

Societe Generale Bank - Cyprus Privacy Statement

Societe Generale Bank – Cyprus Limited (referred to as ‘we’, ‘us’, ‘our’, ‘SGBCy’ or the ‘Bank’) is dedicated to ensure that your privacy is protected and that your data will be handled in an open and transparent manner.

This privacy statement will provide to you information as to how the Bank collects and process your personal data, what your rights under the EU General Data Protection Regulation (‘GDPR’) are and when the Bank shares your personal data either with other members of Societe Generale Group or third parties.

1. Who we are

SGBCy is a licensed credit institution registered in Cyprus under registration number HE 31003 and has its registered office at 88 Dighenis Akritas & 36 Kipranoros Street, 1061 Nicosia, Cyprus.

If you have any questions, or want more details about how we use your personal information, you can contact our **Data Protection Officer** at 88 Dighenis Akritas & 36 Kipranoros Street, 1061 Nicosia, Cyprus, email: dpo.sgbcy@socgen.com.

2. What personal data we process and where we collect it from

We collect and process different types of personal data, depending on the service or product that existing or prospect clients are interested in. Personal data are received directly from our clients or via their representative or via our e-banking or our website, in the context of our business relationship.

We may also collect and process personal data which we lawfully obtain from other entities within Societe Generale Group, or other third parties such as Artemis Bank Information Systems Limited and Public Authorities or from publicly available sources such as the Bankruptcy Archive, the Department of Registrar of Companies and Official Receiver and the Land Registry.

3. Whether you have an obligation to provide us with your personal data

In order to establish a business relationship with you, you must provide us with certain personal data in order to perform our obligations as a banking institution. Such obligations include our duty to collect personal data in order to verify your identity before establishing a business relationship with you or the legal entity you

represent. This obligation is imposed to banking institutions under the Money Laundering Law provisions.

In light of the above, kindly note that in case you object in providing us with certain personal data, we reserve the right to discontinue our business relationship or reject your application.

4. Why we process your personal data and on what legal basis

Your personal data is processed in accordance with the GDPR for one or more of the following reasons:

A. For the performance of a contract: performance of banking transactions and offer of financial services following a contract with our client and/or completion of our acceptance policy in order to enter into a contract with a prospect client.

B. For compliance with a legal obligation under various laws such as the Cyprus banking law, the Money Laundering Law, the Cyprus Investment Services Law, Tax laws, Law on Deposit Guarantee and Resolution of Credit and Other Institutions Scheme, Payments Law and/or under regulations/directives of our supervisory authorities such as the European Central Bank, the European Banking Supervisory Authority, the Cyprus Central Bank, the Cyprus and Securities Exchange Commission.

C. For the purposes of safeguarding legitimate interests pursued by us or by a third party such as:

- Initiating legal claims and preparing our defence in litigation procedures,
- Means and processes we undertake to provide for the Bank's IT and system security, preventing potential crime, asset security, admittance controls and anti-trespassing measures,
- Setting up CCTV systems, e.g. at ATMs, for the prevention of crime or fraud,
- Measures to manage business and for further developing products and services,
- Sharing your personal data within the Societe Generale Group for the purpose of updating/verifying your personal data in accordance with the relevant anti-money laundering compliance framework,
- The transfer, assignment (whether outright or as security for obligations) and/or sale to one or more persons (including the Cyprus Central Bank) of and/or charge and/or encumbrance over, any or all of the Bank's benefits, rights, title or interest under any agreement between the client and the Bank.

D. You have provided us with your explicit consent for processing. Such consent may be revoked by you at any time with immediate effect. However, any processing of personal data prior to the receipt of your revocation will not be affected.

5. Who receives your personal data

In the course of the performance of our contractual and statutory obligations your personal data may be provided to various departments within the Bank but also to other companies of the Societe Generale Group. Various service providers and suppliers may also receive your personal data so that we may perform our obligations. Such service providers and suppliers enter into contractual agreements with the Bank by which they observe confidentiality and data protection according to the GDPR.

6. Transfer of your personal data to a third country or to an international organisation

Your personal data may be transferred to third countries [i.e. countries outside of the European Economic Area]. Processors in third countries are obligated to comply with the European data protection standards and to provide appropriate safeguards in relation to the transfer of your data in accordance with GDPR Article 46.

7. To what extent there is automated decision-making and whether profiling takes place

In establishing and carrying out a business relationship, we generally do not use any automated decision-making.

8. How long we keep your personal information for

Your personal data will be kept by the Bank for as long as there is a business relationship between you and us.

Upon the termination of our business relationship, your personal data will be kept by SGBCy for ten (10) years in accordance with the directive of the Data Protection Commissioner. However, this period of time may be extended to twelve (12) years for legal and/or regulatory reasons.

For prospect clients, the retention period of their personal data is six (6) months from the date of notification of the rejection of your application for banking services

and/or facilities or from the date of withdrawal of such application, as per Data Protection Commissioner directive.

9. Your rights under the GDPR

You have the following rights in terms of your personal data we hold about you:

- **Receive access to your personal data,**
- **Request correction [rectification]** of the personal data we hold about you,
- **Request erasure of your personal information,** also known as the ‘right to be forgotten’,
- **Object to processing of your personal data** under specific circumstances,
- **Request the restriction of processing** of your personal data,
- **Request to receive a copy** of the personal data concerning you in a format that is structured and commonly used and transmit such data to other organisations, also known as the ‘right to data portability’,
- **Withdraw the consent that you gave us** with regard to the processing of your personal data at any time.

To exercise any of your rights, or if you have any other questions about our use of your personal data, please contact your account manager, or visit any branch of the Bank, or contact our Data Protection Officer at dpo.sgbcy@socgen.com.

Right to lodge a complaint

If you have exercised any or all of your data protection rights and still feel that your concerns about how we use your personal data have not been adequately addressed by us, you have the right to complain by completing our on line contact form <http://www.sgcyprus.com/sqbcy/Contact-Us>. You also have the right to complain to the Office of the Commissioner for Personal Data Protection. Find out on their website how to submit a complaint (<http://www.dataprotection.gov.cy>).

Note:

The General Data Protection Regulation (EU) 2016/679 is applicable as of the 25th of May 2018.