

## PERSONAL DATA PRIVACY NOTICE

We treat the confidentiality of your personal information with the greatest importance. This guide to Personal Data Protection Policy explains what data we collect about you and the way in which we use it, as well as the rights you have and the way in which you may exercise them. We commit to deploying all adequate measures to protect the confidentiality and integrity of your personal data.

### 1. Who are we?

Talisman S.à.r.l., is a brokerage company, registered on the RCS (Public Register of Companies) in Luxembourg under number B224094. It is approved as a broker with the Luxembourg Insurance Commission under number 2020CM005 and is included in the “Approved register of brokerage companies in the Grand-Duchy of Luxembourg” available on the website of the Insurance Commission at the following address <http://www.caa.lu/fr/operateurs/intermediaires/societe-de-courtage>. Talisman S.à.r.l., is authorised to operate in Luxembourg and in the European Union member states, under the freedom to provide services regime of the EU.

Talisman S.à.r.l., collects your personal data for its own use, as data controller.

You can contact us using the following contact details:

**Post:** 2, rue de la Reine, L-2418 Luxembourg, Grand Duchy of Luxembourg.  
**Tel:** 00 352 (0) 262 03241  
**E-mail:** [info@talismansarl.lu](mailto:info@talismansarl.lu)

Personal data is any information concerning an identified or identifiable natural person (for example, the name of a person, their photo, their telephone number, a contract number, a password, etc.).

The data controller, as defined by the European data protection regulations, is the person that determines the purposes and methods for processing personal data.

You can send any request for additional information or any request concerning your personal data using the contact details provided above.

### 2. What is the personal data we collect?

Only personal data strictly necessary for realisation of the purposes detailed below will be processed. As part of our activities, based on your particular circumstances, we may process the following data:

- Identification data (surname, first name and other given names, gender, date of birth, nationality etc.)
- Contact data (email address, mobile and/or telephone number, postal address etc.)
- Marital status
- Financial data and asset information (list of movable and immovable assets; equity, debt, real estate, etc.)
- Data associated with your work /profession (duties undertaken)
- Composition of the household (for example: marital status, number of children, dependents, etc.)
- And any other information that you may freely provide to us.

We may also process some **sensitive data**, which will be subject to strengthened protection measures, such as:

- Passport/Identity Card/Your tax identification number

We process this data particularly carefully.

We may also use the **data obtained from external sources**, especially in the following cases:

- Data obtained by a financial partner (bank, financial manager, family office, etc.) which contacts Talisman S.à.r.l., with a view to collaborating on your requirements, in full transparency with you
- The updating of the data (for example; concerning the composition of your family, your address, your expired identity document etc.)

In some cases, we may use **personal data concerning persons other than you**, for example:

- your ancestors, your children, your partner, the beneficiary or beneficiaries of your life insurance
- your employees, your legal/statutory representatives, your shareholders/partners

If you send us such data, you agree to inform the persons concerned of this.

### **3. How do we use your personal data?**

#### **3.1 For what purposes and on what legal basis do we use personal data?**

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First of all, we will use your personal information to execute our **contractual obligations** to you, in order, above all, to provide you with the services expected as part of our role as an insurance intermediary, such as:

- determine your requirements and your needs (as part of the insurance-based investment product)
- advise you
- submit documents concerning the products with which you have requested our assistance to you
- assist you in entering into an insurance contract (preparatory work, proposal completion, submission and establishment)
- assisting you with managing and executing insurance contracts (midterm alterations, claims and cancellations)
- retaining your preferences of if and how we can contact you to send you information or proposals

We may also use your personal data with a view to respecting our **legal obligations**, especially as concerns:

- prevention of money laundering and the financing of terrorism
- distribution of insurance policies
- our tax and accounting obligations

Based on our **legitimate interests**, we may process your information in order to:

- manage our clients and establish a comprehensive view of the clients (for example; by preparing statistics concerning our clients in order to find out who they are and to get to know them better)
- prevent abuse, fraud and offences
- protecting our commercial assets
- ensuring personal safety and security of property, as well as the security of the businesses' networks and IT systems
- checking the legality of transactions
- recording, exercising, defending and preserving the rights of the business or the individuals it may represent, for example, as part of litigation
- establishing proof

#### **3.2 Do we use your personal data to make automated decisions?**

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We do not use your data for profiling purposes or with a view to making automated decisions. If we decide in the future to do so, we will inform you beforehand and explain the underlying logic of such a decision to you, as well as the expected scope and consequences of this process.

### **4. Why is it necessary to provide us with your personal data?**

If you refuse to provide us with the data requested as part of the intended services provision (such as, for example; assistance with entering into an insurance contract or making a claim on an insurance contract), we may be unable to fulfil our role as an intermediary or to comply with your requests.

### **5. Where and how do we transfer your personal data?**

#### **5.1 Who has access to your personal data and to whom is it transferred?**

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In order to protect your privacy, the persons authorised to access your data are determined specifically based upon their professional tasks within the brokerage.

Under no circumstances will we sell your personal data to third parties. In order to realise the purposes detailed above (cf. point 3.1), we nonetheless send some information to third parties:

- to insurance companies from which you wish to receive a proposal or with which you wish to sign a contract
- with a view to the successful execution of our assignment as an intermediary, your data may be sent and/or processed by our subcontractors
- in order to respect our legal obligations, your data may be sent to a government authority and/or to our regulator
- in case of litigation, your data may be sent to our lawyers and used to defend our case in court

## 5.2 Where do we transfer your personal data?

We may transfer some of your personal data to the United Kingdom, outside of the European Economic Area (“EEA”) since 31/12/2020, according to the following terms:

- the purpose of the transfer is to perform the administration and of the insurance contract (preparatory work, proposal completion, submission, midterm alterations, claims cancellations, issue of policy wording and associated documentation etc.).
- this third party country is recognised by the European Commission as providing an adequate level of protection of personal data.

## 6. For how long is your personal data kept?

We will keep your data for as long as:

- necessary for realisation of the purposes detailed above
- a legal obligation requires us to keep the data (for example; keeping accounting documents)
- the time bar periods applicable have not passed with a view to ensuring that we have the information needed to protect us against any legal action

## 7. What are your rights and how can you exercise them?

As the person concerned, you have a range of rights. Below you will find a brief description of these rights and the way in which you can implement them.

**Right to information** - You can send us any questions concerning the recording and processing of your data.

**Right of access** – You can, at any time, secure confirmation as to whether or not the personal data concerning you is processed and, where applicable, access to this data as well as a free copy of this data.

**Right to correction** – You can, at any time, by sending us a written request, correct the personal data concerning you, which is inaccurate. You can, in the same way, request that incomplete data be completed.

**Right to erasure**– You can, at any time, by sending us a written request, erase your personal data, on the condition that the following grounds apply:

- the data is no longer necessary for the purposes for which it was collected and processed
- you have withdrawn your consent on which the processing was founded
- you object to the processing and there are no legitimate and compelling grounds for the processing
- the data was processed illegally
- the data must be erased to respect a legal obligation

**Right to restrict processing** – When a restriction on processing is granted, the personal data concerned can only be processed with the consent of the person concerned, or to establish, exercise or defend legal rights, or to protect the rights of another natural or legal person, or even for reasons of significant public interest.

You can request the restriction of the processing for one of the following reasons:

- you contest the accuracy of the personal data
- in case of illegal processing
- we no longer need your personal data for the purposes of processing but you still need it in order to establish, exercise or defend legal rights

- you object to the processing (the processing will be limited during the period necessary to verify the existence of legitimate grounds in our favour, which prevail over your legitimate grounds)

**Right of opposition**– You have the right to oppose, at any time and by sending us a written request, for reasons concerning your particular circumstances, the processing of your personal data on the grounds of the execution of a public interest assignment or which is necessary for the purposes of the legitimate interests we are pursuing.

We will no longer process this personal data, unless it is demonstrated that there are legitimate and compelling grounds for the processing, which prevail over your interests, rights and freedoms, or in order to establish, exercise or defend legal rights. When your personal data is processed for prospecting purposes, you have the right to oppose it at any time.

**Right to portability**– You have the right, by sending us a written request, to receive personal data concerning you that you have provided us within a structured, commonly used and machine legible format, and to transmit this data to another data controller without us hindering this, when:

- the processing is founded on your consent or on the contract; and
- the processing takes place using automated procedures.

**Right to withdraw consent**– When the processing is founded on your consent, you have the right to withdraw your consent at any time by sending us a written request. Withdrawal of your consent will not undermine the legality of the processing, which was founded on the consent given before withdrawal.

**Right to make a claim** – We make every effort to ensure our legal obligations in terms of data protection are respected and to follow up, as quickly as possible, on any claim, which is sent to us in this regard. In the event that you are not satisfied with the response received, you may make a claim with the Data Protection Authority.

**National Commission for Data Protection**

1, avenue du Rock'n'Roll

L-4361 Esch-sur-Alzette

Tel.: (+352) 26 10 60 -1

[www.cnpd.public.lu/fr/support/contact.html](http://www.cnpd.public.lu/fr/support/contact.html)