

# PRIVACY NOTICE

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## Societe Generale Private Banking (Monaco)

This Privacy Policy is issued by:

**Societe Generale Private Banking**, a *société anonyme* registered in the Principality of Monaco, having its registered office at 13-15, boulevard des Moulins, MC 98007, Monaco, registered with the Registry of Commerce and Industry of the Principality of Monaco under number 96S3214 (the “**SGPB**”) as Data Controller

## Glossary of terms

### Clients

Clients and prospective clients of SGPB

### Controller

Entity which determines the purposes and means of Personal data processing

### GDPR

Regulation (EU) 2016/679 of the European Parliament and of the Council

### Personal data

Information relating to an identified or identifiable natural person (“data subject”). An identifiable natural person is one who can be identified directly or indirectly.

### Processing

Any operation or set of operations, which is performed on Personal data or on sets of Personal data, whether or not by automated means.

### Processor

Any person or entity, which processes Personal data on behalf of the controller.

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To set an adequate level of protection for Personal data processed by SGPB and to comply with applicable data protection laws including the GDPR, this Privacy Policy contains the terms and conditions applicable to the collection, processing and use of Personal data by SGPB.

**This Privacy Policy sets out:**

1. Information concerning the way we collect Clients' Personal data and the purpose of the related data processing, their legal bases, the categories of data concerned and their retention period;
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;
6. Contacts details.

SGPB, as data controller, will collect and process Personal data from its Clients.

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.

In case of possible divergence of interpretation between the present Policy and the General Terms and Conditions for Operation of Bank Accounts (the "**General conditions**") applicable to opening of accounts and other relevant contractual documentation applicable to SGPB's account and products, the terms of the General condition and the other relevant contractual documentation must prevail.

**1. How do we collect Clients' Personal data?**

We collect Personal data:

- directly from SGPB Clients
  - o when seeking or are provided with information on the services and/or products proposed by SGPB; or
  - o during subscription process
  - o and during contractual relationships;
- generated by Client's banking activities;
- from third party and/or public source where provided by for a legal obligation.

**2. Type of Personal data collected**

In the course of its banking and financial activities, SGPB process the main following categories of Personal data:

- Identification data: name, address, date of birth, nationality, identity documents, email address, telephone number, number of dependent children,
- Data related to personal life: centre of interests
- Professional data: professional status, job title

- Economic and financial information: transaction data, tax and country residence, account number, credit card number, income amounts, tax brackets, patrimony valuation
- Connexion data and log: e-banking password, IP address
- Sensible data: curatorship, guardianship
- Conversations and communications with SGPB

### **3. Processing purposes**

The main purposes of SGPB's processing are:

#### 3.1 Management of the banking relationship, including:

- Administering and management of account(s) and/or products and services subscribed, including execution of the Clients orders and transactions and claims processing,
- Management, study and granting of loans and risk selection;
- Debt collection or disposal, management of payment incidents.

#### 3.2 Respect of legal and regulatory requirements to which SGPB or its group (the "**Societe Generale Group**") are subject, especially regarding:

- operational risk management, including the security of IT networks and transactions, and the use of international payments;
- tax status determination ;
- the obligations resulting from the financial markets;
- the prevention of the fraud;
- the fight against money laundering and financing of terrorism;
- the request of any court of any relevant governmental authority or jurisdiction.

#### 3.3. Marketing purposes and improving quality of services:

- organising commercial events and surveys;
- offering new and adapted services and products;
- conducting statistical and marketing studies.

### **4. Legal Basis for our processing**

Each SGPB Processing activity is based on one of the following legal basis:

- Performance of a contract to which the Client is party or to take steps at the request of the Client prior to entering into a contract referred to in clause 2.1, or
- Execution of contract(s) for the purposes referred to in clause 2.1, or
- Compliance with legal or regulatory obligations of SGPB or Societe Generale Group for the purposes referred to in clause 2.2, or
- Legitimate(s) interests of SGPB concerning the fraud processing and the purposes referred to all or part of clause 2.3, or
- Consent of Clients in case of marketing purpose where the interests or fundamental rights of the Client override SGPB's legitimate interest.

## **5. Retention period**

SGPB will retain Personal data only for the period necessary for the purposes set out in this Policy.

- For management of banking relationship, SGPB will keep Personal data of its Clients during the contractual relationship and, if applicable, for further period provided for by applicable law.
- For legal and regulatory requirements SGPB will keep Personal data of its Clients only during the delay mentioned for by the applicable law, or necessary to comply with it where the law not mentioned a specific delay. In case of complaints or legal action, SGPB will keep the necessary data until the prescription period of the related legal actions.
- For any commercial prospecting or advertising campaigns, SGPB may keep the Personal data of its targeting clients and non-client prospect during the period provided for by applicable law or in accordance with the General conditions.

All the retention periods specified above are defined in accordance with the [General conditions](#) applicable to SGPB's accounts and products, being reminded that these conditions must prevail over the present Privacy Policy in case of difference of interpretation.

## **6. Communication with third parties**

SGPB may disclose Personal data to other legal entities within the Societe Generale Group, to which SGPB belongs, as well as its contractual partners, brokers, and insurers, data Processors and service providers, within the limits necessary for the execution, if necessary, of the purposes described above and for managing accounting procedures of the Societe Generale Group, notably when pooling resources and services with the Societe Generale Group.

SGPB may also disclose Personal data, upon request, to the official organs and competent administrative or judicial authorities, located within or outside the European Economic Area, particularly in the context of the fight against money laundering and terrorist financing.

In case of disclosure to a third party, and in particular for exchanges with its Processors, SGPB will set out every requirement provided for by applicable regulations, including but not limited to the GDPR, in order to preserve the confidentiality and security of the concerned Data.

## **7. Application of European Union data protection rules regarding the transfer of Personal data outside the European Economic Area**

Owing in particular to the international nature 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 to countries outside the European Economic Area, whose legislation on the protection of personal data is different from that of the European Union or Monaco.

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, SGPB will ensure that the transferred data are 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 contact details inserted below.

## **8. Communication with data subjects in relation to their rights under the GDPR**

Under the GDPR, SGPB's Clients have the right 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.

Clients may also, without any legitimate grounds, object to receive direct marketing information. If applicable, they may also benefit of specific rights provided for by national data protection regulation.

Clients have the following options regarding their rights:

- To exercise any of these rights they can contact
  - Societe Generale Private Banking, 13/15 boulevard des Moulins 98000 Monaco
  - or through the bank's website, at "Contact-us" available on <https://www.privatebanking.societegenerale.mc/en/contact/>
  - or directly to our Data Protection Officer (Roman JANECEK) by email at [MON-Privmonaco-DPO@socgen.com](mailto:MON-Privmonaco-DPO@socgen.com)
- Clients may also lodge complaints about processing of their Personal data with a local Data Protection Authority (CCIN)

## **9. Security of processing**

SGPB takes all physical, technical and organizational 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.

## **10. Contact details**

In case of any questions or concerns about any information in this Policy, please contact:

- Societe Generale Private Banking, 13/15 boulevard des Moulins 98000 Monaco
- Through our bank's website, at "Contact-us" available on <https://www.privatebanking.societegenerale.mc/en/contact/>
- Our Data Protection Officer (Roman JANECEK) by email at [MON-Privmonaco-DPO@socgen.com](mailto:MON-Privmonaco-DPO@socgen.com)

**SOCIETE GENERALE PRIVATE BANKING (Monaco)**

S.A.M AU CAPITAL DE 7.650.000 EUROS

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