

ODDO BHF SCA
Privacy Policy



ODDO BHF

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1. INTRODUCTION

ODDO BHF SCA («**ODDO BHF**», «**we**» or **us**), located at 12 boulevard de la Madeleine, 75009 Paris, is committed to protect your personal data and privacy, and to ensure the security and confidentiality of the information entrusted to us.

ODDO BHF, as data controller, undertakes in particular to comply with French Act No. 78-17 of January 6, 1978 relating to information technology, files and freedoms, as amended (the «**French Data Protection Act**»), Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on the protection of individuals with regard to the processing of personal data and on the free movement of such personal data (the «**GDPR**»), as well as the Directive 2009/136/EC of the European Parliament and of the Council of 25 November 2009 («**ePrivacy Directive**»).

The purpose of this policy is to inform you about the processing of your personal data by ODDO BHF and, in particular, the category of personal data collected by ODDO BHF, the purposes for which we use them, the recipients with whom we share these personal data, the retention period during which we keep them and the rights you have over your personal data.

ODDO BHF has appointed a Data Protection Officer (DPO) who can be contacted as follows:

- By post to: DPO de ODDO BHF SCA
12 Bd de la Madeleine
75440 Paris Cedex 09
- By email: dpo@oddo-bhf.com

2. DOES THIS INFORMATION NOTICE APPLY TO YOU?

You are concerned by this policy as a natural person, if you are («**You**»):

- Current customer, former customer, prospect interested in our products or having subscribed to our newsletters or interacted with us on social networks;
- Candidate for an ODDO BHF job offer;
- Journalist in contact with our press services;
- A member of our customer's family;
- An heir or beneficiary of a life insurance contract
- Visitor of the ODDO BHF's website.

As a professional, you are also concerned by this policy if you are:

- Representative, director, shareholder, manager or beneficial owner of companies that are prospects, customers or in a business relationship with ODDO BHF;
- An authorized agent or signatory.

When you provide us with personal data relating to other natural person, remember to inform them of the communication of their data and invite them to read this policy. We take care to do the same whenever we can (i.e. when we have the persons' contact details).

3. WHAT TYPES OF PERSONAL DATA DO WE COLLECT?

Personal data is any information relating to an identified or identifiable natural person.

A natural person can be identified directly (surname and first name) or indirectly (telephone number or online identifier, postal or e-mail address, etc.).

3.1 The personal data that may be processed by ODDO BHF are:

- **Identification information** as an example: surname, first name, nationality, date and place of birth, copy of identity document, signature.
- **Information about personal and/or professional contact** as an example: telephone number, postal address, e-mail.
- **Information on your career** as an example: data on your CV, work experience, qualifications, date of birth, photo, etc.
- **Information on legal representatives** as an example: identity and titles of managers, partners, agents and beneficial owners or legal representative of a child.
- **Information on your tax status** as an example: income tax levels, tax number.

- **Information about your family and property situation** as an example: assets owned, marital status, number of children, information on origin and destination of funds, information on the income of the customer's beneficial owner, Information collected as part of internal controls.
- **Information about your investment knowledge and experience** as an example: MiFID questionnaire, diplomas, investor qualification.
- **Information relating to your transactions** as an example: instructions, transaction history, transactions generated on your accounts, complaints, information on origin and destination of funds.
- **Information relating to commercial relations** as an example: letters, e-mail addresses, telephone conversations.
- **Information collected for events** as an example: meetings, events, webinars.
- **Information we attribute to you** as an example: customer number, account number.
- **Information relating to the use of the website** as an example: authentication data to access the online account, cookies, tracers, logs and browsing data. To find out more about cookies, please refer to the cookie policy available on the ODDO BHF website.
- **Information on the use of IT tools** as an example: logs, account number, account password, browsing time, server return code, session ID.
- **Information about biometric data** as an example: biometric information, using a biometric recognition system (voice or facial recognition) for authentication purposes with electronic signature or recording your phone conversation when you place an order on the markets or video recording for safety and risk prevention.
- **Information for compliance purposes** as an example: criminal convictions or offenses, information on the income of the customer's beneficial owner, Information on origin and destination of funds.

3.2 What are the sources of this personal data?

Some personal data are provided directly by you, in particular when subscribing to our products and services and as part of the follow-up of the commercial relationship, when subscribing to ODDO BHF communications, when contacting our press services, or when applying for a position with ODDO BHF. When you have subscribed to our products and services through a financial advisor or broker, some of the personal data listed above may be provided to us by them.

In addition, we may collect or obtain your personal data from contracts and administrative documents as part of your contractual or pre-contractual relationship with ODDO BHF.

We may also collect information about you from third parties. This may be the case, for example, when your employer provides us with information about you, or when your contact details are provided to us by one of our customers, in the event that you are for example:

- A family member, heir or beneficiary of a life insurance contract;
- Legal representative (mandates/delegations of authority);
- Company shareholder(s);
- A member of staff of our service providers and business partners;
- Personal contact(s).

It is also possible that data concerning you may be collected from public registers or other third-party sources, in particular when we carry out checks in accordance with our regulatory obligations, such as the fight against money laundering and the financing of terrorism, or when we apply national or international financial sanctions or information on beneficial owners collected from public authority databases.

4. WHY AND ON WHAT LEGAL BASIS DO WE PROCESS YOUR PERSONAL DATA?

The legal bases and purposes for which your personal data are collected and processed by ODDO BHF are as follows:

4.1 The performance of a contract to which you are a party or the performance of pre-contractual measures taken at your request (Art 6 (1) b) GDPR)

We process your personal data to conclude and perform our contracts, in particular to:

Purposes of Processing	Categories of Personal Data
Subscribing and opening your account or life insurance contract.	<ul style="list-style-type: none"> • Identification information • Information about personal and/or professional contact • Information we attribute to you • Information concerning the follow-up of the commercial relationship • Information on legal representative • Information on your tax status • Information about your family and property situation • Information about your investment knowledge and experience
Provision of information on products and services subscribed to	<ul style="list-style-type: none"> • Identification information • Information about personal and/or professional contact • Information relating to commercial relations
Management of your online account	<ul style="list-style-type: none"> • Identification information • Information about personal and/or professional contact • Information we attribute to you • Information relating to commercial relations • Information on the use of IT tools
Assistance and response to your requests	<ul style="list-style-type: none"> • Identification information • Information about personal and/or professional contact
Manage your applications to job offer	<ul style="list-style-type: none"> • Identification information • Information about personal and/or professional contact • Information on your career

4.2 Compliance with a legal or regulatory obligation (Art. 6 (1) c) GDPR)

We use your personal data to comply with various legal and regulatory obligations to which we are bound, including:

Purposes of Processing	Categories of Personal Data
Fight against money laundering (including Loi Sapin II) and the finance of terrorism	<ul style="list-style-type: none"> • Information about your family and property situation • Information about personal and/or professional contact • Information we attribute to you • Information on legal representative • Information on your tax status • Information relating to your transactions • Information for compliance purposes
The fight against tax evasion	<ul style="list-style-type: none"> • Identification information • Information about personal and/or professional contact • Information we attribute to you • Information on legal representative • Information on your tax status • Information about your family and property situation • Information about your investment knowledge and experience • Information relating to your transactions • Information for compliance purposes
Compliance with MIFID II (Market in Financial Instrument Directive II”) and DDA (“Insurance Distribution Directive”) regulations	<ul style="list-style-type: none"> • Identification information • Information about personal and/or professional contact • Information we attribute to you • Information on legal representative • Information on your tax status • Information about your family and property situation • Information about your investment knowledge and experience • Information relating to your transactions • Information for compliance purposes

Purposes of Processing	Categories of Personal Data
Compliance with national and international financial sanctions	<ul style="list-style-type: none"> • Identification information • Information about personal and/or professional contact • Information we attribute to you • Information on legal representative • Information on your tax status • Information about your family and property situation • Information relating to your transactions • Information for compliance purposes
Processing of data subjects' requests	<ul style="list-style-type: none"> • Identification information • Information about personal and/or professional contact • Information relating to the use of the website • Information relating to your transactions
Checks to be carried out on dormant accounts	<ul style="list-style-type: none"> • Identification information • Information about personal and/or professional contact • Information we attribute to you • Information on legal representative • Information on your tax status • Information about your family and property situation • Information relating to your transactions • Information for compliance purposes
Preventing and detecting corruption and influence peddling	<ul style="list-style-type: none"> • Identification information • Information about personal and/or professional contact • Information we attribute to you • Information on legal representative • Information on your tax status • Information about your family and property situation • Information about your investment knowledge and experience • Information relating to your transactions • Information for compliance purposes
Reporting to public authorities in application of regulatory duty (e.g. EMIR, MIFIR, FICOBA etc.)	<ul style="list-style-type: none"> • Identification information • Information about personal and/or professional contact • Information we attribute to you • Information on legal representative • Information on your tax status • Information about your family and property situation • Information relating to your transactions • Information for compliance purposes
Recording of phone conversations (AMF regulation requirement)	<ul style="list-style-type: none"> • Identification information • Information about personal and/or professional contact • Information relating to your transactions • Information about biometric data

4.3 The pursuit of our legitimate interests (Art. 6 (1) f) GDPR), without these taking precedence over your interests or fundamental rights and freedoms

Where we base any processing of personal data on legitimate interest, we balance that interest against your fundamental rights and freedoms to ensure that there is a fair balance between them.

The processing operations based on legitimate interests are as follows:

Purposes of Processing	Categories of Personal Data
Managing the risks to which we are exposed, in particular fraud prevention, based on our legitimate interest in security and risk prevention	<ul style="list-style-type: none"> • Identification information • Information about personal and/or professional contact • Information we attribute to you • Information relating to commercial relations • Information for compliance purposes • Information relating to the use of the IT tools
The security of our information system and websites and its improvement based on legitimate interests related to security, risk prevention and service improvement	<ul style="list-style-type: none"> • Identification information • Information about personal and/or professional contact • Information we attribute to you • Information for compliance purposes • Information relating to the use of the website or IT tools

Purposes of Processing	Categories of Personal Data
Monitoring access to premises with video surveillance systems based on a legitimate interest in safety and risk prevention	<ul style="list-style-type: none"> • Identification information • Information about biometric data
Communication of information to legitimate third parties, such as lawyers, auditors and statutory auditors, based on a legitimate interest in the right to defense.	<ul style="list-style-type: none"> • Identification information • Information about personal and/or professional contact • Information we attribute to you • Information relating to commercial relations • Information on legal representative • Information on your tax status • Information about your family and property situation • Information about your investment knowledge and experience • Information relating to your transactions • Information collected as part of internal controls
Handling complaints and litigation based on the legitimate interest of improving services	<ul style="list-style-type: none"> • Identification information • Information about personal and/or professional contact • Information we attribute to you • Information relating to commercial relations • Information on legal representative • Information relating to your transactions • Information collected as part of internal controls
The sending of information about ODDO BHF products and services that we think may be of interest to you: management of your contact preferences, monitoring of the products presented to you and your interests, invitations to events, sending of satisfaction questionnaires about the products and services we offer, based on the legitimate interest linked to the communication of information about our products and services .	<ul style="list-style-type: none"> • Identification information • Information about personal and/or professional contact • Information we attribute to you • Information relating to commercial relations • Information relating to the use of the website
Standard profiling in order to personalize our products and offers: we carry out marketing profiling that has no legal effect on you, such as marketing segmentation in order to suggest services and products that are likely to meet your expectations/ needs, based on the legitimate interest linked to the communication of information about our products and services offer.	<ul style="list-style-type: none"> • Identification information • Information about personal and/or professional contact • Information we attribute to you • Information relating to commercial relations • Information relating to the use of the website

ODDO BHF does not use automated decision-making, including profiling, that will produce legal effects on you (Article 22 of the GDPR). If we use such methods in particular cases, we will inform you separately if required by law.

However, we may process information that does not identify any individual, meaning that is not a personal data (e.g., anonymous, aggregated data) without restriction.

4.4 Consent (Art. 6 (1) a) GDPR)

In certain cases, your consent is necessary for us to be able to process your personal data, in particular:

Purposes of Processing	Categories of Personal Data
Processing for purposes other than those described in the previous sections	<ul style="list-style-type: none"> • Identification information • Information about personal and/or professional contact • Information relating to commercial relations
The sending of communications and marketing operations carried out by ODDO BHF	<ul style="list-style-type: none"> • Identification information • Information about personal and/or professional contact • Information relating to commercial relations • Information relating to the use of the website
Use of browsing data (cookies) for marketing purposes	<ul style="list-style-type: none"> • Identification information • Information we attribute to you • Information relating to the use of the website

5. WITH WHOM DO WE SHARE YOUR PERSONAL DATA AND WHY?

As a financial institution, we are bound by professional secrecy and only share your personal data when strictly necessary or with your consent.

In particular, we may communicate your personal data to other ODDO BHF Group entities or to our service providers and subcontractors whose intervention is strictly necessary to satisfy the purposes described above. We ensure that the service providers we choose (e.g. information technology provider) comply with regulatory requirements to ensure the confidentiality and security of your personal data,

We also share your personal data with other third parties such as regulated professions such as lawyers, notaries, bailiffs, chartered accountants, auditors, with local or foreign financial, tax, administrative, criminal or judicial authorities, or with law enforcement authorities, government agencies or public bodies, to whom we are legally obliged to communicate data.

6. DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE EUROPE?

In the course of providing our services, your personal data may be transferred to countries that are not members of the European Economic Area («EEA»). These data transfers take place either to countries recognized by the European Commission as having a level of protection equivalent to that existing in the European Union or are based on one of the adequate safeguards provided for in Article 46 of the GDPR.

For example, our teams within our Tunisian 100% wholly owned affiliate, ODDO BHF Tunis, may access your personal data remotely to manage and administer our IT infrastructure and applications. This transfer is governed by the EU Standard Contractual Clauses issued and approved by the European Commission.

When we transfer your personal data outside the European Union, we implement appropriate and reasonable organizational and technical measures to guarantee the security and confidentiality of your personal data.

You can contact our DPO at the address given in the preamble to find out more about the appropriate safeguards implemented to transfer your personal data and obtain a copy.

7. HOW LONG DO WE PROCESS AND STORE YOUR PERSONAL DATA?

We will only process your personal data for as long as is necessary to fulfil the purposes described above and will destroy or render it anonymous once it is no longer required to fulfil these purposes, unless the retention of such data is necessary to comply with legal or regulatory requirements or is justified by the need to assert our rights as part of judicial actions, investigations or similar proceedings.

For more information on the retention periods for the personal data we process, you can freely contact our Data Protection Officer as referred below.

8. HOW DO WE PROTECT YOUR PERSONAL DATA?

We take care to minimize the collection of personal data, to keep it up to date and to ensure its security. Technical and organizational measures are implemented to guarantee the appropriate protection of your personal data against any unauthorized access, loss, destruction, modification or disclosure.

ODDO BHF's staff and partners are aware of personal data protection issues, trained, and undertake to guarantee the confidentiality and security of personal data to which they have access in the course of their duties and missions.

In the event of a breach of your personal data, presenting a risk to your rights and freedoms, we will notify the relevant breach to the competent personal data protection authority within the time limits prescribed by the GDPR.

In the event that this breach presents a high risk to your rights and freedoms, ODDO BHF also undertakes to:

- To notify you in the conditions prescribed by the GDPR;
- Provide you with the necessary information and recommendations to remedy the situation.

9. DO I HAVE A DUTY TO PROVIDE DATA?

Within the scope of our business relationship, you must provide any personal data that is necessary for the commencement and execution of a business relationship and the fulfilment of the associated contractual duties, and any information that we are legally obliged to collect. Without this data, we will generally be unable to conclude our contract with you or execute the contract.

10. WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?

In accordance with the French Data Protection Act and the GDPR (Articles 16 to 22), you have rights that allow you to exercise real control over your personal data and the way we process it.

- **You can request access to your personal data:** This right enables you to ask us whether we are processing personal data about you, and to request communication of this data and the way in which it is processed.
- **You can request rectification of your personal data:** You have the right to rectify, complete, update or delete incomplete, inaccurate or obsolete data.
- **You may request the deletion of your personal data:** If you wish, you may request the deletion of your personal data to the extent permitted by law.
- **You may object to the processing of your personal data for reasons relating to your particular situation:** We will no longer process your personal data unless (i) we are obliged to do so by law, (ii) we need to fulfil a contractual obligation, (iii) or there are compelling legitimate grounds for processing the data or the data is necessary for the establishment, exercise or defense of legal claims.
- **You may object to the processing of your personal data for commercial prospecting purposes.**
- **You may suspend the use of your personal data:** If you dispute the accuracy of the personal data we use or object to your data being processed, we will carry out a verification or review of your request. While your request is being examined, you may ask us to suspend the use of your data.
- **You can withdraw your consent:** If you have given your consent to the processing of your personal data, you can withdraw this consent at any time.
- **You may request the portability of part of your personal data:** You may request a copy of the personal data you have provided to us in a structured, commonly used and machine-readable format. Where technically possible, you may request that we transfer this copy to a third party.
- **You can organize what happens to your personal data after your death:** If you live in France, you can send us instructions concerning the storage, deletion and communication of your personal data after your death.

Exercising your rights is free of charge. However, in the event of manifestly unfounded or excessive requests, particularly due to their repetitive nature, we may require payment of a reasonable fee.

If you wish to exercise these rights or request clarification regarding ODDO BHF's processing of your personal data, you may contact the Data Protection Officer (DPO), either by post (DPO ODDO BHF SCA - 12 Bd de la Madeleine, 75440 Paris Cedex 09), or by sending an e-mail to dpo@oddo-bhf.com, or online by completing the contact form available on the home page of this policy.

You also have the right to lodge a complaint with the Commission Nationale Informatique et Libertés (CNIL) if you consider that the processing of your personal data does not comply with the GDPR and/or the French Data Protection Act.

11. CHANGES/UPDATES TO THIS PRIVACY NOTICE

We will regularly update this policy. To this end, we invite you to consult the latest version of this document on our website, and we will inform you of any significant changes through our website or via our usual communication channels.