

Privacy Notice of AG Beyond SA, acting through its commercial business units “AG pension & Health Services” and “Waldon”

About this Privacy Notice

This privacy policy concerns you: for these purposes, the term ‘you’ shall refer to

- the representative of a corporate client at AG Beyond;
- a staff member of a corporate client at AG Beyond;
- a person who contacts AG Beyond for information about our services;
- a visitor to our websites;
- a person who completes a satisfaction survey or participates in a contest;
- a person who subscribes to our newsletters or requests downloads of documents we publish;
- a person who applies for a job;
- or any other person who has a relationship with AG Beyond.

For each of these persons, AG Beyond has to process personal data. The personal data processed by AG Beyond depends on the type of relationship we have with you, and therefore this Policy may only partially apply to you. We hereby remind you of the principles that apply to the processing of such data.

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Collection of personal data

1. Your privacy: We safeguard it together

At AG Beyond, your privacy is important to us. Very important. We process your personal data in a transparent and legally compliant manner. This Privacy Policy explains why and how we do this, but also tells you what you can do to help us in this context. Because protecting your privacy is something that we do together.

Your privacy is an extremely precious asset

As part of our services, it is our duty to collect, maintain and process certain data about you. We always do this with the utmost care, in a fully transparent manner and, of course, in full compliance with the applicable legislation. Sometimes we also request your help, since we protect your privacy with your cooperation.

Who are you?

This Privacy Policy is intended for all natural persons who come into contact with AG Beyond. This Privacy Policy is not intended for legal entities.

Who are we?

We are all staff members of AG Beyond. AG Beyond SA/NV is a company fully owned by AG Insurance SA/NV. It is headquartered in 1000 Brussels on 53 boulevard Emile Jacqmain, VAT BE 0894.469.761 [Register of Legal Entities - Brussels]. Legally, AG Beyond, acting through its "Pension & Health Services" and "Waldon" business units, is the 'controller' of your personal data. This means that we determine why [for what purposes] and how [by what means] we process your data.

It also means that we are the point of contact for you as well as for the supervisory authorities with regards to all questions relating to the use of your data. Would you like to ask us any questions about your privacy? E-mail or write us a letter, and our 'data protection officer' or 'DPO', who is our specialist in the matter, will contact you within one month.

AG Beyond – Waldon, Data Protection Officer, 53 boulevard Emile Jacqmain, 1000 Brussels, DPO@waldon.be.

AG Beyond – AG Pension & Health Services, Data Protection Officer, 53 boulevard Emile Jacqmain, 1000 Brussels, info@agph-services.be.

Which legislation is applicable?

The application legislation is Regulation [EU] 2016/679 of the European Parliament and of the Council of 27 April 2016 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 [General Data Protection Regulation].

This European regulation has also been the subject of a Belgian law: The law of 30 July 2018 on the protection of persons with regard to the processing of personal data.

2. Your privacy, your business

2.1. Why?

For the simple reason that it affects you.

Your name, photo, telephone number, username, contract number, e-mail address, etc. are data that belong to you as a person. That is why we call it personal data.

What personal data do we maintain about you and why?

We maintain different types of data concerning you. This enables us to identify you, contact you [securely] and offer you our services.

For example, we process your identification data such as your surname, first name, date of birth, postal address, telephone number, e-mail address, etc., together with technical data such as identification data about the devices you use [for example, an IP address]. In other words: anything that can help AG Beyond recognise that it is in fact you who is browsing.

As part of our service offering, we may need to collect other data such as: your living habits, your sports activities, your family situation, financial data about you, your marital status etc.

To enable us to provide some of our services, we may also need to collect data about your health, but only if you provide your express consent for this purpose. And very rarely, we also process personal data in relation with criminal convictions and offences, if we need it for the management of our own disputes or if you have given us your explicit consent.

We do not process the following sensitive data: data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, but also genetic data, biometric data for the purpose of uniquely identifying a natural person, and data relating to sexuality or sexual orientation.

Access to such data is limited to the persons who need it in order to perform their work. Furthermore, such data may only be processed for the purpose for which you have given your consent.

2.2. What?

If you wish, you can access your data and have it rectified. In certain cases, you can even have your data deleted. Sometimes, you can also object to the use of your data for certain purposes, or you may refuse to allow the fully automatic processing of your data, or you may request the transfer of your data to you or to a third party. You may also object to receiving commercial information about our products and services, at any time.

You can view your data. What does that mean ?

You may ask us:

- whether or not we process personal data about you;
- why [for what purposes] we process it;
- what categories of personal data we process concerning you;
- what categories of recipients we share your data with;
- for how long we retain your data;
- to provide you with more information about the rights you can exercise [right to rectification, erasure, etc.] or about the possibility of submitting a complaint to the Data Protection Authority;
- about the source the process data came from;
- the logic underlying the automated processing [including profiling] of some of your personal data.

You can have your data rectified. What does that mean?

It means that we do our utmost to ensure that the data that we store concerning you is as accurate and complete as possible. If, however, you find that the data is incomplete or incorrect, you can request a rectification of the same. We would be happy to do that.

You can also request the deletion of your data. What does that mean?

It means that you also have the right to erasure [the right to be forgotten].

You can ask us to delete the personal data we have concerning you. That is possible if:

- the data is no longer required for the purposes for which we collected it;
- you have given us permission to process your data, and you decide to withdraw such permission;
- you have objected to the processing of your data and we have no reason not to comply with your request.

Note: in some cases we are not in a position to do so and have the right to retain your data anyway. For example, when we are legally obliged to retain your data.

You can ask us to restrict the processing of your personal data. What does that mean?

It means that you can ask us to intervene if, in your opinion:

- an item of personal data is incorrect and we are still checking whether or not it is correct
- we no longer need your data, but you do need it in order to initiate, exercise or substantiate a legal claim

Note: in some cases, there is no other option and we have the right to continue processing your data anyway. This happens, for example, when you notify us that the restriction is no longer necessary, but also when we need to process your data in order to initiate, exercise or substantiate a legal claim. The processing may also be necessary in the public interest or to protect the rights of a natural person or legal entity.

You may refuse to take decisions based solely on automated processing, including profiling. What does that mean?

It means that a decision cannot be based solely on automated processing of data, including profiling, if it could have legal consequences for you, or could have a significantly similar impact on you. The law provides for this, but we also believe in this very strongly. We believe that the best service can be achieved by adopting an individual approach to each case.

Since we are aware of the impact our decisions can have on your life, AG Beyond always ensures significant human intervention and guarantees that they will not give rise to any legal consequences for you, or have significant impact on you. Otherwise, we guarantee that our decisions:

- are necessary in order to conclude or to perform the contract between us and you; or
- are based on your express consent; or
- are authorised by law.

Note: if we use decisions that are based solely on automated processing including profiling, and create legal consequences for you, or have a significant impact on you, we will notify you. We will also inform you why we are making that decision and what the expected consequences will be. If you have any questions about this, or if you disagree with the decision [except in the case of processing that is permitted by law], please notify AG Beyond accordingly.

You may request the transfer of your data to yourself or to a third party. What does that mean?

It means that you can ask us to transfer your data to yourself or directly to another data controller, provided that this is technically possible.

Note: You can request this if [1] you have consented to the processing of your data, or if the processing is necessary for the fulfilment of a contract, and [2] if the processing is automated.

You can withdraw your consent. What does that mean?

Imagine that you have given us permission to process your data, but wish to reconsider that decision. It's possible.

Note: If you reconsider your decision, it shall not mean that we will eliminate the data that we have already processed. It continues to be valid. However, withdrawing your consent may also make it impossible for AG Beyond to fulfil its purpose and/or to comply with your request for an intervention.

You can object to the processing of your data. What does that mean?

If you do not want to give us permission to process your data, you may object to this at any time. This may happen if the processing of your personal data is based on the public interest or on a legitimate interest on our part.

Note: in some cases, we cannot comply with that objection. This shall apply in case our legitimate interest outweighs yours, or if it is necessary to continue processing your data in order to initiate, exercise or substantiate a legal action.

You can also object to the processing of your data for prospecting purposes. What does that mean?

It means that you may always notify us, at any time and free of charge, that you do not want us to process your data for prospecting purposes. You can also notify us that we are not allowed to profile your data in connection with prospecting.

Note: If you do not want us to process your data for prospecting purposes, do not forget to disable cookies [or other similar technologies] on our websites and mobile apps. Do the same on our social media pages to prevent the collection of data through these cookies that you may have previously accepted. For more information about how cookies work and how to accept or reject them, please see our Cookie Policy on www.waldon.be or on <https://www.agemployeebenefits.be/privacy/en/cookie-policy> [via the "Cookies" button at the bottom of the page].

2.3. How?

It's easy. Send us an e-mail or a letter together with a copy of the front of your identity card. Our 'data protection officer' or 'DPO', who is our specialist in the matter, will contact you within one month.

AG Beyond – Waldon, Data Protection Officer, 53 boulevard Emile Jacqmain, 1000 Brussels, DPO@waldon.be.

AG Beyond – AG Pension & Health Services, Data Protection Officer, 53 boulevard Emile Jacqmain, 1000 Brussels, info@agph-services.be.

The decision is yours!

Always be as specific as possible if you want to exercise your rights. This will enable us to handle your question properly, exactly according to your wishes. In order to prevent someone else from exercising your rights, it is important for you to enclose a copy of the front of your identity card.

3. We take [great] care of your privacy

3.1. Why?

It is normal for us to keep records in order to reach you quickly and to be able to serve you in the best manner possible. But we also use them to provide you with commercial information about our products and services that may be of interest to you. In addition, your data is also used to comply with our statutory obligations and to optimise our internal processes.

We process your personal data for various purposes. For each processing, only the data relevant to the achievement of the intended purpose is processed. Find out more about what these purposes are and how we use your data in section 3.2 [‘what’].

We want to reach you quickly and assist you properly. What does that mean?

It means that we make every possible effort to ensure the maximum possible accuracy of the data concerning you that we retain and process. Find out more about how we do this in section 3.3 [‘how’].

3.2. What?

When we start working on your data, we are responsible for its processing. But what exactly do we do with your data? Quite a lot: we collect, record, organise, structure, store, update or modify, retrieve, consult, use, forward, disseminate or otherwise make available, align or combine, restrict, erase or destroy the data.

We process your data with the utmost care. What does that mean?

It means that we process your personal data on legal grounds and for specific purposes.

What are these legal grounds?

We process your personal data in connection with the performance of the contract with your employer/the pension fund that manages your pension plan or with you directly or to take steps at your request or at the request of your employer/the pension fund that manages your pension plan in order to conclude a [pre-contractual] contract, for example, in order to:

- analysing the opportunity to conclude an agreement within the scope of the already concluded agreement with AG Beyond and/or the conditions to be attached to the same;
- concluding, managing and implementing contracts that are part of the range of products and services offered by AG Beyond, including the management of the customer relationship;
- maintaining a history of the [most recent] contact moments to establish the frequency thereof, and to maintain the same at an acceptable level;
- maintaining a record of your preferences, i.e. whether and how AG Beyond may contact you to provide you with information, advertisements or proposals;
- performing a service that you have requested, for example by providing us with your details online to subscribe to the newsletter, applying for a job or requesting a quote. In such case, we will process the data you have provided in order to send you the newsletter, process your application or send you the requested offer.

However, we may also process your personal data for reasons of legitimate interest. In such cases, our efforts are directed toward maintaining a fair balance between our legitimate interest and respect for your privacy. These are situations where we process your personal data in order to function in the most optimal manner and to provide you with the best possible service.

For example, we process your data:

- to protect goods and persons as well as AG Beyond’s computer networks and systems;
- to report any misuse that [could] cause serious damage to the financial situation, results and/or reputation of AG Beyond;
- for monitoring and control purposes;
- to obtain an overall picture of our customers [e.g. compile statistics about our customers in order to know who they are and to get to know them better];
- to follow up our activities and administrative knowledge of the different persons who are related to AG Beyond, allowing, wherever necessary, the identification of files or other parties;

- to test, evaluate, simplify, optimise and/or automate AG Beyond's internal processes in order to make them more efficient;
- to test, evaluate, simplify and optimise the online systems to improve your user experience (for example: to fix bugs on our websites and mobile apps, to contact you to solve technical problems if we establish that you have started filling in your data online in order to enjoy a particular service, but you have not been able to complete this process, etc.);
- to manage and customise the products;
- for prospecting purposes;
- to develop new products and services that we know will better meet your needs and requirements.

We also process your personal data in order to comply with a number of legal, regulatory and administrative obligations, for example to comply with our tax obligations.

Finally, we also process your personal data in certain cases provided we have obtained your consent to do so, and for the specific purposes to which you have consented.

We process your data for prospecting purposes. What does that mean?

We process your personal data for prospecting purposes on the basis of our legitimate interest. We will only send you proposals or offers if we are firmly convinced that this is of real interest and benefit to you. For example, we would like to inform you about the possibility of obtaining new services (either from AG Beyond, either from Partners or from companies belonging to the groups whereby of which AG Beyond is a member).

How does AG Beyond contact you for prospecting?

AG Beyond may use the usual channels (e.g. by telephone or letter) or electronic channels such as e-mail, in order to contact you for prospecting purposes.

What kind of data do we use for prospecting?

It is important to us that you know that we collect and process your data with care in this context as well. We only use data for prospecting purposes if:

- you or your employer/the pension fund that manages your pension plan have directly or indirectly communicated the same to us during your contacts with AG Beyond;
- we obtained it during interactions between you or your employer/the pension fund that manages your pension plan and ourselves (e.g. about your payment habits for invoices, etc.);
- we obtained it through cookies (and other similar technologies) that you have accepted on AG Beyond's websites or mobile apps, including AG Beyond's social media pages (for example, Waldon's Facebook page). For more information about how cookies work and how to accept or reject them, please see our Cookie Policy on www.waldon.be or on <https://www.agemployeebenefits.be/privacy/en/cookie-policy> (via the "Cookies" button at the bottom of the page).

Note: This data may sometimes be corrected by a professional data supplier to ensure that we have accurate and recent data.

What data are not used by us for prospecting?

Under no circumstances do we use your personal data from the special categories (e.g. data about your health).

How do we know we are making proposals that interest you?

To ensure that you receive offers that interest you and are best suited to your wishes and needs, AG Beyond may also use your personal data for profiling and making decisions based on the profile formed for prospecting purposes. This means that:

- we determine general or specific profiles in order to better assess your needs and/or behaviour, such as:
 - the category of service user to which you belong;
 - the extent to which certain of your characteristics correspond to a model (for example, your choice of products/services shows a behaviour from which it can be inferred that certain other products or services could be useful to you);
 - the expectations you place in AG Beyond with regard to services, e.g. your desire to always take the initiative in terms of services, your desire to receive regular feedback on requested services, etc.

- we follow the signals you have provided about the products offered by or through AG Beyond, for example:
 - participation in a competition;
 - carrying out a simulation;
 - the use of an application;
 - the request for information [e.g. a brochure about our services]
 - future events.
- we examine the list of products and services available to you, in order to send you a proposal, wherever applicable, of a range of similar products and services that may be of overall benefit;
- we measure whether you make [sub]optimal use of a product or service, in order to be able to offer you other products or services that better correspond to your personal situation.

Note: In certain specific cases, it will be necessary for us to request your explicit permission to provide you with quotations and proposals. For example, if you request a service offer online or participate in a competition, or when you wish information, quotation or proposal, but are not yet a customer of us.

We will process your personal data for profiling purposes as described in section 3.2 above. What does that mean?

We sometimes process your personal data for profiling purposes and for making decisions based on a profile, including analysing the data and creating statistics, models and profiles.

What exactly is profiling?

Profiling is any form of automated processing of personal data, wherein such data is used to assess certain personal aspects about the individual. For example, we analyse or predict elements about his/her return on work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements. As far as possible, we only use anonymous or pseudonymised data for profiling.

What do we use as a basis?

That depends on the purpose of the profiling. This may relate to:

- the need to perform the contract or to take pre-contractual measures at your request, or a legal, regulatory or administrative obligation;
- our legitimate interest. In such case, our efforts are directed toward maintaining a fair balance between our legitimate interest and respect for your privacy. For example, we may process your data for profiling purposes in the context of prospecting or as part of the automation of internal processes,
- your consent.

Because we know the impact our decisions can have on your life, AG Beyond always ensures significant human intervention in all cases, and guarantees AG Beyond that they will neither create legal consequences for you nor have a significant impact on you. Otherwise, we guarantee that our decisions:

- are necessary in order to conclude or to perform a contract between us and you or with your employer/the pension fund that manages your pension plan; or
- are based on your express consent; or
- are authorised by law.

Note: if we make use of decisions that are based solely on profiling and that create legal consequences for you or have a significant impact on you, we will notify you. We will also inform you why we are making that decision and what the expected consequences will be. If you have any questions about this, or if you disagree with the decision [except in the case of processing that is permitted by law], please report it to your AG Beyond contact person.

3.3. How?

With the utmost care. Not everyone within AG Beyond has access to your data. Only people who handle your file can access and process it. These people have a strict duty of confidentiality and are very conscious of this. There is something more: our specialised teams ensure that it is technically impossible for unauthorised persons to access your data. We also do not retain the data for longer than is necessary, and only as required by the law.

How do we collect your personal data?

Among other things, we collect your data when:

- You or your employer/the pension fund that manages your pension plan becomes our customer;
- you complete the forms and contracts that we submit to you;
- you use our services and products;
- you subscribe to our newsletters, respond to our invitations (conferences, etc.), take part in competitions, etc;
- you contact us through the various channels made available to you;
- your data will be published or communicated by:
 - authorised third parties (persons whom you have specifically authorised, the Belgian Official Gazette, companies of the groups to which AG Beyond belongs);
 - or professional data suppliers.
- you are filmed by our security cameras in and around our buildings. These images are only stored in order to guarantee the security of goods and persons and to prevent abuse, fraud and other infringements of which our customers and ourselves could become victims (their presence is indicated by pictograms indicating our contact details);
- you communicate information while using our websites (including our social media pages) and our mobile applications, for example, when you:
 - provide us with data when subscribing to AG Beyond – Waldon’s newsletter;
 - enter your data online in order to submit your application for a vacancy at AG Beyond;
 - enter your data in the “private areas” of the website or of our websites; and
 - you visit one of our websites or use one of our mobile apps via cookies and other technologies (more information about cookies can be found in our Cookie Policy on www.waldon.be or on <https://www.agemployeebenefits.be/privacy/en/cookie-policy> [via the “Cookies” button at the bottom of the page]).

In some cases, we also use data obtained from external sources. This may also happen in the case of professional data suppliers, or to improve data (e.g. when correcting spelling errors in your address), or to enrich data (e.g. with regards to the composition of your family).

Note: When we request your personal data, you have the right not to respond. However, such refusal could prevent the establishment of contractual relations, alter their nature, or affect their management.

How do we protect your personal data?

We treat your data with the utmost care.

We restrict access. What does that mean?

It means that only persons who need your personal data in order to perform their duties will have access to it. In addition, they are bound to observe a strict obligation of confidentiality and to comply with all technical and organisational regulations to ensure the confidentiality of personal data.

In addition to our own staff, your data may be communicated to other persons, such as a technical adviser or a processor.

AG Beyond's processors are specialised partners, whom we engage for certain services in order to provide you with the best service in connection with your contract. This may relate to:

- in some cases, distribution intermediaries whose services we use;
- the partners with whom we develop well-being programmes;
- the partners with whom we develop specific studies and surveys.

They may also involve other processors, for example:

- lawyers and other advisers;
- IT service providers;
- marketing and communication agencies.

Note: These processors are bound to us under contract and are consequently obliged to comply with our instructions and conform to the principles laid down in our Privacy Policy. AG Beyond takes particular care to ensure that these processors:

- only have access to the data they need to perform their duties;
- undertake a commitment towards AG Beyond, on the one hand, to process such data in a secure and confidential manner and, on the other, to only use the same for the performance of their duties.

We also share your data with other persons if we are contractually or legally bound to do so, or if we have a legitimate interest in doing so. In such cases, we ensure that:

- such persons only have the data that we are contractually or legally obliged to disclose or that are provided on the basis of a legitimate interest that justifies the data transfer; and
- such persons give AG Beyond an undertaking that they shall process this data in a secure and confidential manner and shall use it only for the purpose for which it was provided to them.

We may forward your data to:

- external companies that can provide services to you that are linked to the services provided by AG Beyond;
- companies that provide us with technical support in order to provide you with the best possible service.

We may continue updating the intermediary you used to obtain information about AG Beyond concerning the status of your contract, and concerning any additional needs that you may have, to the exclusion of any other personal data.

Do we sometimes transfer data abroad? Why?

Sometimes we may also transfer your data outside the European Economic Area (EEA) to a country that may not be able to guarantee an adequate level of protection for personal data. In such cases, AG Beyond protects your data by increasing IT security and by contractually requiring an increased level of security from its international counterparties.

We do everything technically possible to protect your data. What does that mean?

It means that we have technical resources and specialised teams dedicated to the protection of your personal data. In this way, we want to prevent unauthorised persons from accessing, processing, adjusting or destroying the data.

Note: Our websites and mobile applications may sometimes contain links to third party sites (social media, event organisers that we sponsor, etc.) whose conditions of use do not fall within the scope of this Privacy Policy or our responsibility. We therefore advise you to read their privacy policy carefully so that you know how they protect your privacy.

How long do we retain your data?

We do not retain your data for longer than is necessary. We will only use your personal data if, and during the period in which, there is a specific purpose to do so. This data will be deleted as soon as all the related purposes have been achieved.

In other words, the processed data will be kept for the entire term of the contract, the statutory limitation period, and for any other retention period that may be imposed under applicable laws and regulations.

Would you like to ask us any questions about your privacy?

E-mail or write us a letter. Our 'data protection officer' or 'DPO', who is our specialist in the matter, will contact you within one month.

AG Beyond – Waldon, Data Protection Officer, 53 boulevard Emile Jacqmain, 1000 Brussels, DPO@waldon.be.

AG Beyond – AG Pension & Health Services, Data Protection Officer, 53 boulevard Emile Jacqmain, 1000 Brussels, info@agph-services.be.

Do you have any complaints about how we deal with your privacy?

If so, the following is the appropriate point of contact:

Data Protection Authority, 35 rue de la Presse, 1000 Brussels, contact@apd-gba.be, +32 2 274 48 00

We also take care of your data online. What does that mean?

It means that we have a cookie policy as you may expect. When you visit one of our websites or use one of our mobile apps, you can choose whether or not to accept our cookies (and other technological tools that collect data and information about your browsing habits). For more information, please visit www.waldon.be or on <https://www.agemployeebenefits.be/privacy/en/cookie-policy> [via the "Cookies" button at the bottom of the page].

You can always stay informed about changes to this Privacy Policy. What does that mean?

In a changing world where technology never stands still, this Privacy Policy may change. We always ensure that you can consult the latest version of this Privacy Policy online.