



Personal Data Protection Policy

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We attach the greatest importance to the confidentiality of your information. This Personal Data Protection Policy explains what data we collect about you and how we use it, as well as the rights you have and how you can exercise them. We undertake to implement all appropriate means to preserve the confidentiality and integrity of your personal data..

1. Who are we?

CBOINSURANCEBROKERAGE Luxembourg is an insurance and reinsurance brokerage company, registered with the Luxembourg RCS under number B275824. It is approved as a broker with the Commissariat aux Assurances de Luxembourg under number 2023CM001, and appears in the Register of brokerage companies approved in the Grand Duchy of Luxembourg available on the Commissariat aux Assurances website at the following address:<http://www.caa.lu/fr/operateurs/intermediaires/societe-de-courtage>. CBO INSURANCE BROKERAGE Luxembourg is authorized to operate in Luxembourg and also within the EEA and in particular in Germany, Belgium and France under the regime of the freedom to provide services. CBO INSURANCE BROKERAGE Luxembourg collects your personal data on its own behalf, as data controller.

You can reach us via the following contact details: **Mail:**

2-4, rue du château d'Eau L-3364 Leudelange

Such. : 00352 2880 78 06 10 Email:

borres.stephane@cbo.lu

Personal data is any information about an identified or identifiable natural person (for example a person's name, photo, telephone number, contract number, password, etc.).

The data controller, within the meaning of European data protection regulations, is the person who determines the purposes and means of the processing of personal data.

You can send any request for additional information or any request relating to your personal data using the contact details above and via the form available on our website in the contact section, specifying the subject of the request.

2. What personal data do we collect?

2.1 Data collected as part of our collaboration:

Only personal data strictly necessary for the achievement of the purposes mentioned below will be processed. As part of our activities, and depending on your particular situation and in the context of your life and/or capitalization insurance, we may process the following data:

- Identification data (surname, first name, 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 real estate assets, etc.)
- Data related to the profession of insurance broker;
- Composition of the family home (for example: marital status, number of children, etc.);
- And any other information that you spontaneously provide to us.

We may also be required to process certain **sensitive data**, benefiting from special protection, such as:

- Your tax identification number

We treat this data with particular care.

We may also use **data obtained from external sources**, particularly in



following cases:

- Data obtained by the financial partner (bank, financial manager, family office) who contacts CBO INSURANCE BROKERAGE Luxembourg with a view to collaborating on your file in complete transparency with you;
- Updating data (for example concerning the composition of your family, your address, your expired identity document, etc.)

In certain cases, we have to use **personal data relating to people other than you**, and for example:

- your ancestors, your children, your partner, the beneficiary(ies) of your life insurance;
- your employees, your legal/statutory representatives, your shareholders/associates;

If you provide us with such data, you undertake to inform the persons concerned.

2.2 Personal data collected from our website:

a) Cookies

[See management of cookies used on our site](#)

b) Data recorded via our form

The contact data you send to us via our form is stored internally until the request is processed. Subsequently, specific processing will be required depending on the nature of the request (applications, request for information regarding services, request for services, proposal for services [...]). Each processing operation will be subject to specific information relating to its purpose, the category of data and the people concerned.

3. How do we use your personal data?

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

We will first use your personal information to carry out our contractual obligations towards you, in particular in order to:

- provide you with the services expected as part of our role as an insurance intermediary, such as:
 - determine your requirements and needs (and in the context of insurance-based investment products, your complete investor profile);
 - provide you with advice;
 - submit documentation relating to the products for which you have requested our assistance;
 - assist you in concluding an insurance contract (preparatory work and subscription itself);
- assist you in the management and execution of insurance contracts (purchase, additional payment, arbitration, liquidation);
- save your preferences, if and how we can contact you to submit information or proposals;

We may also use your personal data in order to comply with our **legal obligations**, particularly in terms of:

- prevention of money laundering and terrorist financing;
- insurance distribution;
- our tax accounting obligations;

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

- manage our customers and have a global vision of customers (for example by establishing statistics of our customers in order to know who they are and to know them better);
- prevent abuse, fraud and offenses;
- protect company assets;
- ensure the security of property and people, as well as the company's networks and computer systems;
- monitor the regularity of operations;



- establish, exercise, defend and preserve the rights of the company or the people it possibly represents, for example during litigation;
- constitute evidence;

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

We do not use your data for profiling purposes or to make automated decisions. If we decide to do so in the future, we will notify you in advance and explain to you the logic underlying such decision-making as well as the significance and anticipated consequences of such processing.

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

If you refuse to provide us with the data requested in the context of certain services (such as for example assistance in concluding an insurance contract or in the event of a claim), we may find it impossible to fulfill our role as intermediary or to respond to 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?

To protect your privacy, the people who are authorized to access your data are precisely determined based on their tasks.

Under no circumstances will we sell your personal data to third parties. In order to achieve the purposes detailed above (see point 3.1), we are however required to communicate certain information to third parties:

- to insurance companies from which you wish to receive a proposal or with whom you wish to conclude a contract;
- for the proper execution of our intermediary missions, your data may be transmitted to and/or processed by our IT subcontractors;
- in order to comply with our legal obligations, your data may be transmitted to the authorities and our regulator;
- in the event of litigation, your data may be transmitted to our lawyers and used to defend our case in court;

Where do we transfer your personal data?

Under no circumstances will we transfer your personal data outside the European Economic Area ("EEA").

6. How long will your personal data be kept?

We will keep your data for as long as:

- necessary for the achievement of the purposes detailed above, or that;
 - a legal obligation imposes such retention (for example, the retention of accounting documents)
- applicable limitation periods will not have expired, to ensure that we have the necessary information to protect ourselves from legal action.

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

As a data subject, you have various rights. Below is a brief description of these rights and how you can exercise them.

Partner Company

CBO may be required to conclude partnership agreements with other insurance brokers under Luxembourg and/or foreign law duly approved by the competent authorities of the various respective countries on which they depend.



CBO and Broker Partners are defined as “Partner Firms”. They have commercial relationships, meaning that one can act as a subcontractor for the other, depending on the specialization required. The terms “CBO”, “broker”, “we”, “us” or similar automatically refer to Partner Companies when the latter provide services for your benefit, after you have designated CBO and/or another partner broker like your insurance broker.

Right to information–You can contact us with any questions regarding the recording and processing of your data. Right of access – You can, at any time, obtain confirmation whether or not personal data concerning you is being processed and, where applicable, access to said data as well as a free copy of it.

Right to rectification–You can, at any time, by sending us a written request, obtain the rectification of inaccurate personal data concerning you. 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, obtain the erasure of your personal data, provided that one of the following reasons applies:

- the data are no longer necessary for the purposes for which they were collected and processed;
- you have withdrawn your consent on which the processing was based;
- you object to the processing and there is no overriding legitimate reason for it;
- the data has been the subject of unlawful processing;
- the data must be erased to comply with a legal obligation.

Right to restriction of processing–When restriction of processing is granted, personal data may only be processed with the consent of the data subject, or for the establishment, exercise or defense of legal claims, or for the protection of rights of another natural or legal person, or for important reasons of public interest.

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

- you contest the accuracy of the personal data;
- in the event of unlawful processing;
- we no longer need your personal data for the purposes of processing but they are still necessary for the establishment, exercise or defense of legal claims;
- you have objected to the processing (the processing will be limited to the period necessary to verify the existence of legitimate grounds on our part which prevail over yours).

Right to object–You have the right to object, at any time and by sending us a written request, for reasons relating to your particular situation, to the processing of your personal data based on the performance of a mission in the public interest. or necessary for the purposes of the legitimate interests we pursue.

We will no longer process this personal data unless it is demonstrated that there are compelling legitimate grounds for the processing which override your interests and rights and freedoms, or for the establishment, exercise or the defense of rights in court.

When your personal data is processed for marketing purposes, you have the right to object to this processing at any time.

Right to portability–You have the right, by sending us a written request, to receive the personal data concerning you which you have provided to us in a structured, commonly used and machine-readable format, and to transmit this data to another controller without that we do not obstruct it, when:

- the processing is based on your consent or on a contract; and
- processing is carried out using automated processes.



Right to withdraw consent—Where processing is based 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 affect the lawfulness of processing based on consent given before its withdrawal.

Right to lodge a complaint—We make our best efforts to ensure compliance with our legal obligations regarding data protection and to respond as quickly as possible to any complaints addressed to us in this regard. In the event that you are not satisfied with the response received, you have the option of submitting a complaint to the Data Protection Authority.

National Commission for Data Protection 1, avenue du Rock'n'Roll-4361 Esch-sur-Alzette Tel. : (+352) 26 26 10 60 -1
www.cnpd.public.lu/fr/support/contact.html

By signing this document, the subscriber(s) acknowledges having been informed of the policy for the protection of his/her personal data applied at CBO Insurance Brokerage Luxembourg.

Signature(s) preceded by the handwritten words "Read and approved"

Date :

First name :

Name :