

# Client and Supplier Data Privacy Policy

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## Data Privacy Policy issued by Société Générale S.A (when acting through its Dublin Branch)

Société Générale S.A. when acting through its Dublin branch (hereafter referred to as “SG Dublin”) is in contact with clients, with connected parties of its clients and with suppliers. When acting through its Dublin branch Société Générale exclusively provides “Securities Services” in the meaning detailed at the end of the following paragraph.

Pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council dated 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereafter referred to as the “Regulation” or as GDPR). In the present policy, a reference to “Data Privacy Policy” refers to this document. Words starting with a capital letters shall have the same meaning as in GDPR. SG Dublin issues the present Data Privacy Policy with a view to inform its suppliers as well as its clients (particularly banks, asset management companies, investment companies, UCITS/AIFs, Hedge Funds and corporates) that it acts as Data Controller in the provision of its “Securities Services”. Such services mainly consist of depositary services provided to UCITS and AIF and custody services.

Due to the type of services provided, Personal Data, as defined below, can be directly or indirectly provided by Data Subjects to SG Dublin. When such Personal Data is being provided by Data Subjects to SG Dublin’s clients, such clients provide the necessary and relevant data to SG Dublin with a view to allow SG Dublin to provide them with the securities services mentioned above.

Accordingly, SG Dublin has implemented this Data Privacy Policy for natural persons who have indirect relations with SG Dublin (i.e. relations with SG Dublin clients). It also applies to natural persons who have direct relations with SG Dublin.

In accordance with the Regulation, SG Dublin in its role as Data Controller, provides Data Subjects with the following information.

### Source of personal data

The Personal Data held by SG Dublin branch is collected mainly from third parties, namely, clients of SG Dublin (in particular, banks, asset management companies, investment companies, UCITS, AIFs, Hedge Funds and corporates) with whom the concerned Data Subjects have a relationship. The above mentioned third parties transfer the data (or request their transfer) to SG Dublin branch for the performance of its “securities services”.

### Categories of personal data processed

The term “Personal Data”, as stated in GDPR, means any type of information, identified or identifiable, relating to a Data Subject. The Data Subject’s Personal Data processed by SG Dublin is that collected from the source described above and could include the name, surname, nationality, contacts (including address, phone number and email address), date and place of birth, civil status, economic and financial information, and details of identification documents. SG Dublin does not process special categories of Personal Data (i.e. special categories of Personal Data are information revealing the ethnic or racial origin of the Data Subject, his/her political opinions, religious or philosophical beliefs or trade union membership, as well as genetic data,

biometric data aimed at uniquely identifying a natural person, data regarding health or sexual life and sexual orientation of the person). However, should SG Dublin ever collect or process special categories of Personal Data in order to achieve the purposes indicated below, SG Dublin will always process this data in compliance with the provisions of the applicable laws and regulations, in particular GDPR, and with the requirements indicated in this Data Protection Policy. Further details about data processing are provided in Appendix 1.

### **Purpose of the processing for which the data is intended. Mandatory and optional nature of the data provision**

The processing of the data indicated above is carried out in compliance with the Regulation and with the principles and obligations of confidentiality and privacy with which SG Dublin (as a branch of Société Générale S.A.) abides.

The Personal Data is processed for the following purposes:

1. Purposes closely related and essential to services provided by SG Dublin acting mainly as depositary of AIF and UCITS funds or as a custodian. When provided to funds, those services are mainly provided to management companies acting as asset managers of the concerned funds. They may however be provided directly to funds themselves in specific cases. Such services may also be provided directly to corporates. The provision of Personal Data necessary for such purposes may not be mandatory from a legal perspective, however, any refusal to provide it may result in the impossibility for SG Dublin to provide the service (s). The processing does not require the consent of the Data Subject;
2. Purposes connected to the obligations laid down by laws, regulations and directives issued by the Supervising Authority and Supervisory Bodies of the financial system. The provision of Personal Data necessary for these purposes is mandatory and the processing does not require the consent of the Data Subject.

The Data Subject's personal data collected for the abovementioned purposes is not used by SG Dublin for marketing, commercial or promotional purposes.

### **Categories of recipients to whom the personal data are disclosed**

In order to carry out some of its activities, Société Générale when acting through its Dublin branch may outsource services to companies belonging to the Société Générale Group but also of third parties, which fall into the following categories:

- companies providing banking, financial and insurance services;
- entities who offer services for the acquisition, registration and processing of data deriving from documents and media provided or originating from the Data Subjects. Such services are characterised by bulk data processing;
- entities who carry out activities of printing, transfer, enveloping, transport and sorting of communications to the Data Subjects;
- entities who carry out activities of archiving the documentation relative to the relations with the Data Subjects;
- entities providing hardware outsourcing and data processing services.

The Personal Data collected may also be communicated to the Competent Authorities of European or NonEuropean countries to provide answers to their requests in accordance with the regulation applicable from time by time, in particular with reference to the prevention of money laundering and terrorist financing.

## **Transfer of personal data outside the European Economic Area**

Given the international presence of the Société Générale Group, and in order to optimise the quality of the services provided, SG Dublin may have to transfer Personal Data collected to countries outside the European Economic Area, whose legal provisions on the protection of personal data are different from those of the European Union.

In such cases, protection of Personal Data pursuant to the Regulation is ensured by signing standard contract clauses or other protection tools defined by law.

## **Retention Period**

SG Dublin keeps personal data for a maximum period of 10 (ten) years, starting from the termination of the contractual relationship with its clients, without prejudice to the provisions of Article.17 of the Regulation.

## **Exercising the personal data access right and other rights**

In relation to the personal data provided, the Data Subject can exercise the following rights guaranteed by the Regulation:

- a) access right;
- b) right to rectification, modification and cancellation of personal data or the right of restriction of
- c) the processing of the former;
- d) right to object the processing;
- e) right to withdraw the consent
- f) right to send a complaint to the competent Supervisory Authority

The right to portability of the data cannot be exercised when the data is not collected directly by SG Dublin. and it processes them on the basis of a contract with its clients and not with the Data Subject concerned.

Data Subjects can exercise any of the abovementioned rights from point a) to point e) sending a written communication to :

SG Dublin acting as Data Controller using the following e-mail address:  
[dataprotection.sgssireland@sgss.socgen.com](mailto:dataprotection.sgssireland@sgss.socgen.com)

Or to SG Dublin's Data protection officer using the following e-mail address:  
[dpo.sgssireland@sgss.socgen.com](mailto:dpo.sgssireland@sgss.socgen.com)

As stated in f) above, individuals concerned can also lodge complaints about processing of their personal data with the Data Protection Authority, at the following address:

Data Protection Commission,  
Canal House, Station Road,  
Portarlinton,  
Co. Laois, R32 AP23,  
Ireland.

## **APPENDIX I LIST OF PERSONAL DATA PROCESSING**

<b>Processing purpose</b>	<b>Additional information relating to processing purpose</b>	<b>Categories of personal data</b>	<b>Legal basis for processing</b>	<b>Data Retention</b>
<b>KYC/AML/Fraud prevention/criminal offences</b>	Participating in the prevention and detection of fraud and related crimes, producing statistics, management information and executing tests, complying with antimoney laundering, terrorism and related legislation and complying with other legal and regulatory obligations.	Board members and main directors, shareholders data. <ul style="list-style-type: none"> <li>• Identification (such as passport).</li> <li>• Private life (such as family members names)</li> <li>• Professional life (such as job title)</li> <li>• Financial data</li> <li>• Prevention and incident management (such as public legal suites)</li> </ul>	Compliance with a legal obligation	For Legal and regulatory requirements Personal Data will only be kept for as long as necessary to comply with applicable laws, unless there is an ongoing legal investigation.
<b>Financial management</b>	Own accounting, performance monitoring, solvency and treasury management	Mainly counterparts data while executing deals for hedging : <ul style="list-style-type: none"> <li>• Identification (such as name)</li> <li>• Professional life (such as professional e-mail address)</li> </ul>	Compliance with a legal obligation Legitimate interest	For management of banking relationships, personal data is stored during the contractual relationship and for further periods in compliance with local regulatory requirements
<b>Client onboarding</b>	During this phase we gather and store what is necessary for services provisions	Operational contacts categories of data: <ul style="list-style-type: none"> <li>• Identification (such as name)</li> <li>• Professional life (such as professional e-mail, professional mobile phone number, contractual scope of accountability)</li> <li>• Depending upon the services we may collect Personal Data from final investors and shareholders: <ul style="list-style-type: none"> <li>• Identification</li> <li>• Operations and services execution (such as bank account)</li> <li>• Contractual relationship (such as contract number)</li> </ul> </li> </ul>	Compliance with a legal obligation Legitimate interest	For management of banking relationship, personal data will be kept during the contractual relationship and for further periods in compliance with local regulatory requirements

<b>Processing purpose</b>	<b>Additional information relating to processing purpose</b>	<b>Categories of personal data</b>	<b>Legal basis for processing</b>	<b>Data Retention</b>
<b>Securities Services provision</b>	While executing the contracts with our clients, we often need to store and handle data in addition to the basic data collected during the on-boarding phase	Depending upon the services, we may collect personal data from final investors and holders: <ul style="list-style-type: none"> <li>• Identification</li> <li>• Operations and services execution (such as bank account)</li> </ul> Contractual relationship (such as contract number)	Contracts execution for clients Legitimate interest	For management of banking relationship, personal data will be kept during the contractual relationship and for further periods in compliance with local regulatory requirements
<b>Payment services Provision</b>	While executing the contracts with our clients, we often need to store and handle data in addition to the basic data collected during the onboarding phase. Such data may deal with final beneficiaries	Depending upon the services we may gather <ul style="list-style-type: none"> <li>• Identification</li> <li>• Operations and services execution (such as smart card numbers)</li> <li>• Contractual relationship (such as contract numbers)</li> </ul>	Contracts execution for clients Legitimate interest	Personal Data will be kept during the contractual relationship and, if applicable, for further periods in compliance with local regulatory requirements
<b>Open Web sites servicing</b>	Our Group websites help a prospect, client, candidate to better know our offers, locations and they distribute our public communication, such as our data policy.	Relevant websites' data privacy policies depict categories of data	Contract execution Legal obligation Legitimate interest	Data retention periods in relevant website privacy policy