

## PERSONAL DATA PROTECTION POLICY

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

This document demonstrates the commitment made to implement the appropriate technical and organisational measures, when collecting and using the personal data of legal persons acting on behalf of a natural person (e.g. legal representative, employee) or the data of natural persons which are transmitted to us for the execution of a signed contract/service (hereinafter referred to as "the persons concerned"), when subscribing to products and/or services and throughout our relationship, to ensure responsible use of personal data.

The personal data of natural persons acting for professional needs (individual business, skilled craft worker) fall under the policy of protection of personal data of individuals.

All individuals whose personal data are transmitted to us must be informed, especially of their rights. This personal data protection policy may be sent to the persons concerned in order to inform them of the methods used by Crédit Mutuel Investment Managers to process their data.

In this policy, when we describe personal data as 'your data', it is the data of the natural persons concerned.

Crédit Mutuel Investment Managers undertakes to respect all the obligations incumbent upon it as a result of 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 are strictly necessary for our activity to enable us to offer you appropriate products and/or services.

We need to collect:

- Data relating to identity such as first name(s), surname(s), date and place of birth
- Data about details such as postal address, business e-mail address, phone number(s)
- Data about professional situation.

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

- 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.

### **4. Purposes of data processing**

Personal data are processed for the following purposes:

- knowledge of individuals (directors or other intermediaries of legal persons whose accounts we manage),
- sending inter-company communications to the intermediary concerned,
- provide information about 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. 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.

- the execution of the contract we have made with the natural person.

### **5. Legal basis for data processing**

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

- to execute a contract or provide you with pre-contractual information
- to meet our legal and regulatory obligations
- to meet our legitimate interests.

### **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
- Our 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. Retention of your personal data (the data concerning directors follows the same regime as that of a natural person as far as data retention is concerned)**

Your personal data are held for the duration of the relationship, i.e. while the natural person uses 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.

Your personal data are stored for the period necessary to achieve the purposes for which they were collected and processed. They will 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 purposes of data processing and the data retention period described above;
- The right to access your data;
- The right to rectification to have your data corrected if it is inaccurate or incomplete;
- The right to delete 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 of your data, free of charge and without having to justify the request, being used for direct marketing to the natural person;
- 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](http://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.

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. 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.