

June 2025

GDPR FAQ

Société Générale Private Banking

GDPR: a key step in the protection of personal data

1. What is the *GDPR*?

The “GDPR” (General Data Protection Regulation) is the personal data protection regulation applicable throughout the European Union (EU) since 25 May 2018 and applies to all companies (regardless of their size, economic sector or location) that collect, host and process the personal data of individuals located within the European Union.

Its objective is to:

- **Strengthen the rights of individuals** (prospects, individual customers, employees, etc.) to give them greater control over their personal data
- **Empower those involved in processing personal data** (data controllers, co-controllers or processors) and encourage them to guarantee maximum protection for personal data
- **Reaffirm the importance of this regulation** with, in particular, a system of stronger sanctions for companies.

Collection and processing of your data

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

- The data needed to deliver products and services

As a banking and financial institution, we collect and process the personal data you have communicated to us which are necessary for the provision of the products and services offered in the context of our commercial activities by adapting our offers to the needs of our customers, in particular your identification data, data relating to your professional situation, your economic and financial situation, as well as data generated when using the accounts and products subscribed or when browsing our sites or applications.

The processing of personal data which are by nature particularly sensitive from the point of view of fundamental rights and freedoms (racial or ethnic origin, political, philosophical or religious opinions, trade union membership, genetic or biometric data, health or sexual orientation) shall be prohibited. It can only intervene under one of the conditions provided by the GDPR (explicit consent of the person, data made public by the person, legal obligation, defense of a right, public interest, etc.).

Information relating to criminal convictions and offenses represents a particular category of data, the processing of which is also subject to specific conditions (control by public authorities or legal authorization). Societe Generale Private Banking only processes sensitive data or information relating to criminal convictions and offenses in the cases, conditions, restrictions and rules of consent provided for by law, as well as the conditions and modalities provided for by applicable law.

- **Data related to regulatory obligations**

Where a legal provision provides, for example, for the collection of a particular data, imposes a specific retention period or obliges us to transmit data to an identified organization, we comply with these regulatory obligations within the limits permitted by applicable local law. Subject to the foregoing, we may therefore collect, store or transmit certain data at the end of or during contractual relations with our customers, where this is provided for by applicable regulations.

- **Particular case of data collection as a subcontractor**

The Group entities that process data as a subcontractor only act within the strict limits of the contracts entered into with their principals, who must in particular determine the data that must be collected and used.

3. **Why is your personal data collected and for what purpose?**

As part of its activities, Societe Generale Private Banking collects and processes data from its clients and prospects to:

- Manage the customer relationship, including:
 - o The administration and management of accounts and / or products and services subscribed, including the execution of client orders and transactions and the processing of complaints,
 - o Management, review, lending and risk selection;
 - o Recovery or assignment of receivables, management of payment incidents.
- Comply with the legal and regulatory obligations to which Societe Generale Private Banking is subject, in particular with regard to:
 - o The management of operational risks (including the security of computer networks and transactions) as well as the use of international payment networks;
 - o Determination of tax status;
 - o Obligations arising from financial markets;
 - o Combating fraud;
 - o Combating money laundering and terrorist financing;
 - o Requests from any court, government authority or competent jurisdiction.
- Carry out marketing actions and improve the quality of services:
 - o Organization of commercial events and surveys;
 - o New and adapted products and services;
 - o The performance of statistical and wealth studies in certain Societe Generale Private Banking entities.

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

- Performance of a contract to which the customer is a party or pre-contractual negotiations with a customer or prospect on their initiative with a view to concluding a contract,

- Compliance with legal or regulatory obligations weighing on Societe Generale Private Banking
- Societe Generale Private Banking's legitimate interests
- Client's consent

Societe Generale Private Banking has put in place all the necessary processes to avoid processing data excessive in relation to the purposes of its processing. All data we collect is strictly necessary to fulfill our contractual and legal obligations or to pursue a legitimate interest of the Bank. If this is not the case, your consent is requested.

4. How does Societe Generale Private Banking design its products and services to protect your personal data?

Societe Generale Private Banking regularly innovates in terms of products, services, distribution channels, technologies in order to adapt to the needs of its different client segments and prospects, all over the world. These innovations or improvements are subject to specific attention in terms of the protection of personal data, particularly the risks taken to the invasion of individuals' privacy. The various protection measures are established from the outset and regularly updated, as are the procedures for exercising the rights of the persons concerned.

5. How long is the data of the data subject kept?

Societe Generale Private Banking retains personal data only for the time necessary to achieve the purpose that was pursued when they were collected. These periods differ according to the purpose of each processing operation concerned and the country in which we operate. The retention period is set by Societe Generale Private Banking in compliance with national legal and regulatory obligations, and our legitimate interest, where applicable. These periods are specified in the general terms and conditions given to customers when opening their bank account. Certain data are kept for evidentiary purposes in the context of pre-litigation or litigation according to local regulations.

Your rights to the processing of personal data

6. What are your rights in relation to the processing of personal data?

In accordance with the requirements of the GDPR and national laws in force, you have various rights when and then after the data collection:

- **right of access:** you can ask us if we hold personal data about you. Where this is the case, this right makes it possible to obtain information on the processing operations in question (purpose, categories of data and recipients, retention period, source of the data, etc.) and to obtain a copy thereof.
 - **right to object:** you can object to the processing of your data for commercial reasons without having to justify a legitimate reason. In other cases, you can exercise your right to object by stating a reason relating to your particular situation and justifying a legitimate reason.
 - **right to rectification:** you can request the correction of your personal data that would prove incomplete or inaccurate. These requests must be accompanied by supporting documents most of the time. When these requests are justified, Societe Generale Private Banking carries out the requested correction or deletion.
 - **right to erasure of data:** you can request the erasure of personal data concerning you. Societe Generale Private Banking has the obligation to erase this personal data as soon as possible, provided that there are no legal or regulatory obligations obliging us to keep your data. Deletion occurs when personal data are no longer necessary for the purposes for which they were collected or processed. Your data is also deleted when you withdraw your consent.
 - **right to portability:** you may receive the personal data concerning you that you have provided directly to Societe Generale Private Banking and transmit it to another controller.
 - **right to restriction of processing:** you can temporarily obtain the suspension of a processing of personal data in compliance with the scope of application provided by the regulations.
- The exercise of certain rights may make it impossible for Societe Generale Private Banking to offer all or part of its services.

7. How can you exercise your rights in relation to the processing of personal data?

Any client or prospect may exercise their rights and contact the Personal Data Protection Officer of the Societe Generale Private Banking entity concerned by contacting the establishment where their account is opened, or by sending an email to the address which appears in the “Contact us” section of the website of the Societe Generale Private Banking entity concerned.

The Data Protection Officer (DPO) is responsible for ensuring compliance with the applicable regulations on the protection of personal data within the institution in question and promoting the dissemination of a data culture. It is the privileged interlocutor vis-à-vis the data protection authority.

Societe Generale Private Banking has appointed a DPO or Data Protection Correspondant (DPC) in all its entities.

The DPC for the France entity may be contacted to the address email:
protectiondesdonnees@societegenerale.fr.

The DPO for Societe Generale Luxembourg can be contacted at the following email address: lux.dpooffice@socgen.com.

The DPO for SGPB Monaco can be contacted at the following email address: list.mon-privmonaco-dpo@socgen.com.

Societe Generale Private Banking has one month to respond to you as soon as the request is received. For complex or numerous applications, this period may be extended by two months in principle. In the latter case, you are informed of the extension and the reason for it.

Data security

8. What security measures are in place to protect personal data?

The security of the personal data entrusted to us is a major concern for Societe Generale Private Banking and is the subject of appropriate organizational and technical measures, including:

- user identification and password management,
- traceability of access and operations, data backup, secure exchanges and confidential data transmission,
- the enabling policy and respect for the confidentiality of personal data.

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

Societe Generale Private Banking has a procedure in the event of a breach of data confidentiality which includes both detection, evaluation, remediation, crisis management and external notification plans allowing Societe Generale Private Banking to be able to notify the breach to the competent European data protection authorities at the latest within 72 hours after having been made aware of it and, where appropriate, to the data subjects in the event of a high risk to their rights and freedoms.

Data transfer and subcontracting

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

Societe Generale Private Banking's operating model involves delegating part of the processes to internal subsidiaries and transferring personal data to Group persons, partners, or subcontractors located within the European Union, or outside the European Union (EU) and the European Economic Area (EEA).

- Provided banking secrecy is respected, it is possible to freely exchange personal data within the countries of the European Union (EU) or the European Economic Area (EEA), respecting the principles of the regulations on the protection of personal data.

- The transfer of data outside the EU or the EEA must however comply with additional specific measures, unless the European Commission has formally recognized that the country of destination has sufficient data protection rules (adequate country). This transfer is systematically carried out under one of the appropriate safeguards provided for by the regulations enabling the data exchanged to be given adequate protection compared with that in force in the European Union.

Where the regulations so provide, certain transfers of data may be made to non-European authorities in compliance with the legal guarantees in question (tax authorities, judicial authorities, financial markets authorities, other regulators, etc.).

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

When Societe Generale Private Banking intends to use the services of a subcontractor and allows the latter access to some of your personal data, the Group selects only service providers that offer sufficient guarantees to protect your data. Contractual clauses have been introduced and effective control measures are part of this.