

Information notice GDPR : Whistleblowers

Information pursuant to Article 13 of the GDPR concerning personal data processed by the LALUX Group as part of the management of whistleblowing reports sent to it within the meaning of the Law of 16 May 2023 on whistleblowers.

1. Data controller

The various entities that make up the LALUX Group are responsible for processing the personal data communicated to them by the author of a whistleblowing report made in accordance with the aforementioned law.

The various entities covered by this declaration are the following companies:

- LALUX Group S.A.
- LA LUXEMBOURGEOISE Société Anonyme d'Assurances
- LA LUXEMBOURGEOISE-VIE Société Anonyme d'Assurances
- DKV LUXEMBOURG S.A.
- APROBAT lalux-assurances S.A.
- Lalux Group Ré
- PECOMA Actuarial and Risk S.A..

hereinafter together referred to as the "LALUX Group".

All reports should be sent to:

LA LUXEMBOURGEOISE Société Anonyme d'Assurances

Compliance Department

9, rue Jean Fischbach

L-3372 Leudelange

Tel: (+352) 4761-1

2. Purposes and legal basis of processing

In accordance with the Law of 16 May 2023 on whistleblowers, the various entities of the LALUX Group are required to establish appropriate channels and procedures for receiving and following-up of external and internal whistleblowing reports.

The processing of personal data by the LALUX Group in this context is necessary to comply with a legal obligation to which it is subject [Article 6, paragraph 1, sub c) of the General Data Protection Regulation (GDPR)].

3. Categories of data processed

In compliance with the confidentiality required by the Law of 16 May 2023 on whistleblowers, the LALUX Group entity or entities concerned processes the personal data communicated to it by the whistleblower, i.e. their first name and last name, as well as any other personal data that the whistleblower themselves may have communicated at the time of reporting and which may concern other natural persons.

Nevertheless, in accordance with Article 23, Paragraph 2 of the Law of 16 May 2023 on whistleblowers, personal data communicated to the LALUX Group which are clearly not relevant to the processing of the whistleblowing report shall be deleted immediately.

4. Categories of recipients of processed data

The personal data communicated at the time of reporting is only accessible to authorised employees of LALUX Group's relevant entity for the purpose of receiving or following up on whistleblowing reports.

To ensure the confidentiality of the data processed, LALUX Group uses the services of a secure external e-mail system (signalement@alerte.lalux.lu) separate from its internal e-mail system, hosted and fully managed by POST Telecom S.A. PSF on a server separate from the other customers and accessible only from the POST Telecom S.A. PSF network.

In accordance with Article 17(4) of the Law of 16 May 2023 on whistleblowers, where a report is communicated to the LALUX Group through channels other than those established in accordance with the Law, the LALUX Group shall ensure that the employees who have received the report refrain from disclosing any information that would make it possible to identify the author of the report or the person concerned and that they promptly forward the report unchanged to LALUX Group's Compliance Department.

If the whistleblowing report does not fall within the competence of the LALUX Group, it will be forwarded confidentially and securely to the competent authority within a reasonable time.

5. Retention period

The personal data contained in the whistleblowing report will be retained for a period of 10 years from the closure of the procedure.

6. Rights of the persons concerned

You may access your personal data and obtain a copy (Article 15 of the General Data Protection Regulation), obtain the rectification of inaccurate or incomplete data (Article 16 of the General Data Protection Regulation), obtain the deletion of such data under the conditions set out in Article 17 of the General Data Protection Regulation and obtain the restriction of processing under the conditions set out in Article 18 of the same Regulation.

In the case of an oral report, the person who provides the report has the opportunity to check, correct and approve the transcript or record of the report.

For any requests relating to the exercise of your rights, you may contact the Data Protection Officer of the LALUX Group, whose contact details are given below (point 7).

7. Contact details for the Data Protection Officer

If you have any questions regarding the processing of personal data by the LALUX Group entity(ies) concerned in the context of the management of reports sent to it, you can contact the LALUX Group Data Protection Officer by e-mail (dpo@lalux.lu or signalement@alerte.lalux.lu) or by post at the following address:

LA LUXEMBOURGEOISE Société Anonyme d'Assurances

Attn: Data Protection Officer

9, rue Jean Fischbach

L-3372 Leudelange

Tel: (+352) 4761-1

8. Claims

If you deem that the processing of your data by LALUX Group constitutes a breach of the General Data Protection Regulation and that LALUX Group has been unable to remedy the breach satisfactorily, you may lodge a [complaint with the National Commission for Data Protection \(CNPD\)](#).