

Allianz Privacy Notice for the Use of Inclusive Meritocracy Virtual Classroom

Allianz Group, consisting of Allianz SE and its affiliates (“Allianz”, “we”, “us” or “our”), uses the Inclusive Meritocracy Virtual Classroom (“IMVC”) to educate all employees on the culture of Inclusive Meritocracy.

The use of the IMVC entails the processing of personal information (i.e. data which can be linked/attributed to an individual person, “**Personal Data**”). Allianz will pay special attention to protect your privacy in the context of using the IMVC. We believe in transparency and we are committed to being upfront about our privacy practices, including how we treat your personal information.

This Privacy Policy sets out which kind of Personal Data will be collected, processed and used via the IMVC, for which purposes, to whom this Personal Data may be shared or disclosed and which rights you as a data subject have in this regard.

1. Who is responsible for the processing of your Personal Data?

Allianz SE, holding of the Allianz Group, located at Koeniginstrasse 28, 80802 Munich, Germany, is responsible for the processing of Personal Data of its employees and for group-wide processing activities for purposes mentioned below.

If you are working for an affiliated operative entity of Allianz SE (“OE”), this OE is also responsible for the processing of your Personal Data.

In all these cases mentioned above, each of the respective entities is considered a data controller as defined by applicable data protection laws and regulations, i.e. these entities decide about the purposes and means of the processing of your Personal Data (each individually and – as the case may be – all together “Data Controller(s)”).

You can request further information by contacting us via the details set out in Section 9.

Within the IMVC functionalities, your Personal Data will be hosted by Munich Leadership Institute, who acts as data processor on behalf and upon the instructions of the Data Controllers, in the European Union (“EU”).

To the extent two or more Data Controllers process your Personal Data in a joint manner, we kindly ask you to address any queries you may have directly to your OE contact as set out in Section 9. The respective contact person will then forward your query to the Data Controller who is primarily responsible, if necessary. Typically, this will be the Allianz entity you are employed with.

2. What Personal Data will be collected, processed and used?

We will collect, process and use the following types of your Personal Data:

- Basic personal information (such as your surname, first name, gender (optional), email address)
- Job-related information (OE, office location, executive/non-executive status, and functional area)
- Information in relation to the use of IMVC (completion data visible at aggregate level only, anonymized “poll” responses, and submissions to the best practice cloud (where all participants can exchange and find best practices on the topics of the IMVC), anonymized by default unless you choose to identify yourself)

3. For which purposes do we collect, process and use your Personal Data?

We will process your Personal Data for the following purposes:

- Learning and development;

- To set up and maintain your IMVC account, for technical support or for other related purposes;
- To leverage the insights you share to continue to drive cultural transformation at Allianz;
- To meet any legal obligations (i.e. administrative obligations);
- To comply with law enforcement requests or discovery procedures, or where required or permitted by applicable laws, court orders, government regulations, or government authorities;
- Where it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person or violations of Allianz policies or terms.

4. On which legal bases do we collect, process and use your Personal Data?

We use your consent as legal bases for the collection, processing and use of your Personal Data in the context of IMVC.

5. Who will have access to your Personal Data?

For the stated purposes, we may disclose your Personal Data to the following recipients or categories of recipients:

- Allianz SE and authorized persons working for or on behalf of Allianz SE;
- The IMVC administrator (learning and development team member) in your OE;
- Other Allianz Group companies, technical consultants, experts, lawyers, medical doctors and service companies to discharge operations (claims, IT, postal, document management);
- Third party agents, service providers and advisers connected only directly to the administration of the IMVC;
- Law enforcement or government authorities where necessary to comply with applicable laws;
- Other parties in the event of any contemplated or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in any insolvency or similar proceedings).

6. Where will my Personal Data be processed?

Your Personal Data may be processed worldwide on a need-to-know basis, and – if you are an EU resident both inside and outside of EU and the European Economic Area (“**EEA**”), by the parties as mentioned above (Section 5). We will ensure that contractual restrictions are implemented regarding confidentiality and security in line with applicable data protection laws and regulations. We will not disclose your Personal Data to parties who are not authorized to process them.

Please note that all countries, also within EU / EEA have different laws regarding the protection of Personal Data. When your Personal Data is transferred from your own country to another country, the laws and rules that protect your Personal Data in the country to which your information is transferred to may be different from those in the country in which you work. For example, the circumstances in which law enforcement can access Personal Data may vary from country to country. So, possibly the law in the other country may be less protective, e.g. towards authorities. Within our global set-up of the IMVC it is our goal to keep a very high standard.

Whenever we transfer your Personal Data within the Allianz Group to an OE outside of the EU / EEA, we will do so on the basis of Allianz’ approved binding corporate rules known as the Allianz Privacy Standard (“Allianz’ BCR”) which establish adequate protection for Personal Data and are legally binding on all Allianz Group companies.

7. What are your rights in respect of your Personal Data?

To the extent permitted by applicable data protection laws and regulations, under most jurisdictions, in particular the EU, you have the right vis-à-vis every Data Controller to:

- Access your Personal Data held about you, including information such as, for example, the source and the categories of the data, the purposes of the processing, the recipients (or categories thereof) and the respective retention period;
- Update or correct your Personal Data so that it is always accurate;
- Request the deletion of your Personal Data from the IMVC tool if it is no longer needed for the purposes indicated above;
- Obtain your Personal Data in an electronic format;
- Restrict the processing of your Personal Data in certain circumstances, for example, where you have contested the accuracy of your Personal Data, for the period enabling us to verify its accuracy;
- Object to the processing of your Personal Data on specific grounds relating to your particular situation that override our compelling legitimate grounds for the processing; and
- Withdraw your consent at any time where your Personal Data is processed with your consent, without affecting the lawfulness of processing based on consent before its withdrawal and on processing done based on other legitimation, e.g. legitimate interest
- File a complaint with the Data Controller and/or the relevant data protection authority.

You may exercise these rights by contacting IMVC@allianz.com and providing your name, the Allianz entity you are employed with, email address, and purpose of your request.

8. How long do we keep your Personal Data?

We will not retain your Personal Data longer than necessary to fulfil the purposes for which the data was collected for or to fulfil legal obligations. Afterwards, we will delete your Personal Data.

The specific periods depend on the jurisdiction you are working in. For further information, please contact us via the details set out in Section 9.

9. How can you contact us?

If you have any queries about this Privacy Policy or how we use your Personal Data, please contact the Privacy Contact Person of the Allianz entity you are employed with via the contact details available under <https://intranet.allianz.com.awin/communities/docs/DOC-23756>.

As required, the Privacy Contact Person may forward your request to the appropriate Data Controller.

10. How often do we update this Privacy Policy?

We regularly review this Privacy Policy. We will inform you when there is an important change that may have an impact on the processing of your Personal Data. This Privacy Policy was last updated on November 24 2017.
