



SOCIETE GENERALE BANK-CYPRUS

## **“BANKING WITH SGBCY” MOBILE APPLICATION PRIVACY NOTICE**

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 Policy aims to explain how the Bank processes, shares and retains your personal data when providing its services to you through our mobile banking application ‘Banking with SGBCy’ (the “App”), 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.sgcyprus.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](mailto:dpo.sgbcy@socgen.com)

Tel. +357 22 399 741

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

## **1. PURPOSES OF PROCESSING YOUR PERSONAL DATA**

The Bank may process the personal data concerning Customers to allow the sound and secure processing of transactions via its App and to ensure that Customers receive the highest level of service in the provision of products and services.

## **2. TYPES OF PERSONAL DATA WE PROCESS**

The Bank may process the following categories of personal data when providing its services to you via the App (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: Account information, transaction history and details, information regarding immovable properties;

Device settings and authentication data, such as: location data, and analytical data, login credentials, unique device identification number, device Internet Protocol (“IP”) address, device name, operating system version;

Marketing and cookies preferences.

## **3. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA**

The Bank may process your personal data via the App mainly:

- 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, namely to better understand your needs and difficulties while using the App, to improve the performance and capabilities of App or to tailor the content and the services that the Bank is providing via the App;

- In order provide marketing to you or improve the overall experience when using the App. When providing marketing and using cookies we will rely on your specific consent. You will have the option to easily change your preferences at any given time.

Please note that the Bank reserves the right to contact you or send notifications or messages via the App to provide you with information regarding important changes or developments relevant to our services, such as changes to our terms and conditions, overdraft notifications, changes/updates on our systems etc. This type of communication will not constitute direct marketing. Thus, we may send such informative messages on the basis of the Bank's legitimate interest and our responsibility to perform our obligations towards you.

#### **4. 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 via the App. 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.

#### **5. SECURITY MEASURES**

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. If such breach occurs will notify you and/or any applicable the Supervisory Authority where we are legally required to do so

The Bank shall ensure that any agent or service provider of the Bank which receives or has access to data and personal information of the Bank's Customers shall also maintain strict controls over such personal information to ensure confidentiality.

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

More specifically, the Bank has implemented the following security measures:

(i) Encryption: Critical personal data on the App platform are encrypted. All channel between mobile and servers are also encrypted;

(ii) Sandbox protection: The App runs its own sandbox and will not run on any mobile device that has been rooted or jail broken;

(iii) Remote Wipe: The Bank can remotely wipe the App and keychain data if the PIN Code is misused or the mobile phone is lost. Wiping Customers' personal data information includes wiping the keys used to encrypt said data and information;

(iv) Time Out: The App automatically locks after a period of inactivity. The PIN Code must be reentered to unlock the application;

(v) Update: Customers are compelled to use the latest version of the Bank mobile application "Banking with SGBCy".

(vi) Authentication Processes: The Bank has implemented a series of authentication processes for full access of its mobile application “Banking with SGBCy” (i.e. first time authentication by insertion of username and password, using security PIN, Transfer PIN, etc.).

Biometric data:

Please note that, where the App provides the option to use biometric characteristics (such as FaceID, Android Fingerprint, Touch ID etc.) as a method of authenticating the App user :

- The Bank does not store or have access to these data.
- The Bank is not responsible for any transactions or any other action via the App carried out with the use of biometric characteristics of third parties which have been saved on the App user’s device.
- The User is fully responsible for using such authentication method and for making sure that the biometric characteristics of third parties are not saved on their device.

## **6. 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 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](mailto: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 [dpo.sgbcy@socgen.com](mailto: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.

## **7. 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 defense of legal claims.

## **8. “BANKING WITH SGBCY” GENERAL CONDITIONS OF USE**

This Policy is part of the General Conditions of Use of the Bank mobile application “Banking with SGBCy”. In case of discrepancy between the provisions of this Policy and the provisions of the General Conditions of Use of the Bank mobile application “Banking with SGBCy” the latter shall prevail.

## **9. 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.