

GDPR FAQ

Societe Generale Private Banking

GDPR: a key step in personal data protection

1. What is the GDPR?

The GDPR (General Data Protection Regulation) is the regulation governing personal data protection in the European Union (EU) as of 25 May 2018.

It applies to all companies (of any size, economic sector or location) that collect, store and process the personal data of subjects located in the European Union.

Its purpose is to:

- **Strengthen the rights of individuals** (prospects, individual clients, employees, etc.) to give them greater control over their personal data.
- **Hold personal data controllers and processors accountable** (data controllers, joint controllers and processors) and incentivise them to guarantee maximum protection of personal data.
- **Affirm the importance of this regulation**, particularly by implementing a system of stricter penalties for corporations.

Collection and processing of your data

2. What data are collected and processed by Societe Generale Private Banking?

- **Data necessary for the provision of products and services**

As a banking and financial institution, we collect and process the personal data supplied by you, which are necessary for the provision of the products and services offered in our business activities because they allow us to adapt these products and services to best meet our clients' needs. Such data include identifying data, professional data, economic and financial data, and data generated when you use your accounts and products or browse our websites or applications.

We are prohibited from processing personal data which are, by their nature, particularly sensitive in relation to fundamental rights and freedoms (racial or ethnic origin; political, philosophical or religious opinions; trade union membership; genetic or biometric data; health or sexual orientation). We are only permitted to do so under one of the conditions provided for by the GDPR (data subject's explicit consent, data made public by the data subject, legal obligation, defence of legal claims, public interest, etc.).

Personal data relating to criminal convictions and offences belong to a special class of data, which may only be processed under special conditions (under the control of official authority or when the processing is authorised by law). Societe Generale Private Banking only processes sensitive personal data or personal data relating to criminal convictions or offences in accordance with the cases, conditions, restrictions and rules of consent provided for by law, and with the conditions and procedures provided for by applicable law.

- **Data relating to regulatory obligations**

Where a legal provision calls, for example, for the collection of a specific type of data, sets a specific storage period or requires us to transmit data to an identified organisation, we observe these regulatory obligations within the limits accepted by applicable local law. Subject to the preceding, we may therefore

collect, retain or transmit certain data either after or during our contractual relations with our clients, when obligated to do so by regulations in force.

- **Special case: data collection as a data processor**

The Group entities that process data in their capacity as data processors act solely within the strict limits of the contracts entered into with their principals, which are notably responsible for determining the data to be collected and used.

3. Why are your personal data collected and how are they used?

In the course of conducting its business, Societe Generale Private Banking collects and processes data belonging to its clients and prospects for the purposes of:

- Managing the client relationship, including:
 - o Administration and management of accounts and/or products and services owned, including execution of client orders and transactions and handling complaints,
 - o Management, review and allocation of loans, and risk selection;
 - o Debt collection or disposal, management of payment incidents;

- Observing the legal and regulatory obligations applicable to Societe Generale Private Banking, particularly regarding:
 - o Management of operational risks (including security of IT networks and transactions) and use of international payment networks;
 - o Determination of tax status;
 - o Financial market obligations;
 - o Fraud prevention;
 - o Prevention of money laundering and terrorist financing;
 - o Requests issued by any court, government authority or competent jurisdiction.

- Conducting marketing campaigns and improving quality of service:
 - o Organisation of commercial events and surveys;
 - o Development of new and appropriate products and services;
 - o Performance of statistical and wealth management research at certain Societe Generale Private Banking entities.

Each of these activities is based on one of the following legal foundations:

- Performance of a contract to which the client is party or pre-contractual negotiations with a client or prospect at their initiative for the purpose or entering into a contract,
- Compliance with legal or regulatory obligations applicable to Societe Generale Private Banking,
- The legitimate interests of Societe Generale Private Banking,
- Client consent.

Societe Generale Private Banking has implemented all necessary processes to avoid any excessive data processing relative to the end purpose of the processing. All the data that we collect are strictly necessary to meet our contractual and legal obligations or to pursue a legitimate interest of Societe Generale Private Banking. In any other case, we specifically ask for your consent.

4. How does Societe Generale Private Banking design its products and services in the interest of protecting your personal data?

Societe Generale Private Banking is constantly innovating to adapt its products, services, distribution channels and technologies to meet the needs of its different client and prospect segments around the world. When making such innovations or improvements, we place a premium on personal data protection, focusing in particular on invasion of privacy risks. Various protective measures are established from the beginning and are regularly updated, as are the procedures under which data subjects may exercise their rights.

5. How long does Societe Generale Private Banking store personal data?

Societe Generale Private Banking stores personal data only as long as necessary to fulfil the purpose for which the data were collected. Storage periods vary according to the end purpose of each processing operation and the country of operation. The storage period is set by Societe Generale Private Banking in accordance with national legal and regulatory obligations, and in our legitimate interests, where applicable. These periods are indicated in the General Terms and Conditions provided to clients when they open their bank account. Some data are retained for evidentiary purposes in the course of pre-disputes or ongoing disputes, subject to local regulations.

Your personal data protection rights

6. What are your personal data protection rights?

Under the requirements of the GDPR and national laws in force, you benefit from various rights during and after the collection of your personal data:

- **right of access:** you may contact us to find out if we hold any of your personal data. If so, your right of access entitles you to obtain information on the processing operations in question (purpose, categories of data and recipients, storage period, data source, etc.) and to obtain a copy.
- **right to object:** you may object to the processing of your personal data for commercial reasons, without being required to provide legitimate grounds. In other cases, you may exercise your right to object on legitimate grounds relating to your particular situation.
- **right to rectification:** you have the right to obtain the rectification of inaccurate or incomplete personal data. The majority of the time, such requests must be accompanied by supporting documents. When the request is grounded, Societe Generale Private Banking makes the requested correction or deletion.

- **right to erasure:** you have the right to request the erasure of your personal data. Societe Generale Private Banking has the obligation to erase your personal data in a timely manner, unless required to save your data in accordance with a legal or regulatory obligation. Your data are erased when they are no longer necessary in relation to the purposes for which they were collected or otherwise processed. Your data are also erased when you withdraw your consent.

- **right to data portability:** you have the right to receive your personal data, which you have directly provided to Societe Generale Private Banking, and to transmit them to another data controller.

- **right to restriction of processing:** you may temporarily obtain the suspension of personal data processing in accordance with the scope of application provided for by the GDPR.

The exercise of certain rights may prevent Societe Generale Private Banking from being able to offer some or all of its services.

7. How can you exercise your personal data protection rights?

Any clients or prospects can exercise their rights and contact the Data Protection Officer of the Societe Generale Private Banking entity in question by contacting the branch where their account was opened, or by submitting an e-mail to the address provided in the “Contact us” section of the entity’s website.

The Data Protection Officer (DPO) is responsible for overseeing compliance with applicable personal data protection regulations throughout the entity in question and for promoting a strong personal data protection culture. The DPO also handles relations with the data protection authority.

Societe Generale Private Banking has appointed a DPO at all of its entities.

The DPC for the French entity may be contacted at the following e-mail address: protectiondesdonnees@societegenerale.fr.

The DPO for Société Générale Luxembourg may be contacted at the following e-mail address: lux.dpooffice@socgen.com.

The DPO for SGPB Monaco is: Roman Janecek

The DPO for SGPB Suisse (Switzerland) is Omar Otmani, who may be contacted at the following e-mail address: sgpb-gdpr.ch@socgen.com

The DPO for Kleinwort Hambros (KH) (United Kingdom, Jersey, Guernsey, Gibraltar and Singapore) is:

- For SG Kleinwort Hambros Bank Limited:
Data Protection Officer
SG Kleinwort Hambros Bank Limited
5th Floor, 8 St. James’s Square
London SW1Y 4JU
UK

- For SG Kleinwort Hambros Trust Company (UK) Limited:
Data Protection Officer
SG Kleinwort Hambros Trust Company (UK) Limited

5th Floor, 8 St. James's Square
London SW1Y 4JU
UK

- For SG Kleinwort Hambros Bank (CI) Limited:
Data Protection Officer
SG Kleinwort Hambros Bank (CI) Limited
PO Box 78
18 Esplanade
St. Helier
Jersey
JE4 8PR
Channel Islands

- For SG Kleinwort Hambros Bank (CI) Limited – Guernsey Branch:
Data Protection Officer
SG Kleinwort Hambros Bank (CI) Limited – Guernsey Branch
PO Box 6
Hambros House
St. Julian's Avenue
Saint Peter Port
Guernsey
GY1 3AE
Channel Islands

- For SG Kleinwort Hambros Bank (Gibraltar) Limited:
SG Kleinwort Hambros Bank (Gibraltar) Limited
PO Box 375
Hambros House
32 Line Wall Road
Gibraltar

- For SG Kleinwort Hambros Trust Company (CI) Limited:
Data Protection Officer
SG Kleinwort Hambros Bank (CI) Limited
PO Box 197
SG Hambros House
18 Esplanada
St. Helier
Jersey
JE4 8RT
Channel Islands

- For SG Kleinwort Hambros Trust Company (CI) Limited – Guernsey Branch:
Data Protection Officer
SG Kleinwort Hambros Trust Company (CI) Limited – Guernsey Branch
PO Box 86
Hambros House
St. Julian’s Avenue
Saint Peter Port
Guernsey
GY1 3ED
Channel Islands

- For SG Trust (Asia) Limited:
Data Protection Officer
SG Trust (Asia) Limited
8 Marina Boulevard
Marina Bay Financial Centre Tower 1 #12-01
Singapore 018981

Societe Generale Private Banking has one month from the date of receipt to answer your request. For complex or large numbers of requests, this period may be extended by two months in principle. In such case, you will be duly notified and given the grounds for the extension.

Data security

8. What security measures have been established to protect personal data?

The security of your personal data is a priority for Societe Generale Private Banking, which has implemented appropriate technical and organisational measures for:

- user identification and password management,
- traceability of access and operations, data storage and security of data exchange and transmission,
- the authorisation policy and respect for the confidentiality of personal data.

9. Does Societe Generale Private Banking have a procedure in the event of a personal data confidentiality violation?

Societe Generale Private Banking has implemented a procedure to address any violation of personal data confidentiality, which includes plans for detection, assessment, remediation, crisis management and external notification. Under this procedure, Societe Generale Private Banking is able to notify the competent European data protection authorities of a violation no later than 72 hours after learning of the violation. In addition, it can notify the data subjects involved in case of a major risk to their rights and freedoms.

Data transfers and data processors

10. Does Societe Generale Private Banking transfer personal data to third parties?

Under Societe Generale Private Banking's operating model, some processes are delegated to internal subsidiaries and some personal data are transferred to persons employed by the Group, partners, or data processors located in the European Union (EU), outside the European Union, or in the European Economic Area (EEA).

- Subject to the observation of banking secrecy, personal data may be freely exchanged in EU or EEA countries, in accordance with the principles of the GDPR.
- Data transfers outside the EU or the EEA shall be subject to additional specific measures, however, unless the European Commission has officially recognised the destination country as having sufficient data protection regulations (adequate countries). Data transfers systematically take place under one of the appropriate safeguards provided for by applicable regulations, ensuring protection equivalent to the protection offered in the European Union.

Where provided for by applicable regulations, certain data transfers may be made to non-European authorities under the legal safeguards in question (tax administration, court authority, financial markets authority, other regulators, etc.).

11. How does Societe Generale Private Banking use data processors and under what conditions?

When Societe Generale Private Banking plans to call on the services of a data processor and provide that party with access to some of your personal data, the Group only selects service providers offering adequate safeguards to protect your data. Contractual clauses have been introduced and are subject to appropriate controls.