

Privacy Policy and Notice at Collection for California Residents

Last Updated: September 3, 2024.

This CCPA Privacy Policy and Notice at Collection for California Residents (the “Privacy Policy”) applies to **AXA XL** and its affiliates (collectively, (“**AXA XL**,” “**we**,” “**us**,” or “**our**”) processing of personal information of California residents to the extent the information is subject to the California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act of 2020 (“**CCPA**”). For example, this Privacy Policy does not apply to personal information collected pursuant to various exemptions including for (i) information collected subject to the federal Gramm-Leach-Bliley Act and its implementing regulations or the California Financial Information Privacy Act, (ii) medical and health information covered by HIPAA, and (iii) de-identified or publicly available information.

Personal Information We Collect, Use, Disclose, Share, or Sell

Categories of Personal Information We Collect, Categories of Sources of Personal Information, Business or Commercial Purposes for Which Personal Information Will Be Used, and Third Parties with Whom Personal Information is Sold, Shared, or Disclosed.

We collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“personal information”). The chart below includes information collected for various types of individuals, such as our customers, employees, and others. As a result, not all of the categories of collected personal information described below may be applicable to you. Within the last twelve (12) months and on an ongoing basis, we may have collected and plan to collect the following categories of personal information from the sources identified below for the business and commercial purposes indicated, and disclosed, shared, or sold (as indicated) such categories of personal information with the specified categories of third parties.

Category of Personal Information	Examples of Personal Information Collected	Categories of Sources of Personal Information Collected	Business or Commercial Purpose(s) for Which Disclosed
Identifiers	A real name, alias, postal address, unique personal identifier, social security number, driver's license number, online identifier, Internet Protocol address, email address, phone number, account name or other similar identifiers.	Directly from you and from others including insurance companies that we work with, other reinsurers and retrocessionaries, third party claims handlers who are involved in a claim or assist us in investigating or processing claims, including witnesses and external claims data collectors and verifiers, our business partners with whom we work to provide insurance products, public sources, such as public databases (where permitted by law), coverholders, insurance brokers or other intermediaries, third party evidence providers, healthcare service providers, financial institutions, pension processing platforms, individuals that you may be associated with (e.g. joint account holders, company employees or directors, family members, etc.	We use your personal information to: (a) to provide our services and fulfil our contractual obligations to you and other third parties (b) to review, process and manage claims (c) to conduct data analysis, which helps us assess risks, price our products appropriately and improve our services (d) to help us prevent and detect fraud, money laundering, terrorism and other crimes (e) to help develop new, and improve existing, services (f) to operate and expand our business activities (g) to carry out background checks, where lawful (h) to perform human resources and administrative activities in connection with our services (i) to exercise, defend and protect our legal rights or the rights of third parties (j) to comply with legal obligations and to cooperate with regulatory bodies to which we are subject (k) for research and development of new insurance products (l) to audit our business (m) for marketing purposes.
Personal Information Categories Listed in the California Customer Records statute (Cal. Civ. Code 1798.80(e))	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.		
Characteristics of protected classifications under California or federal law	Race, color, age (40 years and older), ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).		
Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies as part of the claims adjusting process.		
Biometric Information	<i>We do not collect this category of personal information</i>		
Internet or other electronic network activity information	Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems and advertisements. Network traffic and other electronic or internet activity performed when acting as our personnel through our systems.		
Geolocation data	Geographic tracking data, physical location and movements.		
Sensory Data	Images and audio, video or call recordings created in connection with our business activities.		

Category of Personal Information	Examples of Personal Information Collected	Categories of Sources of Personal Information Collected	Business or Commercial Purpose(s) for Which Disclosed
Professional or employment-related information	Performance evaluations. Employer name, positions held, physical demands of positions held, and salary information. Recruitment information, qualifications, references, information contained in your resume/CV/cover letter or as part of application process; employment data such as dates of service, promotions, leaves, date of death; location of employment and workplace, job titles, work history, work hours, licensure and certification records, professional memberships; termination records, correspondence between us and you; your membership in public service, including military; Personal or work relationship information related to data falling under Code of Business and Ethics subjects: including but not limited to "Outside Interests" or "Insider Trading"; and performance record, compensation history, disciplinary and grievance information (including related legal matters).	See above.	See above.
Non-public education information (as defined in the Family Educational Rights and Privacy Act (20 U.S.C. 1232g, 34 C.F.R. Part 99))	Education records and transcripts.		
Inferences drawn from other personal information	Information used to create a profile about a consumer based on information collected above, reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.		
Sensitive Personal Information	SSNs and other government identification numbers, financial account credentials, racial and ethnic origin, health information, and information collected and analyzed concerning a consumer's sex life or sexual orientation. Various information related to the employment or work of our employees, independent contractors, and other company personnel. This includes health information, demographic information, company electronic communications, company financial information, racial and ethnic origin, sexual orientation, and government identifiers such as a social security number or driver's license number needed for human resources purposes.		

Categories of Third Parties to which Personal Information is Disclosed

We may share any of the categories of your personal information described above with third parties under the following circumstances. We operate as a global business, so we may share your personal information with AXA group companies who may use this information for the purposes described in this privacy notice. Insurance companies, coverholders, intermediaries, financial institutions, retrocessionaires and business partners. We may share your personal information with insurance companies, intermediaries, financial institutions, retrocessionaires and business partners that use your personal information in connection with the provision of insurance and processing of claims. For example, we may share your personal information with other reinsurance businesses for the purposes of settling claims. Service providers. We may share your personal information with service providers that perform services and other business operations for us, for example, IT and analytics providers, actuarial service entities, auditors and advisers. Any law enforcement agency, court, regulator, government authority or professional body. We may share your personal information with these parties where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party. Asset purchasers. We may share your personal information with any third party that purchases, or to which we transfer, all or substantially all of our assets and business. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this privacy notice. Customer companies. We may share our personal information with your company or employer in certain circumstances, for example, if your company has a corporate insurance product with us and you make a claim under that product. Because we operate as part of a global business, the recipients referred to above may be located outside the jurisdiction in which you are located (or in which we provide the services).

Information about our Personal Information Processing Activities

Additional details of how we process personal information is set forth in the chart above.

Personal Information is retained based on internal retention policies. Information is segregated by legal retention requirements and maintained in accordance with various local, state, federal, and other legal requirements. Personal Information will not be retained beyond the reasonably foreseen need to retain the information for legal or business purposes.

We do not sell consumers' personal information.

We do not share personal information (for purposes of cross-context behavioral advertising).

We do not sell or share (for purposes of cross-context behavioral advertising) the personal information of minors under 16 years of age.

We share cookies with third parties as described in our online privacy policy's cookie policy available here, <https://axaxl.com/cookie-policy>. To opt-out of the sharing of information with third parties in this context, please review our online privacy policy for instructions or adjust your browser settings accordingly.

We do not use or disclose sensitive personal information for purposes other than the following:

- (1) To perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services.
- (2) To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted personal information,
- (3) To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions.
- (4) To ensure the physical safety of natural persons.
- (5) For short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of a consumer's current interaction with the business, provided that the personal information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction with the business.
- (6) To perform services on behalf of the business.
- (7) To verify or maintain the quality or safety of a product, service, or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured by, manufactured for, or controlled by the business.
- (8) To collect or process sensitive personal information where such collection or processing is not for the purpose of inferring characteristics about a consumer.

Your Privacy Rights

Submitting Consumer Requests

You may submit a consumer request to us by email at dataprivacy@axaxl.com, or by phone at 1-800-242-5198 (toll free) to make a consumer request. You may make up to two disclosure requests in any 12 month period. Please review the consumer request forms below.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

Making a verifiable consumer request does not require you to create an account with us.

When you submit a verifiable consumer request, we will take steps to verify your request by email or telephone call. In some cases, we may request additional information in order to verify your request or where necessary to process your request. If we are unable to adequately verify a request, we will notify the requestor. Authorized agents will be required to provide proof of their authorization and we may also require that the relevant consumer directly verify their identity and the authority of the authorized agent.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Right to Know and Access Your Information

You have the right to request that we disclose to you certain descriptions and categories of the personal information we collect, use, disclose, share, or sell about you. For example, you may request the following through a consumer request:

- (1) The categories of personal information we have collected about you.
- (2) The categories of sources from which the personal information is collected.
- (3) The business or commercial purpose for collecting, selling, or sharing personal information.
- (4) The categories of third parties to whom we disclose the personal information.
- (5) The specific pieces of personal information we have collected about you.

You may make up to two disclosure requests in any 12 month period. See above for additional details on making a consumer request.

Right to Request Deletion

You have the right to request that we delete your personal information. See above for additional details about how to submit a consumer request.

You should be aware, however, that California law allows us to retain your personal information under certain conditions, even if you have asked us to delete it, such as when retaining your personal information is necessary for us to complete a transaction with you or provide you with a good or service you have requested. We will notify you of any denial of your deletion request and the reason for such denial.

Right to Request Correction

You have the right to request that we correct your personal information. See above for additional details about how to submit a consumer request.

Right to Non-Discrimination for Exercise of Consumer Privacy Rights

We will not discriminate against you because you have chosen to exercise any of your privacy rights provided by the CCPA.

Using an Authorized Agent

You may use an authorized agent to submit a consumer request. To use an authorized agent, you will need to (i) provide written instruction to your agent, and verify your identity to us, or (ii) provide a power of attorney pursuant to California Probate Code Sections 4000 to 4465.

Contact Us

Please read this Policy carefully to understand our practices regarding how we process CCPA personal information. If you should have any questions regarding this Privacy Policy please contact us below.

If you would like to contact us with a general question, please review our web site here:

Website: axaxl.com/privacy-notice

Email: dataprivacy@axaxl.com

Address: 100 Constitution Plaza Hartford, CT. 06103 W

Attn: Chief Data Privacy Officer