Last updated: June 2025

In this Data Protection Policy ("Policy"), "Societe Generale Private Banking France", "we" and "our" mean "Societe Generale, a public limited company with a capital of **EUR 1,000,395,971.25** at September 23, 2024", registered with the RCS under the unique identification number 552 120,222 and registered with ORIAS under number 07022493 and domiciled 29, Boulevard Haussmann 75009 Paris and more particularly Societe Generale Private Banking France, as data controller, located at the same address.

About this Policy

As a banking institution and insurance broker, Societe Generale has built strong and lasting relationships with its clients, based on mutual trust.

In order to maintain this trust, we make the security and protection of your personal data an unconditional priority.

To this end, Societe Generale complies with all applicable French and European regulations relating to the protection of personal data, in particular the General Data Protection Regulation (EU) 2016/679.

In our capacity as the controller of your personal data, we inform you in particular of the types of personal data we collect, the processing we carry out and the reasons why we carry out it, as well as of your rights and the means of contact or redress made available to you.

This Policy is intended for and applies to Societe Generale Private Banking France's individual customers and prospects and potential business relationships, as well as to persons in contact with our customers when justified (e.g., beneficiary of a transfer, heir in the event of an inheritance, guarantor, etc.) hereinafter referred to as "you/your/your".

In particular, it addresses:

1. The types of personal data we collect and process;
2. The objectives pursued by the processing (its purposes) and the data retention periods associated with each processing;
3. The legal bases on which the processing carried out is based;
4. Recipients and categories of recipients;
5. Transfers outside the European Economic Area;
6. Your rights regarding your personal data;
7. The security of your personal data.

This Policy is regularly updated to reflect changes in Societe Generale's practices as well as potential changes in the regulations applicable to personal data. We invite you to consult it regularly to be informed of the latest version in force. If you are a customer, we will inform you of any new version or substantial modification thereof.

The Client undertakes to communicate this Policy to the persons whose personal data he may be required to provide to Societe Generale.

1. Types of personal data we collect and process

Societe Generale Private Banking France collects and processes the following types of personal data:

- Civil status and identification data: surname, given name(s), gender, date of birth, copies of identity documents, examples of signatures, possible legal protection regime, etc. ;
- Contact details: postal addresses, email addresses, telephone numbers, etc. ;
- Data related to your personal situation: family situation, marital regime, number and age of children, etc. ;
- Data related to your professional situation: position held, employer name, workplace, etc. ;
- Economic and financial information: income, financial and tax situation, etc. ;
- Transaction and banking transaction data (nature of transactions, date, card payments, transfer, direct debit, amount, wording, etc.);
- Login data related to the use of our online services: identification and authentication data at your connected spaces, logs, cookies, navigation data on Societe Generale websites and applications;
- Data processed as part of the electronic signature (signatory identification data, timestamp, logs, etc.);
- Data from correspondence and communications between you and us, whether at an agency or remotely (interviews, telephone calls, electronic messages, instant messaging, social media communications or any other type of communication);
- Data related to the products and services subscribed (type of product, payment method, maturity, amount, etc.);
- Images from video protection devices in accordance with applicable rules (e.g. security surveillance cameras in branches or car parks).

These personal data are collected either directly from you or, if necessary, indirectly (i) from Societe Generale group companies; (ii) from the Banque de France when files are consulted (FICP and/or FCC); (iii) from the National Directory of Identification of Natural Persons; (iv) from the General Directorate of Public Finance, (v) or more generally from public sources relevant to the various purposes described in paragraph 2.

Finally, where relevant, some of the data or data types mentioned above may be reconciled in order to better fulfill the purposes described in paragraph 2. These reconciliations are always made by ensuring that only data strictly necessary for the achievement of the objective pursued by the processing (in application of the principle of "minimization" provided for by the regulations) are used.

2. Purposes of processing and storage period of personal data

The personal data referred to in the previous paragraph are processed, depending on the situation, to meet different purposes or purposes. Each of these purposes is associated with a type of personal data, a retention period of these data beyond which they are no longer used and are anonymised and/or deleted, except for some of them which may be archived with restricted access for a determined period. The different purposes that lead us to process your personal data are the following:

- The management of the banking and/or insurance relationship, the subscription and management of the account(s) and/or products and services subscribed, in particular for evidentiary purposes, and recovery actions. Your personal data may be kept for a period of five (5) years from the entry into account of the end of the commercial relationship in our information system, or from the end of a possible recovery procedure.
- The subscription of products distributed by Societe Generale, such as insurance, offers or complementary services of partners, for which the latter are most often responsible for the processing of your data or in some cases, jointly responsible with Societe Generale. Where applicable, Societe Generale and/or the partner will inform you of the broad lines of the agreement between them allocating their respective data protection obligations. The data will be kept for a defined period with regard to the product or service concerned.
- The response to your requests and support in your procedures (e.g. request for a quote).
- Opinion and satisfaction studies and statistical studies. Your personal data may be kept for a period of three (3) years from the completion of the study.
- The implementation of a loan (prior analysis, granting decision), its management over time and the implementation of associated insurance. Your personal data may be kept (i) for a maximum period of five (5) years beyond the term of the loan or, (ii) for a period of twelve (12) months from the notification of the refusal of the bank or the date of abandonment of your application.
- The fight against fraud (e.g. scoring, detection of atypical transactions, etc.). Your personal data may be kept for a maximum period of five (5) years from the closure of the proven fraud file or the issuance of an alert.
- Compliance with legal and regulatory obligations incumbent on Societe Generale Private Banking France, in particular Know Your Customer (KYC) obligations, operational risk management (in particular IT network security, customer protection, supervision and internal control, transaction security as well as the security of the use of international payment networks), financial security obligations (fight against money laundering and terrorist financing and obligations regarding sanctions and embargoes), obligations related to the integrity of financial markets and activities on financial markets, obligations related to the determination of the tax status of clients and to the the associated tax regulations and the rules of good conduct of French and international regulators, ethics and the fight against corruption, data protection and in general the obligations relating to the management and management of compliance risks. For these purposes, your personal data may be shared between Group entities. They will be kept for a period of five (5) years to ten (10) years from the chargeable event provided for by the regulations in force (example: in tax regulations known as “FATCA”, 5 years from the receipt of the duly completed self-certification form).
- In the event of death:
  - Identification of your accounts and safes. Your data may be kept for a maximum period of thirty (30) years depending on the cases provided for by the regulations in force.
  - The processing of your instructions relating to the fate of your personal data after your death. Your data may be kept for the time necessary to settle your estate.
- Identification of behavior or serious wrongdoing (e.g. physical violence against Societe Generale staff). This personal data may be kept for a period of ten (10) years from the recording of the facts in our systems.
- The processing of images from video protection devices for the purpose of the security of property and persons. This data will be kept for one month. Recording of your conversations and communications with Societe Generale Private Banking France, regardless of their medium (e-mails, letters, telephone interviews, etc.). This recording may be carried out and give rise to re-tapping for the purpose of improving telephone reception, complying with legal and regulatory obligations relating to financial markets, and ensuring the security of the transactions carried out or providing proof of orders or transactions carried out. Depending on the applicable regulations, your personal data may be kept for varying periods, which may not exceed five (5) years from their registration.
- Recording of data processed in the context of electronic signature for evidentiary purposes. These data will be kept either for a period of five (5) years from the entry into account of the end of the contract in question, or for a period of 10 years from the date of electronic signature in accordance with the French Consumer Code, whichever is the longer. Accounting processing: accounting data and supporting documents may be kept for a period of ten (10) years in accordance with the legal provisions in force.
- Research or analysis activities to improve our procedures and develop our models. Your personal data may be reused in order to:
  - optimize our internal control processes;
  - improve risk and compliance management;
  - offer customized services and products.

  These data are kept for a fixed period for each of these sub-purposes.
- Commercial prospecting, offering commercial offers tailored to your situation and profile, conducting commercial events and advertising campaigns.
  - The data may be kept for a maximum period of three (3) years from the entry into account of the end of the commercial relationship in our information system or for prospects, from the last contact.
  - Societe Generale Private Banking France may anonymize and aggregate this data in order to compile statistical reports.

It is specified that the personal data collected and processed in accordance with the aforementioned purposes may be kept for an additional period if the defense of a right or interest so requires, or in order to meet the requirements of the authorized authorities such as, for example, a public authority, a French or international regulator. In this case, the personal data will not be used for other purposes and will be accessible only to authorized persons with a need to know (examples: legal service, compliance service, audit and inspection body).

3. Legal basis for processing operations

3.1 General rules

The processing carried out by Societe Generale Private Banking France is based on one of the following legal bases:

- Execution of the banking and/or insurance relationship (e.g. taking out a mortgage);
- Compliance with Societe Generale Private Banking France's legal and regulatory obligations (e.g. combating money laundering and terrorist financing);
- Pursuit of the legitimate interests of Societe Generale Private Banking France (e.g. fight against fraud, research and development activities, commercial prospecting, including profiling). The choice of this legal basis is made after balancing the interests pursued by Societe Generale Private Banking France with the interests of the persons concerned and the assessment of reasonable expectations in this regard. In addition, safeguards will be put in place to safeguard the interests, rights and fundamental freedoms of individuals (in particular information of individuals, right of opposition and security measures);
- Consent (e.g. social media data, collection of vital cards as identification);
- Safeguarding the vital interests of the data subject or of another natural person, when a customer has paid by bank card for a product or service presenting a threat to the safety of persons (recall of defective products, health crisis, etc.).

3.2 Rules specific to profiling processes

Societe Generale Private Banking France implements profiling processes, i.e. processes consisting in assessing certain aspects concerning the economic situation of natural persons, their personal preferences or interests, the analysis of their behavior, or their location and movements.

These profiling processes have different purposes, mainly to secure your operations, fight against fraud, personalize the relationship, commercial prospecting or to better meet our obligations relating to the management and management of compliance risks.

In the case of commercial prospecting, the processing may consist in analyzing some of your data (products or services held, banking transactions such as transfers, direct debits, payments, navigation data if you have consented by accepting the deposit of advertising cookies, etc.) in order to establish profiles that correspond to you.

These profiles allow Societe Generale Private Banking France to send you personalized offers more adapted to your needs, expectations or situation (e.g. the detection of a moment of life that may require support from your bank such as an entry into working life, a trip, a move, a birth, the arrival of an exceptional payment, the pre-assessment of your borrowing capacity).

For certain ad hoc commercial campaigns, these profiles may be enriched with data collected by third-party partners such as advertising agencies.

For each of these processing operations, an in-depth analysis is carried out in order to determine whether the processing must be based on your consent, the legitimate interest of Societe Generale Private Banking France, or on another legal basis:

- If profiling is based on your consent:

  Societe Generale Private Banking France ensures that your consent is collected, after having informed you explicitly and transparently about the use of your data, as well as about the logic of the processing. Societe Generale Private Banking France also allows you to withdraw your consent at any time.
- If the profiling is based on the legitimate interest of Societe Generale Private Banking France:

Societe Generale Private Banking France alone, or jointly when acting with another data controller, for example, Societe Generale Private Banking France, when acting as an insurance broker, may use certain data about you held by Societe Generale Assurances entities, to provide you with advice tailored to your insurance needs. For more information on the processing carried out by Societe Generale Assurances entities, you can consult their personal data protection policy accessible via the Personal Data - Societe Generale Assurances link. With regard to profiling processes, you may at any time manage your choices (consent or opposition) in your connected space under the heading "Management of personal data", or in accordance with the terms described in paragraph 6.

3.3 Specific rules for fully automated decisions

In cases where Societe Generale Private Banking France implements processing operations involving fully automated decision-making that produce legal effects concerning you or significantly affect you, these processing operations (i) are based on one of the following legal bases: the execution of the contract in which the processing is carried out or your consent, or the legitimate interest of Societe Generale Private Banking France; (ii) are authorized by European Union law or French law. Such processing shall be carried out in compliance with the applicable regulations and with appropriate safeguards.

4. Recipient Categories

Your data may be communicated, depending on the purposes pursued:

- Societe Generale Group entities, its partners, brokers, intermediaries and insurers, subcontractors and service providers. Such communication shall take place only in the context of processing which pursues one of the purposes described in paragraph 2;
- In compliance with the applicable regulations, to third parties in France or abroad for the purpose of establishing, safeguarding or defending a right in court, in the context of administrative or criminal investigations by one or more regulators, the respect of commitments made towards them or in the context of legal disputes of any kind;
- To certain regulated professions such as statutory auditors (e.g. to provide regulatory reports) or lawyers (to act in defense of Societe Generale's rights), or notaries (e.g. in connection with real estate transactions or successions);
- To payment initiators and account information service providers (aggregators), only if you consent or at your request
- To out-of-court settlement providers and recovery providers.

5. Transfers outside the European Economic Area

Due in particular to the international dimension of the Societe Generale group, the processing operations listed in paragraph 2 above are likely to involve transfers of personal data to countries that are not members of the European Economic Area (EEA), whose

personal data protection laws differ from those of the European Union.

In particular, your personal data may, within the limits authorized by applicable regulations, be communicated to official bodies and to the authorized administrative and judicial authorities of non-EEA countries, in particular in the framework of regulations on the fight against money laundering and the financing of terrorism, international sanctions and embargoes, the fight against fraud and the determination of your tax status.

When personal data are transferred to non-EEA countries, a precise and demanding legal framework is in place to govern this transfer, in accordance with the applicable European regulations, in particular by signing standard contractual clauses approved by the European Commission. In addition, appropriate and complementary security measures may be put in place to ensure the protection of personal data transferred outside the EEA. The standard contractual clauses are available on the CNIL website (www.cnil.fr). For more information, you can send your request to the contact address indicated in paragraph 6.

6. Your rights

You have a right of access to your personal data as well as a right to rectification, erasure, limitation of processing, as well as a right to portability of some of your data. You can also withdraw your consent at any time, or object for reasons relating to your particular situation to the processing of your personal data, or define general or specific guidelines on the fate of your personal data in the event of death.

You can also, at any time and without charge, without having to justify your request, object to your personal data being used for commercial prospecting purposes. If your objection does not concern commercial prospecting, Societe Generale Private Banking France may refuse to act on your request if:

- There are compelling legitimate grounds for processing personal data or that the data are necessary for the establishment, exercise or defense of legal claims;
- You have consented to the processing of your data, in which case you must withdraw this consent and not oppose it;
- The processing in question is necessary for the performance of a contract that binds you to Societe Generale Private Banking France;
- There is a legal obligation to process your personal data;
- The processing is necessary to safeguard the vital interests of the data subject or of another natural person.
- You can exercise your rights and contact the Data Protection Officer as follows:
- Directly from your Client Space in the “My personal data” section;
- To the following postal address: Societe Generale Private Banking - Data Protection - CPLE/FRB/DPO - 17 cours Valmy CS 50318 - 92972 La Défense cedex;
- By e-mail to: protectiondesdonnees@societegenerale.fr;
- With a SG agency.

Finally, you have the right to register a complaint with the Commission Nationale de l’Informatique et des Libertés (CNIL), the French supervisory authority in charge of compliance with personal data.

7. The security of your personal data

Societe Generale Private Banking France takes all physical, technical and organizational measures to guarantee the confidentiality, integrity and availability of personal data, in particular to protect them against loss, accidental destruction, alteration and unauthorized access.

In the event of a breach of personal data concerning you, presenting a risk to your rights and freedoms, Societe Generale will notify the CNIL of the breach in question within the regulatory deadline.

In the event that this violation presents a high risk to your rights and freedoms, Societe Generale will inform you as soon as possible of the nature of this violation and the measures implemented to remedy it.