

PERSONAL DATA PROTECTION POLICY

Crédit Mutuel Investment Managers makes respect for privacy and the protection of personal data a priority.

This document demonstrates our commitment to implementing appropriate technical and organisational measures when collecting and using your data, whenever you subscribe for products and/or services and throughout our relationship, to ensure responsible use of your personal data

Crédit Mutuel Investment Managers undertakes to respect all the obligations incumbent upon it arising from the regulations applicable to the processing of personal data, especially:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 applicable since 25 May 2018 (hereinafter 'the General Data Protection Regulation' or 'GDPR')
- The French Data Protection Act No.78-17 of 6 January 1978 as amended
- Any recommendations from any control authority.

Personal data are also protected by the professional secrecy to which we are bound.

1. Definitions

'**Personal data**' means any information relating to a natural person identified or who could be identified directly or indirectly by an identification element such as a name, a telephone number, a postal address, an e-mail address, an identification number, location data, etc.

'**Processing of personal data**' means any operation carried out on personal data such as the collection, recording, organisation, holding, adaptation, modification, extraction, consultation, use, interconnection, limitation, deletion, destruction, etc.

'**Person in charge of processing**' means the natural or legal person, public or private, or the department, which determines alone or with others the aims and means of the processing.

'**Sub-contractor**' means the natural or legal person, public or private, or the department, which processes the personal data on behalf of the person in charge of processing.

2. Data Protection Officer

The Data Protection Officer is a specialist in the protection of personal data, responsible for informing and advising the person in charge of data processing and ensuring compliance with the applicable regulations, and is the designated contact person with the French data protection authority (CNIL), representing a pledge of confidence and guarantee of the exercise of the rights of individuals when data are processed.

3. Personal data collected

The personal data that we collect or hold about you are strictly necessary for our activity to enable us to offer you appropriate products and/or services.

We need to collect:

- Data relating to your identity such as your first name(s), surname(s), date and place of birth

- Data about your details such as your postal address, your e-mail address, your phone number(s)
- Data for identification and authentication, IP address etc.
- Data relating to your professional situation and investor profile
- Data collected through cookies (Article 11 below).

Data may be collected directly from you or from the following sources (non-exhaustive list):

- The Crédit Mutuel Federations or CIC banks
- Publications or databases such as the Official Journal, the Official Bulletin of Civil and Commercial Advertisements
- Anti-fraud organisations
- Websites, social networks concerning data that you have made public
- Sponsorships
- The use of prospect files.

We may also need to know the personal data of persons who are not clients of the company. For example (non-exhaustive list):

- Prospects
- Guarantors
- Legal representatives of legal persons or natural persons such as minors or protected adults
- Agents
- Persons carrying out transactions with our customers, with you or on your behalf (e.g. notary, lawyer, accountant).

4. Purposes of data processing

The processing of data by Crédit Mutuel Investment Managers serves specific, explicit and legitimate purposes.

In particular, your data may be processed to:

- provide you with appropriate products and services,
- provide you with information about these products and services, including emails, mobile alerts, letters, text messages or phone calls. These communications concern our existing products and services as well as new services and exclusive offers that may interest you. The electronic communications (e-mails, text messages, etc.) that are sent to you may concern products and services similar to those to which you have subscribed, in accordance with Article L34-5 of the French Postal Services and Electronic Communications Code.

You can let us know at any time if you no longer wish to receive marketing communications.

If you tell us that you do not wish to receive further communication or if you wish to start receiving such communications again, we will keep a computer record of these requests, as proof.

- manage and execute our services for the products and services to which you have subscribed,
- prospect for customers, conduct marketing initiatives, perform profiling and segmentation, and carry out statistical studies,
- comply with legal and regulatory obligations, particularly regarding knowledge of customers (KYC), the fight against money laundering and the financing of terrorism, risk assessment, security and the prevention of non-payment and fraud, the fight against tax evasion, and financial market obligations,
- record and keep some of the conversations and communications that we may have with you, whatever their medium (mainly electronic messages, face-to-face interviews, and phone calls), especially for the purposes of improving the handling of phone calls, compliance with legal and regulatory obligations relating to the financial markets, and the security of transactions.

5. Legal basis of data processing

We collect and use your personal data on the following basis:

- to execute a contract concluded with you or provide you with pre-contractual information,
- to meet our legal and regulatory obligations,
- to meet our legitimate interests,
- to ask for your consent for a specific task.

6. Recipients of the collected and processed personal data

Your personal data are only communicated to designated, authorised recipients.

These recipients may have access to your data within the limits necessary to achieve the above-described purposes.

Recipients may be:

- Our establishment as person in charge of processing,
- Authorised personnel in the sales network and sales department,
- Establishments and companies that are members of the group to which we belong and our partners,
- Service providers and sub-contractors performing services on our behalf,
- Guarantors,
- Brokers and insurers,
- Duly authorised judicial and/or administrative authorities,
- Regulated professions (e.g. notaries, lawyers, bailiffs).

7. Holding your personal data

Your personal data are held for the duration of the relationship in the sense of your using our products and services. They may be held beyond the relationship, including to comply with applicable regulations, or to assert our rights or defend our interests.

Your data may be archived for a longer period for the management of claims and/or litigation, to meet our regulatory obligations, or to meet demands from duly authorised judicial or administrative authorities.

Where customers are concerned, depending on the nature of the data and applicable law, the data may be held for up to 10 years after the end of the relationship or transaction.

Where prospects are concerned, data may be held for a period of three years from their collection or last contact with you.

Your personal data are stored for the period necessary to achieve the purposes for which they were collected and processed. They will then be destroyed securely or made anonymous.

When personal data are collected for several purposes, they are stored until the end of the longest retention or archiving period.

8. Transfer of personal data outside the European Union

Your personal data may be transferred in limited cases and for strictly controlled purposes, to a country outside the European Union. We will make sure that they are protected:

- By the existence of an adequacy decision rendered by the European Commission which recognises that the destination country has an adequate level of data protection;
- If the level of protection has not been recognised as equivalent by the European Commission, we rely on the implementation of appropriate guarantees such as standard contractual clauses approved by the

European Commission.

9. Your rights

You have rights regarding the collection and processing of your personal data, which can be exercised under the conditions set by the regulations in force, namely:

- The right to be informed in an understandable and easily accessible way about the processing of your data;
- The right to access your data;
- The right to rectification to have your data corrected if it is inaccurate or incomplete;
- The right to erase your data, unless we have legal or legitimate reasons to retain them;
- The right to object to the processing of your data if this is founded on the legitimate interest of the person in charge of processing;
- The right to object to any processing, free of charge and without having to justify the request, of your data being used for direct marketing;
- The right to limit the processing of your personal data;
- The right to the portability of your data when the processing is based on the consent or execution of contracts and that the processing is carried out using automated processes;
- The right to withdraw your consent at any time when the processing of your personal data is based on your consent;
- The right to give specific or general instructions regarding the storage, deletion and communication of your personal data, applicable after your death;
- The right to lodge a complaint with the French data protection authority: CNIL, 3 Place Fontenoy TSA 80715 75334 PARIS CEDEX 07 or on the website www.cnil.fr/fr/plaintes.

We would point out that the exercise of some of these rights may in certain cases result in the company being unable to provide the service.

In addition, we may be justified in continuing to process your personal data despite the exercise of your right to deletion, limitation or objection to the processing of your data if we have a legitimate interest in doing so or if regulations require us to retain your data.

You can exercise any of the rights listed above, by writing to the following address: The Data Protection Officer, 63 chemin Antoine Pardon, 69814 TASSIN CEDEX.

10. Security of your personal data

We employ technical and organisational measures to protect your data, including the implementation of appropriate physical, logical and organisational security measures, encryption, and anonymisation to ensure the confidentiality and integrity of your data and avoid any unauthorised access.

11. Cookies

Our cookie management policy is available on our website:
<https://new-www.cmcic-am.fr/fr/particuliers/gestion-des-cookies.html>

12. Update of the personal data protection policy

Our personal data protection policy will be regularly updated to take account of legislative and regulatory developments.

We invite you to read the latest version available on our websites.