

INFORMATION PACKAGE LEAFLET ON THE DATA PROCESSING A PERSONAL

PALATINE Asset Management undertakes to ensure that the processing of personal data it implements complies with the General Data Protection Regulation (GDPR) and the Data Protection Act.

This Notice is intended to provide you with detailed information on how Palatine Asset Management, acting as data controller, protects your personal data.

It explains how your data is obtained, why it is processed, with whom it is likely to be shared, the measures implemented to ensure their confidentiality and security and recalls the rights you have and how to exercise them. Depending on the nature of the product or service subscribed, additional specific information will be provided.

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SOME DEFINITIONS

When the following terms are used, they mean:

'We': PALATINE Asset Management involved in the processing of your personal data as data controller,

« You »: You or any individual involved in our relationship (your legal representative, proxy, contact, etc.),

« Personal data 'or' personal data, or 'data': These may be different categories of data depending on the need. For example:

Information about your identity and/or contact such as name, first name, date of birth, postal and electronic address, telephone number, identity document numbers, age, signature specimen,

Information about your family, professional and tax situations,

Banking and financial information related to your operations, including your knowledge of investment products,

Video surveillance images in our premises, geolocation to locate them.

WHO ADDRESSES THIS LEAFLET

The Notice is intended for you as a natural person concerned by a personal data processing implemented by Palatine Asset Management, whether you act as a private individual or in the context of a professional activity.

It concerns you in particular if you are:

- A customer, potential customer or prospect,
- A natural person acting in any capacity as part of an established relationship with a customer of Palatine Asset Management, natural or legal person, for example: An authorised agent or signatory, legal representative, surety, designated contact, member, employee or beneficial owner, heir or beneficiary of a life insurance contract.

WHO COLLECTS YOUR PERSONAL DATA

PALATINE ASSET MANAGEMENT

You use the services of Palatine Asset Management regularly, which supports you through its employees, the remote services made available to you, and where appropriate through its agents and distributors.

PALATINE Asset Management is in charge of collecting and processing personal data related to this relationship. She acts as controller for this purpose.

THE UES BANQUE PALATINE

Palatine Asset Management is not alone in providing these services and a range of products designed to meet your needs. It is part of the Ues Banque Palatine (Groupe BPCE) and enters into partnerships with companies.

All these companies contribute to the services provided to you and ensure compliance with the same principles. To do this, they may have communicated and processed your personal data.

HOW WE OBTAIN PERSONAL DATA ABOUT YOU

During our relationship, we will collect and process personal data about you. These data may vary depending on the nature of the product or service subscribed.

Personal DATA AND INFORMATION YOU Communicate

When entering into a relationship and then when subscribing to any new product or service, we collect directly from you the data necessary for this operation.

These data are necessary:

To enable us to fulfil our legal and regulatory obligations such as the obligation to know our customer, our tax or anti money laundering and anti terrorist financing obligations,

To get to know you, advise you and offer you products and services that meet your needs,

For the subscription and management of your products or services.

Some data may also be collected when you perform simulations on our website, ask for information or request contact.

PERSONAL DATA FROM THIRD PARTIES OR OTHER SERVICES

Personal data may also come from:

Third party suppliers,

A partner of Palatine Asset Management,

Other products or services provided by third parties, including Groupe BPCE/Banque Palatine companies, to which you have subscribed,

Other persons involved in our relationship (your agents, designated contacts, employees, beneficial owners, family members, legal representatives, etc.)

PUBLIC PERSONAL DATA

We may collect public personal data about you.

Public personal data are personal information or data produced or received by an administrative authority in the context of its public service mission, published by an administrative authority or communicable to any person upon request.

We may use public personal information or data when authorised by laws or regulations and in compliance with the specific rules for communication and reuse specified by said texts.

EXCLUSION OF SPECIAL CATEGORIES OF PERSONAL DATA

Specific categories of personal data are data that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, personal data concerning health or personal data concerning the sexual life or sexual orientation of a natural person. As a matter of principle, we do not collect or process this type of data.

In any case, if we were to process these particular categories of personal data, this would be done in accordance with the applicable legislation or regulation which provides in certain cases for the prior collection of your explicit consent.

WHO ACCESSES YOUR DATA

As a portfolio management company, we are bound by professional secrecy and may only share your data under strict conditions or with your consent.

This same principle of secrecy and confidentiality applies to all those involved, be they our employees, our service providers, our partners and their own employees.

Within the Banque Palatine Ues, we may be required to disclose some of your personal data to the following entities:

BPCE S.A. acting as the central body of Groupe BPCE so that it can fulfil the various tasks assigned to it by law, for the benefit of Banque Palatine and the Group, in particular in terms of prudential reporting to any competent regulatory authority, in terms of coordinating the commercial policies and commercial actions of Groupe BPCE institutions, or for the purpose of managing data governance on behalf of Groupe BPCE institutions. Data governance refers to the organisation and procedures put in place to regulate data collection and use practises within Groupe BPCE, and to optimise the effectiveness of the use of such data in compliance with the legal and ethical framework,

To the entities, service providers of Groupe BPCE or the Banque Palatine Ues, in the event of pooling of technical resources, particularly IT resources on behalf of Palatine Asset Management. To this end, your personal data may be pseudonymised or anonymized for the purpose of researching and creating statistical models. Pseudonymisation means that the data in question can no longer be connected to your person without the use of additional information, kept separately and subject to technical and organisational measures to ensure that the initial data can no longer be attributed to an identified or identifiable natural person.

With third parties, we may share some of your data in the following cases:

With certain regulated professions, such as lawyers, bailiffs, notaries or audit firms,

With third parties (service providers, subcontractors, etc.) in order to entrust them with operational functions,

With our subcontractors and service providers for the sole purpose of services to be performed on our behalf, related in particular to the provision of financial services or products or the carrying out of surveys or statistics,

If necessary, with the Ombudsman of our institution as part of your mediation request.

We must also share your data when professional secrecy is lifted by law, particularly with regard to the tax and customs administration, the Financial Markets Authority, parliamentary committees of inquiry. Secrecy is also lifted with regard to the information required for the application of the agreements concluded by France organising an automatic exchange of information for tax purposes (Article 1649 AC of the French General Tax Code). Secrecy may not be opposed to the judicial authority acting in criminal proceedings, as well as in civil proceedings where a specific text expressly provides for it.

WHY TREAT US YOUR DATA HAS CHARACTER PERSONNEL

As part of our relationship, we use all or part of the personal data concerning you, for the purposes described below and on the basis of the following foundations:

EXECUTE THE CONTRACT RELATING TO THE PRODUCTS AND SERVICES YOU HAVE SUBSCRIBED OR WISH TO SUBSCRIBE

We process your personal data first and foremost in order to provide the products and services that you subscribe to, or wish to subscribe to.

The processing is implemented as it is necessary for the execution of the contract, or for the execution of pre contractual measures taken at your request as a customer, in the context of an already established relationship, or as a prospect or potential customer if no business relationship has yet been established (pre contractual measures such as the issue of advice, proposal, simulation).

The treatments implemented in connection with the management of our relationship include:

- A- the management of your portfolios of financial instruments under management mandates, the management of transactions on these accounts with issuers of financial instruments and investment service providers,
- B- the management of arbitrage mandates in UC of insurance contracts,
- C- claims management.

Without these treatments, we would not be able to enter into or execute the contract.

MEET OUR LEGAL AND REGULATORY OBLIGATIONS

Our business operates in a highly regulated regulatory environment. To meet these legal obligations, we implement personal data processing.

As a result, we may be required to collect or request specific information regarding certain transactions if required by law or regulation.

Combating money laundering and the financing of terrorism

We are required to identify our customers and, where applicable, the actual beneficiaries of the transactions and to constantly monitor our customers throughout the duration of the business relationship (amount and nature of the transactions, source and destination of the funds, monitoring the customer's professional, economic and financial situation, etc.). The information you provide to us in this respect must be regularly updated.

As such, we are required to apply special vigilance measures with respect to Politically Exposed Persons defined by the Monetary and Financial Code.

We are also required to report to the competent authorities certain transactions in particular:

- Transactions involving sums that could arise from an offence punishable by deprivation of liberty or that could participate in the financing of terrorism or in a tax fraud laundering transaction,
- Transactions for which the identity of the principal or beneficial owner of the transaction remains doubtful despite the diligence performed in respect of the obligation to verify identity incumbent on the management company.

Prevention, search and detection of payment fraud and remote access to your payment accounts

We are required to implement security measures involving the processing of certain of your personal data as part of our authentication procedures and with a view to protecting the integrity and confidentiality of your data.

Other regulatory obligations

Responses to requests for the exercise of rights under the regulations on the protection of personal data. The exercise of your rights requires the processing of personal data concerning you for the purposes of identification, management of your requests and preservation of proof.

Our business as a company (general accounting, billing, balance sheet management, reporting, audit etc.) requires us to process a large volume of our customers' personal data.

ADDRESSING OUR LEGITIMITY INTERESTS

We may invoke a 'legitimate interest' in processing your data, especially when we are faced with situations that may pose risks to our business, including:

- A- prevent fraud, particularly on credit and payment transactions, and manage any legal remedies,
- B- combating financial crime with regard to both the financial sector and our customers and employees,
- C- prevent and manage incivility towards our employees,
- D- ensure the security of our networks and information, our automated banking machines, and monitor access to our premises, in particular by means of video surveillance.

This legitimate interest can be linked to the analysis of our commitment risk, particularly when assessing the risks associated with credit applications and throughout the contractual relationship. The automated treatments implemented in this context ultimately include human intervention and result in a decision to grant or refuse credit. You have the right to comment and challenge the decision taken as a result of this process.

Our legitimate interest can also be linked to the management:

- Statistical studies and satisfaction surveys,
- The relationship with our customers (improvement of customer knowledge, improvement of our products and services, monitoring, design, development and monitoring of commercial activity),
- Marketing prospecting, profiling and segmentation including, where appropriate, the combination of data for analytical purposes,
- Of our communication activities.

These treatments are implemented taking into account your interests and fundamental rights. As such, they are accompanied by measures and guarantees to ensure the balance between the protection of your interests and rights and the pursuit of our legitimate interests.

IMPLEMENT CERTAIN TREATMENTS WITH YOUR CONSENT

In certain cases, you will be informed and requested prior to the implementation of the processing of your data to express your consent, in a specific manner, with regard to the purpose indicated to you. Your data cannot be processed without your consent.

HOW LONG ARE YOUR DATA STORED

Once the data processing purposes have been met, and taking into account any legal or regulatory obligations requiring the retention of certain data, we delete or anonymize your data.

The retention period is variable and depends on the nature of the data and the purposes pursued. The data is usually kept for the time necessary for the performance of the contract and until the expiry of the various legal periods applicable.

When a personal data is collected for several purposes, it is retained until the longest storage or archiving period is exhausted.

The table below shows the main deadlines applicable to the relationship.

TYPE OF TREATMENT	SHELF LIFE	POINT OF DEPARTURE CONSERVATION
Accounting documents and supporting documents (account statements, etc.)	10 years *	From the end of the relevant accounting year

Award, execution and management of products and services subscribed	5 years *	From the end of the product or service *, the termination of our relationship *,
Combating money laundering and the financing of terrorism	5 years	From the execution of the transaction
Fight against fraud Prevention and detection of offences and crimes	5 years	From the day of the offence. When legal proceedings are initiated, the data are kept until the end of such proceedings and the expiry of the applicable limitation periods.
Commercial prospecting, at the end of a previously established contractual relationship: Exploitation of the names, first names, address, date and place of birth and characteristics of the product previously subscribed	5 years	From the end of our relationship or the last contact on your part
Commercial prospecting for a non customer prospect	3 years	From the collection or last incoming contact from the prospect
Cookies, tracers	13 months maximum	From the date of deposit of the tracer
Prevention and detection of criminal offences in preparation and/or prosecution	5 to 20 years depending on the nature of the offence	From the finding of the infringement
<p>* These periods may be longer in certain specific situations, where required by regulations, or for the defence of a right or interest, for example:</p> <ul style="list-style-type: none"> - For the management of unclaimed accounts and data related to the search of the persons concerned: 30 years, - To comply with tax provisions (relating to regulated savings in particular): 6 years. When a personal data is collected for several purposes, it is retained until the longest storage or archiving period is exhausted. 		

How TO Ensure THE SAFETY AND CONFIDENTIALITY OF YOUR DATA

Respect for privacy, security and confidentiality of data, and especially personal data entrusted by our customers, is our priority.

Given the nature of the personal data and the risks presented by the processing, we take the technical and organisational measures necessary to preserve the security of your data, and in particular to prevent them from being distorted, damaged, or that unauthorised third parties have access to it or prevent any improper use.

Thus, we implement the physical, technical, organisational and state of the art security measures necessary to:

Protect the security of our customers' personal data against unauthorised access, modification, distortion, disclosure, or destruction of the personal data we hold,

Protect our activities.

We regularly conduct internal audits to ensure the security of personal data and to guard against unauthorised access to our systems.

Nevertheless, the security and confidentiality of personal data is based on the best practices of each individual, so you are invited to be vigilant.

In order to protect the confidentiality of your personal data, we invite you, in particular in the rules of Internet use, to take all necessary measures, in particular by erasing, as soon as the end of your consultation, the traces of navigation and by prohibiting access to unauthorised third parties in the event that you download this data to management software. We invite you to consult the security advice available to you, in particular via our website.

In accordance with our commitments, we select our subcontractors and service providers carefully and impose on them:

- A level of personal data protection equivalent to ours,

- Access to and use of personal data or information strictly necessary for the services they must provide,

- Strict compliance with applicable laws and regulations on confidentiality, bank secrecy and personal data,

- The implementation of all appropriate measures to ensure the protection of personal data that they may be required to process,

- Defining the technical and organisational measures necessary to ensure data security.

OR ARE STORED YOUR DATA

Personal data and information relating to our Customers are stored in our information systems or in that of our subcontractors or service providers.

In this context, we select subcontractors and service providers that meet the quality and safety criteria. These must provide sufficient guarantees, in particular in terms of specialist knowledge, reliability and resources, for the implementation of technical and organisational measures, including with regard to processing security.

As such, we impose confidentiality rules on our subcontractors and service providers that are at least equivalent to our own.

As a matter of principle, we favour technical solutions and the storage of personal data in hosting centres located within the European Union. If this is not the case, we take the necessary measures to ensure that subcontractors and service providers offer the appropriate security and protection measures as described below.

ARE YOUR DATA COMMUNICATED OR ACCESSIBLE FROM A COUNTRY OUTSIDE THE EUROPEAN UNION?

Your personal data transmitted in accordance with the agreed purposes may not be transferred to a European Union country or outside the European Union.

IMPLEMENTATION OF SPECIFIC TREATMENTS BASED ON SPECIFIC TECHNOLOGY

VIDEO PROTECTION

As part of the implementation of security measures at our premises, we use video protection systems in compliance with the rules laid down in the Internal Security Code, and in particular the authorisations issued by the competent prefectures, or regulations relating to the protection of personal data.

You are informed that these images are recorded and stored and that they can lead to the identification of persons filmed either by the systems implemented or by the agents having access to the images.

Signs in filmed locations indicate the existence of this type of device, the identity of the person in charge and the procedures for exercising your rights of access to the visual recordings concerning you.

The images are kept for a period of one month, except in criminal proceedings. If such proceedings are initiated, the images are then taken from the device (after recording this transaction in a specific collection) and kept during the course of the proceedings.

COOKIES AND OTHER TRACERS

Cookies or other tracers are tracers deposited and read, for example, when viewing a website, reading an e mail, installing or using software or a mobile application, regardless of the type of terminal used.

You are informed that during your visits to one of our sites, cookies and tracers may be installed on your terminal equipment. You can consult, on the relevant website, the cookie policy implemented. When necessary, we collect your consent prior to installing such tracers on your terminal equipment but also when we access data stored on your equipment.

The lifetime of these tracers is a maximum of 13 months.

YOUR RIGHTS

Within the limits and conditions authorised by the regulations in force, you can:

Access your personal data,

Have your personal data corrected, updated and erased, it being specified that erasing can only occur when:

Personal data are no longer required for the purposes for which they were collected or otherwise processed,

You have withdrawn your consent on which the treatment was based and there is no other legal basis justifying it,

You objected to the processing of your data for reasons related to your particular situation and that there is no compelling legitimate reason to pursue it,

Personal data has been unlawfully processed,

Personal data must be erased in order to comply with a legal obligation under Union law or French law to which the Bank is subject,

Oppose the processing of your personal data for reasons related to your particular situation and that there is no compelling legitimate reason to pursue it,

Oppose the processing of your personal data for commercial prospecting purposes, including profiling related to such prospecting,

Receive the personal data concerning you and that you have provided to us, for automated processing based on your consent or on the performance of a contract, and request the portability of this data from a third party, request a limitation of the processing of personal data that we operate concerning you when:

You dispute the accuracy of the personal data for a period allowing the controller to verify the accuracy of the personal data,

You object to erasing your data while processing is illegal,



We no longer need the data, but it is still necessary for you to establish, exercise or defend legal rights,

You opposed the processing of your data, during the verification of whether the legitimate reasons pursued by the Bank prevail over yours.

Where the treatment is based on your consent, withdraw this consent at any time,

File a claim with a supervisory authority. CNIL -3, place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07 - www.cnil.fr

In addition, you have the opportunity to provide us with guidelines for the retention, erasure and communication of your data after your death, which guidelines can also be registered with 'a certified digital trusted third party.' These directives may designate a person responsible for their execution. However, these rights may not have the effect of infringing the rights of the heirs or allowing the communication of information to which only the heirs can legitimately have access.

HOW TO EXERCISE YOUR RIGHTS

If you would like to know more about the provisions of this information sheet, you can contact the Customer Reporting Department of Palatine Asset Management by mail at its postal address: TSA 60140 - 93736 Bobigny Cedex 9 or by e mail at: reporting@palatine.fr.

Your rights are exercised directly with Palatine Asset Management.

For the exercise of your rights by mail, you must prove your identity by clearly indicating your first and last names, the address to which you want the answer to be sent to you, sign your request. We advise you to attach a copy of your ID to facilitate your application.

The exercise of your rights of access, rectification, opposition, erasure, of your right to the limitation of the processing or the portability of personal data is carried out free of charge.

In respect of the exercise of the right of access, we will provide you with a copy of the personal data being processed. In the event of claims that are manifestly unfounded or excessive, in particular because of their repetitive nature, we may require the payment of reasonable fees taking into account the administrative costs incurred in providing this information, making the communications or taking the measures requested, or refusing to respond to your request.

SPECIFIC ACCESS RIGHTS

For the treatment implemented pursuant to Articles L. 561-5 to L. 561-23 of the French Monetary and Financial Code, the purpose of which is to combat money laundering and terrorist financing:

The right of indirect access is exercised with CNIL (L. 561-45 of the French Monetary and Financial Code).

This information leaflet may be amended. The latest version is available on the Palatine Asset Management website.