

# CLIENTS' DATA PRIVACY POLICY

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**EFFECTIVE FROM 25 MAY 2018**

This Privacy Policy is issued by Data Controller

**Societe Generale - Societe Anonyme - Registered Office: 29 Boulevard Haussmann 75009 Paris**

**This Privacy Policy sets out:**

1. Information concerning the purposes of processing, their legal basis, the categories of data and the retention of data;
2. Communication to third parties;
3. Transfers outside the European Economic Area;
4. Communication with data subjects in relation to their rights under the GDPR (Global Data Protection Regulation); and;
5. Security of processing;

Societe Generale, as data controller, will collect and process personal data from their clients and prospective clients ("**Clients**") and this policy is dedicated mainly for their activities of coverage and investment banking, global finance, global market and securities services, and activities of transactions (bank, commercial and corporate transactions) and/or payments.

By this Policy individuals as Clients' employees and legal and other professional representatives and other individuals concerned by processing that Societe Generale is setting up in a course of its banking activities ("**Data Subjects**") will be informed about personal data collection and data processing.

This 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.

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## 1 - Processing purpose

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### 1.1 Categories of Personal Data

In the course of its banking relationship with Clients, Societe Generale, in compliance with EU data protection legislation (regulation (EU) 2016/679), collects and processes the following personal data relating to its Clients, their employees and legal and other professional representatives (“**Data Subjects**”), as:

- Identification data: name, address, date of birth, nationality, identity documents,
- Personal data: civil status,
- Professional data: email address, telephone number professional status, job title
- Economic and financial information;
- Conversations and communications with Societe Generale.

### 1.2 Processing purposes

In the course of its banking relationship with Clients, Societe Generale has set up processing and in compliance with EU data protection legislation (regulation (EU) 2016/679), Societe Generale has to provide purpose of the processing.

Processing purposes are detailed in Appendix [“GDPR processing description”](#).

### 1.3 Legal Basis for processing

Societe Generale has to provide to Data Subjects, the legal basis of the processing.

Certain personal data are used by Societe Generale to provide Clients with the products or services requested, as necessary for the performance of any contracts to which Clients are a party or in order to take steps at the request of Data Subjects prior to entering into a contract.

Some of processing defined are necessary for Societe Generale’s legitimate interests.

Personal data are also processed for the purposes of complying with statutory and regulatory requirements (legal obligation) to which Societe Generale is subject, particularly in matters concerning finance market obligations, 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.

Consent of Data Subjects will be used for processing that requires it, and in particular where fundamental rights of individuals override Société Generale’s legitimate interest. Consent is not used when processing is necessary to provide services and products or in connection with compulsory and regulatory processing.

Information on detailed legal basis is provided in Appendix [“GDPR processing description”](#).

### 1.4 Retention of data

Societe Generale retains personal data only for the minimum period necessary for the purposes set out in this Policy. Criteria used to determine the retention period are detailed in Appendix [“GDPR processing description”](#).

## 2 - Communication with third parties

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Societe Generale discloses personal data to other legal entities within the Societe Generale Group for the purpose of managing their 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 within the Societe Generale Group.

In addition, Societe Generale entrusts 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 takes all physical, technical and organizational measures necessary to ensure the security and confidentiality of personal data.

### 3 - Application of European Union data protection rules regarding the transfer of personal data outside the European Economic Area

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Given the international dimension of Societe Generale Group, and in order to optimize quality of service, the communication of information mentioned above may involve the transfer of personal data outside the European Economic Area, whose legislation on the protection of personal data is different from that of the European Union.

In such cases, except where the concerned country has been officially recognized by the European Commission as ensuring to personal data an adequate level of protection compare to the European standard, Societe Generale will ensure that the transferred data are protected by suitable Standard Contractual Clauses or other appropriate safeguards mentioned by the GDPR.

For further information about safeguards applied to international transfers of personal data, please use contact details inserted below.

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.

### 4 - Communication with data subjects in relation to their rights under the GDPR (Global Data Protection Regulation)

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Data Subjects have rights under data protection legislation to:

- access to their personal data;
- have their personal data rectified or erased if needed;
- object to the processing of their personal data based on legitimate grounds;
- obtain the restriction of a processing in the case provided for by the GDPR;
- receive personal data in a structured, commonly used and machine-readable format (data portability), in the case provided for the GDPR.

Data subjects may also benefit of specific rights provided for by national data protection regulation.

In addition, Data Subjects may, in certain circumstances, object to the processing of personal data, including, as individuals, not to receive direct marketing information.

If Data Subjects wish to exercise any of these rights, please contact us at:

Data controller contact details for the activities of coverage and investment banking, global finance, global market and activities of transactions (bank, commercial and corporate transactions) and/or payments:

- [FR-GDPR-SG-CONTACT@sgcib.com](mailto:FR-GDPR-SG-CONTACT@sgcib.com)

Data controller contact details for the activities of Securities Services:

- [SGSS-PersonalData@socgen.com](mailto:SGSS-PersonalData@socgen.com)

Data Protection Officer contact details

- [Sg-Protection.Donnees@socgen.com](mailto:Sg-Protection.Donnees@socgen.com).

Individuals concerned can lodge complaints about processing of their personal data with a Data Protection Authority as *Commission Nationale de l'Informatique et des Libertés (CNIL)*, In France.

## 5 - Security of processing

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Societe Generale takes all 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.