
DATA PROTECTION POLICY



Société Générale Private Wealth Management S.A.

Data Protection Policy, Luxembourg, last updated version - March 2023.

1. What is the purpose of this document?

Société Générale Private Wealth Management S.A. (« **SGPWM** », « **Company** » or « **us** »), which is a Luxembourg management company governed by (i) the provisions of Chapter 15 of the amended law of 17 December 2010 relating to undertakings for collective investment and (ii) the provisions of the amended law of 12 July 2013 on alternative investment fund managers, has been duly authorised by the Luxembourg financial supervisory authority (i.e. *Commission de Surveillance du Secteur Financier*). SGPWM is part of Société Générale Group.

SGPWM has built strong and lasting relationships with its clients and partners based on reciprocal trust and mutual interest. Protecting the privacy and confidentiality of the information you entrust to us is essential to us.

The purpose of this policy is to inform in a transparent manner about the processing operations which are likely to be implemented throughout the professional relationship, with regard to clients, prospects, natural persons intervening in the context of a relationship with a client such as an agent, a legal and other professional representative, a designated contact, an agent or a beneficial owner and his partners ("**you**" or "**your**").

This policy falls within the framework of and in accordance with the provisions of the European General Data Protection Regulation No. 2016/679 of 27 April 2016 ("**GDPR**") and sets out in particular,

- Why your personal data are collected and what is their legal basis;
- Which categories of personal data are collected and what is their source;
- Who receives your personal data;
- Specific transfers of some specific personal data;
- How long your personal data are stored;
- What data protection rights you have.

2. Controller

Your personal data are collected and processed by SGPWM, incorporated under Luxembourg law, registered with the Luxembourg Register of Commerce and Companies under number B60963 and having its registered office at 11, Avenue Emile Reuter, L-2420 Luxembourg.

Phone: (+352) 47 93 11 1 Fax.: (+352) 22 88 59.

SGPWM - in its capacity as Controller - ensures that the necessary arrangements are made to comply with the legal requirements regarding personal data.

3. Why your personal data are collected and what is their legal basis?

SGPWM collects and processes your personal data necessary for the performance of its activities, in order to:

- 1. Execute your contractual and pre-contractual requests:** the Company uses your data in order to provide you with services and products and in particular to: [art. 6, 1. b) of the GDPR]
 - Provide you with information about its products and services;
 - Manage your relationship with her;
 - Evaluate whether it can offer you a product or service and under which conditions;
 - Carry out the operations necessary for the management of the products or services to which you have subscribed;
 - Manage and process payment incidents, unpaid debts and the resulting amicable and judicial recovery operations [art. 6, 1. f) of the GDPR].
- 2. Comply with a legal obligation:** the Company uses your data to fulfill various obligations, including in particular: [Art. 6, 1.c) of the GDPR]
 - Respond to official requests from duly authorized public or judicial authorities;
 - Fight against money laundering and finance of terrorism;
 - Comply with applicable legislation on international financial sanctions and embargoes;
 - Fight against tax fraud and fulfill its obligations in terms of declarations or tax audits;
 - When the Company observes a criminal violation, report this violation to the competent authorities if necessary;
 - Apply financial regulations by virtue of which it must in particular:
 - Put in place security measures to prevent abuse and fraud;
 - Detect unusual transactions;
 - Apply due diligence measures with regard to certain categories of persons;
 - Record trade;
 - Declare certain operations to the competent authorities.
- 3. Pursue the legitimate interest of the Company :** [art. 6, 1.f) of the GDPR]
 - The Company processes your data, in order to deploy and develop its products and services, improve its risk management and defend its interests in court, including processings such as:
 - Establish and keep proof of operations and transactions;
 - Ensure the physical and logical security of its information system;
 - Prevent fraud and damage to property and people;

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- Establish statistics, models or tests, to optimize risk management, or to improve its products and services and develop new ones;
 - Carry out communication, prospecting and sales promotion operations;
 - Develop commercial strategies;
 - Promote products and services that correspond to your situation or your profile. This can be done for example by analyzing the products or services that you already have or use;
 - Carry out satisfaction surveys and surveys.

All processings are carried out by taking into account your interests and fundamental rights.

How the Company determines which products and services correspond to your situation or your profile?

The Company determines the products and services which may be suitable for you based on:

- Market segmentations in order to suggest innovative products and services likely to best meet your needs;
- Classifications required by current regulations (AML, DAC, FATCA, etc.).

The Company uses the above processings as decision support but does not implement any automated decision-making process producing legal effects with regard to the data subjects. Human intervention is always foreseen in the decision-making process.

4. Which categories of personal data are collected and what is their source?

SGPWM may need to collect various data concerning you, which include in particular:

- Identification data: name, address, date of birth, nationality, identity documents, email address, telephone number, number of dependent children;
- Data related to personal life: center of interest, marital status and dependants;
- Professional data: professional status, job title;
- Economic and financial information: transaction data, taxation and residence, account number, credit card number, amount of income, tax brackets, valuation of assets;
- Connection data: username, password for electronic services, IP address;
- CCCV footage;
- Data, ratings and ratios relating to your investor or borrower profile and other data necessary for sound management of the Company's risks in accordance with the law.

These personal data may have been collected directly from you or generated during the use of its services and products or obtained from third party sources (whether or not from publicly available sources):

- Its service providers or professional clients;
- Third parties with whom you have subscribed for products and services through the Company;
- Third parties (e.g. public authorities or institutions, establishments operating professional databases,

other financial establishments, fraud prevention organizations, or data providers), in accordance with the regulations on the protection of data.

5. Who receives your personal data?

SGPWM is bound by professional secrecy and can only share your personal data under strict conditions or with your consent.

The Company may be required to communicate personal data in the following cases depending on the purposes pursued:

- Certain entities of the Société Générale Group (eg. consolidated risk management);
- Independent agents, intermediaries or brokers, financial institutions, financial and commercial partners with whom we have regular relations (eg., banks, insurance companies, debit and credit card issuers);
- Supervisory, financial, tax, administrative or judicial authorities, public bodies or public bodies on request and to the extent permitted by law;
- Certain regulated professionals such as lawyers, notaries or auditors;
- Its intermediaries in banking operations;
- Its subcontractors and service providers for the sole purpose of the services to be performed on its behalf and in particular the provision of banking and financial services or products or the carrying out of surveys or statistics.

The Company is also required to share your data when professional secrecy is waived by law and in particular with regard to tax administrations and supervisory authorities (CSSF, CNPD, etc.) Confidentiality cannot be opposed to the judicial authorities, acting within the framework of criminal proceedings, as well as within the framework of civil proceedings when a specific text expressly provides for it.

6. Specific transfers of some specific personal data

Given in particular the international dimension of SGPWM, certain processings are likely to involve transfers of personal data to countries which are not members of the European Economic Area (EEA), which data protection laws differ from those of the European Union. In this case, unless the country concerned has been officially recognized by the European Commission as guaranteeing an adequate level of protection of personal data, the Company will ensure that the personal data transferred are protected by appropriate standard contractual clauses or other guarantees mentioned by the GDPR.

In particular, your personal data may, within the limits of what is authorized by the applicable regulations, be communicated to official bodies and to the authorized administrative and judicial authorities of countries which are not members of the European Economic Area (EEA).

Thus, the Company may, in accordance with the law, disclose certain data within the framework of the automatic exchange of tax data, which obliges the Company to declare to the "*Administration des Contributions Directes*" ("**ACD**") of Luxembourg the required information, in particular the identity, the account numbers, balances and banking income of the client residing in a member country of the European Union outside Luxembourg or of another country participating in the international exchange of tax information, with a view to their transmission to the competent authorities of the client's country of

residence.

Any request for information from the Company to the client in this context which remains unanswered on time will have consequences for the transmission of information to the ACD of Luxembourg.

In addition, the personal data included in / or accompanying certain transactions, including in particular fund transfers (payment or direct debit orders) are processed by the Company and by other specialized companies, such as SWIFT (Society for Worldwide Interbank Financial Telecommunication) insofar as they are necessary to execute and document before mentioned transactions. This processing can be carried out in centers located in other European countries and in the United States of America, in accordance with local legislation. Consequently, the authorities of the countries concerned may request access to personal data held in these operational centers as part of their legal missions, including for the purpose of combating money laundering and the financing of terrorism.

The client who instructs SGPWM to carry out a payment order or any other similar operation expressly instructs the Company so that the data necessary for the correct execution of the transaction are transferred and processed outside Luxembourg, including when the country concerned does not ensure a level of protection of personal data equivalent to that of European legislation.

In the context of the execution of securities orders by external service providers, respectively the deposit of securities with external service providers having their head office inside or outside the European Union; these may be subject to national laws and regulations (for example in the context of the fight against money laundering respectively the financing of terrorism) or other rules, which require the obtaining of personal data of clients or where applicable from their legal representatives, beneficial owners, final contractors or securities depositors as well as their transmission to the competent judicial or supervisory authorities at national level, to securities issuers or to other third parties involved in the execution of securities orders or the deposit of securities.

For these specific cases, the Company is obliged to transmit the personal data of clients, their legal representatives, beneficial owners, final contractors or securities depositors to external service providers.

The client, respectively their legal representatives, confirm that they have informed the beneficial owners and any other third party concerned of the Company's obligations described above, have obtained their mandate and agreement to the transfer and processing of the related data and to transmit it to the Company upon simple request.

The client, respectively its legal representatives, expressly instruct the Company, in their own name and on behalf of the beneficial owners and any other third party concerned, in view of the transfer and processing of the data necessary for the correct execution of securities transactions, respectively of the deposit of securities to external service providers in Luxembourg or abroad, and instruct the Company to proceed with said transfers, even if these countries do not have the level of protection of personal data equivalent to that provided for by European legislation.

7. How long your personal data are stored?

The personal data referred to in paragraph four (4) are processed, depending on the situation, in order to meet different objectives or purposes. Each of these purposes is associated with a category of data, a data retention period beyond which they are no longer being used, archived then anonymized and / or deleted.

The retention period of your data depends on the nature of the data, the purposes pursued to which are

added the retention periods imposed by applicable legal and regulatory provisions.

The Company keeps your data for the longest period required by applicable regulations. The deadlines may also be extended in the event of legal action. In this case, the data is kept until the end of the legal proceedings and then archived according to the applicable legal limitation periods. When personal data are collected for several purposes or when several legal and regulatory provisions are cumulatively applicable, it is kept until the longest retention or archiving period has expired.

Different retention periods apply, in particular for example concerning:

- Client data: most of the information is kept for the duration of the contractual relationship and for ten years after the end of the contractual relationship;
- Data collected for pre-contractual purposes, without the effective conclusion of a contract. When you have contacted the Company for a request for a product or service or for a simulation and your request has not been followed by a subscription, the Company keeps your data in order to be able to reissue a simulation or keep a record of the advice that she was brought to provide you. These data are kept for a period of five years or more, if the competent authorities so require, for the purposes of combating money laundering and the financing of terrorism and the fight against fraud as from their collection.

8. What data protection rights do you have?

You have the following rights, within the limits and conditions imposed by law:

- **The right to information:** we hope that this Policy will have answered your questions, you can contact the Company's Data Protection Officer (DPO) for any further information.
- **The right to access your data:** you can access your data by contacting the Company's DPO. Please note, however, that the Company processes a large amount of data and in accordance with the law, you may be asked to specify, before any data is provided, which data or which processing operations your request relates to.
- **The right to rectify your data when it is incorrect or obsolete.**
- **The right to withdraw your consent:** if you have given your consent for the processing of your personal data; it should be noted that such withdrawal does not have retroactive effect and will not prevent the Company from continuing lawful processing, in particular those required by law.
- **The right to lodge a complaint** with the National Commission for Data Protection (**CNPD**, Complaints Department, 15 Boulevard du Jazz L-4370 Belvaux, www.cnpd.public.lu) when you consider that the processing of your data does not comply with the law.

In certain cases and according to the conditions set by law (in which case the Company will first check that these conditions are met), you also have the following rights:

- **The right to request the erasure** of your data.
- **The right to request the restriction** of the processing of your data.
- **The right to oppose** the processing of your data for prospecting purposes or for any other legitimate reason (except for a legitimate and compelling reason for the Company to continue processing).
- **The right to portability** of the data you have provided to the Company, insofar as this is technically possible.

For any questions concerning the processing of your personal data by SGPWM, and for any request relating to the exercise of your rights, you can contact our DPO by email at lux.dpooffice@socgen.com or by post at Société Générale Luxembourg, DPO, PO Box. 1271, L 1012 Luxembourg.

For all your requests, please attach a copy of your identity document, so that we can identify you. This policy may change to better protect your personal data. The latest version in force is available on the Company's website <https://sgpwm.societegenerale.com/en/tools/data-policy/>