Privacy Notice for Suppliers

Please read this Data Protection Notice for Suppliers (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’).

1. Who will process my personal data?

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

ageas SA/NV
Avenue du Boulevard 21
1210 Brussels
Company number: 0451.406.524

ageas SA/NV, hereafter referred to as “Ageas”, will only process your personal data as described in this Notice and in accordance with the relevant data protection legislation, including the GDPR.

Depending on the processing activity in the context of which your personal data are processed, Ageas may be qualified as a separate data controller or as a joint controller with another Ageas entity within the group.

The Notice governs the collection, use and retention by Ageas of personal data relating to (i) employees, workers, agents, delegates, and representatives of any third party vendors or suppliers (legal entities) delivering services to Ageas, (ii) Ageas suppliers and service providers that are natural persons, including self-employed individuals, and (iii) third parties such as visitor.

Ageas has a Data Protection Officer (DPO), who can be contacted by any of the following means for any privacy-related questions, including regarding how Ageas collects, uses and stores your personal data: e-mail: privacy@ageas.com

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 for the performance of the contract (‘Contract’);
- 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’).
- with your consent (‘Consent’). You can withdraw your consent at any time. However, this will
not affect the lawfulness of any processing activities before such withdrawal.

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

- the necessity to protect your vital interests or those of another person, for example in case
  of a medical emergency (‘Vital interests’)
- the necessity in matters of public interest or public authority that has been handed to us, for
  example the reporting of an alleged crime to the investigating authorities (‘Public interest’).  

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 collects and processes your personal data for the purposes mentioned below. This information
will either be obtained directly from you or provided by the company you work for.

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 ground¹ 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.

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.
<table>
<thead>
<tr>
<th>Purpose</th>
<th>Examples of personal data</th>
<th>Primary legal ground</th>
</tr>
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<tbody>
<tr>
<td>Execution/performance of a contract with you/your employer, including organization of requests for proposals (RFPs); The use of Electronic signature methods; and/or The performance of (standard) contractual audits.</td>
<td>- Contact details: full name, company e-mail address; company postal address; your business landline/GSM number; - Identification information: gender, language, date of birth, nationality, national ID card number or passport number (insofar required for the delivery of the services to Ageas, including onsite access to Ageas premises, and in accordance with applicable laws); - Professional background information: job title, position, CV (insofar required for performance of contract), company name; - Your electronic identification information (insofar required for the delivery of services to Ageas): login details including passwords, your access level and rights, badge number, IP address, online identifiers, cookies, logs, metadata (including access and connection times), photographs (e.g. on company badge), CCTV or image recordings; - Financial information and bank account details (for suppliers who are natural persons).</td>
<td>Contract</td>
</tr>
<tr>
<td>Management of a professional relationship with suppliers, including conducting its business and maintaining a professional/business relationship with the suppliers; Implementing camera surveillance at the Ageas sites and at the Ageas car parks for security, health and safety purposes; Managing Ageas’ IT resources and infrastructure and monitoring the use of Ageas’ IT systems and network for IT security purposes; To enable suppliers to participate in training courses.</td>
<td>- Your business card. - Contact details: your full name; company e-mail address; company postal address; your business landline/GSM number; - Professional background: organization/company name, job title/position; - Photographs and CCTV or image recordings.</td>
<td>Consent</td>
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- Consent - Legitimate interest pursued by Ageas 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.
3. **Who will have access to my personal data?**

3.1. **Principle**

Ageas will disclose your personal data only as described in this Notice (including any updates to this Notice).

3.2. **Ageas entities and third party processors**

Ageas transfers or discloses your personal data to its entities and to third party service providers processing personal data on Ageas’ behalf for the purposes set out above. Third party service providers include cloud service providers, IT services/consulting/outourcing companies, database providers, event agencies, travel agencies, banks and insurance companies that deliver service to Ageas. These service providers provide their services from locations within and outside of the European Economic Area (“EEA”).

Finally, other third parties include regulatory and government agencies, Ageas’ advisors and external legal counsel, auditors and potentially, third parties with whom Ageas may merge or which may be acquired by Ageas.

3.3. **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;
3.4. Other

If a third party acquires all (or substantially all) of our business and/or assets, Ageas 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.

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

Ageas will transfer your personal data to other Ageas entities, including our entities outside of the EEA. As a general rule, Ageas will implement a legally valid data transfer mechanism under the GDPR, such as the EU standard contractual clauses approved by the European Commission prior to such transfer. 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 defense of legal claims).

5. Will Ageas make use of automated decision-making?

Automated decisions are defined as decisions about individuals that are based solely on the automated processing of data and that produce legal effects that significantly affect the individuals involved. As a rule, Ageas does not make use of automated decision-making as described above.

6. How long are my personal data stored?

Your personal data will not be stored longer than necessary for the abovementioned purposes.

The retention periods 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.

Images originating from camera surveillance will be stored for a period of 30 days.

Ageas will delete your personal data once the abovementioned retention periods will have expired, or if you object to our processing of your personal data, except where we need to hold on to such data for the establishment, exercise or defense of legal claims, for the protection of the rights of another natural or legal person or for compliance with a European 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;
- Transfer your personal data (= to obtain them in a structured, commonly-used and machine readable format) insofar we process them in an automated way. 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.

You have at any time the right to object to the processing for which Ageas bases itself in point 2 on the legitimate interest. Ageas will then cease the processing unless it has compelling legitimate grounds for the processing.

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. For any further information about these rights please contact privacy@ageas.com.

8. Changes

We may edit this Privacy Notice from time to time, within the limitation set out by the relevant privacy and data protection laws. With each update, you will be notified via the regular communication channels.