

SG AUSTRALIA PRIVACY STATEMENT

FEBRUARY 2024

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1. ABOUT THE STATEMENT

Société Générale comprises Société Générale (ARBN: 092 516 286) and its Australian subsidiaries, including Société Générale Australia Ltd and Société Générale Securities Australia Pty Ltd (collectively referred to as “SG Australia”, “we”, “us” or “our”). This Statement applies to SG Australia as well as any SG legal entities located outside Australia that collect, process, store or have access to **personal information**¹ of that was collected or held in Australia.

Protecting our customers’ privacy is fundamental to the way we do business. We are committed to earning and maintaining your trust by carefully and respectfully managing your personal information.

Pursuant to the *Privacy Act 1988* (Cth) (“the Privacy Act”), we are required to comply with the Australian Privacy Principles (“APPs”), which concern the way personal information is collected, used, stored, disclosed and destroyed in Australia. The scope of this Statement is to detail how Societe Generale handles personal information in accordance with those requirements. It sets out the types of personal information we collect, how that information may be used, and under what circumstances it may be disclosed by Societe Generale. This Statement also outlines our approach to dealing with suspected data breaches.

This Statement does not apply to certain types of information, which are not covered by the Privacy Act, including certain employee records in relation to our current or former employees. However, where you are a current or former employee and the personal information which we have collected about you is within the scope of the Privacy Act, this Statement applies to that personal information.

Accordingly, the following information can be found in the Statement:

- (i) The types of personal information we process;
- (ii) How and why we process personal information;
- (iii) The way we deal with personal information;
- (iv) What qualifies as an eligible data breach;
- (v) How to contain, assess and manage suspected data breaches;
- (vi) The roles and responsibilities of staff;
- (vii) How data breach incidents are to be recorded; and
- (viii) The process for reviewing data breach incidents.

This Statement is subject to periodic review, at a minimum on an annual basis and in any event following any relevant change in law or regulation.

As part of that update process, Australia Compliance may rely on the support of other departments, including the SG Legal department.

¹ Section 6 of the Privacy Act provides that personal information includes any Information or opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable.

2. PERSONAL INFORMATION

2.1 Categories of Personal Information Collected

For the purposes of conducting its business operations, SG Australia may collect and hold the following personal information:

- (i) Personal data about or relating to, or from an individual, which may include (but is not limited to) names, identification particulars, date of birth, contact details (including postal or email addresses and phone number), portfolio information, transaction patterns and behavior, background (which may possibly include financial, career, education and family background) and demographic data;
- (ii) Personal data generated in the ordinary course of the commercial/financial relationship with Societe Generale, for example (but without limitation, when an individual gives instructions for
 - a. Account opening, administration, operation and review
 - b. Back and middle office matters, including settlement, processing and reporting, on behalf of the Client. Such personal data may include signatures, answers to questions intended for security verification, emergency contact numbers or call-back contact details; and
 - c. Providing identifying information as part of required Know Your Client (KYC) onboarding processes.
- (iii) Personal data collected when an individual participates in events organised by Societe Generale for its Clients, such as functions, seminars, contests or rewards programmes;
- (iv) Personal data from cookies, or other technologies deployed for analysis of visits to websites or the use of any information technology application of Societe Generale; and
- (v) Images, photographs, videos, CCTV footage or voice recordings of individuals.

SG Australia may collect such information either directly from individuals, or from third parties including other credit providers, government agencies, market research organisations and credit reporting agencies.

The Act, however, distinguishes personal information from sensitive information, with the latter being that which relates to an individual's identity. This includes, but is not limited to, ethnicity, nationality, criminal records, sexual preferences or race.

Due to the nature of this data, SG Australia will only collect sensitive information about an individual in the following circumstances:

- (i) Where an individual consents to the collection of the information and if the information is deemed reasonably necessary for one or more of SG Australia's functions or activities; or
- (ii) Where the collection of the information is required or authorised by or under an Australian law or a court/tribunal order; or
- (iii) Where a permitted general situation exists in relation to the collection of the information by an SG legal entity.²

² To determine whether a permitted general situation exists, reference should be had to the table at section 16A of the Privacy Act.

2.2 Purposes for Collection, Use or Disclosure of Personal Information

Personal data may or will be collected, used or disclosed in or outside Australia for the following purposes:

- a) The management of the business relationships with Clients, the performance of contract(s) relating to Clients and/or provision of services to Clients, which shall include (but is not limited to) performing the daily operation of the services and administrating and maintaining the accounts of Clients, carrying out instructions or responding to any enquiries from Clients and verifying the identity and authority of representatives whom Societe Generale may deal with;
- b) To perform internal management, to operate control (including financial control) and management information systems, and to carry out internal or external audits;
- c) Compliance with Societe Generale policies and applicable laws, regulations, directives and regulatory guidelines including but not limited to know-your-customer, anti-money laundering, countering the financing of terrorism and sanctions/embargoes and/or tax purposes, obligations, procedures, arrangements and with requirements in relation to the sharing of data and information among the Societe Generale group;
- d) To monitor and record calls and electronic communications with individuals for quality, training, investigation and fraud prevention purposes;
- e) Any investigation, complaints and/or crime or fraud prevention;
- f) Compliance with any applicable law, rule or regulation, regulatory policy, industry code of practice or guidelines, judgment, order, notice, direction or request issued by any banking, taxation, administrative, judicial, governmental, law enforcement, quasi-governmental, supervisory, regulatory or equivalent body, clearing or exchange or other bodies (including without limitation any trade repositories or third party service provider used to transfer "Client information" to a trade repository), whether domestic or foreign;
- g) Liaising and interacting with and responding to regulatory, statutory or governmental bodies or courts or tribunals;
- h) Enforcing or defending Societe Generale's rights, contractual or otherwise, participating in potential or actual litigation, arbitration or other legal process, including preparation therefor and conduct thereof;
- i) Compliance with contractual arrangements by or between regulatory bodies or associations within the financial industry or other financial institutions;
- j) Carrying out legal and company secretarial activities;
- k) Other purposes for which the Data Subject has given his or her express consent, where the consent is necessary, and the purposes associated with such consent has been notified to an individual;
- l) Marketing purposes (where specifically consented to or where permissible under applicable law) and other related purposes such as informing the Data Subject of news and publications which may be of interest, organizing commercial events, offering new services, conducting statistical and private capital surveys (including behavioural surveys);
- m) As reasonably required for the provision or receipt of third party services;
- n) Complying with reasonable business requirements including but not limited to internal management, training, service quality, auditing, reporting, submissions or filings, data

- processing, control or risk management, statistical, trend analysis and planning or other related or similar activities;
- o) Conduct or development of Societe Generale's business relationship with a Client including, but not limited to:
 - (i) Account opening, administration, operation and review;
 - (ii) Back and middle office matters, including settlement, processing and reporting;
 - (iii) Information system management, testing, archiving and maintenance activities;
 - (iv) Documentation negotiation, generation and management; and (v) managing clients relationships and/or servicing clients, including designing financial services or products for clients; or
 - p) Otherwise in the course of Societe Generale's business, operations or relations or as required or permitted by law.

2.3 Dealing with Personal Information

2.3.1 Disclosure Obligation

At or before the collection of an individual's personal information, or as soon as we can practicably do so, SG Australia will provide those individuals with the following details concerning the collection of their data:

- (i) The purpose of collection;
- (ii) Whether their personal information may be distributed to other SG entities, for example via a global database;
- (iii) Their right of access to this information. In this regard, an individual may request access to their personal information by writing to us.

2.3.2 Use and Disclosure of Personal Information

SG Australia can only collect, use or disclose personal information in connection with one of the purposes listed above in the following circumstances:

- (i) The individual's consent has been obtained;
- (ii) The information could be reasonably expected to be used for reasons related to the reason the information was provided to SG Australia;
- (iii) The individual is reasonably likely to have been aware, or were made aware, that information of that kind is usually passed to a third party;
- (iv) SG Australia has a suspicion of unlawful activity;
- (v) The use or disclosure of the information is required or authorised by law;
- (vi) The use or disclosure of the information is necessary for public health or public safety reasons; and
- (vii) SG Australia reasonably believes that the use or disclosure of personal information is necessary for a range of functions or activities carried out by, or on behalf of, an enforcement body.

In circumstances where SG Australia discloses an individual's personal information to a third party, we must ensure that those third parties are bound by the same privacy rules we follow. Further, the information supplied must not be used by that third party for anything other than the purpose for which SG Australia supplies that information to them, unless the person concerned otherwise agrees.

SG Australia may use personal information to market products and services to individuals but in each direct marketing communication, SG Australia must notify those individuals that they are not obliged to receive any further direct marketing communications.

Accordingly, each written direct marketing communication by SG Australia must set out our business address and telephone number and, if the communication with the individual is made by fax, or other electronic means, a number or address at which SG Australia can be directly contacted electronically.

2.3.3 Information Transfer across International Borders

As Société Générale is part of a large global organisation, we may need to disclose personal information to entities located outside Australia including our own related bodies corporate, third-party service providers and business associates.

There are certain safeguards which must be met before we are allowed to transfer personal information outside Australia. Generally, we are required to take reasonable steps to ensure that the recipient will not breach the APPs in relation to that information. In some circumstances we may disclose personal information to an overseas recipient where an individual has provided their consents or we are otherwise required or permitted to do so by law.

2.3.4 Data Quality

SG Australia must take reasonable steps to make sure that the personal information we collect, use or disclose is accurate, complete and up-to-date. SG Australia must take reasonable steps to ensure that the personal information we use or disclose is accurate, up-to-date, complete, and relevant. We must take reasonable steps to correct personal information we hold where we are satisfied that the information is incorrect or an individual has requested their information be corrected.

2.3.5 Data Security

SG Australia may store personal information electronically or in hard copy. In doing so, we must take reasonable steps to protect the personal information we hold from being misused or lost, as well as from unauthorised access, modification or disclosure.

Subject to any legal obligation we may have to keep information for a certain period of time, SG Australia must take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for one of the purposes listed at 2.2.

Australian Privacy Principle 11 is key to minimising the risk of a data breach. It requires SG Australia to take reasonable steps to protect the personal information they hold from misuse, interference and loss, and from unauthorised access, modification or disclosure. Some of the steps SG Australia must take to protect personal information and prevent the unauthorised disclosure of information include:

- (i) Restricting access to our computer systems and physical records to authorised persons and preventing users from accessing information they have no need to access;
- (ii) Requiring employees to use unique passwords to gain access to systems and having these passwords changed regularly;
- (iii) Encrypting data sent from other computers to SG Australia's systems during internet transactions;
- (iv) Employing firewalls, intrusion detection services and virus scanning tools to prevent unauthorised persons and viruses from entering its systems;
- (v) Providing secure storage for physical records; and
- (vi) Preventing unauthorised access to SG Australia's offices by providing security keys only to authorised persons.

2.3.6 Access and Correction

Individuals can request to access the personal information SG Australia holds about them. There are circumstances where we are not obligated to provide an individual with access to their personal information. Examples of such circumstances include the following:

- (i) We believe there is a threat to life or public safety;
- (ii) There is an unreasonable impact on other individuals;
- (iii) The request is frivolous;
- (iv) The information would not be ordinarily accessible because of legal proceedings;
- (v) It would prejudice negotiations with that individual;
- (vi) It would be unlawful;
- (vii) It would jeopardise taking action against serious misconduct by that individual;
- (viii) It would be likely to harm the activities of an enforcement body (e.g., the police); or
- (ix) It would harm the confidentiality of our commercial information.

All requests to access personal information will be directed to the SG Australia Privacy Officer (refer contact details below) and where reasonable and practical, SG Australia will provide the person with access to their information in the form they desire.

As mentioned previously, individuals can also request that SG Australia correct personal information we hold about them. Upon receiving a request, we will take reasonable steps to correct this information where we are satisfied that it is incorrect.

If access is restricted or refused, SG Australia must provide the reason why to the individual concerned.

2.3.7 Contact or Complaint

Individuals can contact our Privacy Officer (Head of Compliance Australia) if they would like to:

- (i) Access, update or correct personal information held by SG Australia;
- (ii) Request more information about how we handle personal information or any privacy issues;
or
- (iii) Make a complaint regarding the treatment of any information collected, used or disclosed by SG Australia. The Privacy Officer will review the complaint in accordance with SG Australia's Complaints Policy and Procedure.

SG Australia

Attention: Head of Compliance

Address: Level 25, 1 Bligh Street, Sydney 2000 NSW

Email: au-segl-compliance@sgcib.com