

NOTICE ON THE PROTECTION OF PERSONAL DATA FOR BNP PARIBAS GROUP'S LEGAL REPRESENTATIVES OF CLIENTS AND EXTERNAL SUPPLIERS

The protection of your personal data ("**personal data**") is important to the BNP Paribas Group

This Data Protection Notice provides you with transparent and detailed information relating to the protection of your personal data by the entities of the BNP Paribas Group ("**we**" or "**us**").

This Data Protection Notice applies to both **legal representatives of clients and external suppliers who provide products and/or services to us (hereafter "you")**.

The purpose of this Data Protection Notice is to inform you about the personal data we collect about you, from you, the reasons why we use and share such data, how long we keep it, what your rights are and how you can exercise them.

We are responsible, as a controller, for collecting and processing your personal data as set out in the Data Protection Notice.

This Data Protection Notice could be supplemented or specified, if necessary, by other Local policies and procedures (such as appendices on the protection of personal data, Terms and Conditions, notices/board in the premises of the entities of BNP Paribas Group, etc.), in particular, as required by Local Legal and regulatory requirements in the country where the contract is performed.

Should you provide us with third party individual personal data, you must provide a copy of this Data Protection Notice to this individual.

1. WHICH PERSONAL DATA DO WE USE ABOUT YOU?

We collect and use your personal data, meaning any information that identifies or allows us to identify you, the extent necessary in the framework of our activities and to perform services or partnership agreement.

Depending on the nature of the products or services provided by the supplier or partner, we collect various types of personal data about you, including:

Identification information (e.g. full name, ID card, passport information, nationality, place and date of birth, gender, professional photograph);

Professional contact information (e.g. postal and e-mail address, phone number, emergency contact details);

Financial and tax Information (e.g. VAT number, tax status, tax residence, income and other earnings, property value),

Bank account details (if you are a supplier for the payment of consideration towards you)

Transaction details (including full name of beneficial owners, address and transaction details including communication in connection with bank transfers)

Connection and tracking data and information about your device (e.g. IP address, technical logs, computer traces, information on the use and the security of the device);

Your presence in our premises (e.g. license plate);

Data from your interactions with us (e.g. minutes of meetings, phone calls, videoconferences, electronic communications (emails, instant messaging (chat)));

Images recording (e.g. video surveillance (CCTV), photos);

Social network data (e.g. data coming from pages and publications on social networks that contain information that you publicly made available).

We may collect sensitive data such as biometric data or data relating to infringements, in strict compliance with the conditions set out in the data protection regulations.

Please note that you are not obliged to provide any of the personal data we request. However, failure to provide your data may result in our inability to provide our services to the clients you represent or to do business with you.

2. FROM WHOM DO WE COLLECT PERSONAL DATA?

We collect personal data directly from you as legal representatives of clients and in the context of your relationship with us.

Occasionally, we collect data from public sources:

- publications/databases made available by official authorities or third parties (e.g., Government Gazette, Commercial Registries, databases of financial sector supervisory authorities),
- websites/social media of legal entities or customers or suppliers containing information they have published (e.g., your own website or social media page),
- public information such as those published in the press.

We also collect personal data:

- from other Group entities,
- from our business partners or those of our customers,
- from service providers (e.g., payment initiation service providers, account information and account aggregation service providers),
- from credit reporting and fraud prevention services.

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

In this section, we describe how and why we use your personal data.

3.1 We process your personal data in order to fulfil our various legal and/or regulatory obligations (for legal representatives and suppliers).

We process your personal data when necessary to comply with the laws and/or regulations to which we are subject, including banking and finance regulations.

3.1.1 We use your personal data for the following purposes:

- Monitoring actions and transactions with a view to managing, preventing and detecting fraud,
- monitoring and reporting of risks (financial, credit, legal, compliance or reputational, operational, etc.) that we and/or BNP Paribas Group may be exposed to,
- supporting the fight against tax fraud and fulfilling our tax audit and disclosure obligations, including our obligations under the Foreign Account Tax Compliance Act and the US Automatic Exchange of Information Act,
- fulfilling our obligations to report and record transactions to the competent authorities (tax, judicial, criminal,

etc.),

- recording transactions for accounting purposes,
- prevention, identification and reporting of Corporate Social Responsibility and sustainable development risks,
- identifying and preventing bribery and corruption,
- identification and management of suspicious orders and transactions,
- exchanging and reporting various actions, transactions or orders or responding to a formal request from duly authorised national or foreign financial, tax, administrative, criminal or judicial authorities, arbitrators or mediators, law enforcement agencies, governmental or public bodies.

3.1.2 We also process your personal data for anti-money laundering and anti-terrorist financing purposes.

As a member of a banking group, we are required to have a robust anti-money laundering and counter-terrorist financing (AML/TF) system in each of our centrally managed entities, as well as a local enforcement system, European and international sanctions that may require the processing of your personal data in the first instance through our Know Your Customer (KYC) and/or Know Your Supplier (KYS) procedures (for the purpose of identifying you, verifying your identity and comparing your details with sanctions lists, before and during the services we provide to you).

In the context of this processing, we [as a branch or subsidiary of BNP Paribas SA] are joint controllers with BNP Paribas, the parent company of the BNP Paribas Group (the term "we" in this chapter also includes BNP Paribas SA).

The processing operations carried out in order to fulfil these legal obligations are detailed in Annex B.

3.2 Your personal data is processed for the performance of a contract with the client whom you represent as their legal representatives in the context of our services to clients and/or for the performance of a contract with our suppliers.

We process your personal data where it is necessary (a) to enter into or perform a contract to provide our corporate customers with the products and services under the applicable contract, including access to our digital services and (b) to enter into or perform a contract with our suppliers.

3.3 Your personal data is processed to fulfil our legitimate interests or the legitimate interests of third parties (relating to legal representatives and suppliers).

Where our processing activity is based on a legitimate interest, we weigh that interest against your interests and fundamental rights and freedoms to ensure a fair balance between them. If you would like to receive more information about the legitimate interests associated with a processing activity, please contact us using the contact details in section 9 (How to contact us) below.

3.3.1 As part of our activities as a bank, we process your personal data for the purpose of (relating to legal representatives and suppliers):

- managing your access to and use of our online communication channels and applications in the context of our contractual and pre-contractual relationships with our customers and/or service providers.
- our communications with you in the context of the services we provide to customers and in the context of the performance of our contracts with our suppliers.

- managing the risks to which we are exposed:

o we keep documentation and, at times, record actions, transactions and communications when you come into contact with our employees [e.g., in chat rooms, via email or in the context of video conferences].

o We monitor transactions for the purpose of managing and detecting fraud, including, when required by law, compiling a fraud list (which includes a list of post-fraud victims).

o we manage legal claims and defend our position in the event of litigation.

- improving cyber security and data leakage prevention measures, managing our platforms and websites and ensuring business continuity.

- the use of video surveillance to monitor access to property and prevent harm and damage to persons and property.

- improving the automation and efficiency of our business processes and customer services (e.g., automatically recording complaints, investigating your requests and improving your satisfaction based on the personal data collected when we communicate with you, such as recording telephone conversations, emails or chat room communications).

- compliance with applicable provisions to trust service providers that issue electronic signature certificates.

- the execution of financial transactions such as sales of debt securities portfolios, securitizations, financing or refinancing of the Group.

- carrying out statistical studies and developing forecasting and descriptive models for:

o commercial purposes: to identify the products and services that best meet your needs, to create new offers based on trends emerging from the use of our online communication channels and applications, to develop our commercial policy to take into account the preferences of our clients

o Security purposes: to prevent potential incidents and improve security management,

o for compliance and risk management purposes (e.g., anti-money laundering and combating the financing of terrorism),

o anti-fraud purposes.

3.3.2 We use your personal data to send you commercial offers by email, post and telephone (for legal representatives and suppliers)

As a member of the BNP Paribas Group, we want to be able to provide you with access to the full range of products and services that best meet your needs.

If you are registered as a contact or representative of a client or supplier and provided you have not objected to this, we will send you offers in any way for our products and services as well as for the products and services of the Group.

We will use reasonable endeavours to ensure that such offers are for products and services relevant to the activities of our customers or prospective customers.

3.4 Your personal data is processed if you have given your consent (applies to legal representatives and suppliers)

For certain personal data processing activities, we will provide you with specific information and ask for your consent. Of course, you can refuse your consent or, if you have given it, withdraw it at any time.

In particular, we ask for your consent for:

- the management of subscriptions to newsletters,
- the management of events,
- the use of your browsing data for the purpose of improving our knowledge of your profile, in accordance with our Cookies Policy.

You may be asked for further consent to the processing of your personal data when necessary.

4. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

Sharing of information within the BNP Paribas Group

- a. As a member of the BNP Paribas Group, we work closely with the other companies in the Group, globally. Your personal data may therefore be shared between Group entities, where necessary, in order to:
 - b. - comply with our various legal and regulatory obligations as described above,
 - c. - fulfil our contractual obligations or defend our legitimate interests as described above; and
 - d. - conduct statistical studies and develop predictive and descriptive models for commercial, safety, compliance, risk management and anti-fraud purposes.
- e. Sharing with Group companies may extend to intra-group processors who carry out processing on our behalf (such as our centres in India, Poland and Portugal)

Disclosing information outside the BNP Paribas Group

In order to fulfil some of the purposes described in this Data Protection Notice, we may, where necessary, share your personal data with processors who carry out processing on our behalf (e.g., providers of IT, product handling, printing, telecommunications, debt collection, advisory and distribution and marketing services).

We may also, where we consider it necessary, share your personal data with other data controllers, such as:

- banking and trading partners, independent agents, intermediaries or brokers, financial institutions, counterparties, trade repositories with whom we have a relationship where such transfer is necessary to enable us to provide you with our services and products or to fulfil our contractual or legal obligations (e.g, banks, correspondent banks, custodians, securities issuers, issuers of securities, payment processors, foreign exchange platforms, insurance companies, payment system operators, payment card issuers or intermediaries, mutual guarantee companies or financial guarantee institutions),
- regulatory and/or independent authorities, local or foreign financial, tax, criminal or judicial authorities, arbitrators or mediators, public authorities or institutions (e.g., the Bank of Greece, the Banque de France and other Central Banks) to which we, or any member of the BNP Paribas Group, are required to disclose data on the basis of:
 - o at their request,

o in our defence, claim or appeal,

o compliance with a regulation or recommendation issued by a competent authority addressed to us or any member of the BNP Paribas Group,

- service providers or third-party payment providers (data relating to your bank accounts), for the purpose of providing a payment initiation or account update service at your request,

- certain regulated professions such as lawyers, notaries or auditors, in particular when necessary in specific circumstances (litigation, audit, etc.) and to our insurers or to a current or proposed purchaser of Group companies or activities.

5. INTERNATIONAL TRANSFERS OF PERSONAL DATA

In certain circumstances (e.g. to provide international services or to ensure operational efficiency), we may transfer your data to another country.

In case of international transfers originating from:

the European Economic Area ("EEA") to a non-EEA country, the transfer of your personal data may take place where the European Commission has recognised a non-EEA country as providing an adequate Level of data protection. In such cases your personal data may be transferred on this basis;

the United Kingdom ("UK") to a third country, the transfer of your personal data may take place where the UK Government has recognised the third country, as providing an adequate Level of data protection. In such cases your personal data may be transferred on this basis;

other countries where international transfer restrictions exist, we will implement appropriate safeguards to ensure the protection of your personal data.

For other transfers, we will implement an appropriate safeguard to ensure the protection of your personal data, being:

Standard contractual clauses approved by the European Commission or the UK Government (as applicable); or

Binding corporate rules.

In the absence of an adequacy decision or an appropriate safeguard we may rely on a derogation applicable to the specific situation (e.g., if the transfer is necessary for the exercise or defense of Legal claims).

To obtain a copy of these safeguards measures to ensure the protection of your personal data, or to obtain 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 will retain your personal data for the longer of the following periods:

- the period required by applicable law,

- the period necessary to enable us to meet our operational obligations, such as: properly maintaining accounts, facilitating customer relationship management and/or responding to legal claims or requests from regulatory authorities.

The majority of personal data collected about a particular customer is retained for the duration of the

contractual relationship plus a specified number of years after the contractual relationship ends or as required by applicable law.

If you would like more information about the length of time for which your personal data will be stored or the criteria by which that length of time is determined, please contact us at the address in section 9 (How to contact us) below.

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

In accordance with applicable regulations, you have the following rights:

- to **access**: you may have the right to obtain information relating to the processing of your personal data, and a copy of such personal data;
- to **rectify**: where you consider that your personal data are inaccurate or incomplete, you can request that such personal data be modified accordingly;
- to **erase**: in some circumstances, you can require the deletion of your personal data, to the extent permitted by Law;
- to **restrict**: in some circumstances, you can request the restriction of the processing of your personal data;
- to **object**: in some circumstances, you can object to the processing of your personal data, on grounds relating to your particular situation;
- to **give instructions**: related to the conservation, the erasure or the communication of your data, after your death;
- to **withdraw your consent**: where you have given your consent for the processing of your personal data, you have the right to withdraw your consent at any time;
- to **data portability**: where Legally applicable, you can ask the restitution of personal data you have provided to us, where technically feasible, the transfer of personal data to a third party.

If you wish to exercise these rights, please refer to section 9 hereafter. For identifications purposes, we may ask you for a proof of your identity.

In accordance with applicable regulation, in addition to your rights above, you are also entitled to Lodge a complaint with the competent supervisory authority.

8. HOW CAN YOU KEEP UP WITH CHANGES TO THIS DATA PROTECTION NOTICE?

In a world of constant technological change, we may need to update this Data Protection Notice from time to time.

We invite you to review the Latest version of this notice Online 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 relating to our use of your personal data under this Data Protection Notice or if you

wish to exercise the rights described in section 7, please contact the data protection office of the BNP Paribas entity you are working with/for.

You can ask your usual point of contact at BNP Paribas for the contact details of the data protection office. If you don't have a point of contact at BNP Paribas, please reach out to your employer for support.

As a Last resort, if you can't retrieve the data protection office's contact details of the BNP Paribas entity you are working with/for, please send an email to group.supplierspersonaldata@bnpparibas.com with the name and Location of the BNP Paribas entity you are working for/with.

If you wish to Learn more about cookies, please refer to our cookie policy.