

# CLIENTS' DATA PRIVACY POLICY

---

**EFFECTIVE FROM 25 MAY 2018**

This Privacy Policy is issued by Data Controller, **Societe Generale Securities Services (Ireland) Limited - Registered Office: IFSC House, Dublin 1, Ireland**, hereafter referred to as the “Company”

**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).
5. Security of processing.

The Company, 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 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 the Company 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.

## SUMMARY

1 - PROCESSING PURPOSE.....	4
2 - COMMUNICATION WITH THIRD PARTIES .....	4
3 - APPLICATION OF EUROPEAN UNION DATA PROTECTION RULES REGARDING THE TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA.....	5
4 - COMMUNICATION WITH DATA SUBJECTS IN RELATION TO THEIR RIGHTS UNDER THE GDPR (GLOBAL DATA PROTECTION REGULATION) .....	5
5 - SECURITY OF PROCESSING .....	6

## 1 - Processing purpose

---

### 1.1 Categories of Personal Data

In the course of its relationship with Clients, the Company, 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**”):

- 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 relationship with Clients, the Company has set up processing and in compliance with EU data protection legislation (regulation (EU) 2016/679), the Company has to provide purpose of the processing. Processing purposes are detailed in the appendix

### 1.3 Legal Basis for processing

The Company has to provide to Data Subjects, the legal basis of the processing.

Certain personal data is used by the Company 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 is necessary for the legitimate interests of the Company.

Personal data is also processed for the purposes of complying with statutory and regulatory requirements (legal obligation) to which the Company 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 the legitimate interest of the Company. 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 the appendix

### 1.4 Retention of data

The Company 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 the appendix,

## 2 - Communication with third parties

---

The Company discloses personal data to other legal entities within the Societe Generale Group for the purpose of managing their 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, the Company 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, the Company takes all physical, technical and organisational 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

---

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 compared to the European standard, Societe Generale will ensure that the transferred data is 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 the contact details inserted below.

Furthermore, the Company 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)

---

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 from 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 Securities Services:

- [dataprotection.sgssireland@sgss.socgen.com](mailto:dataprotection.sgssireland@sgss.socgen.com)

Data Protection Officer contact details

- [dpo.sgssireland@sgss.socgen.com](mailto:dpo.sgssireland@sgss.socgen.com).

Individuals concerned can lodge complaints about processing of their personal data with the Data Protection Authority (*Data Protection Commission, Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23, Ireland.*)

## 5 - Security of processing

---

The Company takes all physical, technical and organisational 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.

# **SGSS (Ireland) Limited**

## **APPENDIX TO CLIENT PERSONAL DATA PROTECTION**

### **PRIVACY POLICY**

---

#### **LIST OF PERSONAL DATA PROCESSING**

**VALID AS OF MAY 25 2018**

**FOR CORPORATE & INVESTMENT BANKING, SECURITIES SERVICES IN IRELAND**

Processing purpose	Additional information relating to processing 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, 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)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.
Record Keeping Conversations and communications with SGSS (Ireland) Limited	SGSS (Ireland) Limited (we) may receive instructions by phone or electronic communication from clients that need to be recorded in order to respect regulatory requirements (such as MIFID2) .	Any one exchanging with our staff: <ul style="list-style-type: none"> <li>• Identification (such as name, phone number, voice)</li> <li>• Professional life (such as job title, prof e-mail address)</li> </ul>	Compliance with a legal obligation	Record keeping rules are compliant with regulatory requirements per country and activity
Financial management	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 prof e- mail address)</li> </ul>	Compliance with a legal obligation Legitimate interest	For management of banking relationship, personal data are stored during the contractual relationship and for further periods in compliance with local regulatory requirements



Processing purpose	Additional information relating to processing purpose	Categories of personal data	Legal basis for processing	Data Retention
Client on-boarding	During this phase we gather and store what is necessary for product/services provisions	Operational contacts categories of data: <ul style="list-style-type: none"> <li>• Identification (such as name)</li> <li>• Professional life (such as prof e- mail, prof mobile phone number, contractual scope of accountability)</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
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: <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>	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
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. 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 number)</li> <li>• Contractual relationship (such as contract number)</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>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>
Open Web sites servicing	Our open websites help a prospect, client, candidate to better know our offers, locations and distributes our public communication (such as our data policy). Each web site presents its own policy.	Relevant websites' data privacy policies depict categories of data	Contract execution Legal obligation Legitimate interest	Data retention periods in relevant website privacy policy
Credit analysis	We always analyze a client situation before granting a credit and revise this situation regularly during the contractual relationship period. In few cases, natural persons may be guarantors or ultimate beneficiaries.	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	Legitimate interest	Personal data is purged after the end of the overall client (financial institution) relationship. This period depends on national laws.