

SOCIETE GENERALE WHOLESale BANKING

APPENDIX TO CLIENT PERSONAL DATA PROTECTION

PRIVACY POLICY

LIST OF PERSONAL DATA PROCESSING

VALID AS OF MAY 25 2018

Process purpose	Detailed process 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 identity, professional cursus, family relationship when linked to their professional activities; for each person: identification, professional life, financial data, commercial & contractual data, operations & services, incident prevention and management	Processing necessary for compliance with a legal obligation	Personal data retention & trigger according to legal and/or regulatory obligation
Data breach management	These activities include every design, prevention, detection and crisis management of data breaches	E-mails, personal identifiers, date of actions, names, internet site address, and every associated joint documentation	Processing necessary for compliance with a legal obligation	Trigger for purge is both a short period due to volume constraints and the concluded investigation on an open case
Financial management	Own accounting, performance monitoring, solvency and treasury management	Mainly counterparts data while executing own deals for hedging. Data such as name, professional e-name, name of counterpart, job title, professional phone numbers	Processing necessary for compliance with a legal obligation Legitimate interest	Personal data are purged according to country boking rules, from 3 years to 12 years after the end of the deal (few derivatives ones have a very long maturity)
Client on-boarding	During this phase we collect and store what is necessary for product/services provisions	Name of operational contacts, professional phone numers, professional adress, job title, scope of delegation, professional e-mail	Processing necessary for compliance with a legal obligation Legitimate interest	Trigger for starting purge is the end of client relation ship. Additional period of few months is added for compliance motivations, according to country legislation
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	Name of operational contacts, professional phone numers, professional adress, job title, scope of delegation, professional e-mail. Depending upon the services we may collect personal data from final investors and holders, register the voices when receiving a market instruction	Contracts execution for corporate clients Legitimate interest	Personal data are purged according to statutory, regulatory and tax requirements, for a maximum of 10 years after the end of the contract (30 years for employees saving funds). Voice recording will be retained for a maximum of 6 months
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	Depending upon the services (please refer to the detailed appendix) we may collect personal data from final beneficiaries and from persons ordering the payment order including their smart card or IBAN identifier. During call back procedure conversation is recorded	Contracts execution for corporate clients Legitimate interest	trigger for starting the purge is the end of every contract. Additional period of few months to several years is added in order to comply with each country's legislation. Voice recording is stored for 6 months
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	Name of operational contacts, professional phone numers, professional adress, job title, scope of delegation, professional e-mail. Depending upon the services we may collect personal data from final investors, register their voice or the counterpart's one when receiving a market instruction or executing a financial market operation	Contracts execution for corporate clients Legitimate interest	Trigger for starting the purge is the end of every contract. Additional period of 5 years is added in order to comply with the french legislation

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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 such as professional email or professional mobile phone number.	Contracts execution for corporate clients Legitimate interest	Trigger for starting the purge is the end of every contract. Additional period of few months is added in order to comply with each country's legislation
Research and associated services	Destinated 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 such as e.g. names, job titles, company names, professional mobile phone and e-mails	Contracts execution for corporate clients	The distribution list of research documentation and invitation is purged after the end of contractual relationships
Corporate Finance 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 (Mergers and Acquisitions, Equity Capital Market, Corporate Brokerage) we may collect personal data from issuers and investors, register their voice or the counterpart's one, when receiving or executing transactions	Contracts execution Legal obligation Legitimate interest	Trigger for starting the purge is the end of every contract. Additional period is added in order to comply with each country's legislation
<u>Open Web sites servicing</u> (relevant websites' privacy policy will be inserted in terms and conditions of each websites including personal data provisions and cookies policies)	Our open websites help a prospect, client, candidate to better know our offers, locations and distributes our public communication (such as our data policy)	In order to ease the navigation of every internaut the site identifies its device cookies (no social cookies) and the version of its navigator; we may use these data for internal statistic purposes	Contract execution Legitimate interest Legal obligation	The navigation data are cleaned at the end of the internet session; statistics are kept 24 months and purged
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 (including behavioural surveys)	We invite the clients/prospects while using their professional e-mail/ mobile phone. When using hotels or public transportation we collect as well their personal preferences for meals or rooms	Legitimate interests	According to the agreements we have with the third parties, these data are erased few days after the meeting
Credit analysis	We always analyse a client situation before granting a credit and revise this situation regularly during the contractual relationship period	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 interests	The personal data are purged 5 years after the end of the overall client relationship in France; this additional period varies according the EU country legislations

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Premises management	While visiting us, we register for safety reasons, our visitor	In some restricted areas, cameras are taking pictures in addition to the names and company of belonging that was kept in the entrance desk	Legitimate interests	Data are purged according to every legal entity policy; but at the latest 12 months after the visit
Sourcing process and vendors management	SG is often contracting with various partners for IT or non IT services, particularly through RFP processing	When managing the vendors/partners relationship we handle personal data such as the name and the professional references of the natural person that is in touch with us (both sales and operational ones). For consulting and IT services, we also collect personal data for our internal needs (access grants to the devices, premises and systems)	Contract execution Legitimate interest Legal obligation	The personal data are anonymized after the vendor's last contractual relationship + 5 years
Bank guarantees and Letters of credit	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 onboarding phase	In this context, we may from time to time manage personal data of our clients' representatives and beneficiaries such as professional email or professional mobile phone number	Contracts execution for corporate clients Legitimate interest	Trigger for starting the purge is the end of every contract. Additional period of 5 years is added in order to comply with each country's legislation