are required to do so by law or sectorial recommendation to which Ayvens Insurance is subject, your Personal Data will be provided to supervisory agencies, fiscal authorities and investigative agencies. See also section 5 '[WHO HAS ACCESS TO YOUR DATA?](#)'.

4.3 DATA PERTAINING TO SUPPLIERS

4.3.1 SUPPLIER ACCOUNT MANAGEMENT

4.3.1.a To provide, manage and administer the Supplier account

What does this purpose entail?

We process your Personal Data to handle day-to-day management and administration of the Supplier accounts, such as maintaining contracts, and keep you informed of all important developments concerning the services you render and other information which is relevant for the Supplier contract and account. This processing is based on the agreement that we have with you or based on a legal obligation.

Which Personal Data do we process for this purpose?

For this purpose, we may process business contact details and log-in details to our Supplier online accounts.

With whom do we share your Personal Data?

See section 5 '[WHO HAS ACCESS TO YOUR DATA?](#)'.

4.3.1.b To communicate with you

What does this purpose entail?

You can contact us by various means (such as e-mail or telephone, or via our website). In this case we use your Personal Data to answer your question/request. We can also contact you, for example, regarding day-to-day management and administration of your Supplier account. This processing is based on the agreement that we have with you or with your consent.

Which Personal Data do we process for this purpose?

For this purpose, we may process your name, your business contact details, your correspondence with Ayvens Insurance pertaining to your question/request and all other personal information you provide to us and/or which is necessary to appropriately respond to you.

With whom do we share your Personal Data?

See section 5 '[WHO HAS ACCESS TO YOUR DATA?](#)'.

4.3.2 AYVENS INSURANCE PREMISES

4.3.2.a Access to and security control of Ayvens Insurance premises

What does this purpose entail?

We may process your Personal Data when you visit us on our premises for the purpose of ensuring appropriate access controls and security, for which we have a legitimate interest (safety and security of our assets).

Which Personal Data do we process for this purpose?

For this purpose, we may process your name, your contact information and the person you are visiting. We may also process video and/or audio information about you through video/audio recording equipment, such as for instance CCTV.

With whom do we share your Personal Data?

See section 5 '[WHO HAS ACCESS TO YOUR DATA?](#)'.

4.3.3 AYVENS BUSINESS PURPOSES

4.3.3.a Management reporting

What does this purpose entail?

We process Personal Data for various Ayvens Insurance business-related purposes for which we have a legitimate interest to process these data, such as data analysis, audits, developing new products, enhancing, improving or modifying our websites and Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

To facilitate your use of our online services or applications, we may analyse data that we collect when using our digital media and combine it with information collected via cookies based on your consent. For example, to better understand which digital channel (Google search, e-mail, social media) or device (desktop, tablet or mobile) you prefer, we can optimize or limit our communication and marketing activities by channel and by device.

Which Personal Data do we process for this purpose?

For this purpose, we may process your name, your e-mail address, your IP address, gender, date of birth, place of residence, digits of your zip code and any other information mentioned in this Statement or otherwise provided to us by you, if such is required for one of the purposes mentioned in the previous paragraph.

With whom do we share your Personal Data?

See section 5 '[WHO HAS ACCESS TO YOUR DATA?](#)'.

4.3.3.b Compliance with laws and legal obligations and protection of Ayvens Insurance assets and interests.

What does this purpose entail?

To comply with a legal obligation or where we have a legitimate interest, we process your Personal Data as appropriate or necessary:

- (a) Under applicable law, including laws outside your country of residence and including sectorial recommendations (e.g., counterparty due diligence (CDD), money laundering, financing of terrorism and other crimes);
- (b) to comply with legal process;
- (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence;
- (d) to enforce our terms and conditions and other applicable policies;
- (e) to protect our operations;
- (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and
- (g) to allow us to pursue available remedies or limit the damages that we may sustain.

Which Personal Data do we process for this purpose?

For this purpose, we process the name, contact information, the date, place and country of birth of the ultimate beneficial owner of the counterparty that Ayvens Insurance wants to do business with; we also process the name, address, job title, signature and the date, place and country of birth of the person(s) who represent the counterparty towards Ayvens Insurance; your correspondence with Ayvens Insurance, the services you render and any other information mentioned in this Statement, if such is required for one of the purposes mentioned in the previous paragraph. For counterparty due diligence (CDD) purposes we periodically also process investigation data based on sanctions, enforcement, adverse media, politically exposed persons and anti-slavery screening. For this purpose, a risk-based approach is used to ensure only

necessary Personal Data is collected. Please note, multiple (trained) employees are involved to evaluate the screening results in case of a 'hit' (human intervention).

With whom do we share your Personal Data?

Only if we are required to do so by law or sectorial recommendation to which Ayvens Insurance is subject, your Personal Data will be provided to supervisory agencies, fiscal authorities and investigative agencies. See also section 5 '[WHO HAS ACCESS TO YOUR DATA?](#)'.

4.4 DATA PERTAINING TO BUSINESS PARTNERS

4.4.1 BUSINESS PARTNER ACCOUNT MANAGEMENT

4.4.1.a To provide, manage and administer the Business Partner account

What does this purpose entail?

We process your Personal Data to handle day-to-day management and administration of the Business Partner accounts, such as maintaining contracts, and keep you informed of all important developments concerning the arrangements between us, other information which is relevant for the Business Partner contract and account. This processing is based on the agreement that we have with you or based on a legal obligation.

Which Personal Data do we process for this purpose?

For this purpose, we may process your business contact details.

With whom do we share your Personal Data?

See section 5 '[WHO HAS ACCESS TO YOUR DATA?](#)'.

4.4.1.b To communicate with you

What does this purpose entail?

You can contact us by various means (such as e-mail or telephone). In this case we use your Personal Data to answer your question/request. We can also contact you, for example, regarding day-to-day management and administration of your Business Partner account. This processing is based on the agreement that we have with you or with your consent.

Which Personal Data do we process for this purpose?

For this purpose, we may process your business contact details, your correspondence with Ayvens Insurance pertaining to your question/request and all other data you provide to us and/or which is necessary to appropriately respond to you.

With whom do we share your Personal Data?

See section 5 '[WHO HAS ACCESS TO YOUR DATA?](#)'.

4.4.2 AYVENS INSURANCE PREMISES

4.4.2.a Access to and security control of Ayvens Insurance premises

What does this purpose entail?

We may process your Personal Data when you visit us on our premises for the purpose of ensuring appropriate access controls and security, for which we have a legitimate interest (safety and security of our assets).

Which Personal Data do we process for this purpose?

For this purpose, we may process your name, your contact information and the person you are visiting. We may also process video and/or audio information about you through video/audio recording equipment, such as for instance CCTV.

With whom do we share your Personal Data?

See section 5 '[WHO HAS ACCESS TO YOUR DATA?](#)'.

4.4.3 AYVENS INSURANCE BUSINESS PURPOSES

4.4.3.a Management reporting

What does this purpose entail?

We process Personal Data for various Ayvens business-related purposes for which we have a legitimate interest to process these data, such as data analysis, audits, developing new products, enhancing, improving or modifying our websites and Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

To facilitate your use of our online services or applications, we may analyse data that we collect when using our digital media and combine it with information collected via cookies based on your consent. For example, to better understand which digital channel (Google search, e-mail, social media) or device (desktop, tablet or mobile) you prefer, we can optimize or limit our communication and marketing activities by channel and by device.

Which Personal Data do we process for this purpose?

For this purpose, we may process your business contact details and any other information mentioned in this Statement or otherwise provided to us by you, if such is required for one of the purposes mentioned in the previous paragraph.

With whom do we share your Personal Data?

See section 5 '[WHO HAS ACCESS TO YOUR DATA?](#)'.

4.4.3.b Compliance with laws and legal obligations and protection of Ayvens Insurance assets and interests.

What does this purpose entail?

To comply with a legal obligation or where we have a legitimate interest, we process your Personal Data as appropriate or necessary:

- (a) Under applicable law, including laws outside your country of residence and including sectorial recommendations (e.g., counterparty due diligence (CDD), money laundering, financing of terrorism and other crimes);
- (b) to comply with legal process;
- (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence;
- (d) to enforce our terms and conditions and other applicable policies;
- (e) to protect our operations;
- (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and
- (g) to allow us to pursue available remedies or limit the damages that we may sustain.

Which Personal Data do we process for this purpose?

For this purpose, we process the name, contact information, the date, place and country of birth of the ultimate beneficial owner of the counterparty that Ayvens Insurance wants to do business with; we also process the name, address, job title, signature and the date, place and country of

birth of the person(s) who represent the counterparty towards Ayvens Insurance; your correspondence with Ayvens Insurance, the services you render and any other information mentioned in this Statement, if such is required for one of the purposes mentioned in the previous paragraph. For counterparty due diligence (CDD) purposes we periodically also process investigation data based on sanctions, enforcement, adverse media, politically exposed persons and anti-slavery screening. For this purpose, a risk-based approach is used to ensure only necessary Personal Data is collected. Please note, multiple (trained) employees are involved to evaluate the screening results in case of a 'hit' (human intervention).

With whom do we share your Personal Data?

Only if we are required to do so by law or sectorial recommendation to which Ayvens Insurance is subject, your Personal Data will be provided to supervisory agencies, fiscal authorities and investigative agencies. See also section 5 '[WHO HAS ACCESS TO YOUR DATA?](#)'.

5. WHO HAS ACCESS TO YOUR DATA?

In addition to what is indicated for each purpose above regarding who has access to Personal Data under the control of Ayvens Insurance, we may also share Personal Data:

- Within Ayvens Group for the purposes described in this Privacy Statement. For a list of the Ayvens affiliates and their locations that may process Personal Data on behalf of the Controller, see the country signs on the top right of www.ayvens.com.
- Within Société Générale Group to which Ayvens Insurance belongs, for internal administrative purposes, to fulfil a legal obligation, to improve our services, to enable us to comply more efficiently and more effectively with laws and regulations or for monitoring, control and reporting purposes. Reporting purposes relate to any regulatory and statutory reporting obligations and data requests as required by Société Générale Group's regulators.
- To our third-party service partners, service providers and unaffiliated partners, or business partners such as claim handlers, intermediaries and reinsurers, to facilitate services they provide to you and us.

Service providers are companies we retain that support us in running our business, for example to help us maintain our IT network and related infrastructure and security and access controls to our premises.

We also use and disclose your Personal Data as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so:

- To comply with applicable law and regulations.
This can include laws outside your country of residence.
- To cooperate with public and government authorities.
To respond to a request or to provide information we believe is important. These can include authorities outside your country of residence.
- To cooperate with law enforcement.
For example, when we respond to law enforcement requests and orders or provide information, we believe is important.
- For other legal reasons.
To enforce our terms and conditions and to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.

- In connection with a sale or business transaction.

We have a legitimate interest in disclosing or transferring your Personal Data to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Ayvens business, assets or stock (including in connection with any bankruptcy or similar proceedings). Such third parties may include, for example, an acquiring entity and its advisors.

We will limit access to Personal Data to personnel with a business need to know for the purposes described in this Statement.

6. WHY PERSONAL DATA MAY BE TRANSFERRED TO THIRD COUNTRIES?

Ayvens is a global service provider that has customers and locations around the globe. Your Personal Data may be stored and/or processed in a country other than the one you reside in. For a list of the Ayvens affiliates and their locations, that may process Personal Data on behalf of the Controller, see the country signs on the top right of www.ayvens.com.

Some of the non-EEA countries are considered to provide for an adequate level of protection of your Personal Data, according to EU standards. You can find a list of these 'adequate countries' [here](#). For the transfer of Personal Data to other countries, Ayvens Insurance has put in place adequate measures to protect your Personal Data, such as Standard Contractual Clauses. You may obtain a copy of these measures by contacting us using the address in the 'How can you contact us?' section below or by following [this link](#).

7. CHILDREN'S PRIVACY

Our Services are not directed at individuals under the age of 18.

8. DO WE USE YOUR DATA FOR OTHER PURPOSES?

We may also use your Personal Data for a purpose other than the initial purpose. This is subject to the condition that the secondary purpose is in line with the initial purpose. The following factors are inter alia taken into account: are the purposes clearly related; is the secondary purpose appropriate and/or expected, was the Personal Data obtained directly from you or in another way; what kind of Personal Data is concerned for the secondary purpose; what would be the implications for you; and what data protection measures are applied when using your data for the secondary purposes.

It is generally permissible to process Personal Data for the following secondary purposes: transfer of the Personal Data to an Archive, internal audits or investigations, implementation of business controls and operational efficiency, IT systems and infrastructure related Processing such as for maintenance, support, life-cycle management, and security (including resilience and incident management), statistical, historical or scientific research, dispute resolution, legal or business consulting or insurance purposes.

9. HOW LONG WILL WE KEEP YOUR DATA?

Personal data of data subjects will be kept for the period necessary to fulfil the purposes described in this Statement unless a longer retention period is required or permitted by law.

The criteria applied to determine the applicable retention periods are: the duration of a relationship and provide the Services to you (for example, for as long as you insure your vehicle through us or for the period in which you might legally bring claims against us); as required by a legal obligation to which we are subject; and as advisable in light of our legal position, such as in regard of applicable statutes of limitations, litigation or regulatory investigations. After the relevant retention period, Ayvens Insurance will either anonymize or purge your Personal Data.

10. HOW DO WE SECURE YOUR DATA?

We seek to use appropriate organizational, technical and administrative measures to protect Personal Data within our organization, in accordance with applicable privacy and data protection laws and regulations. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please notify us in accordance with the 'How can you contact us?' section below immediately.

11. CHANGES TO THIS STATEMENT

We reserve the right to amend this Statement at any time in order to, for instance, address future developments of Ayvens Insurance or changes in industry or legal trends. The 'Last Updated' legend at the top of this Statement indicates when this Statement was last revised.

12. HOW CAN YOU CONTACT US?

If you have questions, requests or complaints, please feel free to contact us via the contact page or contact our Data Protection Correspondent via [this link](#). Because e-mail communication is not always secure, please do not include sensitive personal information in the e-mails you send us.

13. HOW CAN I EXERCISE MY PERSONAL DATA RIGHTS?

Please contact our Data Protection Correspondent via [this link](#) if you have any questions or concerns about how Ayvens Insurance processes your Personal Data; if you would like to exercise your right to request access, correct, suppress or delete Personal Data about you or request that we cease using it (right to object), withdraw your consent or if you would like to request a copy or portability of your Personal Data. We will respond to your request consistent with applicable law. Requests to exercise your data protection rights are coordinated by our Data Protection Correspondent based in Ireland, with input from our UK Branch where relevant to your request.

Please note that we may not be required to comply (or fully comply) with your request. Applicable laws or regulations may impose conditions or restrict certain of such rights. For instance, for as long as we have a relationship with you, or where personal data is kept in a backup system (for the purpose of restoring the data in case of a data loss event) and the data purging cycle may be different than applicable to the production system. In those circumstances, we will write to you explaining why we are unable to comply at that moment or, in the case of backup data, the request may be implemented at a later stage (when the backup is overwritten).

In your request, please make clear what Personal Data you would like to access or have changed or deleted, or otherwise let us know what limitations you would like to put on our use of your Personal Data.

For your protection, in principle we only implement requests with respect to the information associated with the particular e-mail address that you use to send us your request, and we may request additional information necessary to verify your identity before implementing your request. Please note that certain Personal Data may be exempt from such requests pursuant to applicable data protection laws or other laws and regulations.

You may also lodge a complaint with a data protection authority for your country or region, or in the place of the alleged misconduct. Please see here [a link](#) to the national data protection authorities located in the European Union and the European Economic Area or [here](#) to lodge a complaint with the Information Commissioner in the UK.