



SwissLife

# Personal data protection notice relating to protection of personal data

*Because the sharing of your personal data can only be based on trust in the relationship that binds us, the protection of such data is an integral part of the core values of the Swiss Life France Group. Protecting your personal data, using it in full transparency, in compliance with fundamental freedoms and rights and with your freedom of choice, has been a strong commitment of the Swiss Life Group for many years.*

*This commitment is driven by our ambition to build a responsible and corporate-citizen business model. On a day-to-day basis, this commitment is reflected in our consideration of regulatory developments, the implementation of strict measures, standards and rules to ensure the security and protection of the information we hold, and the possibility for you to exercise your rights at any time.*

*This privacy notice reflects the commitments undertaken by the Swiss Life France Group in the context of its insurance, brokerage and private banking activities, for a respectful and responsible use of your personal data, in compliance with the General Data Protection Regulation (GDPR).*

## Personal data protection policy – Insurance activities

As an insurer, Swiss Life collects personal data at various stages of the commercial relationship or the management of insurance contracts.

Depending on the insurance contracts and services offered, your data may be processed, as data controllers, by entities of the Swiss Life France Group<sup>(1)</sup>:

- SwissLife France;
- SwissLife Assurance et Patrimoine;
- SwissLife Assurance Retraite;
- SwissLife Prévoyance et Santé;
- SwissLife Assurances de Biens;
- SwissLife Gestion de Fortune.

For each situation, the identity and contact details of the relevant data controller are specified in the various materials (forms, contractual documents, etc.) made available to data subjects.

The purpose of this notice is to explain how personal data are processed and how you may exercise control over them.

*[Note: If you hold banking contracts or accounts subscribed with Swiss Life, this notice is supplemented by a specific notice detailing the personal data processing implemented for banking activities, available on our websites and in your contractual documentation.].*

## Who is concerned by this notice?

You are concerned by this notice, as an individual (“you”), if you are:

- a prospect or a person interested in the products and services of the Swiss Life Group;
- a client (or former client), insured person or beneficiary of insurance guarantees and benefits (e.g. policyholder, beneficiary, heir, employee covered under a group insurance contract);
- a person concerned for other reasons (legal representative or beneficial owner of a legal entity, premium payer, driver, third party victim, witness, creditor, healthcare professional, or any person involved, interested in or intervening in an insurance contract).

## Why and on what legal basis do we collect personal data?

In the context of our relationships, your personal data may be used for various purposes and on various legal bases, consistent with our missions. Collected data are not subject to any further processing, which is incompatible with the initial purposes of collection.

### 1) Purpose: conclusion, management and performance of insurance contracts

#### Management of insurance contracts and activation of guarantees

Based on the legal basis of contract performance or pre contractual measures, personal data are used to:

- assess the needs of each insured person in compliance with our duty to advise, in order to offer suitable contracts and services;
- examine, accept, control and monitor risks (including by means of profiling);
- manage contracts from the pre contractual phase through to termination;
- perform guarantees and benefits provided under contracts (e.g. assessment of damage and compensation);
- manage customer relationships;
- manage complaints, disputes and the exercise of legal remedies.

## Compliance with legal obligations

Certain legal requirements require mandatory processing of your data. These processing activities are carried out on the legal basis of applicable legislation, in particular the French Insurance Code and the Monetary and Financial Code.

Your data may notably be used to comply with tax or social security obligations, anti money laundering and counter terrorist financing requirements, or obligations relating to the identification of beneficiaries of dormant insurance contracts.

## Legitimate interests pursued by the insurer

Certain data processing operations are carried out for the legitimate interests of the data controllers, including:

- actuarial statistics and studies;
- prevention and detection of tax or insurance fraud (including the possible inclusion on a list of persons presenting a fraud risk);
- for motor insurance, contract and claims data may be used as part of the automated mutualised system operated by ALFA (Agence de lutte contre la fraude à l’assurance);
- implementation of prevention actions aimed at reducing risks and claims;
- research and development activities, in particular to improve products, services and contract management processes;
- customer communication, loyalty and service quality improvement initiatives (loyalty programmes, prize draws, satisfaction surveys, analysis of correspondence, emails and phone calls);
- intra group customer management to provide a comprehensive response to customer needs across insurance, banking and services;
- implementation of data and IT system security measures (access management, multi factor authentication, logs, detection of unusual behaviour, etc.).

**If you are the beneficiary of an insurance contract taken out with Swiss Life through AGIS (Association générale interprofessionnelle de solidarité),** of which you are a member, AGIS, in its capacity as Data Controller, may process your personal data in order to manage your membership of the Association, send you institutional or contractual communications, as well as notices of meetings and any documents required for the management of the bodies provided for by its articles of association, whether by postal mail or by electronic means of communication (email, SMS/MMS).

Such processing is carried out in order to comply with AGIS’s statutory or regulatory obligations. Swiss Life may be a recipient of the data in the context of its duties necessary for the management and performance of insurance contracts (in accordance with the purposes and legal bases listed above).

### 2) Purpose: commercial prospecting

The entities of the Swiss Life France Group have a legitimate interest in carrying out communication and commercial prospecting activities. These activities are intended to develop our business and to offer clients or prospects new contracts, products and services tailored to each individual situation and considering their preferences.

*(1) Swiss Life France (“SLFR”) heads a sub group (the “France Group”) comprising:*  
– *an insurance division with four operational entities (together, the “4S”): three insurance undertakings (including the Company) and one undertaking authorised as a supplementary occupational pension fund;*  
– *a brokerage / distribution division, including in particular the subsidiaries Agami, Placement Direct, Mon Assurance Facile and Swiss Life Agence Nationale;*  
– *a banking and private wealth management division;*  
– *and an asset management and real estate division.*

Commercial prospecting activities may relate to banking, financial or insurance products and services, with the aim of providing the most appropriate advice to our clientele.

In this context, personal data processing may be carried out for the purposes of:

- performing operations relating to prospect management, such as the selection of individuals, surveys, product or service testing, referral programs, prize draws or competitions, and technical operations such as data enrichment and standardization.
- the acquisition, transfer, rental or exchange of data relating to the identification of prospects, in compliance with applicable regulations.
- the management of opt out lists relating to the receipt of commercial prospecting communications.

Processing operations carried out in the context of electronic commercial prospecting (email, SMS/MMS) directed at prospects are based on the explicit consent of the prospects.

All other data processing operations implemented for commercial prospecting purposes are based on the legitimate interests of the data controllers.

## Why do we record certain telephone conversations or interactions?

Swiss Life implements call listening or recording systems (telephone calls, chats, etc.) for several purposes:

### 1. Service quality, training and evaluation

Certain recording mechanisms enable us to continuously improve the quality of our services and the satisfaction of data subjects, as well as to train and assess our staff. Such recordings are carried out on an occasional basis, may concern inbound or outbound telephone calls, and are retained for a maximum period of six (6) months, in accordance with the applicable data retention rules.

Within the limits of their respective responsibilities, the recordings may be accessed by the following recipients: call advisors and persons responsible for their training and/or evaluation; our service providers acting as data processors (call centres and providers of technical recording solutions); departments responsible for improving service quality, product offerings and customer satisfaction; as well as audit, compliance and security departments in the performance of their duties.

You may object to these recordings by informing your call advisor. You may also exercise your data subject rights (right of access, rectification, erasure, restriction of processing, etc.) in accordance with the conditions set out in the section “What are your rights regarding your personal data?”.

### 2. Recordings implemented for legal and regulatory compliance

Other call-recording mechanisms may be implemented by our distribution networks in order to comply with their legal and regulatory obligations relating to telephone canvassing and the sale of insurance products or services by telephone (in particular the Law of 8 April 2021 reforming insurance brokerage and its implementing Decree of 17 January 2022), or to constitute evidence of transactions carried out by telephone.

Where an insurance contract is concluded, such recordings are retained for a period of two (2) years.

Where no contract is concluded, the recordings are deleted without delay if you object to the continuation of the telephone conversation, or within a maximum period of one (1) month in the event of refusal of the commercial offer made to you.

These recordings are exclusively intended for the competent authorities responsible for monitoring compliance with legal obligations (ACPR and DGCCRF), as well as for our internal departments responsible for audit and control or for the handling of complaints and litigation.

You may obtain a copy of these recordings by exercising your right of access in accordance with the procedures described in the section “What are your rights regarding your personal data?”

## What personal data do we collect?

Depending on the contracts or services concerned, only personal data that are adequate, relevant and strictly necessary are processed, in accordance with the data minimization principle and the specific purpose of each processing activity.

Depending on the circumstances, the categories of data collected may vary and may relate to prospects, clients, or any person involved in or intervening in insurance contracts, including in particular:

- Identification and contact data (e.g. civil status, nationality, identity documents, postal address, email address, telephone number, country of residence, etc.);
- Data relating to contract management and insurance premiums (e.g. customer ID, contract duration, premiums, bank details, driving license, vehicle registration number, etc.);
- Personal life data (e.g. family or marital status, household composition, children's ages, legal capacity, etc.);
- Economic, financial or patrimonial data (e.g. income, assets, outstanding amounts, tax data, credit, subscribed capital, level of indebtedness, etc.);

- Professional life data (e.g. occupation, employer, SIRET number, company name, expected retirement date, etc.);
- Data necessary for risk assessment (e.g. characteristics of insured property, geographical situation, claims history and loss experience, etc.);
- Data relating to benefits and claims (e.g. compensation amounts, death benefit, expert reports, etc.);
- Health data: in certain circumstances, health data may be collected where strictly necessary (e.g. health questionnaires for risk assessment, reimbursement of health-care expenses, compensation for bodily injury, etc.). Such data are processed in compliance with medical confidentiality and with your consent, except for our social protection activities (including supplementary health insurance), for which the collection of such consent is not required.
- Geolocation data relating to persons or property in connection with insurance risks or services;
- Lifestyle data relating to insured property or services provided (e.g. sports practiced for which you are insured, mileage travelled, secondary residence, etc.);
- National identification number (Social Security number), under the conditions provided for by decree;
- Data relating to offences and criminal convictions, where applicable, in compliance with the strict conditions laid down by data protection regulations.
- Data necessary for fraud prevention (e.g. any data collected during the conclusion, management and performance of insurance contracts, including health data, connection data, and any information collected during investigations and case handling);
- Data relating to devices, browsing and authentication (e.g. IP address, pages viewed, location, cookie preferences, customer ID, etc.);
- Data relating to the commercial relationship (e.g. requests for documentation or information, responses to prize draws or competitions, opinions on products and services, etc.);
- Data obtained from public sources (e.g. commercial registers, open data) or data lawfully provided either by third parties (e.g. data aggregators) or by other companies belonging to the Swiss Life Group (in particular SwissLife Banque Privée, SwissLife Gestion de Fortune, SwissLife Gestion Privée), where necessary for assessing your needs and providing advice in order to offer suitable insurance, banking or financial services solutions.

Such data are primarily collected directly from the data subjects. However, certain data may also originate from: our commercial partners and distribution networks (general agents, brokers, comparison platforms, etc.); other entities of the Swiss Life Group (in particular our banking, private banking or wealth management subsidiaries); your employer, where a group insurance contract has been taken out (e.g. retirement, provident insurance, supplementary health insurance); professional or public bodies (social security schemes, tax authorities, mediators, Official Journal, etc.); regulated professions (notaries, lawyers, etc.); any other third party where justified by their mission (commercial registers, digital identity providers, etc.). Certain data may also be collected from publicly accessible sources, such as websites or social media pages, in compliance with the limits set by applicable regulations.

In accordance with regulatory requirements, we are required to ensure that your data are accurate, complete and up to date. We may therefore contact you periodically to verify this information and, where appropriate, to update your file. Data identified by an asterisk (\*) in our forms are necessary for processing requests or for compliance with legal obligations. Their provision is mandatory; failing this, requests may not be processed or processing times may be extended.

## How long are personal data retained?

Personal data are retained only for the period necessary to fulfil the purposes for which they are processed, in accordance with applicable legal and regulatory requirements.

- Where an **insurance contract is concluded**, the data collected are retained for the purposes of managing and performing the contract for the entire duration of the contractual relationship and until the expiry of the applicable statutory limitation periods (e.g. five (5) years for obligations relating to anti money laundering and counter terrorist financing, ten (10) years to comply with accounting obligations, and up to thirty (30) years for certain contracts, in particular life insurance contracts).
- Where **no insurance contract is concluded** (e.g. contract without effect, customer withdrawal, etc.), the data (including health data, where applicable) may be retained for a maximum period of five (5) years from the date of collection or from the last contact initiated by the prospect.
- For **fraud prevention purposes**:
  - where a fraud alert is deemed not relevant, the data are deleted within a maximum period of six (6) months;
  - where a fraud alert is deemed relevant, the data are retained for five (5) years from the closure of the fraud file;
  - where judicial proceedings are initiated, the data are retained until the end of the proceedings and the expiry of the applicable limitation periods;
  - persons recorded on a list of suspected fraudsters are removed from that list after a period of five (5) years from the date of their inclusion.

- In the context of **commercial prospecting**, personal data are retained for a maximum period of three (3) years after the last contact or the end of the contractual relationship.
- Information collected as part of **satisfaction surveys** is retained for a maximum period of three (3) years from the date of collection.
- Where a data subject **subject exercises their rights under data protection law**, the data relating to such requests are retained for five (5) years from the closure of the request.
- With regard to **the recording of telephone conversations**, please refer to the section “Why Do We Record Certain Telephone Conversations or Interactions?” above.

## Your rights – Stay in control of your personal data

Every individual has rights over their personal data, enabling them to exercise control over their data and the way in which it is processed:

- **Right of access:** you may obtain information regarding the processing of your personal data as well as a copy of such data;
- **Right to rectification:** if you consider that your personal data are inaccurate or incomplete, you may request that they be corrected or completed accordingly;
- **Right to object:** you may object to the processing of your personal data on legitimate grounds, or object without justification to the use of your data for commercial prospecting purposes;
- **Right to restriction of processing** of your personal data;
- **Right to erasure:** you may request the deletion of your personal data, subject to the continued application of your contract;
- **Right to data portability:** you may request that the personal data you have personally provided be returned to you or, where technically feasible, transferred to a third party;
- **Right to withdraw your consent at any time** where specific and explicit consent has been given for the processing of certain data;
- **Right to define instructions** regarding the processing of your personal data after your death, under the conditions provided for by the French Data Protection Act;
- **Automated decision making and artificial intelligence:** where your personal data are used as part of an automated decision making process, you will be provided with meaningful information about the logic involved, the underlying algorithm, and the envisaged consequences of such processing. You may also contact our services to obtain further explanations and, where applicable, to contest the decision.

To exercise your rights or for any questions relating to the use of your personal data, please contact our Data Protection Officer (DPO\*)<sup>(2)</sup>:

### DPO Swiss Life

1, rue Bellini, 92800 Puteaux – France  
email: [dposwisslife@swisslife.fr](mailto:dposwisslife@swisslife.fr)

You may also, in the event of a complaint, choose to contact the **French Data Protection Authority (CNIL)** by post (3, place de Fontenoy – 75334 Paris Cedex 07 – France) or online at <https://www.cnil.fr>. However, we encourage you to contact the Data Protection Officer first for any matter relating to your personal data.

In reference to this policy, our data collection documents (forms, etc.), contractual conditions and websites provide transparent information to individuals from whom personal data are collected.

### Learn more about your rights

Within your personal online space, you may manage your commercial prospecting preferences, update certain data and access information relating to the contracts and services you have taken out with the Swiss Life Group, in accordance with the applicable terms of use.

With regard to commercial prospecting, you may also object to receiving communications by using the unsubscribe links included in our emails. With regard to telephone prospecting, you may also object by registering free of charge on the Bloctel opposition list ([www.bloctel.gouv.fr](http://www.bloctel.gouv.fr)), which prohibits professionals with whom you have no ongoing contractual relationship from contacting you by phone.

With regard to the prevention of insurance fraud, individuals are also informed that ALFA (Agence de lutte contre la fraude à l'assurance) operates a mutualised system for data relating to motor insurance contracts and declared claims. Rights relating to these data may be exercised at any time by writing to: ALFA – 1, rue Jules Lefebvre – 75431 Paris Cedex 09 – France.

With regard to anti money laundering and counter terrorist financing, the right of access is exercised with the French Data Protection Authority (CNIL) in accordance with the French Monetary and Financial Code.

## Recipients of personal data

Personal data are disclosed, within the limits of their respective responsibilities, to the following recipients:

- the departments of the data controllers responsible for commercial relations and contract management;
- the banking and financial entities of the Swiss Life Group (Swiss Life Banque Privée, Swiss Life Gestion Privée, Swiss Life Gestion de Fortune), for the purpose of providing comprehensive advice and a global offering tailored to each individual situation (insurance, banking and private wealth management), and to enable access to specific services within personal online spaces (e.g. visibility of insurance contracts and subscribed banking or financial products, performance of online transactions relating to insurance or banking contracts);
- other entities of the Swiss Life Group, including our parent company in Switzerland, where justified by their missions, in particular to comply with legal and regulatory obligations, for reporting purposes, fraud prevention, anti money laundering and counter terrorist financing, audit and control activities, to improve the reliability of certain data, to facilitate the conclusion or performance of a contract taken out with a Swiss Life Group entity by transmitting data already held in order to limit administrative formalities, or for the implementation of IT or communication systems;
- our introducers and distribution networks (brokers, intermediaries, general agents, etc.) acting as points of contact for advising and assisting clients with respect to their contracts, guarantees and benefits;
- where necessary, our reinsurers, assistance providers or data processors, or other insurance companies where they are concerned or involved in the management of a contract (for example, in the event of a claim, insurance fraud, or for the compensation of third party victims);
- data may also be exchanged, where necessary, with AGIS (the policyholder association for certain insurance contracts), as well as with account aggregation providers (insurance and banking), payment service providers or electronic signature service providers;
- public or professional bodies likely to be involved in insurance activities, such as authorised public authorities (social security or pension bodies, tax authorities, supervisory authorities, Caisse des Dépôts et Consignations), professional organisations where applicable (in particular the Agency for the Prevention of Insurance Fraud or the Association for the Management of Insurance Risk Information), mediators, notaries, lawyers and courts where applicable, as well as medical advisors and personnel specifically authorised to process medical data.

Personal data are processed and hosted by Swiss Life primarily in France or within the European Union or the European Economic Area, including Switzerland.

Where personal data are required to be transferred to a third country (in particular to our data processors), Swiss Life implements all appropriate safeguards to govern such transfers (e.g. standard contractual clauses adopted by the European Commission, transfers to countries recognised as providing an adequate level of data protection) and ensures that personal data are protected under appropriate conditions guaranteeing their confidentiality and security, as well as the effective exercise of data subject rights.

Certain personal data may also be transferred outside the European Union in the context of the performance of insurance contracts where the situation so requires (e.g. where a beneficiary of insurance guarantees is located in a third country). Such transfers are carried out in accordance with the provisions of the GDPR, in particular Article 49, which authorises transfers that are necessary for the performance of a contract.

## Data security measures

Swiss Life determines and implements the appropriate measures necessary to protect personal data in order to prevent any unauthorised access by third parties and to avoid any loss, alteration or unauthorised disclosure of such data.

To this end, Swiss Life's information security policy is based on a combination of technical (logical), physical and organisational measures. In particular, Swiss Life defines access control and confidentiality rules applicable to the personal data processed, and ensures that only duly authorised persons have access solely to the data strictly necessary for the performance of their duties.

Furthermore, Swiss Life contractually requires its partners and data processors to provide appropriate guarantees to ensure the protection, security and confidentiality of personal data.

(2) In the event of requests relating to medical data, please address your request to: Medical Advisor – Swiss Life, 1, rue Bellini – 92800 Puteaux – France.

## Artificial intelligence – Responsible and ethical use of data

In the course of its activities, the Swiss Life Group may make use of artificial intelligence systems (AIS). Such AIS may concern any individuals involved in, interested in or intervening in insurance contracts (e.g. prospects or clients, dependants, beneficiaries, repairers, healthcare professionals, or other third parties).

The data used may consist of all or part of the data listed in the section “What Personal Data Do We Collect?” of this Privacy Notice. In certain cases, these data may be supplemented by datasets obtained from publicly and freely accessible sources, within the limits set by applicable regulations (e.g. institutional websites, forums, professional social networks, publicly accessible web pages, content sharing platforms, or comment pages relating to Swiss Life), or by data transmitted by our partners or data providers who have previously informed the individuals concerned of the reuse of their data by third parties, in accordance with applicable legal requirements.

The artificial intelligence systems implemented by the Swiss Life France Group pursue the purposes and rely on the legal bases described in the section “Why Do We Collect Personal Data?”, namely:

- the conclusion, management and performance of insurance contracts (see section 1), including for the purposes of fraud prevention, anti money laundering and counter terrorist financing, risk assessment, acceptance, control and monitoring, as well as for improving service quality; and
- commercial prospecting (see section 2).

No personal data are used for purposes that are incompatible with the original purposes for which the data were collected, it being specified that the use of personal data for the development, training or improvement of artificial intelligence models is considered compatible with those original purposes.

In order to ensure the level of trust expected when using algorithms and artificial intelligence systems, and in compliance with Regulation (EU) 2024/1689 of 13 June 2024 on artificial intelligence (the “AI Act”), the Swiss Life Group implements all necessary measures to meet the requirements of that Regulation, to assess risks and limit the impacts of the use of artificial intelligence on your personal data, and to ensure respect for fundamental rights, freedoms and ethical principles (in particular respect for private and family life, non discrimination, diversity and the protection of personal data).

To this end, a dedicated artificial intelligence governance framework has been established. Risk assessments are carried out for each AI use case, and appropriate technical, organisational and legal measures are implemented depending on the nature of the data used and the impacts associated with each use of artificial intelligence.

All employees are regularly informed, trained and made accountable with regard to the use of artificial intelligence, and the use of public or unsecured AI tools is strictly prohibited. In addition, any decision or content generated by an artificial intelligence system is subject to mandatory and systematic human review prior to use.

This general information relating to the implementation of artificial intelligence systems by the Swiss Life France Group may be supplemented by specific and individual information, in accordance with the requirements of the AI Act (e.g. where an individual interacts with an AIS facilitating information searches or the routing of online requests).

Furthermore, a specific notice is provided whenever content (texts, images, videos, etc.) is generated using an artificial intelligence system.

## Data Protection Stakeholders

To ensure the protection of everyone’s personal data, the Swiss Life Group has appointed a Data Protection Officer (DPO). The DPO is a specialist in personal data protection, responsible for ensuring compliance with data protection rules and acting as the privileged contact point for the French Data Protection Authority (CNIL) and for all individuals concerned by the collection or processing of personal data:

DPO Swiss Life – 1, rue Bellini, 92800 Puteaux – France,  
mail: DPOswisslife@swisslife.fr

*This Personal Data Protection Policy is accessible to everyone on the Swiss Life websites, and a reference to this policy is included in our data collection documents (forms, etc.), as well as in our commercial and contractual documentation.*

*This Personal Data Protection Policy is supplemented in particular by:*

- “Cookie” notices available on our websites and applications, informing you of the tracking mechanisms implemented for monitoring your browsing activity and enabling you to manage your preferences;
- Specific provisions applicable to certain contracts or services (e.g. geolocation systems, terms and conditions of use of our applications or personal online spaces);
- Personal data protection policies dedicated to processing operations carried out by other entities of the Swiss Life Group, in particular SwissLife Banque Privée, SwissLife Gestion Privée, SwissLife Gestion de Fortune, Placement Direct and Mon Assurance Facile.

*Personal Data Protection Policy validated by the DPO of Swiss Life France  
Last update: February 2026*