

CLIENTS' DATA PROTECTION

PRIVACY POLICY EFFECTIVE FROM 25 MAY 2018

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Société Générale S.A.
Oddział w Polsce
KRS: 00000 99264
NIP: 526-000-42-10



Société Générale S.A.
Capital: 1,009,897,173,75 EUR
552 120 222 RCS Paris

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This Privacy Policy is issued by: Data Controller

Société Générale S.A. Oddział w Polsce, ul. Marszałkowska 111, 00-102 Warszawa

This Privacy Policy sets out:

1. Information concerning the purposes of processing, their legal bases, the categories of data and the retention of data;
2. Communication to third parties;
3. Transfers outside the European Economic Area;
4. Communication with data subjects in relation to their rights under the GDPR (Global Data Protection Regulation); and;
5. Security of processing.
6. Contacts details

Société Générale, as data controller, will collect and process personal data from their clients and prospective clients ("**Clients**").

By this Policy individuals as Clients, clients' employees and legal and other professional representatives ("**Data Subjects**") will be informed about personal data collection and data processing.

This Policy may be amended or updated from time to time to reflect changes in practices with respect to the processing of personal data or changes in applicable law.

Relevant websites' privacy policy will be inserted in terms and conditions of each websites including personal data provisions and cookies policies.

1. Processing purpose

1.1. Categories of Personal Data

In the course of its banking relationship with Clients, Société Générale will, in compliance with EU data protection legislation (regulation (EU) 2016/679), collect and process the following personal data relating to its Clients, their employees and legal and other professional representatives ("Data Subjects"), as:

- Personal details: Identity and other elements of civil status; Identity documents;
- Contact details: as name, email address, job title,
- Employment details: Information relating to their professional and (where relevant) financial status.

1.2. Processing purposes

Processing purposes are detailed in annexe n°1

Main purposes of processing are:

1.2.1. Administering and operating account and providing and managing products and services, assessing credit worthiness, offering products and services.

Société Générale will collect information about individuals:

- during the product/service application process, the subscription and use of products and services, communication of orders and transactions; or
- from third parties authorized to communicate such information (commercial information registers, other public resources available to banking and financial institutions).

1.2.2. 1.1.2. Participating in the prevention and detection of fraud and related crimes, producing statistics, management information and executing tests, complying with anti-money laundering, terrorism and related legislation and complying with other legal and regulatory obligations.

Personal data will also be processed for the purposes of complying with statutory and regulatory requirements to which Société Générale is subject, particularly in matters concerning identification controls, checking transactions, operational risk management, the prevention of conflicts of interests, the prevention of the fraud, the fight against money laundering and financing of terrorism.

Furthermore, Société Générale will, in accordance with applicable legal requirements relating to the provision of financial services, record electronic communications (telephone, instant messaging, SMS messages, e-mail and all other means of electronic communication) with its Clients and counterparts to ensure the control and the security of transactions and service quality.

1.2.3. 1.1.3. Marketing purposes (unless Clients tell us not to), organising commercial events, offering new services, and conducting statistical and private capital surveys (including behavioural surveys).

1.3. Legal Basis for processing

Information on detailed legal basis are provided in annex n^o1.

Certain personal data will be used by Société Générale to provide Clients with the products or services requested, as necessary for the performance of any contracts to which Data Subjects are a party or in order to take steps at the request of Data Subjects prior to entering into a contract.

Some of processing defined are necessary for Société Générale's **legitimate interests**.

Personal data will also be processed for the purposes of complying with statutory and regulatory requirements (**legal obligation**) to which Société Générale is subject, particularly in matters concerning identification controls, checking transactions, operational risk management, the prevention of conflicts of interests, the prevention of the fraud, the fight against money laundering and financing of terrorism.

Legal basis of prior consent will be used in relating of processing that would require it and prior consent is not used when processing is necessary to provide services and products or in connection with processing necessary or compulsory.

1.4. Retention of data

Société Générale will retain personal data only for the minimum period necessary for the purposes set out in this Policy. Criteria used to determine the retention period are detailed in annex n^o1.

2. Communication with third parties

Société Générale will disclose personal data to other legal entities within the Société Générale Group for the purpose of managing their banking relationship, managing products and services, executing the account holder's orders and transactions, managing accounting procedures of the Group, notably when pooling resources and services with the Société Générale group.

In addition, Société Générale entrusts certain operational functions to other entities of the Société Générale Group or to service providers chosen for their expertise and reliability to provide specific services. In such cases, Société Générale will take all physical, technical and organizational measures necessary to ensure the security and confidentiality of personal data.

3. Application of European Union data protection rules regarding the transfer of personal data outside the European Economic Area

Owing in particular to the international nature of Société Générale group, and in order to optimize quality of service, the communication of information mentioned above may involve the transfer of personal data to countries outside the European Economic Area, whose legislation on the protection of personal data is different from that of the European Union.

Where Société Générale is transferring personal data outside the European Economic Area (except where the relevant country has been determined to ensure an adequate level of data protection by the European Commission or Société Générale needs to make the transfer in order to perform a contract concluded in the interests of the relevant individual) Société Générale will ensure that the personal data are protected including by the incorporation of standard clauses approved for this purpose by the European Commission in the applicable agreement with the relevant third party. by suitable Standard Contractual Clauses or other appropriate safeguards.

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For further information about safeguards applied to international transfers of personal data, please us contact details below.

Furthermore, Société Générale may also disclose personal data, upon request, to the official organs and administrative or judicial authorities of a country, located within or outside the European Economic Area, particularly in the context of the fight against money laundering and terrorist financing.

4. Communication with data subjects in relation to their rights under the GDPR (Global Data Protection Regulation)

Data Subjects have rights under data protection legislation to:

- access personal data;
- have personal data rectified or erased;
- restrict or object to the processing of personal data;
- receive personal data in a structured, commonly used and machine-readable format.

Data Subjects may also, in certain circumstances, object to the processing of personal data, including, as individuals, not to receive direct marketing information.

Data controller contact details

If Data Subjects wish to exercise any of these rights, please contact us at

PL-SGV-ADO-DC@sgcib.com

Data Protection Officer contact details

PL-SGV-IOD-DPO@sgcib.com

Individuals concerned can lodge complaints about processing of their personal data with a Data Protection Authority [*as Commission Nationale de l'Informatique et des Libertés (CNIL), In France*].

5. Security of processing

Société Générale takes all physical, technical and organizational measures needed to ensure the security and confidentiality of personal data, particularly in view of protecting it against loss, accidental destruction, alteration, and non-authorized access.

6. Contact details

In case of any questions or concerns about any information in this Policy, please contact

Data controller contact details

PL-SGV-ADO-DC@sgcib.com

Data Protection Officer where applicable

PL-SGV-IOD-DPO@sgcib.com

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Glossary of terms

Personal data

Information relating to an identified or identifiable natural person (“data subject”). An identifiable natural person is one who can be identified directly or indirectly.

Controller

Entity which determines the purposes and means of processing data

Processing

Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means.

Processor

Any person or entity which processes personal data on behalf of the controller.

* * *