

PRIVACY POLICY

1. About this Policy

In this Privacy Policy, "Societe Generale SAR", "we", "us" and "our" means Societe Generale Saudi Arabia, located at 8th Floor, North Tower, Abraj Atta'Awuneya, PO BOX 53828, 11593, Riyadh, Kingdom of Saudi Arabia, CMA license 14182-30 and CR No.1010279178 a subsidiary of Société Générale, a company incorporated and existing in France, having its registered office at 29 Boulevard Haussmann, 75009 Paris, France.

The following information provides you with an overview of the processing of your Personal Data by us and your rights under the Kingdom of Saudi Arabia's Personal Data Protection Law (the "PDPL"), promulgated by Royal Decree No. M/19, dated 09/02/1443H, amended pursuant to Royal Decree No. M/148, dated 05/09/1444H,

The specific data that is processed and how it is used depends largely on the reason we need to process it, and the nature of your relationship with us.

2. WHO IS RESPONSIBLE FOR THE PROCESSING OF MY DATA, AND WHOM CAN I CONTACT TO EXERCISE MY RIGHTS?

Data Controller Contact Details:

Societe Generale Saudi Arabia

Data Protection Officer Contact Details:

E-mail : SA-DPO@socgen.com

Physical Mail:

Societe Generale Saudi Arabia

8th Floor, North Tower, Abraj Atta'Awuneya,

PO BOX 53828

11593, Riyadh

Kingdom of Saudi Arabia

Should you have any questions or concerns about any information in this Privacy Policy or the exercise of your rights as presented in this Privacy Policy please contact us through the above contact details. You can also directly contact your Societe Generale SAR business contact who will further forward your matter to our Data Protection Officer.

3. KEY TERMS

- **Data Subject** is the individual the Personal Data relates to.
- **Personal Data** is any data, regardless of its source or form, that may lead to the identification of identifying an individual specifically, or that may directly or indirectly make it possible to identify an individual.
- **Process** (or processing) is any operation which is performed on Personal Data, whether by manual or automated means, including collecting, recording, saving, copying, organizing, formatting, storing, modifying, updating, consolidating, retrieving, disclosing, transmitting, publishing, linking, erasing and destroying of Personal Data.
- **Sensitive Data** is a type of Personal Data that may reveal racial or ethnic origin, or religious, intellectual or political belief, security data, data relating to criminal offenses, biometric or genetic data, health data, and data that indicates that one or both of the individual's parents are unknown.

4. WHY DO WE PROCESS PERSONAL DATA?

We mainly process Personal Data of the legal representatives and employees of companies with which we are in business, regulatory or a customer relationship or in the process of establishing such a relationship. If we are not able to process Personal Data about you or your organization, we cannot provide our services.

We also process Personal Data that:

- we receive as part of business relationships with our service providers (Personal Data relating to the representatives of our service providers).
- we receive from job applicants as part of our recruitment activities, either directly from applicants, or via an agency engaged to conduct this activity on our behalf.
- we have legitimately acquired from publicly available sources.

The Personal Data referred to above may include one or a combination of the below:

- Personal details: names, surnames, gender, birth dates, religion 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 your professional and (where relevant) financial status.
- Data related to electronic identification and data relating to IT usage;
- Information shared during telephone conversations
- Background and education information prior or during employment; and
- Other data required by applicable regulations.

5. WHAT ARE OUR LEGAL BASES FOR PROCESSING PERSONAL DATA?

We process the aforementioned Personal Data in accordance with the provisions of the PDPL:

With your consent

If we seek your consent to the processing of your Personal Data for specific purposes, the lawfulness of this processing is based on your consent. We may seek your consent to process Sensitive Data. In such a case, we will obtain your consent in writing or using electronic means. You may withdraw your consent to our processing of your Personal Data at any time, by contacting us using the details above. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. If we do have another legal basis for processing your Personal Data, then we may continue to do so, subject to your rights, and as applicable under such other legal basis. Please note that in the absence of another applicable legal basis, the withdrawal of consent may result in termination of our relationship with you.

In order to perform our contractual obligations

When you seek information about our services or engage us, we will process your Personal Data to deliver our services to you, to communicate with you, and to maintain our accounts and records. We do this to perform our obligations under the contract to which you or your organization are a party.

In order to comply with the law

Personal Data is also processed where necessary to comply with any statutory or regulatory requirements to which we are subject, particularly in matters concerning finance market obligations, identification controls, checking of transactions, operational risk management, the adherence to sanction and embargo requirements, the prevention of conflicts of interests, the prevention of fraud, and the fight against money laundering and financing of terrorism.

In the pursuit of a legitimate interest

The processing of Personal Data shall be considered a legitimate interest when we transfer Personal Data other legal entities within the Societe Generale Group for international administrative purposes, or if it is necessary and proportionate to prevent fraud or to ensure network and information security. In each case, these legitimate interests are only valid if they are not outweighed by your rights and interests.

6. WHY DO WE PROCESS PERSONAL DATA?

We process your Personal Data for the following purposes:

- Management of the contractual relationship between the client and Societe Generale SAR;
- 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 other relevant statutory and regulatory requirements to which Societe Generale SAR 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;
- Determining a consolidated risk profile of the client at the Societe Generale Group level;
- Implementing an improved client service policy at the Societe Generale Group level;
- Marketing purposes (unless clients and Data Subjects request us not to), organising commercial events, offering new services.

7. WITH WHOM DO WE SHARE PERSONAL DATA, AND WHY?

Your Personal Data is processed by us and may be communicated to the following recipients:

- Employees, agents, representatives and consultants of Societe Generale SAR;
- Other legal entities within the Societe Generale Group;
- External legal advisors and auditors;
- External fraud detection services;
- External service providers having a contractual relationship with Societe Generale SAR or Societe Generale Group and for which SG SAR is a beneficiary;
- Local and international regulatory bodies in the context of fulfilling such regulatory requirements.

In such cases, we ensure adequate physical, technical and organizational measures are implemented to ensure the security and confidentiality of your Personal Data (such as written agreements, to ensure third parties are contractually bound to provide Personal Data with the same level of protection that it is afforded when it is in our care).

Furthermore, we may also disclose Personal Data, upon request, to regulators, public bodies and institutions [such as the Capital Market Authority (CMA)] or investigating authorities (e.g. tribunals) when there is a legal, judicial, or regulatory obligation.

8. WHEN DO WE TRANSFER PERSONAL DATA INTERNATIONALLY?

In certain circumstances, we transfer your data to other parties (including other legal entities within the Societe Generale Group, and our third party service providers) located outside the Kingdom of Saudi Arabia. In such cases, we will ensure it is afforded a level of protection equivalent to that provided under the PDPL. In order to achieve this, we may rely on an adequacy decision issued by the Saudi Data and AI Authority when transferring your Personal Data. In the absence of an adequacy decision, we will ensure necessary protections (such as binding data processing contractual clauses, and robust technical and organizational safeguards) are in place, to protect your Personal Data and your rights.

9. HOW DO WE STORE AND SECURE PERSONAL DATA?

We process and store Personal Data for as long as is necessary for the purposes outlined in this Privacy Policy, and according to our retention schedules, after which we will safely dispose of it, according to our secure data deletion processes. Our retention schedules are determined by various criteria, including:

- The purpose for which we are processing it;
- Archiving obligations – laws or regulations may set a minimum period for which we are legally required to retain your Personal Data;
- Fraud identification purposes; or
- Existing or potential litigation.

Our data handling practices are built on a foundation of necessity, purpose, and minimization, and we incorporate privacy protection into the design of all our systems and processes. For example, we secure our systems and devices, and ensure access to Personal Data is restricted.

We carry out risk assessments of our Personal Data processing activities and take necessary measures to eliminate or limit any identified risk. We have implemented a procedure for the management of Personal Data breaches, which allows us to notify the relevant authorities, and the affected persons, within the timeframes mandated by the PDPL.

10. HOW DO YOU EXERCISE YOUR RIGHTS?

The PDPL provides you with the following rights in relation to the processing of your Personal Data:

- The right to withdraw your consent at any time if you previously your consent for the processing of your Personal Data;
- The right to access, rectify and update your Personal Data;
- The right to request a copy of your Personal Data;
- The right to request destruction of your Personal Data in certain circumstances.

You can exercise your rights by contacting us using the details set out above.

We may need to request additional information from you to help us verify your identity, and to ensure your right to access, or to exercise any other rights. We will respond to your request within 30 days. If your request is complex in nature, we may contact you to request additional time to respond, and inform you of the reason for the delay.

In certain circumstances, we may refuse to comply with your request, for example:

- where we are unable to confirm your identity;
- where your request is repetitive, manifestly unfounded, or requires disproportionate efforts to process;
- where your request is unfounded or when it is repetitive, manifestly unfounded, or requires disproportionate efforts;
- where granting you access would adversely affect the privacy, rights, or freedoms of others, including trade secrets or intellectual property.

In such cases, we will inform you of our reason for refusing to act on your request.

11. WHO DOES THIS POLICY CONCERN?

When you provide us with third party Personal Data (including but not limited to those listed above), you confirm that such third party receives this Privacy Policy and understands the information in this Privacy Policy about how we will use their Personal Data.

12. ARE YOU REQUIRED TO PROVIDE YOUR PERSONAL DATA?

As a corporate representative or employee of our clients, as part of the business relationship, you must provide any Personal Data necessary to enter into and carry out a business relationship and fulfil the related contractual obligations, or the Personal Data which we are legally required to. Without this data, we will generally have to refuse to conclude a contract or execute an order or be unable to continue to execute an existing contract and may have to terminate it.

In particular, according to money laundering regulations (e.g. Know Your Customer, or 'KYC' requirements), we are obliged to identify you prior to the establishment of a business relationship. In order for us to fulfil this regulatory and legal obligation, you must provide us with the necessary information and documents

and immediately notify us of any changes resulting in the course of the business relationship. If you do not provide us with the necessary information and documents, we are not permitted to initiate or to continue the desired business relationship.

13. HOW DO YOU KEEP UP TO DATE WITH CHANGES TO THIS POLICY?

We may make changes to this Privacy Policy from time to time in response to changing legal, technical or business developments. When we update it, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We invite you to review the latest version of this Privacy Policy online. We will notify you of any material changes through our website or through our other usual communication channels.

This Policy was last updated on 14 September 2024.