



SOCIETE GENERALE BANK-CYPRUS

Privacy Notice

This Privacy Notice aims to bring to your attention how SOCIETE GENERALE BANK - CYPRUS LIMITED (the “Bank”) processes, shares and retains personal data when providing its services to you as a physical person related to a company which is a customer of the Bank (e.g. Director, Trustee, Representative, Officer, Authorised Signatory, Ultimate Beneficial Owner) (“you”, “data subject”, “Customer”), as well as what your data privacy rights are and how you can exercise those rights.

For a more detailed analysis on how we process your personal data in the course of providing our services and products you can always read our Privacy Policy on our website (<http://www.sgcypus.com>).

DATA CONTROLLER DETAILS

The Bank is the data controller of the processing of personal data as described in this Privacy Notice. This means that the Bank is responsible for the lawfulness of the processing and also determines the purposes and the means of processing.

For any question about this Privacy Notice or any other related inquiries/complaints, please contact the Bank’s Data Protection Officer by email or by post.

Our Data Protection Officer's contact details are:

E-mail: dpo.sgbcy@socgen.com

Tel.: +357 22 399 741

Address: 88, Dighenis Akritas & 36 Kypranoros Street, 1061 Nicosia, Cyprus

CATEGORIES OF PERSONAL DATA

The Bank may process the following categories of personal data when providing its services to you (the list below is not exhaustive as the Bank may need to collect additional information about you, especially when carrying out its legal obligations):

Identity data, such as: full name, Title, ID/Passport details, Date/place of birth;

Contact details, such as: address, Telephone number, email, fax;

Financial/Transactional data, such as: Income, information regarding immovable properties, financial wealth;

Background/educational/employment/personal life data, such as: Family details, profession/occupation, educational level, employer details, data related to your life and pension/car/home/health insurance scheme;

Technical data, such as: Information on the devices and technology you use when accessing or using our services;

Criminal records in the course of conducting Background Checks and Due Diligence pursuant to Anti-Money Laundering Law.

The above records will be processed by the Bank for one or more of the following purposes:

- (a) The processing of any application submitted by you for the provision to you of any service or product or transaction, including, among others, any form of financial, credit or investment services;
- (b) The facilitation, promotion and completion, in any manner, of the provision to you of any of the services or products or transactions mentioned in (a) above;
- (d) Debt collection, credit assessment, confirmation of your identity, the prevention of fraud or other offences such as money laundering;
- (e) The statistic and historic analysis and scientific research by the Bank, any associate or representative of the Bank, whether in Cyprus or abroad;
- (f) The promotion of the sale of products or provision of services, which may include your notification in any way of any service or product or scheme offered by the Bank, provided that you consent to being so notified by signing the attached statement of consent.

WHAT HAPPENS IF YOU DO NOT PROVIDE THE PERSONAL DATA?

Where the legal basis to process your personal data is the legal or contractual obligation or our legitimate business interests, and you fail to provide that necessary data when requested, we may not be able to perform or take the steps to enter into a contract with you as Customer. In this case, we will notify you that we have to postpone or cancel the offering of a product or of service with you.

LEGAL BASES

The Bank may process personal data relating to you:

- When we have a legal obligation or other regulatory obligations require us to do so (for example, requirements from Central Bank of Cyprus and Anti-money laundering authorities);
- In order to perform a contract between you and the Bank or to take steps at your request prior to entering into a contract;
- In order to pursue our legitimate interests, provided that those interests are not overridden by your fundamental rights and freedoms;
- When we need to obtain your specific consent to do so.

SOURCES AND RECIPIENTS

We mainly collect your personal data directly from you through our application forms, during our meetings with you, by telephone or email or other electronic means such as the website and the mobile banking app. In addition, we may collect your personal data directly from you when you use our telephone enquiry services, visit the Bank's branches, use our websites or mobile applications or when you otherwise provide information to us.

Furthermore, we may collect or request to receive personal data about you from third parties, such as credit reference services or other financial institutions and Anti-money laundering check agencies.

We may share your personal data with sub-contractors who process the data on behalf of the Bank for the purposes of providing secure and efficient services on the basis of our legitimate interests or other regulatory or supervisory authorities and bodies for the purpose of complying with a legal obligation.

DATA RETENTION

The Bank will store and retain your personal data for as long as:

- we have a Customer relationship with you; or
- we require the data in order to comply with specific legal or regulatory obligation.

We shall retain your personal data for a period of up to ten (10) years after termination of our contractual/business relationship with you and / or the closure of the accounts with us and only in those cases where there are no financial / legal or other outstanding disputes with the Bank. In case during those 10 years a notice is received from the Tax Commissioner for an investigation of fraud/wilful default then the 10 years' period is extended to 12 years.

In the case of prospect Customers where a contractual / business relationship with the Bank has not been completed and / or has not been established, the retention period is set at six (6) months from the date of notification of the rejection by the Bank or the withdrawal of the application by the data subjects.

YOUR RIGHTS

As data subjects, you have the following rights under data protection law. *(Please note that these rights are not absolute, are subject to various exceptions and their applicability will depend on the legal basis on which the Bank relies in each case):*

- The right to be informed about how your personal data are processed by the Bank and request access to your personal data;
- The right to correct inaccurate or incomplete personal data;
- The right to request the erasure of your data, especially when there is no longer any legal basis or purpose for processing or when the processing was illegal;
- The right to restrict the processing, for example when you object to the processing, but we need to verify if we have legitimate grounds to continue the processing;

- The right to object to the processing, especially when the Bank relies on its legitimate interests;
- The right to request that your data is delivered to you in a commonly used form or transferred to another data controller;
- The right not to be subject to automated decision-making (including profiling);
- The right to withdraw consent where the processing was based on your consent. When the sole purpose of processing is to provide direct marketing to you, your right to withdraw your consent is absolute;
- The right to lodge a complaint with the Office of the Commissioner for Personal Data Protection (commissioner@dataprotection.gov.cy).

You may exercise your rights at any given time by sending your request in writing to the Bank's Data Protection Officer by email to dpo.sgbcy@socgen.com or by post to 88, Dighenis Akritas & 36 Kypranoros Street, 1061 Nicosia, Cyprus.

The Bank will respond to your request within one month, unless the request is very complex or excessive, in which case we may need two additional months. Please note that the Bank will ask the data subject or the authorised requestor to provide some proof of identification in order to avoid personal data from being disclosed to unauthorised persons.

DATA TRANSFERS

As mentioned above, the Bank may share your personal data within the Société Générale Group or to a third country outside the European Economic Area (EEA) in accordance with the necessary and appropriate safeguards provided under the GDPR and/or local data protection law.

However, in the absence of such appropriate safeguards there may be circumstances where the data can be transferred. For example, where we have obtained your explicit consent; the transfer is necessary for the performance or a conclusion of a contract we have with you; the transfer is necessary for important reasons of public interest; or the transfer is necessary for the establishment, exercise or defence of legal claims.

SECURITY

The Bank has taken serious efforts to secure your data and ensure the confidentiality, integrity and availability of your data. We have put in place appropriate technical and organisational measures to prevent a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to your personal data. In the case of a data breach we will notify you and the Data Protection Commissioner where we are legally required to do so.

We have also adopted measures to limit the process and access to your personal data only to those authorized members of staff, partners and other third parties.

MODIFICATIONS

The Bank may amend this Notice in accordance with any amendments to (i) the applicable laws, rules, ordinances and prescribed standards in Cyprus and/or EU, or (ii) the Bank's internal rules, instructions and guidelines relating to the protection of personal data.