

# **DATA PROTECTION POLICY**

(this “Policy”)

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## 1. INTENTION

This Policy is intended to provide guidance and information to Clients and Data Subjects (both as defined below) of Societe Generale, Singapore Branch and SG Securities (Singapore) Pte Ltd and each of their branches, related corporations, subsidiaries, representative offices and affiliates (collectively “**Societe Generale**”) regarding the collection, storage, transfer, processing, use and disclosure of personal data in connection with Societe Generale’s business, operations and/or policy pursuant to the Singapore Personal Data Protection Act (No. 26 of 2012) (“**PDPA**”).

This Policy applies to the personal data (defined below) of individuals, being employees, officers, representatives, representative offices, affiliates, shareholders, members of the board of directors (or equivalent management board) of Societe Generale's prospective, current and former corporate clients (together, the “**Clients**”), authorized signatories or authorized dealers, beneficial owners, guarantors, advisers, contractors, service providers, partners, committee members, call-back nominees, dealers, customers, payors, payees and security providers in connection with or related to Clients, contract parties and other natural persons (together with Clients, “**Data Subjects**”). It applies also to personal data gathered in connection with the onboarding of the Clients, throughout any business relationship with Societe Generale and after the conclusion of such business relationship.

For the avoidance of doubt, this Policy supplements but does not supersede nor replace any other consent that may have been previously or specifically provided to Societe Generale in respect of any personal data.

This Policy first came into effect on or about July 1 2014.

## 2. COLLECTION AND USE OF PERSONAL DATA

In general, “**personal data**” refers to any data, regardless of its format, about an individual who can be identified from that data or from that data and other information to which an organisation has or is likely to have access.

From time to time, Societe Generale may collect or receive from Clients, any person authorized by Clients, Data Subjects, third parties and/or publicly available sources the following personal data:

- a) personal data about or relating to, or from the Data Subjects, which may include (but is not limited to) names, identification particulars, date of birth, contact details, portfolio information, transaction patterns and behavior, background (which may possibly include financial, career, education and family background) and demographic data;
- b) personal data generated in the ordinary course of the banking/financial relationship with Societe Generale, for example, when a Data Subject gives instructions, writes cheques, transfers funds, deposits money or arranges banking/credit facilities 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;
- c) personal data collected when a Data Subject participates in events organised by Societe Generale for its Clients, such as functions, seminars, contests or rewards programmes;
- d) 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

- e) images, photographs, videos, CCTV footage or voice recordings of Data Subjects.

Personal data of a Data Subject may be collected, stored, used, processed, transferred or disclosed in and to any country which Societe Generale considers appropriate, in accordance with the PDPA and in accordance with local practices and laws, rules and regulations in such country.

### **3. PURPOSES FOR WHICH PERSONAL DATA IS USED, DISCLOSED OR TRANSFERRED**

Personal data may or will be collected, stored, used, processed, transferred or disclosed in or outside Singapore for the following purposes:

- a) the management of the business relationships with 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 Data Subjects 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 (consent is deemed to be given in the event that processing is implemented in response to a request from the Data Subject);
- 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; and
  - p) otherwise in the course of Societe Generale's business, operations or relations or as required or permitted by law.

#### **4. ACCURACY OF DATA**

It is the responsibility of the Data Subject to provide accurate and updated personal data to Societe Generale. Societe Generale will endeavour to ensure that they accurately record personal data. Inaccurate data will be corrected or deleted as appropriate (subject to certain exemptions), including following the request of the Data Subject, subject to the PDPA.

It is the responsibility of Data Subjects to notify Societe Generale of any changes to their personal data in a timely manner.

#### **5. SECURITY OF DATA**

Access to a Data Subject's personal data is limited to authorized persons whose status, duties and responsibilities specifically require or justify access to and use of such data. In addition, Societe Generale takes measures to prevent personal data from being distorted, altered, or damaged, or unauthorized third parties gaining access to it.

Where there is a need to make a public announcement which contains the personal data of a Data Subject, only the minimum amount of information required for the purpose of that announcement should be disclosed.

#### **6. DISCLOSURE AND TRANSFER OF DATA**

Societe Generale may disclose and/or transfer a Data Subject's personal data both inside and outside of Singapore<sup>1</sup>, for the purposes specified in this Policy and permitted or required by applicable law, to the following entities:

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<sup>1</sup> Countries outside Singapore include but are not limited to France, United Kingdom, United States of America, India, Canada and Hong Kong.

- a) any entity in the Societe Generale Group (including Societe Generale's head office, other branches, subsidiaries, affiliates and representative offices);
- b) any agent, contractor, or third party service provider which provides administrative, mailing, telecommunications, call centres, business, process, travel, visa, knowledge, management, human resource, data processing, information technology, computer, payment, debt collection, credit reference checks or clearing, custody or other services to Societe Generale;
- c) any person or entity under a duty to keep the personal data confidential;
- d) any person who Societe Generale deems fit for the purpose of any merger, amalgamation, acquisition, corporate reconstruction, corporation reorganization undertaken (or which may be potentially undertaken) by Societe Generale;
- e) any third parties to whom Societe Generale is required to transfer data by law or regulatory requirement;
- f) any financial institution, processing agent, finance- or credit-related companies or agencies (including but not limited to trustees, insurers, securities and investment companies) which have dealings with Societe Generale;
- g) any drawee or drawer bank in connection with any cheque or equivalent;
- h) any person or entity to whom Societe Generale is under any obligation or otherwise required to make disclosure pursuant to legal process, or pursuant to any other foreign or domestic legal and/or regulatory obligation or request, or agreement entered into by any of them and any governmental authority, domestic or foreign, or between or among any two or more domestic or foreign governmental authorities, or in connection with or to any financial industry self-regulatory or financial industry bodies or association of financial services providers with which Societe Generale is required or expected to comply, including disclosure to any regulatory, statutory, judicial, supervisory, governmental or quasi-governmental body or other authority (including but not limited to tax authorities) or to any rating agency or stock exchange;
- i) a third party involved in or in connection with potential or actual litigation or arbitration or other legal process or proceeding with Societe Generale; and
- j) any actual or proposed assignee of Societe Generale or participant or sub-participant, investors, purchasers or transferee of Societe Generale's rights in respect of the Client, or all or any part of the assets or business of Societe Generale;
- k) any party giving or proposing to give a guarantee or third party security to guarantee or secure (as the case may be) the Client's obligations and liabilities to Societe Generale; and/or
- l) any person to whom disclosure is reasonably considered by Societe Generale to be necessary.

Societe Generale will reasonably endeavour to ensure that any third party who receives personal data of a Data Subject from any Societe Generale entity shall treat that personal data with confidence and in accordance with the PDPA.

Societe Generale will not sell or transfer personal data of a Data Subject to any third party for that party to use for direct marketing purposes (if Societe Generale is aware) without the prior consent of the Data Subject.

## **7. RIGHT OF ACCESS AND CORRECTION REQUESTS**

Subject to the PDPA and certain exemptions, Data Subjects may request a copy of or a correction to their personal data held by Societe Generale by contacting the Personal Data Protection Officer

(see section 9 for details). Depending on the data requested, the Data Subject may be required to pay an administration or other fee to be determined by Societe Generale in order for their request to be processed.

## **8. RETENTION**

Societe Generale will only retain personal data for as long as is reasonably necessary and/or as required or permitted by law.

## **9. GOVERNANCE**

As at the date of the current revision of this Policy, interested persons may contact Societe Generale's Personal Data Protection Officer at [sin-pdpo@sgcib.com](mailto:sin-pdpo@sgcib.com).

## **10. CHANGES TO THIS POLICY**

Societe Generale may amend, vary or modify this Policy in its sole discretion from time to time without any prior notice. A copy of this Policy (which is subject to change without notice) is available at this link: <https://www.societegenerale.asia/en/disclosure-information/singapore/>.

## **11. GOVERNING LAW**

This Policy shall be governed by and construed in accordance with the laws of Singapore.