

Privacy Notice

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1. About this privacy notice

This general privacy notice applies to personal data held by Premia Insurance Europe nv/sa (hereinafter: "PIE") and Premia Services Europe nv/sa (hereinafter: "PSE") and sets out how these companies process personal data.

"Personal data" means any information which identifies directly or indirectly you as an individual. It may include your name but it may also be other information such as your date of birth, nationality and gender which when combined identify you.

Please note that this privacy notice may be updated from time to time. Any changes we make to this privacy notice in the future will be posted on this website (for applicants) or on the intranet (for Staff members).

This privacy notice was last updated in January 2024.

2. Identity and contact details of the controller

PIE and PSE are two daughter companies of Premia Holding Europe ("PHE"). PIE is an insurance company and PSE is the unique insurance intermediary (mandated underwriter) with which PIE works. The parties both provide insurance and reinsurance services (hereinafter referred to as: "Services").

PIE & PSE act as joint controllers with respect to the personal data that they either process themselves or that they outsource for processing.

Below you will find our contact details:

Premia Insurance Europe nv/sa
Premia Services Europe nv/sa
Entrepotkaai 5
2000 Antwerp
Belgium

3. Responsibility and privacy principles

PIE and PSE believe that personal privacy of the data subject (e.g. a Staff¹'s member or a job applicant), from whom they collect information is of essential importance. They are responsible for ensuring that they comply with relevant data protection laws when processing your personal information.

Pursuant to legislation applicable in this domain, such as the General Data Protection Regulation (hereinafter: "GDPR") they are consequently implementing measures so that the collected personal data:

- Is processed in a manner that is, with respect to the data subject, lawful, fair and transparent ('lawfulness, fairness and transparency');
- Is only collected for specified, explicit and legitimate purposes ('purpose limitation');
- Is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed ('data minimisation');
- Is accurate and, where necessary, kept up to date ('accuracy');
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed ('storage limitation');
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

¹ Staff is defined as a group of people employed by a company, regardless of the position they hold or the legal status of their employment. Staff is a collective term for categories ranging from employees to managers (interns or contractors).

4. Contact details of the data protection officer

PIE and PSE have agreed that the data protection officer (hereinafter: "DPO"), for the two entities, will be designated within PIE.

The DPO's contact details are as follows:

Premia Insurance Europe nv/sa or Premia Services Europe nv/sa
DPO
Entrepotkaai 5
2000 Antwerp Belgium

E-mail : privacy@premiare.eu

5. Categories of personal data processed and purposes of processing

PIE & PSE process the following categories of personal data for the following purposes:

- **For a job applicants**

In the context of your application for a position within PIE and/or PSE, the following data is processed: identification data, financial data, family situation, lifestyle habits, health data, sexual orientation data, criminal data.

- **For Staff members**

In the context of your working relationship with PIE and/or PSE, the following categories of personal data are subject to processing: identification data, financial data, family situation, lifestyle habits, health data, sexual orientation data, criminal data.

Personal data is processed as part of the management of your employment contract, or the management of your collaboration contract (for contractors), or the management of your mandate (for people with self-employed status such as executive directors).

- **For employees & managers' family members**

In the same context of the working relationship with PIE and/or PSE, data relating to family members of employees or managers are also processed. The categories of data are as follows : identification, family situation.

Personal data is processed as part of the management of the employment contract.

6. Legal grounds for processing personal data

The personal data are processed on the basis of one of the following legal grounds:

- **For a job applicants**

The data processing is necessary in order to take steps at the request of the applicant prior to entering into a contract. Without this information, it is impossible to proceed with the necessary recruitment steps and potentially conclude an employment contract.

For the criminal data : the processing is based on the consent of the applicant.

- **For Staff members:**

Data are processed on the basis of the contract to which the Staff member is party. Without this personal data, it is impossible to properly execute the employment contract.

For the health data, the processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the Staff member, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional.

For the criminal data: the processing is based on the consent of the Staff member.

- **For employees & managers' family members**

Data are processed on the basis of the legitimate interest.

As part of the management of the employment contract with the employees and managers, data concerning their member's family is required, for example, so that they can be included as a beneficiary

of the hospitalization insurance and group insurance.

Without this personal data, it is impossible to properly execute the employment contract and provide the benefits to the data subject. The data processed is limited and is processed to the advantage of the data subject.

7. Source of the personal data

Your personal data may be transmitted to PIE and/or PSE, mainly by:

- Yourself;
- Head-hunters;
- Recruitment / staffing agencies;

For employees & managers' family members: data is transmitted by the staff member.

8. Recipients categories of personal data

8.1. Staff

Your personal data can be consulted by the Staff members as well as for other Premia Group entities. However and according with the privacy principles mentioned before (point 3), it is ensured that only those persons that require access to your personal data as part of their job can actually access your personal data.

8.2. Service providers

In performing their Services, PIE and PSE engage external service providers (e.g. experts, IT service providers, representatives in Belgium and correspondents abroad). Your personal data can accordingly also be provided to these service providers.

These service providers shall observe the necessary safeguards and statutory obligations with respect to your privacy. PIE and PSE shall only provide that data required by these service providers for performing their tasks. PIE and PSE shall demand of these service providers that they implement the necessary technical and organisational measures in order to process your personal data in a secure and confidential manner.

8.3. Recipients within the context of controls

As part of the control and reporting obligations with which PIE and PSE are required to comply, personal data may be transmitted to control authorities such as the FSMA, the NBB and the Data Protection Authority.

For internal controls, personal data may also be transmitted to other companies in the group to which PIE and PSE belongs.

9. Transferring personal data to third-party countries or an international organisation

PIE and PSE will only transfer personal data directly to parties located in countries outside of the European Union in the following cases:

- There is an adequacy decision on the part of the European Commission in place, or
- Suitable safeguards are provided, and you have enforceable rights and effective legal remedies.

10. Period for which the personal data will be stored

PIE and PSE will not retain your data for longer than is necessary for the purposes described above, unless the retention or processing of such data is subject to specific legal provisions.

In determining the exact retention period for the personal data concerned, PIE and PSE take into account the number, nature and sensitivity of the data, the potential risk of damage arising from unauthorised use or disclosure of the data, the purposes for which PIE and PSE process the data, whether or not they can fulfil these purposes in another way and the applicable legislation.

For certain data, specific legal retention and/or limitation periods may apply (e.g. the Belgium Labour Law). In any case, we will never keep your data longer than is necessary according to the criteria set out above.

11. Your rights as a data subject

11.1. Right of access

You have the right to obtain confirmation from PIE and PSE on whether or not your personal data is processed and to gain access to the following information:

- The purposes of the processing;
- The categories of personal data concerned;
- The categories of recipients to whom the personal data has been or will be disclosed;
- Where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- Where the personal data are not collected from the data subject, any available information as to their source;
- Information on your rights;
- Information on whether or not automated decision-making exists;
- The appropriate safeguards if your data is transferred outside of the EU.

You can request a copy of your processed personal data free of charge. For any further copies requested by the data subject, PIE and PSE may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

Please note that the right to obtain a copy shall not adversely affect the rights and freedoms of others.

11.2. Right to rectification

You have the right to obtain without undue delay the rectification of your personal data that is incorrect.

Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

11.3. Right to erasure (“right to be forgotten”)

You have the right to demand the erasure of your data in the following cases:

- The personal data is no longer required for those purpose for which it was collected or otherwise processed;
- You withdraw your consent and PIE and PSE has no other legal basis for processing your personal data;
- When you assert your right to object and there are no overriding legitimate grounds for the processing;
- Your personal data was unlawfully processed;
- Your personal data must be erased in order to comply with a statutory obligation to which PIE and PSE are subject.

In spite of the above, your personal data will not be erased if the processing is required:

- For performing a statutory processing obligation to which PIE or PSE is subject;
- For the establishment, exercise or defence of legal claims;
- For statistical purposes.

11.4. Right to restriction of processing

You have the right to demand the restriction of the processing of your personal data in the following cases:

- You dispute the accuracy of the personal data: the processing will be restricted for the period required to verify the accuracy of the personal data;
- The processing is unlawful, but you object to the erasure of your personal data and demand that its usage be restricted;
- PIE and PSE or their processors no longer need the personal data for the purposes of the processing, but you require it for the establishment, exercise or defence of legal claims.

If the processing of your personal data is restricted due to the above reasons, PIE and PSE shall only be able to further process it on the basis of the following grounds:

- You consented to the processing;
- For the establishment, exercise or defence of legal claims;
- For the protection of the rights of another natural person or legal person;
- For reasons of important public interest of the Union or of a Member State.

If PIE and PSE or their processors revoke the processing restriction, you will be informed thereof.

11.5. Right to object

You have the right to object to the processing of your personal data at all times on the grounds of reasons specific to your situation, with such on the basis of the 'legitimate interests' legal ground, including with respect to profiling on the basis of these interests.

PIE and PSE and their processors shall then cease the processing, unless they demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or that pertain to the establishment, exercise or defence of legal claims.

11.6. Right to data portability

You have the right to demand the transmission of your personal data, in a structured, commonly-used and machine-readable format, to another party if:

- The processing is dependent on your consent or your contract, and
- The processing is dependent on automated procedures.

In exercising his or her right to data portability, the data subject shall have the right to have the personal data transmitted directly from one data controller to another, where technically feasible.

This right shall not adversely affect the rights and freedoms of others.

11.7. Right to withdraw your consent

When a processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. PIE & PSE and their processors shall then cease the processing.

The existence of the right to withdraw consent at any time do not affect the lawfulness of processing based on consent before its withdrawal.

11.8. Complaints

If you have any complaints, you can contact PIE's DPO directly by post or by email (see below).

You also have the right to submit a complaint to the Data Protection Authority (Drukpersstraat / Rue de la Presse 35, 1000 Brussel - Bruxelles - T: +32(0)2 274 48 00 - E: contact@apd-gba.be).

11.9. How to exercise your rights

In order to exercise your rights, you can easily send a request to PIE's DPO:

- By post:
Premia Insurance Europe nv/sa DPO
Entrepotkaai 5
2000 Antwerp
Belgium
- By email: privacy@premiare.eu

The exercise of your rights, as described above, always depends on the requirements and conditions laid down by the legislation in force (such as the General Data Protection Regulation (the so-called "GDPR")).

If we have reason to doubt your identity, we may ask you for additional information needed to confirm your identity. The exercise of your rights shall not adversely affect the rights and freedoms of others.

12. Obligation to provide personal data

In some cases you could be required to provide specific personal data (for example, as part of a recruitment procedure or for certain functions, to check that the person complies with Fit & Proper conditions).

You can provide us with your general personal data (e.g. name, address, etc)

- By post:
Premia Insurance Europe nv/sa
HR Manager
Entrepotkaai 5
2000 Antwerp
Belgium
- By email : to the email address given to you by your correspondent. If you have not been given this

information, the general address privacy@premiare.eu may be used.

As regards sensitive data (e.g. medical data) and criminal data, in order to treat them confidentially, we ask you to communicate this preferably directly to the Human Resources Manager by email, specifying "Confidential" on the envelope or in the subject line of the email.

13. Automated decision-making

We do not use profiling (where an electronic system uses personal information to try and predict something about you) or automated decision making (where an electronic system uses personal information to make a decision about you without human intervention).