

Ref no. AICF 21-08

INFORMATION LETTER ON THE PROCESSING OF YOUR PERSONAL DATA

APRIL International Care France

APRIL International Care France attaches great importance to the protection of your personal data. This Information letter describes how your data is used and your rights in this regard. It will be updated if any changes are made to the information contained in it and a new version will then be sent out to you.

1 Origin of the data

In the course of the conclusion, performance and termination of your insurance contract, we collect personal data from You, either directly or indirectly, including through your insurance broker and from the Primary member if You are simply an Insured member.

2 Processing your data

2.1. How is your data processed?

In the following table, we explain to You the purposes for which your data is collected and used, the basis on which it is collected, who controls it and to whom it is disclosed.

Why do We collect it?	On what basis?	Who controls it?	Who do We disclose it to?
To respond to your application for insurance (we may contact You for this purpose by email, phone or text message)			
<ul style="list-style-type: none"> Analysis of your insurance needs 	Legal obligation to advise where we are your direct broker	Us	<ul style="list-style-type: none"> Service providers
<ul style="list-style-type: none"> Analysis of the conditions for accepting your application Pricing Responding to your questions 	Implementation of pre-contractual measures	Us and the Insurer(s)	<ul style="list-style-type: none"> The insurers, reinsurers and partner brokers we approach in connection with your insurance The association having purchased the plan in which You are enrolling Our bank Legally authorised authorities Service providers
<ul style="list-style-type: none"> Processing the application for and purchase of your insurance The administration of your plan (adding an endorsement, calculating and collecting your premiums, producing your insurance certificates, managing your claims, monitoring the insured risks, preparing reports for the insurers of your plan, etc.) 	Performance of the insurance contract or pre-contractual measures	We and the Insurer(s)	
To create and improve our products, services and processes			
<ul style="list-style-type: none"> Measurement and continuous improvement of the quality of our services (your letters, emails and phone calls may be logged for analysis, and contact may be made by phone, email or text message for satisfaction surveys) Statistical and actuarial studies 	Legitimate interest or consent	Us	<ul style="list-style-type: none"> Service providers
To carry out direct marketing activities			
<ul style="list-style-type: none"> Contact by email, phone or post to offer You APRIL products and services Disclosure of your data to identified partners 	Legitimate interest or consent (depending on the communication channel)	Us	<ul style="list-style-type: none"> Service providers Business partners
<ul style="list-style-type: none"> In referral schemes, use of your data and those of the person you referred to provide You with benefits 	Consent	Us	<ul style="list-style-type: none"> Referred person Service providers

Why do we collect it?	On what basis?	Who controls it?	Who do We disclose it to?
To combat insurance fraud			
<ul style="list-style-type: none"> Detection of attempted fraud Management of identified cases of fraud to stop unjustified claims being paid (with the names potentially being added to a list of persons presenting a risk of fraud) 	Legitimate interest	Us and the Insurer(s)	<ul style="list-style-type: none"> Insurers and reinsurers of your plan Your broker Service providers
To comply with our legal obligations			
<ul style="list-style-type: none"> Combatting money laundering and the financing of terrorism and the application of financial sanctions based on the French Monetary and Financial Code (a copy of your ID may be requested) 	Legal obligation	Us and the Insurer(s)	<ul style="list-style-type: none"> Insurers and reinsurers of your plan Credit institution Your broker Tracfin, the French anti-money laundering organisation Service providers
<ul style="list-style-type: none"> Combatting unclaimed life insurance policies (AGIRA files) Withholding taxes at source on benefits paid 	Legal obligation	Us and the Insurer(s)	<ul style="list-style-type: none"> Legally authorised authorities such as the French Treasury AGIRA, the French organisation which manages unclaimed life insurance policies Service providers
<ul style="list-style-type: none"> Implementation of accounting, tax and social rules Auditing of accounts 	Legal obligation	Us	<ul style="list-style-type: none"> Service providers Statutory auditors
<ul style="list-style-type: none"> Incident handling Handling requests to exercise your personal data rights 			
To handle complaints and disputes			
<ul style="list-style-type: none"> Processing complaints 	Legal obligation	Us and the Insurer(s)	<ul style="list-style-type: none"> Service providers The Ombudsman responsible for complaint handling
<ul style="list-style-type: none"> Management of any amicable or legal procedures and establishment of proof of our obligations (to prove the existence or otherwise of an insurance contract or compliance with our legal obligations, or to defend ourselves in case of litigation) 	Legitimate interest	Us	<ul style="list-style-type: none"> Service providers
To manage our digital services			
<ul style="list-style-type: none"> Ensuring the proper functioning and security of our digital services, including access to our websites, online areas (Customer Zone, applications area, etc.) and mobile apps 	Legitimate interest	Us	<ul style="list-style-type: none"> Service providers
<ul style="list-style-type: none"> Using cookies or trackers for the proper functioning of our websites and mobile apps, as well as for audience measurement and advertising purposes as described in the cookie policy available on our websites and apps 	Legitimate interest or consent	We and/or third-party cookie vendors	<ul style="list-style-type: none"> Service providers Third-party cookie vendors (see cookie policy on the relevant website)
To control and manage our business activities			
<ul style="list-style-type: none"> Internal control and audit to monitor our activities and the proper functioning of our processes and activities 	Legitimate interest	Us	<ul style="list-style-type: none"> Service providers
<ul style="list-style-type: none"> Measuring and generating statistics for our business activities 	Legitimate interest	Us	<ul style="list-style-type: none"> Service providers

2.2. Automated processing

- Your data may be processed in a fully automated manner, including by profiling, depending on the particular process for the application for, purchase of and administration of the insurance plan, including to assess and quantify the risks to be insured, to determine whether your application for insurance can be accepted and under what conditions of pricing and cover, or to determine the compensation to be paid.
- This automated processing may therefore have an impact on the Insurer's acceptance of your application for insurance or on the pricing or adjustment of the insurance cover You are requesting. It may lead to the insurance being denied, an increase in the premium or an exclusion from cover. You have specific rights with respect to your data which is subject to automated processing as set out in section 3.2. How to exercise your rights.**

2.3. Processing your health data

We may collect, through questionnaires or other means, data about your health, on our behalf and that of the Insurer as joint data controllers.

Your health data is then processed by us and the Insurer:

- **With your consent for certain health or death & disability insurance plans**, for the purposes of pricing and the execution, administration and performance of the insurance contract, including: risk assessment, management of your claims and any disputes, management of remedies, risk monitoring, statistical and actuarial studies, and combatting insurance fraud; **in this case You have the right to withdraw your consent at any time (see section 3.2. How to exercise your rights).**
- **To meet the service obligations for supplementary health and death & disability benefits**, for the purposes of the execution, administration and performance of the insurance contract, including: risk analysis, management of your claims and any disputes, management of remedies, risk monitoring, statistical and actuarial studies, and combatting insurance fraud.
- **To meet our legal obligations**, for the purposes of combatting fraud and money laundering.

This data may only be disclosed for these purposes to the Insurer and to the reinsurers approached within the framework of the analysis and management of your insurance as well as to the service providers commissioned by Us or by the Insurer within this framework (for example the medical examiner or the archiving service provider).

Based on the medical history provided by You, **exclusively automated processing determines whether your application for insurance is accepted and, if so, under what conditions of pricing and cover. This processing may therefore have an impact on the acceptance, pricing or adjustment of the insurance cover You are applying for and, in particular, lead to a decision to deny the insurance, increase the premium or impose exclusions from cover. In this respect, You have specific rights as set out in section 3.2. How to exercise your rights.**

2.4. Who has access to your data?

- **Us, APRIL International Care France**, 14 rue Gerty Archimède 75012 Paris France, for the purposes and in accordance with the procedures described in this document. Within our departments, only those persons who need to be aware of your data in the course of their duties have access to it.
- **The organisations and service providers listed in the table above**, for the purposes and in accordance with the procedures described in this document, within the strict framework of their duties. Our service providers include our medical examiner, our IT service providers and payment or electronic signature service providers.

2.5. Where is your data processed?

- In the territory of the **European Union**.
- However, it may in exceptional cases be transferred to countries outside this territory.

If the data is transferred, it is governed by a cross-border flow agreement drawn up in accordance with the standard contractual clauses in force issued by the European Commission or by the Binding Corporate Rules (BCR) of the relevant service providers.

2.6. How long will your data be stored?

The length of time your data is stored depends on the purpose for which it was collected. It is set out in the following table:

For what purpose?	For what maximum duration?
Quotes which are not accepted	3 years
The purchase and administration of your insurance plan and the handling of complaints and disputes	Duration of the insurance plan and the claim, plus the statutory limitation period
The creation and improvement of our products	
The control and management of our business activities	5 years
The continuous improvement of our services	6 to 12 months
Direct marketing	3 years
Referral schemes	3 years
The combatting of money laundering, the financing of terrorism and insurance fraud	5 years
The fulfilment of our legal obligations	According to the applicable storage and limitation periods, and in particular 10 years for accounting purposes
The proper functioning and security of access to our websites, Customer Zone/application areas and mobile apps	1 year
The use of cookies	Based on the durations specified in the cookie policy of the relevant site

3 Your rights

3.1. What are your rights?

- **Right of access.**
- Right to **erase** data that is inaccurate, incomplete, ambiguous, obsolete, or the processing of which would be unlawful.
- **Right of rectification.**
- The right to **set up guidelines for the storage, erasure and disclosure** of this data after your death.
- Right to **object**.
- Right to **restrict processing**.
- Right to **portability**.

3.2. How to exercise your rights?

1 Contact our **Data Protection Officer (DPO)**

If necessary, You may be asked to provide a photocopy of your ID to confirm your identity.



2 You can file a complaint online or by post with the French Data Protection Authority, **Commission Nationale Informatique et Libertés (CNIL)**

If You believe, after having contacted us, that your rights are not being respected.

3 **In the cases below**, you can exercise your rights as follows:

● For **direct marketing** purposes

- You can unsubscribe by clicking on the link in the email or text message you received.
- You can opt out directly with the caller on the phone and/or by registering free of charge with the national telephone marketing opt-out directory.



Registering with Bloctel has no impact on our current contractual relations and We may still call You in connection with their processing.

● For **monitoring** purposes

- To combat money laundering.
- To combat the financing of terrorism.
- To apply financial sanctions.



● Where **your consent is required**

- You have the right to withdraw your consent at any time. It is, however, important to bear in mind that withdrawing your consent can make it impossible to set up or implement the insurance plan and has no effect on the processing already carried out.
- How do you do this?
Contact the applications and administration departments using the contact details provided online or in your contractual documents.

● For **fully automated processing**

- You have the right, at any time, to obtain human intervention in the decision-making process, to express your point of view and contest the decision taken.
- How do you do this?
Contact the applications and administration departments using the contact details provided online or in your contractual documents.



14 rue Gerty Archimède 75012 Paris – France

A French simplified joint-stock company (S.A.S.) with capital of €200,000. Registered in Paris under number 309 707 727
Insurance intermediary registered with ORIAS under number 07 008 000 (www.orias.fr)
Prudential Supervision and Resolution Authority – 4, place de Budapest CS 92459 – 75436 Paris Cedex 09 – France