

DATA PROTECTION POLICY

General Data Protection Regulation, known as the "GDPR", is one of Filhet-Allard Group's core concerns and the Group has a strong commitment to comply with these regulations.

Filhet-Allard Group is aware of its responsibility and is committed to ensuring the protection and confidentiality of personal data processed in connection with the services offered to its customers.

What personal data can we collect?

As data controller, Filhet-Allard Maritime is likely to collect and process the following personal data in the course of its business

- Identification information (surname, first name, address, e-mail, telephone number, status, job title, relationship with the insured...).
- Financial information (bank account number, financing bank...).
- Information related to the insurance policy.
- Information about current claims, which may include medical data and Social Security number.
- Data required to meet legal and regulatory obligations, including fraud prevention.

What purposes?

Personal data may be collected and used by Filhet-Allard Maritime in its capacity as data controller for the purposes described below corresponding to the following legal principles:

Legal principle :	Reason for processing :
Conclusion, management and execution of your contracts and pre-contractual measures	<ul style="list-style-type: none">- A request for contact- Review, acceptance, control and monitoring of risk- Request for a commercial offer.- Management of contracts from the pre-contractual phase to the termination, including operations related to the payment of premiums,- Execution of contractual guarantees
Legal and regulatory obligations	<ul style="list-style-type: none">- Fight against money laundering , corruption and the financing of terrorism- Legal and fiscal obligations
Legitimate interests	<ul style="list-style-type: none">- Fight against insurance fraud

Establishment of statistics and actuarial studies	<ul style="list-style-type: none"> - Analyse de données ayant pour objectif d'établir des informations statistiques pour le placement. - Analysis of data to establish statistical information for insurance placements.
Statistics for audience measurements	<ul style="list-style-type: none"> - Cookies deposited on your device to statistically analyze the use of our website in order to improve its performance and adapt our services.

We are committed to respecting the confidentiality of the personal data you provide and will never pass on this data for commercial purposes. If we are going to use your data for a purpose different from those stated above, we will update our privacy policy with the new purpose and, where appropriate, seek consent to process personal data for the new purpose.

Do we share your personal data?

We share your personal information with the following parties who are considered essential:

- Those responsible for managing the contract throughout its lifespan.
- Insurers, potential co-brokers, and other business partners.
- Affiliated companies of Filhet-Allard Group within the framework of the exercise of their missions as well as their service providers (subcontractors) who are selected and contractually committed to respect the security and confidentiality measures of the group.
- Administrative or judicial control authorities.

In the context of the fight against money laundering and the financing of terrorism, a suspicious transaction report or an asset freeze may be issued pursuant to the French Monetary and Financial Code.

We do not lend or transfer, in any way whatsoever, the personal data of our clients to third parties for their own commercial use.

Due to the international dimension of Filhet-Allard Maritime, the transfer of personal data for the purposes described above may be carried out between member or non-member countries of the European Economic Area. In this case, we will use mechanisms that guarantee an adequate level of protection for such data

How is personal data protected?

Information security and personal data protection are two fundamental pillars of the Filhet-Allard group. As such, a cybersecurity strategy has been defined to effectively face the array of threats that we may encounter. Our objective: to protect our information capital, and in particular the personal data of third parties that we process.

This strategy is based on several key principles:

Our Cyber Security and Data Protection teams work together to design systems that integrate protection and compliance requirements, without disproportionality on either side.

Security is integrated into projects as early as possible using a dedicated methodology (privacy by design and security by default)

A "security balance" is sought. In other words, advanced security is implemented based on a risk analysis and an in-depth defence strategy when business security objectives require it. The processing of sensitive data in accordance with Data Protection laws is notably a trigger for this level of requirement. Inversely, standard security procedure is deployed when no particular issue is identified.

In parallel with the implementation of appropriate protection measures, a precise mix of detection measures is deployed at high-intensity to identify attack attempts as early as possible and adapt our cybersecurity system if necessary.

In addition, the Filhet-Allard group's security team regularly adapts protection measures to respond rapidly to new threats (new attack techniques, new vulnerabilities etc.)

Finally, a global training and awareness strategy is deployed within the Filhet-Allard group on the protection of our information system and the personal data processed therein.

Our goal: to make our employees an effective first line of defense.

Our employees are increasingly aware of and responsive to these issues. Thus, they alert our teams earlier and earlier because they are acquiring the right reflexes.

How long do we keep personal data for?

Filhet-Allard Maritime keeps the personal data collected for an appropriate period, proportionate to the processing purposes, in accordance with the requirements of the Commission Nationale Informatique et Libertés (CNIL) in order to comply with its legal and statutory obligations.

Your personal data is kept for the duration of the contract and, in the event of termination of the contract, until the legal time-limit.

Personal data relating to health is kept for the time necessary to execute the guarantees and the contract, and then for the duration of the legal prescription.

Finally, the data necessary to meet a legal or regulatory obligation, or a suspicion of fraud, will be archived for the time required.

What are your rights?

In accordance with the GDPR, EU Regulation 2016/679, and the amended Data Protection Act, you have a right of access, correction, deletion, data portability, to withdraw your consent, to object or restrict processing and define the way you want these rights to be processed after death.

These rights may be subject to an exception on the basis of a public interest or the protection of our legitimate interests.

You may exercise your rights (proof of identity may be requested) or submit your questions concerning this policy on personal data, by contacting the Data Protection Officer of Filhet-Allard Maritime by e-mail or post at the address below:

FILHET-ALLARD MARITIME

DPO - Compliance Department

Rue Cervantès - Mérignac

33735 Bordeaux Cedex 9

E-mail : dpo@fa-maritime.com

If necessary, you also have the right to lodge a complaint with the Commission Nationale de l'Informatique et des Libertés :

CNIL - 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07.