

Privacy policy

FOR ODDO BHF SCA CLIENTS



ODDO BHF

Summary

1. INTRODUCTION	02
2. PURPOSE	02
3. DOES THIS PRIVACY POLICY APPLY TO YOU?	02
4. HOW DO WE COLLECT YOUR DATA AND WHAT DATA IS COLLECTED?	02
5. WHY AND ON WHAT LEGAL BASIS DO WE PROCESS YOUR PERSONAL DATA?	04
6. WHY MIGHT WE RECORD OUR COMMUNICATIONS?	04
7. WHO DO WE SHARE YOUR PERSONAL DATA WITH AND WHY?	04
8. DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE EUROPE?	04
9. HOW LONG DO WE PROCESS AND STORE YOUR PERSONAL DATA ?	04
10. HOW DO WE PROTECT YOUR PERSONAL DATA?	05
11. AM I OBLIGED TO PROVIDE DATA?	05
12. WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?	05
13. CHANGES/UPDATES TO THIS PRIVACY POLICY	06
APPENDIX 1 – CATEGORIES OF PERSONAL DATA PROCESSED BY ODDO BHF	07
APPENDIX 2 – PURPOSES FOR WHICH YOUR DATA MAY BE PROCESSED BY ODDO BHF	08

1. INTRODUCTION

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

ODDO BHF, as data controller, undertakes to comply in particular with:

- French Law No. 78-17 of 6 January 1978 on 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 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the «**GDPR**»); and
- Directive 2009/136/EC of the European Parliament and of the Council of 25 November 2009 (the «**ePrivacy Directive**»).

2. PURPOSE

This policy informs you about the processing of your personal data by ODDO BHF, including the categories of data we collect, the reasons why we use them, the recipients with whom we share them, the period for which we retain them and your rights in relation to them.

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

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

3. DOES THIS PRIVACY POLICY APPLY TO YOU?

You are affected by this policy as a natural person if you are (“**You**”):

- A client (current or former), a prospect interested in our products or who has subscribed to our newsletters or interacts with us on social media;
- A member of our client’s family;
- An heir or beneficiary of a life insurance policy;
- Visitor to the ODDO BHF website; and

You are also affected by this policy, as a professional, if you are:

- A representative, director, shareholder, executive or beneficial owner of companies that are prospects, clients or have a business relationship with ODDO BHF;
- An authorized representative or signatory.

When you provide us with personal data relating to other individuals, please remember to inform them that their personal data has been disclosed and invite them to read this policy. We will take care to do the same whenever we are able to do so (i.e. when we have the individuals’ contact details).

4. HOW DO WE COLLECT YOUR DATA AND WHAT DATA IS COLLECTED?

Personal data is any data relating to an identified or identifiable natural person. A natural person can be identified directly (surname and first name) or indirectly (telephone number or identifier, postal or email address, etc.).

PRIVACY POLICY

The data we collect relates in particular to your identity (surname, first name, date of birth, etc.); your professional, family and financial situation; your tax status; your commercial relationship with ODDO BHF; and your use of our website and online space.

The table in Appendix 1 of this policy provides more information on the categories of data that we may collect and process.

We collect your personal data:

- Directly from you, in particular: (i) when you subscribe to our services; (ii) as part of the monitoring of the commercial relationship; (iii) when you subscribe to communications from ODDO BHF; (iv) by telephone call or electronic messages, secure messaging, conversations and physical meetings.
- From a financial adviser or insurance broker, when you have subscribed to our products and services through them.
- Through contracts and administrative documents in the context of your contractual or pre-contractual relationship with ODDO BHF.
- Through our website and social media channels.
- From third parties, such as one of our clients (natural or legal persons), in the event that you are, for example:
 - A family member, heir or beneficiary of a life insurance policy;
 - A legal representative (mandates/powers of attorney);
 - A shareholder(s) of companies;
 - A member of staff of our service providers and business partners;
 - Personal contact(s).
- From public registers or other third-party sources, in particular (i) for checks in accordance with our regulatory obligations (such as anti-money laundering and counter-terrorist financing); or (ii) when we apply financial sanctions at national or international level (where data on beneficial owners is collected from public authority databases).

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

There are various legal bases that allow ODDO BHF to collect and process your personal data, including:

- The preparation, conclusion and execution of your contracts with ODDO BHF (account agreement, provision of investment services, insurance brokerage, etc.).
- Compliance with our legal obligations, such as compliance with financial market regulations and the fight against money laundering and terrorist financing.
- Your consent. You may have consented to the processing of your personal data by ODDO BHF for a specific purpose, including the use of your browsing data (cookies) when using our website. We may process your data for this purpose, unless you withdraw your consent at any time.
- Our legitimate interest. Where applicable, we weigh this interest against your interests or fundamental rights and freedoms to ensure a fair balance between them.

The table in Appendix 2 lists the purposes for which your personal data is processed by ODDO BHF, indicating, for each purpose, the legal basis on which ODDO BHF relies to justify such processing.

For all activities carried out to fulfil the above purposes, ODDO BHF does not implement any processing that results in fully automated decision-making. ODDO BHF thus guarantees human intervention in decisions taken in the context of the above processing, particularly if these have legal consequences for you.

6. WHY MIGHT WE RECORD OUR COMMUNICATIONS?

We may record and retain conversations and communications you have with us, including telephone calls, letters, emails and any other type of communication to verify and retain evidence of your instructions.

7. WHO DO WE SHARE YOUR PERSONAL DATA WITH AND WHY?

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

In particular, we may disclose your personal data to:

- Other entities within the ODDO BHF group;
- Service providers and subcontractors whose involvement is strictly necessary to fulfil the purposes described in Appendix 2. We ensure that our service providers (e.g. IT suppliers) comply with regulatory requirements to guarantee the confidentiality and security of your personal data.
- Third parties such as:
 - Regulated professions such as solicitors, notaries, bailiffs, accountants and auditors;
 - Financial, tax, administrative, criminal or judicial authorities, whether local or foreign; or
 - Law enforcement authorities, government agencies or public bodies, to whom we are legally required to disclose data.

8. DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE EUROPE?

Personal data collected by ODDO BHF may be transferred to countries outside the European Economic Area («EEA») in accordance with the GDPR:

- These data transfers therefore take place: (i) to countries recognized by the European Commission as having a level of protection equivalent to that existing in the European Union; or (ii) to countries where transfers are based on one of the adequate safeguards provided for in Article 46 of the GDPR.
 - ▶ For example, our teams at our affiliate in Tunisia, ODDO BHF Tunis, wholly owned by ODDO BHF, may access your personal data remotely for the management and administration of our IT infrastructure and applications. This transfer is governed by Standard Contractual Clauses issued and approved by the European Commission.
- During these transfers, we take appropriate and reasonable organizational and technical measures to ensure the security and confidentiality of your personal data.

You may contact our DPO as indicated above to find out about the appropriate safeguards implemented for the transfer of your data and to obtain a copy of them.

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

We process your personal data only for the time necessary to achieve the purposes described in Appendix 2.

We will destroy or anonymize it once it is no longer necessary for those purposes, unless the retention of such data is necessary:

- To comply with legal or regulatory requirements; or.
- It is justified by the need to assert our rights in legal proceedings, investigations or similar procedures.

For more information on the retention periods for your personal data, you can contact our DPO as indicated above.

10. HOW DO WE PROTECT YOUR PERSONAL DATA?

We protect your personal data by:

- Minimising its collection;
- Keeping it up to date; and
- Ensuring its security. Technical and organizational measures are taken to prevent unauthorized access, loss, destruction, modification or disclosure of your personal data.

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

In the event of a breach of your personal data, we will notify the relevant personal data protection authority within the time limits prescribed by the GDPR.

Where such a breach poses a high risk to your rights and freedoms, ODDO BHF also undertakes to:

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

11. AM I OBLIGED TO PROVIDE DATA?

Within the framework of our relationship (commercial, professional, etc.), you must provide all personal data necessary (i) for the establishment and execution of this relationship, (ii) for the fulfilment of the obligations, in particular contractual obligations, related thereto, (iii) for the fulfilment of our legal obligations. Without this data, we will generally be unable to establish this relationship, enter into a contract with you or perform this contract, as the case may be.

12. WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?

In accordance with the French Data Protection Act and the GDPR, your rights allow you to exercise real control over your personal data and how we process it. You may:

- **Request access to your personal data:** This right allows you to ask us whether we are processing your personal data and to request disclosure of this data and the methods used to process it.
- **Request the rectification of your personal data:** You have the right to rectify, complete, update, and erase incomplete, inaccurate, or obsolete data.
- **Request the deletion of your personal data:** you may request the deletion of your personal data within the limits authorized by law.
- **Object to the processing of your personal data, including for commercial prospecting purposes, on grounds relating to your particular situation :** In this case, we will no longer process your personal data unless (i) we are required to do so by law, (ii) we need to fulfil a contractual obligation, or (iii) there are legitimate and compelling reasons for processing the data or it is necessary for the establishment, exercise or defense of legal claims.
- **Suspend the use of your personal data:** If you dispute the accuracy of the personal data we use or object to the processing of your data, we will verify or review your request. While your request is being reviewed, you may ask us to suspend the use of your data.
- **Withdraw your consent:** Where you have given your consent to the processing of your personal data, you may withdraw that consent at any time by contacting our DPO as indicated above.
- **Request the portability of your personal data :** You may request receiving a copy of the personal data you have provided to us in a structured, commonly used and machine-readable format. Where technically feasible, you may request that we transmit this copy to a third party.

PRIVACY POLICY

- **Organize what happens to your personal data after your death** : If you reside in France, you may send us instructions regarding the storage, erasure and communication of your personal data after your death.

You may exercise your rights free of charge. However, in the event of manifestly unfounded or excessive requests, particularly due to their repetitive nature, we may require payment of reasonable fees.

To exercise these rights or request further information about ODDO BHF's processing of your personal data, you may contact the DPO as indicated above.

You may lodge a complaint with the French Data Protection Authority (CNIL) if you consider that the processing of your personal data does not comply with the GDPR and/or the French Data Protection Act.

13. CHANGES/UPDATES TO THIS PRIVACY POLICY

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

APPENDIX 1 – CATEGORIES OF PERSONAL DATA PROCESSED BY ODDO BHF

Data category	Details
Identification data	Marital status, first name, surname, date and place of birth, nationality, professional contact details, personal contact details, telephone number, email address, signature.
Data relating to professional life	Professional experience, position held, qualifications obtained, type of employment contract.
Data relating to representatives of legal entities or natural persons	Identity and titles of directors, partners, agents and beneficial owners or legal representatives of minors.
Data relating to your tax status	Income tax level, tax identification number.
Data relating to your family situation	Marital status, number of children, number of dependent children.
Data relating to your financial situation	Assets owned, information on the origin and destination of funds, information on the income of the client's beneficial owner, information collected as part of internal controls.
Data collected in connection with our legal obligations	Data relating to your investment knowledge and experience (MiFID questionnaire, your investor status), the income of the client's beneficial owner, the origin and destination of funds, data necessary for our compliance with loi Sapin II, FATCA-CRS, FICOBA, IFU, loi Eckert, QI regulations, reporting transactions to the AMF, data relating to convictions or criminal offences.
Data relating to your accounts and transactions	Instructions, transaction history, transactions generated on your accounts, complaints, information on the origin and destination of funds, account type, account number, account opening and closing, account statements, late payments, fund verification, cheques and credit or debit card transactions, fund transfer authorisations, account balances and turnover, non-payment or partial payments, account usage restrictions and financial conditions.
Data relating to the monitoring of the commercial relationship	Letters, e-mail addresses, telephone conversations.
Data collected during events	Meetings, events, webinars.
Data relating to website use	Authentication data for accessing online accounts, cookies, trackers, logs and browsing data. For more information on cookies, please refer to the cookie policy available on the ODDO BHF website : http://www.oddo-bhf.com .
Data generated by the telephone recording device	Identification data, conversation recording, technical information relating to the call (date, time and duration of the call).
Data relating to the use of our IT tools	Connection data (logs), account number, account password, browsing time, server return code, session ID.

APPENDIX 2 – PURPOSES FOR WHICH YOUR DATA MAY BE PROCESSED BY ODDO BHF

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

a. 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 with you as a client, in particular to provide you with services, such as investment advice, order reception and transmission, order execution, life insurance brokerage, portfolio management or Lombard loans.

The provision of these services may require the opening of an account in the books of ODDO BHF and the provision of a personal online space.

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

We process your personal data to comply with our legal and regulatory obligations, in particular:

- **Anti-money laundering and counter-terrorist financing (AML-FT) :** In accordance with AML-FT regulations, ODDO BHF, as a regulated institution, has an obligation to exercise constant vigilance over these business relationships. As such, ODDO BHF complies with the client due diligence obligation.
This involves compliance checks when entering into a relationship and throughout the duration of the relationship, in order to (i) verify and confirm the identity of clients, including, where applicable, that of their beneficial owners and agents; and (ii) collect information on the purpose and nature of the business relationship and gather any other relevant information. These checks also aim to identify clients who may present higher risks in terms of AML-FT, in particular Politically Exposed Persons (PEPs) , to carry out appropriate checks and detect and identify any suspicious transactions so that, where necessary, a suspicious transaction report can be made to the competent authorities.
- **Compliance with national and international sanctions :** We process the data of clients with whom ODDO BHF enters into or has a relationship to verify whether they are subject to national or international sanctions and to take appropriate measures (screening, flow filtering, client base).
- **Compliance with regulations on markets in financial instruments (MiFID II) :** We record communications with you relating to the provision of investment services (receipt, transmission and execution of orders, investment advice, discretionary management). We also assess the suitability and appropriateness of your client profile in relation to the investment product or service provided.
- **Compliance with our obligations under the Insurance Distribution Directive (IDD) :** We assess the suitability of the insurance product offered to your client profile.
- **Prevention of market abuse, in accordance with Regulation (EU) No 596/2014 (“MAR”) :** We record communications related to financial transactions, maintain a list of persons with access to inside information and monitor transactions to detect market abuse.
- **Combating fraud and tax evasion :** We may transmit tax information about you to the competent authorities under international agreements (CRS/FATCA).
- **Prevention and detection of corruption and influence peddling (Loi Sapin II) :** We may process our clients’ data to identify individuals exposed to these risks.
- **Processing requests from data subjects :** We process your data to respond to your requests under the GDPR or the French Data Protection Act.
- **Verification of dormant accounts (Loi Eckert) :** We process your data to identify inactive accounts, contact the beneficiaries of the deceased account holder where applicable, and transfer unclaimed funds to the Caisse des dépôts et consignations.
- **Communication of information and reports to public authorities :** We are legally required to provide the competent authorities with information, such as information relating to the existence of an account opened in your name at the Direction Générale des Finances Publiques (FICOBA file); or information on transactions you may have carried out through us (MIFIR regulation) to the Autorité des Marchés financiers.

PRIVACY POLICY

- **Recording transactions for accounting purposes :** We process data relating to transactions you may have made or data appearing in supporting documents as part of our obligations to record accounting transactions.

c. Pursuit of our legitimate interests (Art. 6 (1) f) GDPR)

When we base the processing of personal data on legitimate interest, this interest cannot override your fundamental rights and freedoms. We ensure a fair balance between the two.

Processing based on legitimate interest includes the following:

- **Security, prevention and risk management :** We may process your data to control access to our premises, including through video surveillance, to prevent any harm to persons or property. Your data may also be processed to manage our operational risks (financial, credit or reputational risks).
- **Carrying out commercial prospecting activities :** We may carry out standard profiling based on information that you have provided to us directly or that has been collected from your use of our websites and applications. This standard profiling allows us to segment our clients for marketing purposes, in order to send them information about ODDO BHF's products and services and personalised invitations to ODDO BHF events.
- **Management of websites, applications and information systems :** We process your data to give you access to our digital resources and to detect and analyse security incidents that could affect the security of our networks and information systems.
- **Performing statistical analyses and improving our internal processes and services :** We process your data to perform statistical studies, which are used in particular to optimise our internal processes or improve our services. We may use artificial intelligence systems to improve our internal processes and our services (for example, provision of Chatbot, summary of interactions with clients). In the event of the integration of an artificial intelligence system, ODDO BHF undertakes to comply with the applicable regulations, in particular the GDPR and the Regulation on Artificial Intelligence (Regulation (EU) 2024/1689 of 13 June 2024) and systematically ensures that the use of these systems is carried out under human supervision. ODDO BHF does not implement any processing that results in fully automated decision-making that would have legal effects on you (Article 22 of the GDPR).
- **Management of our presence on social media :** We may process your personal data as part of our monitoring of social media, to respond to publications, posts or comments in relation to ODDO BHF, and to prevent any damage to ODDO BHF's reputation.
- **The execution of an agreement with a company that has a business relationship with ODDO BHF :** We may process the data of representatives, directors, shareholders, executives or beneficial owners of prospective institutional clients, institutional clients or companies that have a business relationship with ODDO BHF, including companies that provide services to ODDO BHF.
- **Management of client complaints of a legal nature and disputes :** We process your data to respond to your complaints and, where applicable, to defend ODDO BHF in disputes that may arise between us and our clients.

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

In certain cases, we require your prior consent to process your personal data, in particular:

- **For marketing activities aimed at prospects :** With your prior consent, we process your data (i) to send you marketing communications and invitations to events by electronic means if you are an individual who is not a client of ODDO BHF; (ii) for marketing purposes, using your browsing data (cookies). For more information on cookies, please refer to the cookie policy available on the ODDO BHF website.
- **To process your data for purposes other than those described in the previous sections.**

You may withdraw your consent at any time.