

PRIVACY POLICY



SOCIETE GENERALE BRUSSELS SOCIETE GENERALE AMSTERDAM

As from 25 May 2018
(Updated on October 15th, 2018)

PRIVACY POLICY

In this Privacy Policy “**Societe Generale**”, “**we**”, “**us**” and “**our**” means “Societe Generale Belgian branch located at Rue des Colonies 11, 1000 Brussels (with company number 0455.297.412) or Dutch branch located at Amstelplein 1, Rembrandt Tower, 1096 HA Amsterdam (with company number 33149169).

About this Privacy Policy

For the purposes of data protection law, we are a data controller in respect of personal data. Societe Generale is responsible for ensuring that it uses personal data in compliance with data protection law, including the General Data Protection Regulation (regulation (EU) 2016/679 - “GDPR”) and any relevant applicable laws in Belgium and the Netherlands.

This Privacy Policy applies to clients, legal representative or employees of Societe Generale’s clients, beneficial owners of Societe Generale’s clients and potential business relationships (hereafter referred to together as the “Clients”).

The Clients undertake to notify their representatives and employees (the “Data Subjects”) of this Privacy Policy.

This Privacy Policy sets out the basis on which any personal data that Clients provides to us, that we create, or that we obtain about Clients from other sources, will be processed by us. Please take the time to read and understand this Privacy Policy.

This Privacy Policy includes in particular:

1. The categories of personal data collected and processed
2. The purposes of processing of personal data
3. The Legal grounds for processing personal data
4. Communication of personal data to third parties
5. Transfers outside the European Economic Area
6. Retention of personal data
7. Rights of Data Subjects
8. Security of personal data
9. Contacting us

This Privacy Policy may be amended or updated from time to time to reflect changes in practices with respect to the processing of personal data or changes in applicable law.

1. Categories of personal data collected and processed

In the course of its banking relationship with Clients, Societe Generale will collect and process the following personal data relating to the Data Subjects:

- Personal details: names, surnames, gender, birth dates and other elements of civil status;
- Identity documents: copy of passport, copy of identity card, example of signature;
- Contact details: work postal addresses, work and private email addresses, job title, etc.
- Employment details: work title and information relating to their professional and (where relevant) financial status;
- Data related to electronic identification and data relating to IT usage;

- Content of any electronic communication (e.g. telephone calls and interviews, internet discussion, e-mails, data related to payment systems etc.) exchanged between the Client and us.

These personal data are collected either directly from the Clients, or via companies belonging to the Societe Generale Group, or from public sources.

When the personal data are collected from the Clients (including their representatives or employees), the provision of the personal data requested is mandatory. Any refusal to do so may have as a consequence that Societe Generale may not be able to provide quality services to the Client or may be in breach of a statutory or regulatory obligation applicable to Societe Generale.

2. Purposes of processing personal data

The above personal data will be stored and processed by Societe Generale for the following purposes:

- Management of the contractual relationship between Societe Generale and the Client;
- Administering and operating account and providing and managing products and services, assessing credit worthiness, offering products and services;
- Participating in the prevention and detection of fraud and related crimes, producing statistics, management information and executing tests, complying with anti-money laundering, terrorism and related legislation and complying with other legal and regulatory obligations;
- Complying with statutory and regulatory requirements to which Societe Generale is subject, particularly in matters concerning identification controls, checking transactions, operational risk management, the prevention of conflicts of interests, the prevention of the fraud, the fight against money laundering and financing of terrorism;
- Establishing statistics and tests;
- Determining a consolidated risk profile for the Client at the level of the group Societe Generale;
- Implementing an improved client service policy at the level of the group Societe Generale;
- Marketing purposes (unless Clients and Data Subjects tell us not to), organising commercial events, offering new services, and conducting statistical and private capital surveys (including behavioural surveys).

Furthermore, Societe Generale will, in accordance with applicable legal requirements, record electronic communications (phones, e-mails) with its Clients and counterparts. When it occurs, the recording of electronic communication by Societe Generale is made for the purpose of establishing proof of transactions or of another professional communication. Data pertaining to electronic communications and the content of said communications may be saved until the end of the period during which the underlying transaction can be legally disputed. The Client undertakes to inform his employees and representatives that any communication with Societe Generale must be strictly confidential and professional.

3. Legal grounds for processing personal data

The processing of personal data is based on:

- the necessity to perform a contract (the offering and provision of products and services to the Client, administering and operating account and providing and managing products and services, assessing credit worthiness);
- a statutory or regulatory requirement (particularly in matters concerning identification controls, checking transactions, operational risk management, the prevention of conflicts of interests, the prevention of the fraud, the fight against money laundering and financing of terrorism);
- the legitimate interest of Societe Generale (prevention of misconduct or fraud, establishment of statistics and tests, determining risk profiles for the Client, improving services and for commercial purposes); and
- the necessity to establish, exercise or defend our legal rights or for the purpose of legal proceedings.

4. Communication of personal data to third parties

Personal data processed by Societe Generale may be communicated to the following recipients:

- employees, agents, representatives and consultants of Societe Generale;
- other legal entities within the Societe Generale Group;
- external legal advisors;
- external fraud detection services; and
- external service providers having a contractual relationship with Societe Generale;

for the purpose of (i) managing its banking relationship, managing products and services, executing the account holder's orders and transactions, managing accounting procedures of the Group, notably when pooling resources and services with the Societe Generale group and (ii) entrusting certain operational functions to other entities of the Societe Generale Group or to service providers chosen for their expertise and reliability to provide specific services.

In such cases, Societe Generale will take all physical, technical and organizational measures necessary to ensure the security and confidentiality of personal data.

Furthermore, Societe Generale may also disclose personal data, upon request, to the official organs and administrative or judicial authorities of a country, located within or outside the European Economic Area, particularly in the context of the fight against money laundering and terrorist financing.

5. Transfer outside of the European Economic Area

Given the international scope of Societe Generale group, and in order to optimize quality of services, the processing of personal data mentioned above may involve the transfer of personal data to countries outside the European Economic Area (EEA), whose legislation on the protection of personal data is different from that of the European Union.

The personal data may also be processed by staff operating outside of the EEA who work for our affiliates or other companies of Societe Generale Group or for one of our suppliers and service providers.

Where we transfer personal data outside the EEA, we will ensure that it is protected in a manner that is consistent with how personal data will be protected by us in the EEA. This can be done in a number of ways, for instance:

- the country that we send the data to might be approved by the European Commission;
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal data; or
- where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme.

In other circumstances the law may permit us to otherwise transfer personal data outside the EEA.

In all cases, however, we will ensure that any transfer of personal data is compliant with applicable data protection law.

More details of the protection given to personal data when it is transferred outside the EEA (including a copy of the standard data protection clauses which we have entered into with recipients of your personal data) can be obtained by contacting us in accordance with the “Contacting us” section below.

6. Retention of personal data

Personal data will be kept no longer than necessary in relation to the purposes for which they were collected or otherwise processed.

How long we hold your personal data for will vary. The retention period will be determined by various criteria including:

- the purpose for which we are using it – we will need to keep the data for as long as is necessary for that purpose;
- legal obligations – laws or regulation may set a minimum period for which we have to keep your personal data;
- the fact that the representative/employee remains a representative/employee of the Client;
- fraud identification; or
- existing or potential litigation.

7. Rights of the Data Subjects

The employees and representatives of the Clients (Data Subjects) have the following rights:

- the right to obtain information regarding the processing of their personal data and access to the personal data which Societe Generale holds about them;
- in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that Societe

Generale transmits those data to a third party where this is technically feasible. This right only applies to personal data which the Data Subjects have provided to us;

- the right to request that Societe Generale rectifies their personal data if it is inaccurate or incomplete;
- the right to oppose against the processing of their personal data for direct marketing purposes;
- where the processing is based on consent, the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- the right to object, on grounds relating to their particular situation, at any time to processing of personal data concerning them which is based on our legitimate interest, including profiling based on that legal ground. Societe Generale shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subjects or for the establishment, exercise or defence of legal claims;
- the right to request that Societe Generale erases their personal data in certain circumstances. There may be circumstances where the Data Subjects asks us to erase their personal data but we are legally entitled to retain it;
- the right to request that Societe Generale restricts its processing of their personal data in certain circumstances. Again, there may be circumstances where the Data Subjects asks us to restrict its processing of their personal data but we are legally entitled to refuse that request.

Data Subjects can exercise their rights by contacting us using the details set out in the “Contacting us” section below, including a copy of both sides of the ID cards of the relevant individuals.

Societe Generale will carry out requests promptly unless we will have a strict business interest not to fulfill requests to the extent permitted by law. Societe Generale will revert on how requests will be handled within 1 month after reception of the request.

Data Subjects may also lodge a complaint with the local data protection authority if he/she deems it appropriate:

- For Belgium, the competent data protection authority is the Belgian Privacy Commission (or “Autorité de protection des données” in French or “Gegevensbeschermingautoriteit” in Dutch), rue de la Presse, 35, 1000 Brussels or by searching their website at <https://www.privacycommission.be>.
- For the Netherlands, the competent data protection authority is “Autoriteit Persoonsgegevens”, Postbus 93374, 2509 AJ DEN HAAG or by searching on their website <https://autoriteitpersoonsgegevens.nl/>.

8. Security of personal data

Societe Generale takes all reasonable physical, technical and organizational measures needed to ensure the security and confidentiality of personal data, particularly in view of protecting it against loss, accidental destruction, alteration, and non-authorized access.

9. Contacting us

In case of any questions or concerns about any information in this Privacy Policy or the exercise the rights provided in this Privacy Policy, please contact:

Data controller contact details:

- The Netherlands GDPR-NL@sgcib.com
- Belgium GDPR-BE@sgcib.com

Data Protection Officer:

- The Netherlands GDPR-DPO-NL@sgcib.com
- Belgium GDPR-DPO-BE@sgcib.com

GLOSSARY OF TERMS

Personal data

Information relating to an identified or identifiable natural person (“data subject”). An identifiable natural person is one who can be identified directly or indirectly.

Data Controller

Entity which determines the purposes and means of a processing of personal data

Processing

Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means.

Processor

Any person or entity which processes personal data on behalf and upon instructions of the data controller.

AGGREGATED PROCESSES

Process purpose	Detailed process purpose	Categories of personal data	Legal basis for processing	Data Retention
KYC/AML/Fraud prevention/criminal offences	Participating in the prevention and detection of fraud and related crimes, producing statistics, management information and executing tests, complying with anti-money laundering, terrorism and related legislation and complying with other legal and regulatory obligations	Board members and main directors identity, professional cursus, family relationship when linked to their professional activities; for each person : identification, professional life, financial data, commercial & contractual data, operations & services, incident prevention and management	Processing necessary for compliance with a legal obligation	Personal data retention & trigger according to legal and/or regulatory obligation
Financial management	Own accounting, performance monitoring, solvency and treasury management	Mainly counterparts' data while executing own deals for hedging. Data such as name, professional e-name, name of counterpart, job title, professional phone numbers	Processing necessary for compliance with a legal obligation Legitimate interest	Personal data are purged according to country booking rules, from 3 years to 12 years after the end of the deal (few derivatives ones have a very long maturity)
Client on-boarding	During this phase we collect and store what is necessary for product/services provisions	Name of operational contacts, professional phone numbers, professional address, job title, scope of delegation, professional e-mail	Processing necessary for compliance with a legal obligation Legitimate interest	Trigger for starting purge is the end of client relationship. Additional period of few months is added for compliance motivations, according to country legislation

Securities Services provision	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, register the voices when receiving a market instruction	Contracts execution for corporate clients Legitimate interest	Personal data are purged according to statutory, regulatory and tax requirements, for a maximum of 10 years after the end of the contract (unlimited for employees saving funds and pension plans)
Payment services Provision	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 (please refer to the detailed appendix) we may collect personal data from final beneficiaries, including their smart card or IBAN identifier	Contracts execution for corporate clients Legitimate interest	Trigger for starting the purge is the end of every contract. Additional period of few months to several years is added in order to comply with each country's legislation
Capital markets services Provision	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, register their voice or the counterpart's one when receiving a market instruction or executing a financial market operation	Contracts execution for corporate clients Legitimate interest	Trigger for starting the purge is the end of every contract. Additional period is added in order to comply with the French legislation; this additional period varies according the EU country legislations

Structured finance Products offer and delivery	While executing the contracts with our clients, we often need to store and handle personal data on their representatives in addition to the basic ones collected during the on-boarding phase	In this context, we may from time to time manage personal data of our clients' representatives such as professional email or professional mobile phone number	Contracts execution for corporate clients Legitimate interest	Trigger for starting the purge is the end of every contract. Additional period of few months is added in order to comply with each country's legislation
Research and associated services	Aimed at high level experts, acting for themselves or their company, we deliver standard or ad'hoc economic, financial or thematic studies	In order to send them the studies or invite them to thematic meetings, we generally handle personal data such as e.g. names, job titles, company names, professional mobile phone and e-mails	Contracts execution for corporate clients	The distribution list of research documentation and invitation is purged after the end of contractual relationships
Corporate Finance Services provision	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 (Mergers and Acquisitions, Equity Capital Market, Corporate Brokerage) we may collect personal data from issuers and investors, register their voice or the counterpart's one, when receiving or executing transactions	Contracts execution Legal obligation Legitimate interest	Trigger for starting the purge is the end of every contract. Additional period is added in order to comply with each country's legislation

<p><u>Open Web sites servicing</u> (relevant websites' privacy policy will be inserted in terms and conditions of each websites including personal data provisions and cookies policies)</p>	<p>Our open websites help a prospect, client, candidate to better know our offers, locations and distributes our public communication (such as our data policy)</p>	<p>In order to ease the navigation of every internaut the site identifies its device cookies (no social cookies) and the version of its navigator; we may use these data for internal statistic purposes</p>	<p>Contract execution Legitimate interest Legal obligation</p>	<p>The navigation data are cleaned at the end of the internet session; data retention provided in relevant website privacy policy</p>
<p>Develop business with corporate prospects or existing counterparts and clients such as corporate/financial institutions</p>	<p>Marketing purposes (unless Clients tell us not to), organising commercial events, offering new services, and conducting statistical and private capital surveys (including behavioral surveys).</p>	<p>We invite the clients/prospects while using their professional e-mail/ mobile phone. When using hotels or public transportation we collect as well their personal preferences for meals or rooms</p>	<p>Legitimate interests</p>	<p>According to the agreements we have with the third parties, these data are erased few days after the meeting</p>
<p>Credit analysis</p>	<p>We always analyse a client situation before granting a credit and revise this situation regularly during the contractual relationship period</p>	<p>Personal data (mainly name, financial situation, marital status, country of personal home, overall situation toward the bank)are handled when a natural person is acting as a guarantor or is the ultimate beneficiary of the credit</p>	<p>Legitimate interests</p>	<p>The personal data are purged after the end of the overall client relationship in France; this additional period varies according the EU country legislations</p>

Premises management	While visiting us, we register for safety reasons, our visitor.	In some restricted areas, cameras are taking pictures in addition to the names and company of belonging that was kept in the entrance desk	Legitimate interests	Data are purged according to every legal entity policy
Sourcing process and vendors management	SG is often contracting with various partners for IT or non-IT services, particularly through RFP processing	When managing the vendors/partners relationship we handle personal data such as the name and the professional references of the natural person that is in touch with us (both sales and operational ones). For consulting and IT services, we also collect personal data for our internal needs (access grants to the devices, premises and systems)	Contract execution Legitimate interest Legal obligation	The personal data are anonymised after the vendor's last contractual relationship + additional period; this additional period varies according the EU country legislations