

**SG DOHA - Representative Office - DATA PROTECTION POLICY**

Version 2

4 September 2023

**What it is:**

SG Doha – Representative Office (“SG Doha”) is subject to the Data Protection Rules (2021) and Data Protections Regulations (the “**QFC Data Protection Laws**”) and, where applicable, must comply with the relevant SG Group Data Protection Procedures.

SG Doha is not currently subject to the EU’s General Data Protection Regulations (“GDPR”) otherwise than through the SG Group’s Code unless or until SG Paris is compelled to apply GDPR to its offices and subsidiaries outside of the EU, provided that where the application of GDPR or the SG Group’s Code contradicts the QFC Data Protection Laws, the latter shall prevail.

**Definitions:**

Personal Data – it means any information relating to a Data Subject.

Data Subject – it means a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the Data Subject. The Policy is addressed to any Data Subject, external to SG Doha, whose data will be processed by SG Doha. This for example may involve an individual who is a representative of a supplier providing SG Doha with a service or of another entity sharing personal data with SG Doha.

Data Controller – it means an individual or entity that determines the purposes and means of the processing of Personal Data. In the context of this Policy the Data Controller is SG Doha.

Data Processor – it means an individual or entity that undertakes the processing of Personal Data on behalf of the Data Controller (SG Doha).

**What data do we use:**

Under its license to operate a Representative Office and its operational set-up, SG Doha does not have clients, and as a rule, SG Doha does not, as matter of business, process any client’s, supplier’s or staff’s Personal Data or Sensitive Personal Data. As such, it does not expect to be either Data Controller or Data Processor.

**Why we may process or transfer your Personal Data and on what legal basis:**

In some rare occasions, clients engaged with SG Paris, an affiliate or branch of Societe Generale (“SG Group”) may channel Personal Data or Sensitive Personal Data as a matter of convenience through SG Doha in the context of business relationships or services provided by SG Group. Such Personal Data or Sensitive Personal Data would be usually required by such SG Group entities in the context of contractual relation or to comply with legal obligations such as Know Your Customer and Anti Money Laundering and Corruptions laws.

In such instances, should it appear necessary for SG Doha to process such persona data or Sensitive personal data in the course of its regulated activity, SG Doha will ensure that it relies on the legal basis set out in Article 10(1)(B) through (F) and Article 12(1)(B)-(C)(F)-(J) of the QFC Personal Data Laws. Where not possible, SG Doha would rely on Article 10(1)(A) and 12(1)(A) and request your consent.

In those instances where SG Doha becomes Data Controller or Data Processor, SG Doha would have to transfer your Personal Data or Sensitive Personal Data. Prior to doing so, it will periodically review the jurisdictions in which Personal Data is intended to be transferred and ensure that such jurisdiction provides adequate levels of protection in compliance with Article 23 and Article 24 of the QFC Personal Data Laws.

**How is your data handled:**

SG Doha endeavors to maintain processes and controls to ensure that it does not process Personal Data or Sensitive Personal Data. Should it become necessary to handle Personal Data or Sensitive Personal Data, SG Doha will endeavor to ensure that (i) such Personal Data or Sensitive Personal Data is up-to-date, and adequately handled, rectified or erased, (ii) conduct a statutory data protection impact assessment when required and review the level of protection of the relevant jurisdictions where such data is processed, (iii) ensure that contracts with Data Processors are in place and contain the statutory contractual safeguards (iv) Data Subjects can easily identify the data controller and processor and (v) maintain technical tools allowing for secure and confidential processing.

**What are your rights:**

SG Doha recognizes the legal rights of Data Subject to request (i) the access to (ii) the rectification of (iii) deletion of, (iv) the portability of and (iv) restriction of his/her Personal Data, as well as (v) to object to the processing at any time and (vi) to lodge a complaint and (vii) to report a Personal Data breach as provided in the QFC Data Protection Laws. In either case, SG Doha will act with the rights of the Data Subject in mind as well as the Data Controller's legal, judicial, regulatory or contractual rights and obligations when interacting with the Data Subject.

**How to contact SG Doha on data protection matters:**

Email:

[QA-DCO@sgcib.com](mailto:QA-DCO@sgcib.com)

Physical mail:

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West Bay  
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