

# Data protection and professional secrecy / Ethics Line

In accordance with the applicable Luxembourg data protection law (including but not limited to the Luxembourg law of 1 August 2018 organizing the National Commission for data protection and the general system on data protection and the European Regulation no. 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the 'GDPR')) (the '**Data Protection Law**'), Zurich Eurolife S.A. as data controller collects, stores and processes, by electronic or other means, the personal data of reporting persons within the whistleblowing framework and other person that might be included in the report (the '**Data Subjects**', '**You**' of '**Your**') including:

- your name and contact details and whether you are employed by the organization (unless you report anonymously);
- the name and other personal data of the persons you name in your submission if you provide such information (i.e., description of functions and contact details); and
- a description of the question or allegation, as well as a description of the circumstances of the incident.

(together the '**Personal Data**').

The lawful basis for the Personal Data processing is (i) compliance with applicable legal and regulatory obligations relating e.g. to fraud prevention and detection, anti-money laundering rules, tax reporting requirements, economic or financial sanctions laws and the legal and regulatory requirements applicable to insurance companies and more in particular the law of May 16, 2023 transposing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report violations of the law of the Union (hereinafter the "Law"). In this regard, Personal Data is processed for purposes of enabling Zurich Eurolife S.A. to receive, investigate, and resolve allegations and questions regarding ethics and compliance.

According to the Law, unless You provide Your consent Your identity must not be disclosed, except for legal exceptions. Failure to provide Your consent may prevent Zurich Eurolife S.A. from adequately investigating a concern. Considering our outsourcing and service provider arrangements, and the fact that we operate in several jurisdictions in which we may be required to share Personal Data with local authorities, affiliates or other third parties, the Personal Data may be disclosed or transferred to third parties for the above-mentioned purposes. This may, depending on circumstances, include the parties listed below (the '**Recipients**')

- Zurich Group; Companies in the Zurich Group share information with each other in the context of outsourcing and service provider arrangements. Information is shared where it is relevant and appropriate for purposes of Regional- or Group-level investigations and system support;
- Other contractors or service providers who may provide services to us such as but not limited to information technology, data storage, data recovery, data security and technical staff of the provider of the reporting system, GCS Compliance Services Europe Limited (GCS);
- Governmental, legal and regulatory authorities, courts, dispute resolution forums (which have jurisdiction over us or our Group companies), investigators or legal process participants and their advisors.

The Recipients are established within the European Union ('**EU**'), the European Economic Area ('**EEA**'), the United Kingdom and Switzerland. Where we transfer Personal Data outside the EU or the EEA, we will ensure that the transfer relies on one of the legitimacy basis set out by the Data Protection Law. We will do this by ensuring that there is either an adequacy decision of the EU Commission regarding the transfer of Personal Data or that the Personal Data is given adequate safeguards by using 'standard contractual clauses' which have been adopted by the EU Commission or, as the case may be, any other legitimacy basis provided for by the Data Protection Law. Switzerland benefits from an adequacy decision of the EU Commission. The Data Subjects have a right to request a copy of the 'standard contractual clauses' from the Data Protection Officer of Zurich Eurolife S.A.

The Recipients may, under their own responsibility, disclose the Personal Data to their agents and/or delegates (the '**Sub-Recipients**'), which shall process the Personal Data for the sole purposes of assisting the Recipients in providing their services to Zurich Eurolife S.A. and/or assisting the Recipients in fulfilling their own legal obligations. The Recipients and Sub-Recipients may, as the case may be, process the Personal Data as data processors (when processing the Personal Data on behalf and upon instructions of Zurich Eurolife S.A. and/or the Recipients), or as distinct data controllers (when processing the Personal Data for their own purposes, notably to fulfil their own legal obligations). Where we transfer Personal Data to Recipients acting as data processors, we will ensure that where such Recipients further transfer Personal Data to Sub-Recipients outside the EU or EEA, such transfer relies on one of the legitimacy basis set out in the preceding paragraph.

The Personal Data shall not be kept by Zurich Eurolife S.A. for any period longer than necessary, with respect to the purposes of the data processing and the type of Personal Data, including compliance with applicable statutory retention periods or limitations.

Your Personal Data will be kept for the time necessary to fulfill the purpose for which they were collected and to determine the possible responsibilities that may arise from said purpose and from the processing of the data.

In accordance with the conditions laid down by the Data Protection Law, the Data Subjects have the right to:

- Access their Personal Data;
- Correct their Personal Data where it is inaccurate or incomplete;
- Object to the processing of their Personal Data;
- Ask for erasure of their Personal Data;
- Ask for the restriction of processing of their Personal Data; and
- Ask for Personal Data portability – to obtain personal information in a digital format.

They may exercise their above rights by writing to the Data Protection Officer of Zurich Eurolife S.A. at the following address:

Data Protection Officer  
Zurich Eurolife S.A.  
Building Elise  
21, rue Léon Laval  
L-3372 Leudelange  
Luxembourg  
E-mail: ZELprivacy@zurich.com

The Data Subjects also have the right to lodge a complaint with the Luxembourg National Commission for Data Protection ('**CNPD**') at the following address: 1, Avenue du Rock'n'Roll, L-4361 Esch-sur-Alzette, Luxembourg; or with any competent data protection supervisory authority of their EU or EEA member state of residence.

Zurich Eurolife S.A. is a life insurance company incorporated under the laws of Luxembourg and registered with the Luxembourg register of commerce and companies under no. B51753.

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Zurich Eurolife S.A. is subject to the applicable Luxembourg legislation and falls under the supervision of the Luxembourg insurance regulator, the Commissariat aux Assurances (11, rue Robert Stumper, L-2557 Luxembourg, Luxembourg).