



SHAREHOLDERS

Privacy Notice

Please read this Data Protection Notice for Shareholders (the **Notice**) carefully. In this Notice we explain why and how we collect your personal data, how we protect these and how long they are stored. We store your data as safely as reasonably possible and protect these against loss, unauthorized distribution or access and we treat your personal data in strict compliance to the applicable legislation related to data protection, more specific the EU Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC or the General Data Protection Regulation ('GDPR').

This Notice is drafted as a Q&A ('Questions & Answers') list.

1 Who will process my personal data?

The controller of your personal data is the following legal entity:

ageas SA/NV
Rue du Marquis 1 box 7
1000 Brussels
Company number: 0451.406.524

As the controller, i.e. the legal entity that decides why and how information relating to you (**personal data**) is collected and processed in the context of your business relationship with ageas SA/NV, we respect your right to privacy. We will only process your personal data as described in this Notice and in accordance with the relevant data protection legislation, including GDPR.

2 What are the legal grounds, the types of personal data and the purposes for which my personal data are processed?

2.1 Possible legal grounds

Ageas will lawfully process your personal data and this mainly for one of the following (relevant) legal grounds:

- because it is necessary to comply with our legal obligations (**'Legal obligation'**)

- because it is necessary to safeguard our own legitimate interests or those of a third party, insofar as your interests or fundamental rights and freedoms don't prevail. We will balance this case by case and will permanently monitor this (**'Legitimate interest'**)

- because it is necessary for the performance of the contract or in order to take steps prior to entering into the contract (**'Contract'**);

Besides those mentioned above, there are also some less common legal grounds based on which Ageas may occasionally process your personal data, such as:

- your consent (**'Consent'**) which we will use only if strictly necessary. You can withdraw your consent at any time. However, this will not affect the lawfulness of any processing activities before such withdrawal.

For each specific purpose for which we process your personal data we will only refer to one legal ground.

2.2 Processed personal data and the related purposes and legal grounds

Personal data include all information that is related to you or on which basis you can be identified. Anonymous data, without the possibility to identify you, are therefore not regarded as personal data.

Ageas processes your personal data, whether or not in electronic or automated form, for legitimate purposes and on the basis of one of the abovementioned legal grounds.

In the table below you find an overview of which type of data is processed by us, for which purpose and which primary legal ground ¹ is invoked. It speaks for itself that this list can't be exhaustive. We keep more details internally in the so-called record of processing activities.

Purpose	Examples of personal data	Primary legal ground	Retention period ² of your personal data for:
to prepare for and manage the attendance and voting procedures for shareholders' meetings	<ol style="list-style-type: none"> 1. identification data: first name, last name; 2. contact details: address; 3. information regarding the shares held by you: e.g. number and type of shares; 4. voting instructions (in case of power of attorney) and voting behaviour; 5. and the above information with regard to represented 'one-man' legal entities that are (former, current or future) holders of Ageas securities and/or investors of/in Ageas. <p>Failure to provide the abovementioned personal data will lead to exclusion from participation to the shareholders 'meeting.</p>	legal obligations	For as long as we are legally required to maintain this information
to analyse Ageas' shareholding and shareholder database	<ol style="list-style-type: none"> 1. identification data: first name, last name; 2. contact details: address, e-mail address; 3. financial details: bank account number, identification of the bank – only for distributions to shareholders registered in the register of nominative shareholders; 4. information regarding the shares held by you: e.g. number and type of shares; 5. and the above information with regard to represented 'one-man' legal entities that are (former, current or future) holders of Ageas securities and/or investors of/in Ageas. 	legitimate interests pursued by Ageas to manage, analyse and update its shareholding and investor database. To this end, Ageas strives to maintain a fair balance between its need to process your personal data and the preservation of your rights and freedoms, including the protection of your privacy	For as long as you remain registered in the Ageas register of nominative shareholders;

¹ As mentioned, we only invoke one legal basis for each purpose, but to keep this Notice transparent, it is not possible to explain the purposes in detail. Therefore, multiple legal grounds can be applicable within one described summarized purpose. We will retain your personal data in accordance with the retention periods set out in the above table. These retention periods included in our data retention policy are dictated by:

- Applicable statutory/legal requirements;
- Industry guidelines, and
- For those data categories for which no express statutory or legal requirements apply, certain other determining factors such as the need to prove or enforce a transaction or contract, enforce our policies, etc.

Purpose	Examples of personal data	Primary legal ground	Retention period ² of your personal data for:
to manage the register of nominative shareholders, to provide servicing communications	1. identification data: first name, last name; 2. contact details: address, e-mail address; 3. financial details: bank account number, identification of the bank – only for distributions to shareholders registered in the register of nominative shareholders; 4. information regarding the shares held by you: e.g. number and type of shares; 5. and the above information with regard to represented 'one-man' legal entities that are (former, current or future) holders of Ageas securities and/or investors of/in Ageas.	legal obligations	For as long as we are legally required to maintain this information
to administer maintain shareholdings, to meet contractual obligation to shareholders	1. identification data: first name, last name; 2. contact details: address, e-mail address; 3. financial details: bank account number, identification of the bank – only for distributions to shareholders registered in the register of nominative shareholders; 4. information regarding the shares held by you: e.g. number and type of shares; 5. and the above information with regard to represented 'one-man' legal entities that are (former, current or future) holders of Ageas securities and/or investors of/in Ageas.	contract	For as long as we are legally required to maintain this information
to pay dividends and other distributions to Ageas shareholders and/ or holders of other Ageas securities	1. identification data: first name, last name; 2. information regarding the shares held by you: e.g. number and type of shares; 3. the above information with regard to represented 'one-man' legal entities that are (former, current or future -) holders of Ageas securities and/or investors of/in Ageas; 4. and financial details: bank account number, identification of the bank – only for distributions to shareholders registered in the register of nominative shareholders.	legal obligations	For as long as we are legally required to maintain this information
to enable Ageas to send you direct marketing communications (including roadshows and presentations) by email or other electronic means	1. your identification details : first name, last name; 2. your contact details : e-mail address; 3. whether you opted in to receiving such communications; 4. and whether you opted out to receiving such communications.	consent	For the duration of your subscription

Purpose	Examples of personal data	Primary legal ground	Retention period ² of your personal data for:
live streaming of the image/voice of certain Ageas shareholders that will be physically present during the shareholders' meetings	Image/voice of certain ageas shareholders	consent, you can withdraw your consent by sitting in a specific area where no recording will take place	as long as the streaming runs, taking into account the necessary technical support
Participating in the general meeting by means of an electronic communication tool provided by Ageas; including verification of the capacity and identity of the shareholder	<ol style="list-style-type: none"> 1. login; 2. identification data: first name, last name, including information with regard to represented 'one-man' legal entities; 3. contact details: address, e-mail address; 4. Mobile phone number (needed to provide username and password); 5. Number of shares on the registration date (bank confirmation); 6. Type of participation: via the WEB application. 	Legal obligation	For as long as we are legally required to maintain this information

3 Where do your personal data come from?

In the course of your shareholder you or your bank will provide us with further information set out in the above table (e.g. identification data, financial details, voting instructions, ...).

4 Who will have access to my personal data?

Principle

We will disclose your personal data only as described in this Notice (including as further detailed above), as may be updated from time-to-time.

Third party processors

Ageas transfers or discloses your personal data to third party service providers processing personal data on Ageas' behalf for the purposes set out above. Third party service providers include IT service providers, paying agents, banks and service providers assisting in organizing shareholders' meetings. These service providers provide their services from locations within and outside of the European Economic Area ("EEA").



Other third parties

include regulatory and government agencies (see further below in this Notice), and potentially, third parties with whom Ageas may merge or which may be acquired by Ageas (see further below in this Notice).

Compliance with laws and legal proceedings

Ageas will disclose your personal data where:

- > Ageas is required to do so by applicable law, by a governmental body or by a law enforcement agency;

- > To establish or exercise our legal rights or defend against legal claims;

- > To investigate, prevent or take actions against illegal activities, suspected fraud, situations involving potential threats to public security, violations of our policies or as otherwise required by law. Further information can be found at the following [link](#).

Other

If a third party acquires all (or substantially all) of our business and/or assets, we will disclose your personal data to that third party in connection with the acquisition. However, such disclosure will occur subject to and in accordance with applicable data protection laws, including the GDPR.

5 Will my personal data be transferred outside the European Economic Area (EEA)?

Ageas may transfer your personal data to certain third party service providers both within and outside the EEA for the purposes set out above. Such non-EEA countries may not offer the same level of personal data protection as EEA countries. We will therefore put in place suitable safeguards to ensure such transfer is carried out in compliance with the applicable data protection rules.

As a general rule, Ageas will implement EU standard contractual clauses approved by the European Commission prior to such transfer that have been executed between Ageas and the third party service provider.

In the absence of the aforementioned appropriate safeguards, Ageas may – to the extent permitted under and in accordance with applicable laws – rely on a derogation applicable to the specific situation at hand (e.g. the data subjects' explicit consent, the necessity for the performance of an agreement, the necessity for the establishment, exercise or defence of legal claims).

6 How long are my personal data stored?

Your personal data will not be stored longer than necessary for the abovementioned purposes. We will delete your personal data once the abovementioned retention periods will have expired or if you object to or withdraw your consent to our processing of your personal data (to the extent such processing is based on your consent), except where we need to hold on to such data for the establishment, exercise or defence of legal claims, of the protection of the rights of another natural or legal person or for compliance with an Europe or European Member State legal obligation which requires such further processing.

7 What are my rights with regard to the processing of my personal data by Ageas and who can I contact?

You have at any time the right to contact Ageas if you want to:

- > Access your personal data. This includes the right to obtain a copy of the personal data undergoing processing to the extent that this would not adversely affect the rights and freedoms of others;

- > Rectify your inaccurate personal data including supplementing incomplete data;

- > Erase your personal data if there is no (longer a) lawful ground for us to process it;

- > Restrict your personal data if you were to object to the processing or to the accuracy of the processed data or if you wish to retain certain personal data in the context of a possible legal claim while Ageas no longer needs the data in the light of the purposes mentioned under point 2;

- > Object to the processing, on grounds relating to your specific situation, to the processing of your personal data by Ageas which is based on Ageas pursuit of its legitimate interests as a controller. In that case Ageas will no longer process your personal data, unless:
 - > Ageas demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms; or

 - > For the establishment, exercise or defence of legal claims;

- > Withdraw consent

- > Right to data portability” You have the right (insofar this does not adversely affects the rights and freedoms of others) to receive the personal data concerning you, that you have provided to Ageas, in a structured, commonly used and machine–readable format and to transmit those data to another controller, without hindrance from Ageas, where the processing is
 - > based on your consent or on a contract; and

 - > carried out by automated means

In addition, you also have the right – if you feel that Ageas did not act in line with data protection legislation – to lodge a complaint with the supervisory authority of your habitual residence, of your place of work or of the place of the alleged infringement.

If you would like to receive more information on the processing of your data, your rights or explanation of this Notice, you can always contact us. Your contact at Ageas for any further information about these rights is the Data Protection Officer: E–mail: privacy@ageas.com.

8 Changes

This Notice may be updated periodically to reflect changes in our personal data processing practices.