

Client Personal Data Protection

Professionals

Retail Banking

In this Privacy Policy, “Société Générale”, “we” and “our” designate

“Société Générale, Société Anonyme incorporated in France, under registration number RC2 552 120 222, whose principal place of business is at 29 Boulevard Haussmann 75009 Paris.

About this Privacy Policy:

Société Générale, French retail banking, has built with its clients close and sustainable relationships based on mutual trust.

In order to maintain trust, we consider the security and protection of your data as our unconditional priority.

Société Générale respects all applicable French and European regulations relative to data protection.

As data controller, we would like to inform you about categories of data we collect, processing we set up and the rationale behind, and finally about your rights and channel contacts or appeal at your disposal.

This Privacy Policy refers and applies to clients, legal or contractual representatives of Société Générale’s clients and potential business relationships (hereafter referred to together as the “Clients” or “you/ your/yours”)

This Privacy Policy includes in particular:

1. Information about categories of personal data we process
2. Processing purposes
3. Lawful basis for processing personal data
4. Information on communication to third parties
5. Transfers outside the European Economic Area (EEA)
6. Retention of data
7. Your rights under the GDPR
8. Information on data security

This Privacy 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.

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1- Information about categories of personal data we process

During the banking relationship, Société Générale will collect and process the following personal data:

- Identification data: name, surname, gender, date of birth, identity documents, specimen signature, etc.;
- Contact details: addresses, email addresses, telephone number, etc.;
- Personal details: civil status; matrimonial regime, number of children and their age, etc.;
- Professional details: job title and information relating to professional status;
- Economic and financial information: revenues, financial and fiscal situation, banking transactions data;
- Login information linked to online services: personal identifying data used to access to connected spaces, logs, cookies, navigation data of Société Générale websites and applications;
- Conversations and communications with us including phone calls, electronic mails, instant messages, communication on social networks or any other type of communication;
- Life habits and preferences: data linked to subscribed services and products, data issued from interactions between you and your agency.

Personal data are collected either directly from Clients, or when necessary to achieve purposes listed in point 2, either from Société Générale entities or from relevant public sources.

2- Processing purposes

Société Générale sets out the purposes for which personal data listed in point 1 are processed:

- Management of the banking and/or insurance relationships, including:
 - Administration, management and operation of account(s) and products and services subscribed;
 - Execution of the Clients orders and transactions;
 - Management, study and granting of loans and risk selection;
 - Debt collection or disposal, management of payment incidents;
 - Identification of accounts and safe-deposit box of deceased persons;
 - Claims management.
- Respect of legal and regulatory requirements to which Société Générale is subject, especially regarding:
 - Management of operational risk, including the security of IT networks and transactions, and the use of international payments;
 - Prevention of the fiscal fraud;
 - Fight against money laundering and financing of terrorism;
 - Compliance with legislation applicable to international sanctions and embargos;

- Request of any court of any relevant governmental authority or jurisdiction.
- Marketing purposes and personalisation of products and services:
 - Organisation of commercial events and surveys;
 - Improvement and personalisation of service offers and products according to your situation and habits;
 - Production of statistical and marketing studies.

3- Lawful basis for processing personal data

Processings listed in point 2 are based on:

- Execution of the banking and/or insurance relationship;
- Compliance with legal and regulatory requirements to which Société Générale is subject;
- Legitimate interests of Société Générale in accordance with your fundamental rights and freedoms (for example: commercial prospection);
- If necessary, in the case of processing not referred to in point 2, your consent, that you may withdraw at any time.

4- Information on communication to third parties

Société Générale may communicate personal data, as and when required:

- to other legal entities within the Société Générale Group, as well as its contractual partners, brokers, and insurers, subcontractors and service providers, within the limits necessary for the execution of the purposes described in point 2;
- to the official organs and competent administrative or judicial authorities, within the limits authorised by the applicable regulation;
- to regulated professions such as auditors, lawyers when they have to provide regulatory reportings or to act in defence of our rights.

5- Transfers outside the European Economic Area (EEA)

Given the international dimension of the Société Générale Group, processings mentioned in the point 2 may involve the transfer of personal data outside the EEA, whose legislation on the protection of personal data is different from that of the European Union. In this case, these transfers are processed in a manner that guarantees and ensures appropriate security and confidentiality of the personal data.

As such, Société Générale takes all physical, technical and organizational measures needed to ensure the security and confidentiality of personal data which may be communicated to the official organs and administrative or judicial authorities of a country, particularly in the context of the fight against money laundering and terrorist financing, the fight against the fraud and for the determination of the tax status.

6- Retention of data

Société Générale retains personal data only for the minimum period necessary for the purposes set out in the point 2 and especially:

- For management of banking and insurance relationships, Société Générale will keep personal data of its Clients during the contractual relationship and, if applicable, for further period provided for by applicable law.
- For legal and regulatory requirements, Société Générale will keep personal data of its Clients only during the delay mentioned for by the applicable law, or necessary to comply with it where the law not mentioned a specific delay. In case of complaints or legal action, Société Générale will keep the necessary data until the prescription period of the related legal actions.
- For any commercial prospecting or advertising campaigns, Société Générale may keep the personal data of its targeting clients and non-client prospect for three years from the end of the business relationship or three years from the last contact with the prospect.

All the retention periods specified above are defined in accordance with the general conditions applicable to Société Générale's accounts and products, being reminded that these conditions must prevail over the present Privacy Policy in case of difference of interpretation.

7- Your rights under the GDPR

You have the right to request access to your personal data, request their rectification and erasure, object their processing, request the restriction of their processing and request their portability in the conditions defined by the applicable regulations. You also have the right at any time to object to processing your personal information when there is something about your particular situation which makes you want to object to processing on this ground or to define general or specific guidelines concerning the fate of your personal data in case of death. It is stated that the exercise of those rights may cause the impossibility to provide in some cases the product or the service.

You also have the right at any time, without charge and without giving any reason to object to processing your personal information for commercial prospection purposes.

To exercise these rights, please contact your agency or Société Générale at the following address: Société Générale – Service Protection des données personnelles - CPLE/BDF/CPD – 75886 Paris Cedex 18.

You also have the right to contact the Data Protection Officer at the following email address: protectiondesdonnees@societegenerale.fr. You have the right to lodge a complaint with the Commission Nationale de l'Informatique et des Libertés (CNIL), the French supervisory authority in charge of compliance with obligations regarding personal data.

8- Information on data security

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.