

PRIVACY POLICY

This Privacy Policy provides you with information relating to the use and the protection of your personal data by Banque Banorient France London (the Data Controller), including the reasons why we share such data. It applies to all our products and services.

1. What personal data do we collect?

We collect and use your personal data to the extent necessary in the framework of our activities and to deliver to you personalised products and services. We may collect various types of personal data about you; at account opening, or during our banking relationship, including:

- Identification and contact information: name, place and date of birth, information on your identity documents (ID card and passport), postal address and e-mail address and phone number;
- Tax status: tax identification number/reference and tax residence;
- Family situation: marital status, number of dependents;
- Employment information: employment, employer's name, remuneration;
- Financial, banking and transactional data: bank account details, credit card number, money transfers, assets, credit history, debts and expenses;
- Data which relates to your use of our products and services including banking, financial and transactional data; and
- Data from your interactions with us: in our branch (CCTV), our internet website, emails, interviews, phone conversations.

Banque Banorient France, London may collect information about you where you do not have a direct relationship. This may apply in the following cases:

- Guarantors;
- Legal representatives (power of attorney); authorized persons, ultimate beneficial owner; Company shareholders;
- Beneficiaries of payment transactions made by our clients; and
- Staff of our service providers.

2. Why we collect your personal data

- a. Performing a contract with you
 - This includes the relevant pre-contract checks, bank approval prior to implementing the contract for providing products and services; and
 - Management of your requests and queries.
- b. Meeting our legal and regulatory obligations. They include the following:
 - Prevention of money-laundering and financing of terrorism;
 - Compliance with sanctions and embargoes;
 - Combating tax evasion and financial fraud;
 - Tax reporting obligations;
 - Compliance with banking and financial regulations in relation to risk management; and
 - dealing with requests from regulators and law enforcement agencies.

- c. Protecting our legal rights. We may use your personal data in order to defend our legal rights, including:
- Collection of monies owed and enforcing or protecting our security;
 - Fraud prevention and proof of transactions;
 - Management of complaints, disputes and claims against the Bank; and
 - IT management, IT security and business continuity.

3. Sharing your personal data

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

- Banque Banorient France entities;
- Service providers that perform services on our behalf;
- Banking partners with whom we have a regular relationship;
- Financial, taxation, regulatory or judicial authorities, state agencies or public bodies, upon request and to the extent permitted by law;
- Credit reference agencies as part of our risk assessment process;
- Fraud prevention agencies; and
- Certain regulated professionals such as lawyers, insurers, notaries or auditors.

4. Transferring your personal data outside the EEA

We may transfer your data to countries outside the European Economic Area (EEA). We do so on the following basis:

- that the other countries have applicable laws to protect your data in the same way;
- the European Commission has decided that the country or the organisation we are sharing data with will protect your data adequately;
- the transfer has been authorised by the relevant data protection authority; and
- the transfer is necessary to perform a contract (on terms approved by the European Union), as instructed by you, for example, when making international payments on your behalf.

5. Retention periods for personal data

We will keep your data in line with our data retention policy, normally, for a period of 7 years after the banking relationship terminates. Some data may have a shorter retention period, but there may also be occasions when we need to retain your data for a longer period under certain circumstances; such as resolving disputes or complaints, or if we are required to respond to regulatory or law enforcement enquiries.

6. Personal data and your rights

You have the following rights in respect of your personal data:

- the right to access the information we hold about you and to find out how we process your personal data;
- the right to request rectification of your personal data that has changed, or is inaccurate or incomplete;
- the right to object, or to restrict processing of your personal data, or to delete your personal data. Please note that regulatory requirements, contractual obligations or legitimate interest may limit or cancel these rights.

If you have any queries or requests, you may write to:

Banque Parorient France London (Data Controller), 193-195 Brompton Road, London SW3 1LZ.

You may find additional information regarding your rights on the Information Commissioner's Office website at <https://ico.org.uk/for-the-public/>

The website also provides you with the process if you are unhappy with the way we deal with your data and you wish to make a complaint to the Information Commissioner's Office.