

# **SOCIETE GENERALE WHOLESALE BANKING**

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

### **PRIVACY POLICY**

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

**VALID AS OF MAY 25 2018**

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, share-holders 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 be kept only during the delay mentioned by or necessary to comply with the applicable law, unless an on going legal investigation.
Record Keeping Conversations and communications with Societe Generale	Societe Generale 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 period in respect of local regulation
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 relations hip, personal data will be kept during the contractual relationship and, for further period in respect of local regulation

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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 corporate clients Legitimate interest	For management of banking relationship, personal data will be kept during the contractual relationship and, for further period in respect of local regulation
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 corporate clients Legitimate interest	Personal data will be kept during the contractual relationship and, if applicable, for further period in respect of local regulation
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 counterparts, <ul style="list-style-type: none"> <li>- Identification</li> <li>- Operations and services execution</li> <li>- Prevention and incident management</li> </ul>	Contracts execution for corporate clients Legitimate interest	Personal data will be kept during the contractual relationship and, if applicable, for further period in respect of local regulation
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 <ul style="list-style-type: none"> <li>- Identification</li> <li>- Operations and services execution</li> <li>- Prevention and incident management</li> </ul>	Contracts execution for corporate clients Legitimate interest	Personal data will be kept during the contractual relationship and, if applicable, for further period in respect of local regulation

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Research and associated services	Dedicated to 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 <ul style="list-style-type: none"> <li>- Identification (such as first name)</li> <li>- Professional life (such prof e-mail address)</li> </ul>	Contracts execution for corporate clients Legitimate interest	Personal data will be kept during the contractual relationship and, if applicable, for further period in respect of local regulation
Corporate Finance Services provision	Depending upon the services (Mergers and Acquisitions, Equity Capital Market, Corporate Brokerage) we may gather personal data from issuers and investors	Issuers and Investors: <ul style="list-style-type: none"> <li>- Identification (such as name)</li> <li>- Private life (such diploma)</li> <li>- Professional life (such as job title)</li> <li>- Prevention and incident management (such as home country embargo)</li> </ul>	Contracts execution Legal obligation Legitimate interest	Personal data will be kept during the contractual relationship and, if applicable, for further period in respect of local regulation
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 provided in relevant website privacy policy
Develop business with corporate prospects or existing counterparts and clients such as corporate/financial institutions	Marketing purposes (unless Clients tell us not to), organising commercial events, offering new services, and conducting statistical and private capital surveys.	Clients and prospects: <ul style="list-style-type: none"> <li>- Identification (such as name)</li> <li>- Private life (such diploma)</li> <li>- Professional life (such as job title)</li> <li>- Prevention and incident management (such as sensitivity of country of final beneficiary)</li> </ul>	Legitimate interest	Personal data are stored as long as the Client/prospect relationship is active. They are purged after a legal retention period depending upon countries legislation

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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.	Guarantors or ultimate beneficiaries: <ul style="list-style-type: none"> <li>- Financial situation (as wealth, debts)</li> <li>- Private data (such as family members, marital status,</li> <li>- Banking data (such as personal IBAN)</li> </ul>	Contract execution	Personal data are purged after the end of the overall client (corporate/financial institution) relation-ship. This additional period varies according each national legislation.