

Societe Generale, Grand Cayman Branch

Privacy Notice

Last Revised: September 30, 2021

Introduction

The purpose of this notice is to provide you with information on our use of your personal data in accordance with the Cayman Islands Data Protection Act (2021 Revision) (the "**DPA**").

In this document, "we", "us" and "our" refers to Societe Generale, Grand Cayman Branch (the "**Bank**"), and its affiliates and/or delegates.

The Bank may modify this Privacy Notice from time to time to reflect our current privacy practices. This Privacy Notice is current as of the "Last Revised" date which appears at the top of this page. We encourage you to periodically review this Privacy Notice to remain informed of any amendments.

Customer Data

By virtue of establishing a relationship (e.g., opening an account or receiving a service or product) with the Bank and your associated interactions with us (whether past, present or future), or by virtue of you otherwise providing us with personal information on yourself, or individuals connected with you, as a customer of the Bank (a "**Customer**") you will provide us with certain personal information (including, for example, if you are an entity, that of your directors, trustees, employees, representatives, shareholders, customers, clients, beneficial owners or agents) which constitutes personal data within the meaning of the DPA ("**Customer Data**").

Customer Data includes, without limitation, the following information relating to you, and/or any individuals connected with you, as a Customer: name and residential address (including proof of same), email address, contact details, corporate contact information, signature, nationality, place of birth, date of birth, tax identification, credit history, correspondence records, copies or details of passport or other government-issued identification, bank account details, source of funds details, details relating to your investment or business activity, and other details we may be required to collect as required by law.

We may also obtain Customer Data from public sources, including government or other public bodies and public websites.

In our use of Customer Data, the Bank will be characterized as a "data controller" for the purposes of the DPA. The Bank's affiliates and delegates may act as "data processors" for the purposes of the DPA.

Who this Affects

If you are a natural person, this will affect you directly. If you are a corporate Customer (including, for these purposes, legal arrangements such as trusts or exempted limited partnerships) that provides us with Customer Data on individuals connected to you for any reason in relation to your relationship with us, this will be relevant for those individuals and you should transmit this document to such individuals, or otherwise advise them of its content.

How We May Use Your Personal Data

The Bank, as the data controller, may collect, store and use Customer Data for lawful purposes, including, in particular:

- (i) where this is necessary for the performance of our rights and obligations under our service, financial and other agreements and/or the constitutional and operational documents of the Bank;
- (ii) where this is necessary for compliance with a legal and regulatory obligation to which the Bank is subject (such as compliance with anti-money laundering and FATCA/CRS requirements); and/or
- (iii) where this is necessary for the purposes of our legitimate interests and such interests are not overridden by your interests, fundamental rights or freedoms.

Additionally, our affiliates, agents or delegates may use Customer Data, for example to provide services to the Bank or to discharge the legal or regulatory requirements that apply directly to them, or in respect of which the Bank relies upon them in order to provide you with services, but such use of Customer Data by the affiliates, agents or delegates will always be compatible with at least one of the aforementioned purposes for which we process Customer Data.

Further explanation regarding how affiliates of the Bank may handle Customer Data is available at: <http://global.societegenerale.com/en/gdpr>.

Should we wish to use Customer Data for other specific purposes (including, if applicable, any purpose that requires your consent), we will contact you.

Why We May Transfer Your Personal Data

We only transfer Customer Data for legitimate business reasons.

In certain circumstances we and/or our authorized affiliates, agents or delegates may be legally obliged to share Customer Data and other information with respect to your relationship with the Bank with the relevant regulatory or government authorities, including, but not limited to, the Cayman Islands Monetary Authority or the Tax Information Authority. They, in turn, may exchange this information with foreign authorities, including tax authorities.

We anticipate disclosing Customer Data to parties who provide services to the Bank and their respective affiliates (which may include certain entities located outside the Cayman Islands or the European Economic Area). Such parties include the following categories of service provider who may either process personal data on our behalf or for their own lawful purposes in connection with services provided to the Bank:

- Societe Generale Group affiliates located in the United States, Canada and France;
- Our attorneys, auditors and accountants;
- Credit reference agencies;
- Information technology service providers, including public cloud service providers;
- Fraud prevention and cybersecurity service providers;
- Service providers assisting us in the fight against financial crime and fraud; and
- Other service providers that assist us in performing our core business operations.

The Data Protection Measures We Take

Any transfer of Customer Data by us or our duly authorized affiliates, agents and/or delegates outside of the Cayman Islands shall be in accordance with the requirements of the DPA.

We and our duly authorized affiliates, agents and/or delegates shall apply appropriate technical and organizational information security measures designed to protect against unauthorized or unlawful processing of Customer Data, and against accidental loss or destruction of, or damage to, Customer Data.



We shall notify you of any Customer Data breach that is reasonably likely to result in a risk to the interests, fundamental rights or freedoms of either you or those data subjects to whom the relevant Customer Data relates.

Data Retention

The retention period for holding of Customer Data will vary and be determined by criteria including the purposes for its use and retention periods prescribed by law and other legal obligations.

Inaccuracies and Corrections

We endeavour to keep Customer Data as accurate and up to date as possible. Should you become aware of any errors or inaccuracies in your Customer Data provided or retained by us please notify us by contacting us directly using the information provided below.

Getting In Touch

Should you have any queries or wish to discuss your data protection rights with us, please contact:

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