
PRIVACY NOTICE

INFORMATION ON DATA PROCESSING AND SHARING

A. DATA AND DATA PROCESSING

Société Générale, Paris, Zurich Branch (“**Bank**”) is a branch of Societe Generale SA (“**SG**”) established at Talacker 50, 8021 Zurich, Switzerland with an additional office in Geneva, Switzerland. SG is a credit institution (bank) incorporated under the laws of France with its registered office at 29 boulevard Haussmann, 75009 Paris, France. SG has branches and (direct and indirect) subsidiaries in various jurisdictions, including (without limitations) member states of the European Union, India, Hong Kong, Singapore or the USA (together, the “**SG Group**”).

The Bank processes information and data – data provided, collected and/or received - (the “**Data**”) relating to personal data from legal representatives and employees of its Clients in connection with its providing financial services to Clients. These services may comprise lending and other credit transactions, account and custody services, securities services, cash management services, payment services (including payments via SIX, SEPA or SWIFT), trade finance services and documentary operations, as well as investment, execution, clearing and settlement services.

Data includes (without limitations):

- personal data of a Client and Client’s affiliates (such as name, address, identification and corporate documents, financial information, or identity of and related information on authorised signatories, directors and beneficial owners including know-your-client data and information);
- contractual data (such as contracts or information on and in relation to accounts and deposits, credit or other financings, or collateral);
- transaction data (such as contracts or information on and in relation to payments and other transactions executed, place / trading venue of execution, or pricing); and
- marketing data (such as information on a Client’s requests or (indicative) offers made to a Client).

B. DATA TRANSFER AND SHARING

As part of the SG Group that is organised globally, the Bank may transfer and share Data – in whole or in part – with SG (including other branches) and (directly or indirectly via SG) other SG Group entities. SG Group entities (including the Bank) may also transfer and disclose Data to their third-party service providers located in- or outside of Switzerland (the “**Service Providers**”).

If such a transfer of Personal Data is made to a State that does not offer an adequate level of data protection, the Bank shall, if required by applicable law, ensure that (i) the consent of the Client is obtained, or (ii) put in place appropriate safeguards. In any event, the Client confirms that it has informed the Related Persons in this respect.

The countries (other than Switzerland) to which Personal Data may be communicated by the Bank are France, Romania, India, Canada, USA, Morocco, Italy, Poland, China. However, Personal Data may be communicated to other countries upon instructions from the Clients (for example in the case of international transfers or investments) or when required by applicable legislation.

The Bank and SG Group entities may share Data with competent judicial, supervisory, regulatory or governmental authorities and/or agencies and with trading, reporting, clearing or settlement infrastructures (the “**Competent Authorities and Institutions**”).

Any such Data transfer or sharing may occur for the purposes mentioned below (the “**Purposes**”) in the interest of the Bank (or where explicitly stated, SG Group).

Purposes are the following:

- maintaining client database(s) by the Bank or SG Group comprising of Client information and related documentation;
- compliance, control and risk management of the Bank and SG Group, including:
 - compliance with controls required by and obligations under applicable laws, rules and regulations, such as sanctions and other filtering, anti-money laundering or anti-bribery regulations;
 - analysis, management and monitoring of (transactional, client and consolidated) risks related to or in connection with Client’s business relationship(s) with the Bank, including (without limitation) (a) client credit risk, market risks and operational risks, or (b) client exposure, related internal limits and contractual provisions or commitments;
 - complying with reporting obligations within SG Group and/or to Competent Authorities and Institutions pursuant to (a) Swiss or foreign laws, rules and regulations applicable to the Bank or any other entity of the SG Group or (b) market practices and SG Group policies in line with such laws, rules and regulations; and
 - performance of internal or external audits and inspections;
- managing and monitoring the services provided to, and transactions with Clients (or facilitating any of them), including:
 - evaluation of potential business relationship and transactions;
 - account opening, administration, operation and review;
 - negotiating and executing agreements or any other legal documents, and performing obligations and duties or processing payments in connection therewith;
 - performing transactions related reporting obligations pursuant to applicable laws, rules and regulations to relevant trading, clearing and settlement infrastructures (such as stock exchanges, markets or other trading venues, or trade repositories)
- developing and improving services or instruments offered by the Bank or SG Group to Clients, including:
 - internal statistics or analysis in relation to, and improving or designing new financial products and/or services of the Bank or other entities of the SG Group for Clients;
 - cross-selling enabling Clients to benefit from the SG Group international network;
- outsourcing or support solutions in favour of the Bank in relation to:
 - back and middle office functions including administrative services, processing of payment and other instructions, monitoring and reporting;
 - maintenance and management of administration, IT systems and other infrastructure;
 - archiving and back-up data centre; and
 - accounting and preparing financial statements;
- disclosure in connection with and for the purpose of any litigation, arbitration, administrative or regulatory, or other investigation, proceeding or dispute, of or, at any Competent Authority and Institution, in each case in Switzerland or abroad, and against or involving the Client, the Bank or any entity of SG Group; and
- consideration, negotiation or execution by the Bank of risk transfer arrangements (including sub-participations arrangements, syndication arrangements, hedging arrangements, securitizations, credit derivatives, or assignments or other transfers of rights or the obligations of

the Bank under a transaction or agreement). For the purpose of such risk transfer arrangement, disclosure of Data shall be permissible to the Bank's prospective counterparty as well as to any rating agency, insurance or re-insurance company or broker, and any legal or other professional advisor of the Bank and of the counterparty of the Bank for such risk transfer or sharing arrangement.

C. PROTECTION OF DATA

The Bank manages and processes Clients' Data in compliance with applicable mandatory laws, rules and regulations. The Bank takes adequate measures (including access management or encryption) to safeguard the confidentiality of Client's Data and to ensure appropriate controls are in place when Data is transferred or shared by the Bank with any other SG Group entity or Service Provider.

Data that the Bank must retain will be preserved in a secure environment and deleted once the business, legal and regulatory needs have been met.

However, when Data is transferred to or shared with SG Group entities or Service Providers located outside Switzerland, it will be subject to the laws, rules and regulations of the respective foreign jurisdiction, which may require such other parties to disclose Data to third parties.

D. ACKNOWLEDGEMENT

The processing and sharing of Data by the Bank as outlined in this Privacy Notice, is valid for all existing and future accounts and other banking relationships with the Bank.

We may assume that the Client informed and where necessary obtained consent of any affiliate, beneficial owner or other relevant person of the Client to provide data relating to such affiliate, beneficial owner or other relevant person to the Bank for processing such data by the Bank pursuant to this Privacy Notice.

E. DATA PROTECTION OFFICER

The Data Protection Officer's contact details are as follows:
Société Générale, Paris, Zurich Branch
Attention: DPO
Talacker 50
CH-8021 Zurich.
Email: CH-Cib-Gdpr-Client-Support@sgcib.com.

F. RETENTION PERIOD

Data is processed within the scope of fulfilling contractual and legal obligations. The Data is subject to legal and internal retention obligations. In addition, we as a bank may be subject to special storage obligations (legal holds), which oblige us to store information for an indefinite period of time.

G. DATA PROTECTION RIGHTS

Data protection rights you may have include:

- Right to information
- Right of correction and/or erasure
- Right to restrict processing and
- Right to Data portability (if applicable)
- Right to object
- Right to object to the processing of your Data for direct marketing purposes and for reasons arising from your specific situation
- Right to lodge a complaint to a competent data protection supervisory authority (if applicable)

You can withdraw your consent to the processing of your Data at any time. A revocation is only effective for the future. Processing before revocation is not affected. Be aware that the exercise of these rights may lead to the Bank being unable to provide its services in part or in whole.

To exercise your rights, please contact the data protection officer using the contact details given above.