



# DATA PROTECTION POLICY

## IN COMPLIANCE WITH THE DATA PROTECTION DIFC LAW No 5 of 2020 (“DPL 2020”)

Valid as of: [April 19, 2024]

In this Data Protection Policy, “Societe Generale DIFC”, “we”, “us” and “our” means Societe Generale, DIFC Branch, located in the Dubai International Financial Centre (“DIFC”), Gate Village Building 6, 4th Floor, PO Box 29600, Dubai UAE, a branch of Société Générale (the “Group”), a company incorporated and existing in France, having its registered office at 29 Boulevard Haussmann, 75009 Paris, France.

The following information provides you with an overview of the processing of your Personal Data by us and your rights under the DPL 2020.

The specific data that is processed and how it is used depends largely on the purpose of the processing.

### 1. WHO IS RESPONSIBLE WITH RESPECT TO THE PROCESSING OF MY DATA AND WHOM CAN I CONTACT?

#### Data Controller contact details:

Societe Generale DIFC  
E-mail: [AE-DCO@sgcib.com](mailto:AE-DCO@sgcib.com)

#### Data Protection Officer contact details:

Rafal Jakubowski, Data Protection Officer and Regional Head of Compliance and Financial Crime, Middle East.

E-mail: [ae-cple@sgcib.com](mailto:ae-cple@sgcib.com)

Physical mail:

Societe General DIFC Branch  
DIFC, The Gate Village, Building 6, Floor 4  
PO Box 29600, Dubai, UAE

Should you have any questions or concerns about any information in this Data Protection Policy or the exercise of your rights as presented in this Data Protection Policy, please contact us through the above contact details. You can also directly contact your Societe Generale DIFC business contact who will further forward your matter to Societe Generale DIFC Data Controller or Data Protection Officer.

### 2. WHAT IS PERSONAL DATA AND SPECIAL CATEGORIES OF PERSONAL DATA

Personal Data – means any information referring to an identified or Identifiable Natural Person.

Identifiable Natural Person - means a natural living 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 (1) or more factors specific to his biological, physical, biometric, physiological, mental, genetic, economic, cultural or social identity (and “Identified Natural Person” is interpreted accordingly).

Special Categories of Personal Data – means Personal Data revealing or concerning (directly or indirectly) racial or ethnic origin, communal origin, political affiliations or opinions, religious or philosophical beliefs, criminal record, trade-union membership and

health or sex life and including genetic data and biometric data where it is used for the purpose of uniquely identifying a natural person.

### 3, WHICH SOURCES DATA DO WE USE?

We mainly process Personal Data of legal representatives and employees of companies with which we are in business, regulatory or a customer relationship or in the process of establishing such a relationship.

We also process Personal Data that we receive as part of business relationships with our service providers (data of representatives of service providers).

We do process our employees' Personal Data, as well as, including their relatives in the process of establishing an employment visa, as per local regulations.

Finally, we process Personal Data that we have legitimately acquired from publicly available sources.

The Personal Data referred to above may include one or a combination of the below:

- Personal details: names, surnames, gender, birth dates, religion and other elements of civil status;
- Identity documents: copy of passport, copy of identity card, example of signature;
- Contact details: work postal addresses, work and private email addresses, job title, etc;
- Employment details: work title and information relating to your professional and (where relevant) financial status;
- Data related to electronic identification and data relating to IT usage;
- Background and education information prior or during employment; and
- Other data required by applicable regulations.

### 4. ON WHAT LEGAL BASIS DO WE PROCESS YOUR DATA?

We process the aforementioned Personal Data in accordance with the provisions of the DPL 2020:

#### a. On the basis of your consent (Article 10 (a) of DPL 2020)

If you have given us your consent to the processing of your Personal Data for specific purposes, the lawfulness of this processing is based on your consent.

In such a case, we will provide you with a consent form. Such procedure can be made available upon request (please see contact details in clause 1)..

#### b. For our necessity to perform a contractual obligation (Article 10 (b) of DPL 2020)



Certain Personal Data must be used by us (i) to provide you with the products or services you requested, (ii) as necessary for the performance of any contracts to which you are a party or (iii) in order to take steps at your request prior to entering into a contract.

**c. For the necessity to comply with the law (Article 10 (c) of DPL 2020)**

Personal Data is also processed for the necessity of complying with statutory and regulatory requirements to which we are subject, particularly in matters concerning finance market obligations, identification controls, checking of transactions, operational risk management, the adherence to sanction and embargo requirements, the prevention of conflicts of interests, the prevention of fraud, and the fight against money laundering and financing of terrorism.

**d. In the pursuit of a legitimate interest (Article 10 (f) of DPL 2020)**

The processing of Personal Data shall be considered a legitimate interest when we transfer Personal Data within our the Group for international administrative purposes or if it is necessary and proportionate to prevent fraud or to ensure network and information security.

**e. Special categories of Personal Data**

The processing of Special Categories of Personal Data includes legal bases such as:

- If you give us an explicit consent that complies with the DPL 2020 (Article 12), to the processing of those Special Categories of Personal Data for one (1) or more specified purposes (Article 11A of DPL 2020);
- Processing is necessary for the purpose of carrying out the obligations and exercising the specific rights of Societe Generale DIFC or your obligations and specific rights in the context of the Data Subject's employment, including but not limited to recruitment, visa or work permit processing, the performance of an employment contract, termination of employment, the conduct of proceedings relating to employment and the administration of a pension, retirement or employee money purchase benefit scheme (Article 11b of DPL 2020);
- Necessary to comply with applicable law that applies to Societe Generale DIFC in relation to anti-money laundering or counter-terrorist financing obligations or the prevention, detection or prosecution of any crime (Article 11h of DPL 2020).

SG DIFC carefully processes only selected and limited types of Special Categories of Personal Data, and only under the legal bases indicated in the DPL 2020.

**5. WHAT IS OUR PURPOSE WHEN WE PROCESS YOUR DATA?**

We process your Personal Data for the following purposes:

- Management of the contractual relationship between the client and Societe Generale DIFC ;
- Administering and operating account and providing and managing products and services, assessing credit worthiness, offering products and services;
- Participating in the prevention and detection of fraud and

related crimes, producing statistics, management information and executing tests, complying with anti-money laundering, terrorism and related legislation and complying with other legal and regulatory obligations;

- Complying with other relevant statutory and regulatory requirements to which Societe Generale DIFC is subject, particularly in matters concerning identification controls, checking transactions, operational risk management, the prevention of conflicts of interests, the prevention of the fraud, the fight against money laundering and financing of terrorism;
- Determining a consolidated risk profile of the client at the Group level;
- Implementing an improved client service policy at the Group level;
- Marketing purposes (unless clients and data Subjects request us not to), organising commercial events, offering new services.

**6. WHO RECEIVES MY DATA ?**

Your Personal Data is processed by us and may be communicated to the following recipients:

- Employees, agents, representatives and consultants of Societe Generale DIFC;
- Other legal entities within the Societe Generale Group;
- External legal advisors;
- External fraud detection services;
- External service providers having a contractual relationship with Societe Generale DIFC; and
- Local and international regulatory bodies in the context of fulfilling such regulatory requirements.

In such case, we take adequate physical, technical and organizational measures we deem necessary to ensure the security and confidentiality of your Personal Data.

Furthermore, we may also disclose Personal Data, upon request, to regulators, public bodies and institutions [such as the Dubai Financial Services Authority (DFSA)] or investigating authorities when there is a legal or regulatory obligation.

**7. IS MY DATA TRANSFERRED OUTSIDE THE DIFC?**

In certain circumstances, we do transfer your data outside the DIFC.

Where we transfer Personal Data outside the DIFC, we ensure that it is protected in a manner that is consistent with the DPL 2020 (as described below).

**a. Transfer to jurisdictions deemed as having an adequate level of protection (Article 26 of DPL 2020)**

The list of the third countries for which there is an adequate level of protection of Personal Data is established and maintained by order of the DIFC Commissioner, and additional written agreements are not necessary.

**b. Transfers out of the DIFC in the absence of an adequate level of protection (Article 27 of DPL 2020)**

We transfer your Personal Data and enhance our contractual obligations as directed by the DIFC Commissioner in the context of the DPL 2020.



## 8. HOW LONG IS MY DATA STORED?

We process and store your Personal Data for as long as the processing purpose continues to exist.

How long we hold your Personal Data for will vary. The continuous processing of your data will be determined by various criteria including:

- The purpose for which we are using it – we will need to keep the data for as long as is necessary for that purpose;
- Archiving obligations – laws or regulations may set a minimum period for which we have to retain your Personal Data;
- Fraud identification; or
- Existing or potential litigation.

## 9. WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?

The DPL 2020 provides you with the following rights:

- The right to withdraw your consent at any time if previously you gave your consent for the basis for the processing;
- The right to access, rectify and erase your Personal Data;
- The right to data portability;
- The right to data cessation;
- The right to object or restrict the processing of your Personal Data;
- The right to object to automated decision making;
- The right not to be discriminated against when you exercise any of your rights set out under Part 6 of the DPL 2020.

You can exercise your rights by contacting us using the details set out in clause 1 above.

We will comply with requests promptly, unless we will have a strict business interest not to fulfill such requests to the extent permitted by law. We will revert on how requests will be handled within one (1) month after receipt of the request at no charge. Complex requests can be extended by a maximum of two (2) further months.

## 10. WHO IS CONCERNED BY THIS DATA PROTECTION POLICY?

When you provide us with third party Personal Data (including but not limited to those listed above), you confirm that such third party receives this Data Protection Policy and understands the information in this Data Protection Policy about how we will use their Personal Data.

Moreover, we will provide you with information notices to ensure the transparency of the processing of your Personal Data.

## 11. HOW CAN YOU KEEP UP WITH CHANGES TO THIS DATA PROTECTION POLICY?

We may need to update this Data Protection Policy from time to time.

We invite you to review the latest version of this Data Protection Policy online and we will inform you of any material changes through our website or through our other usual communication channels.

## 12. IS THERE AN OBLIGATION FOR ME TO PROVIDE DATA?

As a corporate representative or employee of our clients, as part of the business relationship, you must provide any Personal Data necessary to enter into and carry out a business relationship and fulfil the related contractual obligations, or the Personal Data which we are legally required to collect. Without this data, we will generally have to refuse to conclude a contract or execute an order, or be unable to continue to execute an existing contract and may have to terminate it.

In particular, according to money laundering (know your customer) regulations, we are obliged to identify you prior to the establishment of the business relationship with our clients. In order for us to be able to fulfil this regulatory and legal obligation, you must provide us with the necessary information and documents and immediately notify us of any changes resulting in the course of the business relationship. If you do not provide us with the necessary information and documents, we are not permitted to initiate or to continue the desired business relationship with your clients.

## 13. HOW IS YOUR DATA SECURED?

We take all reasonable physical, technical and organisational 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.

Risk analyses are carried out and the necessary measures are taken to eliminate or limit the identified risks.

A procedure for the management of Personal Data breaches is implemented and allows the notification, within the legal deadlines, to the DIFC Commissioner, as well as to you.