

Data Protection Notice - Brokers

Allianz Global Life dac (AGL) pays special attention to protecting the privacy of its distributors/brokers. We believe in transparency, and we are committed to being open and clear about our privacy practices, including how we treat your personal information. This section sets out which kind of Personal Data will be collected, processed, and used, for which purposes, to whom it may be shared or disclosed, and what rights you have as a data subject.

Overview

The General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR) is European Union legislation, effective from 25 May 2018, which strengthened the data protection rights of individuals.

The GDPR states the following data protection principles:

- *Lawfulness, Fairness, Transparency:* Personal data must be processed lawfully, fairly and in a transparent manner.
- *Purpose limitation:* Personal data must be collected for specified, explicit and legitimate purposes and not processed in a manner that is incompatible with those purposes.
- *Data minimization:* Personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- *Accuracy:* Personal data must be accurate and, where necessary, kept up to date.
- *Storage Limitation:* Personal data must be kept in a form which permits identification of individuals for no longer than is necessary for the purposes for which the personal data are processed. Personal data can be stored for longer periods in certain circumstances only.
- *Integrity and Confidentiality:* Personal data must be processed in a manner that ensures appropriate security of the personal data.

AGL (or 'the Company') as a Data Controller, is committed to complying with data protection obligations. The Company collects and processes personal data relating to its Brokers in the course of business in a variety of circumstances, e.g. onboarding, training, sales performance and commission payments in honouring the Broker contractual agreement with AGL.

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

AGL is responsible for the processing of Personal Data of its Brokers. AGL is a specialized provider of retirement and life solutions, registered office at Maple House, Temple Road, Blackrock, Dublin. Company Reg. No. 458565.

AGL is considered a Data Controller as defined by applicable data protection laws and regulations, i.e. AGL decides about the purposes and means of the processing of your Personal Data.

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

AGL may collect, process and use the following types of Personal Data:

- Basic personal information (such as your surname, first name, address, date of birth, gender, telephone numbers, email address, PPSN, professional qualifications where required (to demonstrate competence to perform a role, etc.).
- Sales-related information.
- Compensation-related information namely commissions.

- Training-related information (such as your attendance at training courses).
- Fitness and Probity attestations.
- Information in relation to the use of the AGL Broker Platform and related systems.

2.1 Special Categories of Personal Data

AGL will not collect sensitive Personal Data from its Brokers

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

AGL processes your Personal Data in the course of business for the following purposes:

- Performance and commission management.
- Training.
- Identification and verification of your identity at onboarding.
- To meet any legal obligations (for example, tax, accounting, regulatory obligations).
- To set up and maintain your account on various IT systems, for technical support or for other related purposes.
- To comply with law enforcement requests or discovery procedures, or where required or permitted by applicable laws, court orders, regulations, or government authorities.
- Where it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud.

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

We use the following legal bases for the collection, processing and use of your Personal Data:

- Performance of a contract.
- Compliance with a legal obligation to which we are subject (for example, where we are legally obliged to retain and disclose certain data related to tax, AML etc.).
- Where the processing is necessary for our legitimate interests unless these are overridden by your own legitimate interests; our legitimate interests include the following:
 - Protecting AGL and/or its employees from harm, by preventing or detecting illegal activities, suspected fraud or situations involving potential threats to the safety of any person or violations of AGL policies or terms,

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:

- For the purpose of providing the Broker Portal functionalities, your Personal Data will be hosted by Allianz Technology SE who acts as data processor on behalf and upon the instructions of AGL and Allianz SE, on servers operated by SAP in the European Union,
- Other Allianz Group companies, technical consultants, experts.
- Law enforcement or government authorities where necessary to comply with applicable laws,

6. Where will my Personal Data be processed?

Your personal data will be processed within the EEA.

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

Under the GDPR, you have a right to:

- Be informed when your Personal Data is held by AGL and learn the origin of the data, the purposes and end of the processing, the details of the data processor(s) and the parties whom the data may be disclosed to.
- Access any of your Personal Data held by the Company; this right is subject to some limitations and exemptions such as (i) opinions given in confidence, (ii) professional legal privilege, (iii) protecting the source of data, (iv) investigations of an offence, (v) other exemptions.
- Have your data updated or corrected so that it is always accurate.
- Request the deletion of your Personal Data 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 legitimate grounds for the processing.
- 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.
- Not be subject to a decision based solely on automated processing, including profiling; and
- File a complaint with AGL and/or the relevant data protection authority.

You may exercise these rights by contacting the Data Protection Officer as detailed in Section 9 below providing your name, email address and your access request.

8. How long do we keep your Personal Data?

We are committed to keep your Personal Data only so long as necessary to fulfil the purposes for which the data was collected for, or to fulfil legal obligations. Therefore, we have implemented certain deletion rules. Broker data will be held for a period of seven years after the end of the relationship with AGL.

9. How can you contact us?

If you have any queries about information provided in this section or how we use your Personal Data, please contact the AGL Data Protection Officer (DPO) by email or post as follows:

Allianz Global Life dac
Data Protection Officer
Maple House
Temple Road
Blackrock
Dublin, A94 Y9E8

Email: dataprivacy-agl@allianz.com

11. How often is this Data Privacy Notice updated?

AGL regularly reviews this Data Privacy Notice. AGL will ensure that the most recent version is available on the company's website and will inform the Data Subjects directly of any important amendments that may impact him/her or require his/her consent.

This Data Privacy Notice was updated on 06/03/2025.