

DATA PROTECTION INFORMATION NOTICE

The BNP Paribas Group⁽¹⁾ places great importance on the protection of your personal data. That is why, in addition to this Notice, the BNP Paribas Group has adopted key principles for the protection of your data, which you can find in the BNP Paribas Group Privacy Policy⁽¹⁾ available at https://group.bnpparibas/uploads/file/bnpparibas_personal_data_privacy_charter.pdf.

The purpose of this Notice is to provide you with detailed information on how BNP Paribas, a joint-stock company, with registered office at PARIS (75009), 16 boulevard des Italiens, ("we") protect your personal data.

We are responsible, as a controller, for the collection and processing of your personal data that we use in the course of our business.

The purpose of this document is to let you know about the personal data concerning you that we collect, the reasons we use it, whom we share it with, how long we keep it, what are your rights and how to exercise them.

It applies uniformly to all BNP Paribas products and services. If necessary, you will be given additional information when you purchase a specific product or service.

1. WHICH PERSONAL DATA DO WE USE ABOUT YOU?

We collect and use your personal data to the extent necessary in the framework of our activities and to achieve a high standard of personalized products and services.

We may collect various types of personal data about you, including:

- identification and contact information (surname, first name, place and date of birth, photo, passport and identity card numbers, sex, age or signature);
- contact information (postal and email address, telephone number);
- identification and authentication data, particularly when using online banking services (technical logs, digital traces, information on the security and use of the terminal, IP address);
- tax status (tax number, country of residence);
- family situation (marital status, matrimonial regime, number of children);
- information about training and employment (level of education, employment, name of employer, remuneration);
- banking and financial information and transaction data (bank details, card number, data related to transactions, including information about transfers, investor profile, credit history, debts and expenses, value of your assets);
- data about your habits and preferences:
 - data related to the use of subscribed products and services (banking, financial and transaction data);
 - data related to interactions with us: in our branches (appointment reports), on our websites, in our applications, on our pages, on social networks, during interviews and telephone or video conversations, in emails;
- video (CCTV images) and geolocation data (for the security of ATMs and branches or to locate the nearest agency or service provider);
- data needed to combat overindebtedness.

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We may collect the following sensitive data only upon obtaining your explicit prior consent:

- biometric data (fingerprints, voice, face) for identification and security purposes;
- health data (for the conclusion of certain insurance contracts when necessary).

Unless it is a legal obligation, we will never ask you to provide us with personal data about your racial or ethnic origins, political opinions, religious or philosophical beliefs or trade union membership, the processing of genetic data, your sex life or your sexual orientation.

The data we use about you may either be directly provided by you or be obtained from the following sources in order to verify or enrich our databases:

- publications/databases made accessible by public authorities (Official Journal);
- our corporate clients or service providers;
- third parties such as credit reference agencies and fraud prevention agencies or data brokers in compliance with data protection regulations;
- websites/social media pages containing information that you have made public (your own website or social media);
- databases made public by third parties.

2. SPECIFIC CASES OF PERSONAL DATA COLLECTION, INCLUDING INDIRECT COLLECTION

In certain circumstances, we may collect and use personal data concerning people with whom we were or could be in contact, such as:

- Non-clients (such as prospects).

We may also need to collect information from non-clients and people with whom we do not have a direct relationship. This may be the case, for example, when your employer provides us with information concerning you, or when your contact information is provided by one of our clients, because you are, for example:

- member(s) of our client's family;
- co-borrower(s)/guarantor(s);
- legal representative(s), authorized representative(s) and person(s) authorized by a moral entity (which may be a client or a provider of BNP Paribas);
- instructing party(ies) or beneficiary(ies) of a transaction made in connection with our client;
- employee(s) of a company client of the Bank, holder(s) of a card subscribed by that company;
- beneficiary(ies) of insurance policies and trusts;
- owner(s);
- beneficial owner(s);
- debtor client(s) (for example, in the case of bankruptcy);
- shareholder(s) of companies;
- member(s) of the staff of our service providers and our business partners.

Finally, we may also need to collect data from:

- the Banque de France, during the consultation of files (National Register of Household Credit Repayment Incidents or the Central Cheque Register), the National Directory for the Identification of Private Individuals (RNIPP) as part of our obligations regarding inactive accounts and safes, the DGFiP (Directorate-General of Public Finances) for the verification of the absence of multiple booklet A holdings;
- third parties (for example, the Register of Commerce and Companies);
- partners, for example, providing marketing lists, provided that you have given your consent to be solicited.



3. WHY AND ON WHICH LEGAL BASIS DO WE USE YOUR PERSONAL DATA?

a. To comply with our legal and regulatory obligations

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

- prevention of money laundering and terrorist financing by identifying and verifying the identities of clients, politically exposed persons, representatives and beneficial owners, by identifying a risk profile and monitoring operations and transactions;
- compliance with applicable legislation on international sanctions and embargoes;
- prevention of tax fraud, compliance with tax audit and reporting obligations, in particular by identifying the clients and accounts concerned;
- compliance with the provisions applicable to trusted service providers issuing electronic signature certificates;
- compliance with banking and financial regulations under which we must, in particular:
 - communicating information about your accounts and transactions and their respective beneficiaries or issuers to payment service providers who act on your request. These include, for example, payment service initiators and providers of an account information service also known as 'account aggregators';
 - to fulfil our reporting obligations to the Banque de France (registration to and deregistration from the National Register of Household Credit Repayment Incidents and Central Cheque Register);
 - to identify and manage inactive accounts and safes for the purpose of querying the National Directory for the Identification of Private Individuals;
 - to evaluate your financial solvency;
 - to prevent non-payment;
 - to comply with our duty to advise, for example, on life insurance;
 - to identify, for certain services, the adequacy of your knowledge and experience with your investment objectives;
 - to monitor and report the risks to which the institution could be exposed;
 - to make a specific offer to clients in financial fragility positions;
 - to set up security measures to prevent abuse and fraud;
 - to detect abnormal transactions;
 - to define your credit risk score and your repayment capacity;
 - to monitor and report the risks we may incur;
 - to record, where necessary, telephone calls, discussions, emails etc.

The list of the above legal provisions is not exhaustive and is subject to change.

- responses to official requests from duly authorized public or judicial authorities

b. To perform a contract with you or to provide you with information at your request before entering into a contract

We use your personal data to enter into and perform our contracts, including to:

- provide you with information about our products and services;
- assist you with requests;
- evaluate whether we can offer you a product or service and, if so, under what conditions;
- subscribe (in particular by electronic signature or telephone) to products and services distributed by BNP Paribas;
- manage the client relationship, in particular:
 - management and execution of products and services such as payment instruments and the granting of credit;
 - assessment of your requirements and needs, knowledge and experience, for example in life insurance or securities;



- wealth management for Banque Privée France clients;
- in particular, distribution of insurance, remote surveillance and long-term lease products, it being understood that the insurer⁽²⁾ or the service provider, as the case may be, remains otherwise responsible, as a controller, for the processing necessary for the implementation of the insurance transaction and the provision of the service;
- security of the payment services you use;
- provide products or services to our corporate clients of which you are an employee or a client (for example, cash management products).

c. To pursue our legitimate interest

We use your personal data in order to deploy and develop our products or services, to improve our risk management and to defend our legal rights, including:

- retention of proof of transactions or operations;
- IT management, such as infrastructure management (for example, shared platforms) and business continuity including IT security;
- fraud prevention;
- studies and client satisfaction surveys;
- recovery;
- financing or refinancing of the BNP Paribas Group;
- creation of individual statistical models, based on the analysis of your transactions, to define your credit risk score;
- establishment of anonymised statistical models and tests for research and development in order to optimise the BNP Paribas Group's risk management or to improve our offer of new and existing products and services;
- recording phone calls for the training of staff;
- customization of the business offers that we make to you or that entities of the BNP Paribas Group⁽¹⁾ could make to you:
 - by improving the quality of banking, financial or insurance products or services;
 - by offering you products or services corresponding to your situation and your profile as we define it.

These business proposals can be realized by means of:

- segmenting prospects and clients;
- analysing your habits and preferences on the various channels (visits to our branches, emails, visits to our website etc.);
- the transfer of your data to another entity of the BNP Paribas Group,⁽¹⁾ in particular if you are a client of that other entity or are likely to become one;
- the correspondence between the products or services you are already using and the data we hold concerning you (for example, we can identify that you do not hold a family insurance product although you have indicated that you have children);
- checking transactions to identify those that seem unusual (for example, when a large withdrawal from your account is made from a country where you do not live).

d. To respect your choice if we requested your consent for specific processing

In some cases, we must require your consent to process your data, for example:

- where the above purposes lead to automated decision-making that produces legal effects or that concerns or significantly affects you, we will inform you separately about the logic involved, as well as the significance and the envisaged consequences of such processing;
- if we need to carry out further processing for purposes other than those above in section 3, we will inform you and, where necessary, obtain your consent.



4. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

In order to fulfil the aforementioned purposes, we only disclose your personal data to:

- BNP Paribas Group entities⁽¹⁾ (for example, to benefit from our full range of products and services) and those in which BNP Paribas has a stake;
- service providers and subcontractors performing services on our behalf;
- independent agents, intermediaries or brokers;
- business and banking partners;
- financial, judicial or state agencies, public bodies on request and within the limits permitted by regulations (for example, the Banque de France, Caisse des Dépôts et Consignations, mutual guarantee companies or financial guarantee bodies);
- certain regulated professions such as lawyers, notaries or auditors.

5. TRANSFER OF DATA OUTSIDE THE EUROPEAN ECONOMIC AREA

In case of international transfers originating from the European Economic Area (EEA):

- where the European Commission has recognized a country as providing a level of data protection equivalent to that prescribed by EEA legislation, your personal data will be transferred on this basis;
- if the level of protection has not been recognized as equivalent by the European Commission, we will either rely on a derogation applicable to the specific situation (e.g. in the case of international payment, the transfer is necessary to perform the contract), or implement one of the following safeguards to ensure the protection of your personal data (standard contractual clauses approved by the European Commission or binding corporate rules).

To obtain a copy of these safeguards or details on where they are available, you can send a written request as set out in Section 9.

6. HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

We retain your personal data for the longest period of time necessary to comply with the applicable legal and regulatory provisions or for any other period given operational constraints such as proper account management, effective client relationship management and responding to judicial or regulatory requests.

Regarding clients, most information is retained for the duration of the contractual relationship and for 10 years after the end of the contractual relationship.

Regarding prospects, the information is maintained for 3 years after its collection or our last contact with you.

In the case of inactivity of your accounts and safes, we retain the data concerned for the durations required by regulations.

7. WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?

In accordance with the applicable regulations, you have different rights, namely:

- Right of access: you may obtain information concerning the processing of your personal data as well as a copy of this personal data.
- Right of rectification: if you believe that your personal data is inaccurate or incomplete, you may demand that personal data be modified accordingly.
- Right to erasure: you may demand the deletion of your personal data within the limits permitted by regulations.
- Right to restriction of processing: you may request the restriction of processing of your personal data.



- Right to the portability of your data: when this right is applicable, you have the right to have the personal data you have provided to be given to you or, where technically possible, transferred to a third party.
- Right to set down instructions for the retention, erasure or communication of your personal data applicable after your death.
- Right to withdraw your consent: where you have given your consent to the processing of your personal data, you have the right to withdraw your consent at any time.
- Right to object: you may object to the processing of your personal data for reasons related to your particular situation. You have the absolute right, at any time, to object to the processing of your personal data for sales prospecting purposes, including profiling related to such prospecting.

You can exercise the rights listed above by sending a letter to BNP Paribas, APAC TDC Val de Marne, TSA 30233, 94729 FONTENAY-SOUS-BOIS Cedex, FRANCE or contacting us online⁽³⁾. Please kindly include a scan/copy of your identity card so that we may verify your identity.

In accordance with the applicable regulations, you are entitled to lodge a complaint with the competent supervisory authority such as the CNIL (Commission Nationale de l'Informatique et de Libertés) in France.

8. HOW CAN YOU STAY INFORMED OF CHANGES TO THIS DATA PROTECTION INFORMATION NOTICE?

In a world of constant technological changes, we may need to regularly update this Information Notice. We invite you to read the latest version of this notice online,⁽³⁾ and we will inform you of any material changes through our website or through our other usual communication channels.

9. HOW TO CONTACT US

If you have any questions regarding the use of your personal data under this document, you can make a query online⁽³⁾ or contact our Data Protection Officer by sending a letter to BNP Paribas, Délégué à la protection des données BDDE, Levallois-Perret (92300), 20 avenue Georges Pompidou. The Data Protection Officer will investigate your query.

10. MISCELLANEOUS

Information about our cookies policy and IT security is available on our sites⁽³⁾.

(1) List of BNP Paribas Group companies available at: group.bnpparibas/decouvrez-le-groupe/bnp-paribas-monde.

(2) List of insurance companies available at: [mabanque.bnpparibas/Informations/Tarifs et conditions/Conditions générales](http://mabanque.bnpparibas/Informations/Tarifs%20et%20conditions/Conditions%20g%C3%A9n%C3%A9rales).

(3) List of our websites: mabanque.bnpparibas, mabanquepro.bnpparibas, [mabanqueprivée.bnpparibas](http://mabanquepriv%C3%A9e.bnpparibas), mabanqueentreprise.bnpparibas, hellobank.fr



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