# **COUNTRY-SPECIFIC PROVISIONS**

## DATA PROTECTION NOTICE

#### Austria

We, BNP Paribas entities registered in Austria, will only disclose your personal data as set out in this Data Protection Notice to the extent this does not violate provisions of the Austrian banking secrecy law and/or other local statutory requirements.

#### **Bahrain**

This section applies solely to data owners in the Kingdom of Bahrain as defined under the Bahrain Personal Data Protection Law No. 30 of 2018 ("PDPL") and our policies have been developed in line with the provisions of the PDPL which came into effect on 1 August 2019.

In addition to the above disclosures, the following applies to Bahrain data owners protected by the PDPL:

In case of transfers of personal data outside the Kingdom of Bahrain, we make sure to transfer your personal data to countries and regions that provide sufficient level of protection for your personal data. Such transfers, to the extent practicable, shall be in accordance with any applicable lists recognized by the relevant authorities and laws.

Furthermore, in case of transfers of personal data outside the Kingdom of Bahrain, we will only disclose your personal data to such third party or parties ("Data Processor(s)") where they have undertaken, in advance and in writing, to maintain the confidentiality, integrity and security of the personal data concerned, in accordance with applicable laws.

In some instances, we may be required to transfer your personal data to other countries whose level of protection has not been recognized by the relevant authorities in terms of the PDPL. In such cases, we may rely on (i) the exceptions provided by the PDPL (e.g. if the transfer is necessary to perform our contract with you); as well on (ii) sufficient guarantees regarding the measures to protect the confidentiality and security of the personal data.

A controller is described under the PDPL as a data manager and is defined as the person who decides, solely or in association with others, the purposes and means of processing of certain personal data. In the events where such purposes and means are prescribed by Bahrain law, the Data Manager shall be the person who is responsible for the processing of the data. All references in this Notice to "controller" are references to "data manager" as defined under the PDPL.

Processing is defined under the PDPL as any operation or set of operations carried out on personal data by automated or non-automated means, such as collecting, recording, organizing, classifying in groups, storing, modifying, amending, retrieving, using or revealing such data by broadcasting, publishing, transmitting, making them available to others, integrating, blocking, deleting or destroying them.

Processing of sensitive personal data is also prohibited without the consent of the data owner, except in some instance as outlined under the PDPL, including, without limitation, when the processing is related to the race or ethnicity, if they are necessary to ascertain equal opportunities or treatment of the society's individuals.

Data owners may at any time withdraw a previous approval they had granted to process their personal data. You have a right to file a complaint with us or any regulator with jurisdiction about an alleged contravention of the protection of your personal data. If you wish to exercise the rights listed above, please send an email to the following address: mea.communications.data.rights@bnpparibas.com; or send a letter to the following address:

Data Protection Office c/o Risk ORC Bahrain Financial Harbour West Tower





King Faisal Highway Manama, Kingdom of Bahrain P.O Box 5241

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

## **Belgium**

We, BNP Paribas SA, Belgium branch, ask that for any question you may have, as well as to exercise your rights, please send your request to the following email address gdpr.desk.cib@bnpparibas.com.

## Bulgaria

We, BNP Paribas entities registered in Bulgaria, will only disclose your personal data as set out in this Data Protection Notice to the extent this does not violate provisions of the Bulgarian banking secrecy law and/or other local statutory requirements. BNP Paribas S.A., registration number 662042449 RCS Paris, with its registered office at 5009 Paris, 16 Boulevard des Italiens, France, acting in Bulgaria through its branch office BNP Paribas S.A., Sofia branch, UIC: 175185891, may require you to include a scan/copy of your identity card for identification purposes pursuant to the Bulgarian Measures Against Money Laundering Act.

#### California Residents

(This section applies solely to Consumers who reside in the State of California as defined under the California privacy Rights Act of 2020 ("CPRA"))

In addition to the above disclosures, the following applies to California residents protected by the CCPA:

Personal information is defined under the CCPA to include any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked with a particular California consumer or household. Examples include, but are not limited to, social security numbers, bank and credit account information, transaction histories, credit information, and biometric data.

A consumer may request that we disclose to you (a) the categories of personal information the we have collected about you, (b) the categories of sources from which the personal information is collected, (c) the purpose for collecting the personal information, (d) the categories of third parties with whom we shares personal information, and (e) the specific pieces of personal information that we have collected about you.

This notice provides: the purpose for collecting and/or sharing your personal data (section 3); the types of personal data we collect and/or share about you (section 4); the categories of sources from which your personal data is collected (section 5); and the categories of personal data we share with third parties (section 6).

A consumer has a right to receive non-discriminatory treatment by a covered business for the exercise of privacy rights conferred by CPRA. For example, a business must not offer a consumer unfair services or pricing because they have exercised their CPRA rights.

Currently we do not sell personal information. If, in the future, we seek to sell the personal information of California residents, we will provide notice and the opportunity to opt out.

If you would like to contact us to exercise your rights under CPRA, you may do so by email at: dataprivacy@us.bnpparibas.com; or by phone at: 212-841-3000.

If you would like to contact us to exercise your rights under CPRA, or if you are a parent, guardian or legal representative making a request on behalf of a California resident, you may do so by email at: dataprivacy@us.bnpparibas.com; or by phone at: 212-841-3000.

Please note that identities of individuals requesting deletion or disclosure of their personal information must first be verified to protect you and the Bank from fraud and identity theft.



Please note that not all personal information is eligible to be deleted.

## **Cayman Islands**

To the extent a BNP Paribas entity ("we") (i) is established in the Cayman Islands and (ii) is a controller of your personal data in the context of that establishment, then as and when the Data Protection Act (As Revised) of the Cayman Islands (the "DPL") comes into force, the DPL will apply to us and you will have rights under the DPL.

The framework and application of the DPL is similar to that of the European General Data Protection Regulation, and accordingly the provisions of the Data Protection Notice broadly apply. In particular, your rights under the DPL are analogous to those listed in section 2 (How can you exercise your rights in the context of our personal data processing?). International data transfers will be subject to the same safeguards as those summarised in section 7 (International transfers of personal data).

The competent supervisory authority for purposes of the DPL is the Ombudsman of the Cayman Islands. Should you have any questions in respect of the application of the DPL please write to <a href="mailto:dl.hfsky\_legal@us.bnpparibas.com">dl.hfsky\_legal@us.bnpparibas.com</a>.

## **Channels Islands**

We will use the information you provide in a manner that conforms with the Data Protection (Jersey) Law 2018 and Data Protection (Bailiwick of Guernsey) Law, 2017.

For any questions you may have, as well as to exercise your rights, please send your request to the following email address: dataprotectionci@je.bnpparibas.com

## **Czech Republic**

## Data Subject Rights

We, BNP Paribas entities registered in Czech Republic, including BNP Paribas S.A., registration number 662042449 RCS Paris, with its registered office at 5009 Paris, 16 Boulevard des Italiens, France, acting in the Czech Republic through its branch office BNP Paribas S.A., pobočka Česká republika, will not require you to include a scan/copy of your identity card for identification purposes, if you wish to exercise the rights listed in section 2 above. Instead, for identification purposes, you can,

- Visit BNP Paribas entities registered in Czech Republic in person.
- Send an original letter with your hand signature which has been verified by a notary public.
- Send as an email with your qualified electronic signature.

## Complaints

In accordance with applicable regulation, you are also entitled to lodge a complaint with the competent supervisory authority. The contact details of the supervisory authority in the Czech Republic is:

ADDRESS: Czech Office for Personal Data Protection (Úřad pro ochranu osobních údajů), Pplk. Sochora 27, 170 00 Prague 7, Czech Republic

TELEPHONE NUMBER: +420 234 665 111

EMAIL: posta@uoou.cz DATA BOX: qkbaa2n

#### Changes to this Data Protection Notice

We may need to update this Data Protection Notice from time to time. We will inform you of any material changes through our website: https://www.bnpparibas.cz/en/

#### Denmark

Provided that a contractual relationship exists, the relevant data controller for the processing of your personal data in relation to the BNP Paribas Group's Corporate & Institutional Banking Business services and activities, as well as certain services of BNP Paribas Securities Services, in Denmark is:

BNP Paribas S.A., Denmark

Filial af BNP Paribas S.A., Frankrig



CVR no. 38 45 16 34 Adelgade 12, 3rd floor DK-1304 Copenhagen K

Email: gdpr.desk.cib@bnpparibas.com Telephone no: + 45 32 71 19 40

#### Marketing

We, BNP Paribas S.A., Denmark, filial af BNP Paribas S.A., Frankrig will only send you marketing material via electronic communications (such as e-mails, SMS, instant messaging services or other equivalent technologies) in accordance with Danish law.

## Recording of telephone conversations

The Bank may record telephone conversations with clients for the purposes of documenting the content of agreements and to ensure the level of client services. All recordings of telephone conversations will be done in accordance with Danish law. Any recordings will be for the Banks own internal purposes and will not be disclosed to any third party, except within the BNP Paribas S.A. group.

## Retention periods

In general and unless there are special reasons for a longer retention period, personal data will be stored for up to 5 years after the business relationship with us has terminated or the single transaction conducted pursuant to requirements in the Danish Act on Measures to Prevent Money Laundering and Financing of Terrorism (as amended from time to time).

#### Ouestions

We, BNP Paribas S.A., Denmark filial af BNP Paribas S.A., Frankrig, ask that for any complaints you may have, please send your complaint to the following address:

BNP Paribas S.A., Denmark Filial af BNP Paribas S.A., Frankrig CVR no. 38 45 16 34 Adelgade 12, 3rd floor DK-1304 Copenhagen K Attention DPO

#### Germany

We, BNP Paribas entities registered in Germany, including BNP Paribas Niederlassung Deutschland, will only record phone communications you have with us if we are obliged by statutory law to do so or we have received your prior consent to such phone recording.

We will only disclose your personal data as set out in this Data Protection Notice to the extent this does not violate provisions of German banking secrecy law and/or other local statutory requirements.

## Greece

## Marketing

We, BNP Paribas, Greek Branch, will only send to you marketing material via electronic communications (such as e-mails, SMS, instant messaging services or other equivalent technologies) in accordance with the Greek law.

## Recording of telephone conversations

The BNP Paribas registered in Greece may record telephone conversations with clients for the purpose of documenting the content of agreements and to ensure the level of client services. All recordings of telephone conversations will be performed in accordance with the Greek law. Any recordings will be for the Bank's own internal purposes and will not be disclosed to any third party, except within the BNP Paribas S.A. group.

## Retention periods

Concerning the processing of personal data to combat money laundering and the financing of terrorism, We, BNP Paribas



registered in Greece, will store your personal data for up to 5 years after the business relationship with us has terminated or the date of an occasional transaction conducted pursuant to requirements in the Greek law. Records of phone and electronic communications relating to certain transactions are stored for up to 5 years and, if requested by the Hellenic Capital Markets Commission (HCMC), may be stored for a period of maximum 7 years after the business relationship with us has terminated or after the single transaction conducted pursuant to requirements in the Greek law.

#### **Ouestions**

For any questions you may have, as well as to exercise your rights, please send your request to the following address:

BNP Paribas, Greek Branch 2, Lampsakou str. 115 28 Athens Attention: DPO

Telephone no.: +30 210 746 8000

## Hungary

We, as BNP Paribas entities registered in Hungary, will only record phone communications you have with us if we are obliged by statutory law to do so (e.g. mandatory recording of complaints) or we can prove a legitimate interest to such phone recording.

Notwithstanding the terms of this Data Protection Notice, we will only disclose your personal data, as set out in this Data Protection Notice, to the extent this does not violate provisions of the Hungarian banking secrecy law and/or other local statutory requirements.

In accordance with applicable regulation, you are also entitled to lodge a complaint with the competent supervisory authority. The contact details of the supervisory authority you can find in Appendix B of this Data Protection Notice.

We may need to update this Data Protection Notice from time to time. We will inform you of any material changes through our website: Data protection - BNP Paribas Hungary

For any question you may have, as well as to exercise your rights, please send your request to the following email address: hu.cib.gdpr@bnpparibas.com

#### **Ireland**

BNP Paribas entities registered in Ireland, will not record any phone communications with you unless we have received your authorisation to such phone recording.

We, BNP Paribas Dublin Branch and BNP Paribas Fund Administration Services (Ireland) Limited ask that for any question you may have, as well as to exercise your rights, please send your request to the following email address: dataprotection.bpss.ireland@bnpparibas.com.

We, BNP Paribas, Dublin branch, ask that for any question you may have, as well as to exercise your rights, please send your request to the following email address dataprotectionofficer-roi@bnpparibas.com

## Italy

The data controller for the processing of your personal data in relation to the BNP Paribas Group's Corporate & Institutional Banking Business services and activities in Italy is:

BNP Paribas Italian Branch Piazza Lina Bo Bardi, 3 20124 Milan, Italy

For any issues and/or questions relating to our use of your personal data, please contact the Italian Data Protection Officer at italydataprotectionofficer@bnpparibas.com





## Marketing

BNP Paribas S.A., Italian Branch, in its quality as Data Controller of data collected through the Italian websites and/or virtual and physical events, will send marketing materials via electronic communications only, in accordance with Italian law.

## Recording of telephone conversations

All recordings of telephone conversations will be done in accordance with Italian law.

## Retention periods

As regards conservation of inherent documentation to the individual clients operations, burden of conservation of accounting records deriving from fiscal, civil and criminal legislation, fulfilment of due diligence obligations of clients for anti-money laundering purposes, the retention period is 10 years from the date of termination of the relationship, in accordance with Italian Law. Furthermore, personal data will be stored for up to 2 years for the purpose of tracking obligations of banking operations and inquiry operations banking, in accordance with Italian Law.

#### Kuwait

This section applies solely to data subjects in the State of Kuwait. Although the State of Kuwait does not have a specific personal data protection law, BNPP Group applies international best practice, as noted in our data protection notice above, when collecting, storing, transferring and processing personal and confidential information. Furthermore BNPP Group observes all local laws and regulations as they pertain to private and confidential data relating to personal status, health status, financial information and other personal information.

In case of a complaint/inquiry in regards to the protection of your personal information, please send an email to the following address: mea.communications.data.rights@bnpparibas.com; or send a letter to the following address:

Chief Operating Officer

Dar Al Awadi Complex, 24th floor, Ahmed Al Jaber Street, Sharq P.O. Box 21188, Safat 13072, State of Kuwait

## Luxembourg

We will only disclose your personal data as set out in this Data Protection Notice to the extent this does not violate provisions of the Luxembourg banking secrecy law and/or other local statutory requirements.

We, BNP Paribas, Luxembourg branch, ask that for any question you may have, as well as to exercise your rights, please send your request to the following email addresses: dpo@bgl.lu and gdpr.desk.securities.lu@bnpparibas.com.

#### Morocco

This section applies solely to data subjects in the Kingdom of Morocco as defined under Law No 09-08, dated February 18, 2009 relating to the protection of individuals with regard to the processing of personal data and its implementation Decree n° 2-09-165 of May 21, 2009 (together the "DP Law") and the BNPP Group policies have been adjusted to ensure all applicable personal data will be treated in accordance with the provisions of the DP law.

To the extent BNP Paribas Regional Investment Company, with registered address Lot 57, Tour CFC, 15th floor, Casa Anfa Hassani Street, Casablanca, commercial number 293279, Casablanca, Morocco ("we") is a controller of your personal data, please be informed of the specific provisions below. The below specific provisions are in addition to the above disclosures noted on this Data Protection Notice:

In case of transfers of personal data to a foreign state, we make sure to transfer your personal data to countries and regions with legal frameworks that provide an adequate level of protection for the privacy and fundamental rights and freedoms in respect of the processing of your personal data. Such transfers are done pursuant to the requisite authorizations by the relevant authorities and laws.

Furthermore, in case of international transfers, we will only disclose your personal data to such third party or parties ("Data Processor(s)") where they have undertaken, in advance and in writing, to maintain the confidentiality, integrity and security of the personal data concerned, in accordance with applicable laws.



You have a right to file a complaint with us or any regulator with jurisdiction about an alleged contravention of the protection of your personal information. If you wish to exercise the rights listed above, please send an email to the following address: mea.communications.data.rights@bnpparibas.com; or send a letter to the following address:

Data Protection Officer Lot 57, Tour CFC, 15th floor, Casa Anfa Hassani Street, Casablanca, Morocco

The competent supervisory authority for purposes of the DP Law is the Data Protection National Commission (Commission Nationale de Protection des Données Personnelles).

#### **Netherlands**

The relevant data controller for the processing of your personal data in relation to the BNP Paribas Group's Corporate & Institutional Banking Business services and activities, as well as certain services of BNP Paribas Securities Services, in the Netherlands is:

Herengracht 595 1017 CE Amsterdam Email: gdpr.desk.cib@bnpparibas.com Telephone no: + 31 20 5501212

#### Questions

For any complaints and/or data protection related questions data subjects can contact our Data Protection Officer:

BNP Paribas S.A., Netherlands Herengracht 595 1017 CE Amsterdam Attention DPO Email: bnpp.nl.dpo@bnpparibas.com

## Norway

Provided that a contractual relationship exists, the relevant data controller for the processing of your personal data in relation to the BNP Paribas Group's Corporate & Institutional Banking Business services and activities, as well as certain services of BNP Paribas Securities Services, in Norway is:

BNP Paribas S.A. Norway Branch (NUF) Filial of BNP Paribas S.A., France Org. no. 918 654 496

Visiting address: Støperigata 2, 0250 Oslo, Norway Postal address: Postbox 106 Sentrum, 0102 Oslo Email: gdpr.desk.cib@bnpparibas.com

Telephone no.: +47 22 82 95 65

## Marketing

We, BNP Paribas S.A., Norway Branch, will only send you marketing material via electronic communications (such as emails, SMS, instant messaging services or other equivalent technologies) in accordance with Norwegian law.

## Recording of telephone conversations

The Bank may record telephone conversations with clients for the purposes of documenting the content of agreements and to ensure the level of client services. All recordings of telephone conversations will be done in accordance with Norwegian law. Any recordings will be for the Banks own internal purposes and will not be disclosed to any third party, except within the



BNP Paribas S.A. group.

#### Retention periods

In general and unless there are special reasons for a longer retention period, personal data will be stored for up to 5 years after the business relationship with us has terminated or the single transaction conducted pursuant to requirements in the Norwegian Act on Measures to Prevent Money Laundering and Financing of Terrorism (as amended from time to time).

#### **Questions**

We, BNP Paribas S.A., Norway Branch ask that for any queries you may have about the Bank's processing of Personal Data, please send your queries to the following address:

BNP Paribas S.A. Norway Branch Org. no. 918 654 496 PO Box 106 Sentrum, NO- 0102 OSLO, Norway Attention DPO

#### **Poland**

This notice is issued by BNP Paribas S.A. Branch in Poland.

We will only disclose your personal data as set out in this Data Protection Notice to the extent this does not violate provisions of the Polish banking and professional secrecy law and/or other local statutory requirements.

For any question you may have, as well as to exercise your rights, please send your request to the following email address: pl.cib.iodo@bnpparibas.com and/or to the following address:

BNP Paribas S.A. Oddział w Polsce ul. Wronia 31 00-846 Warszawa

## **Portugal**

Provided that a contractual relationship exists, the relevant data controller for the processing of your personal data in relation to the BNP Paribas Group's Corporate & Institutional Banking Business services and activities, in Portugal is:

BNP Paribas, Portugal Branch

Address: Torre Ocidente, Rua Galileu Galilei, nº 2, 13º piso,

1500-392 Lisboa, Portugal NIPC: 980 000 416

#### Marketing

We, BNP Paribas, Portugal Branch, will only send you marketing material via electronic communications (such as e-mails, SMS, instant messaging services or other equivalent technologies) in accordance with Portuguese law.

## Recording of telephone conversations

The Bank may record telephone conversations with clients for the purposes of documenting the content of agreements and to ensure the level of client services. All recordings of telephone conversations will be done in accordance with Portuguese law. Any recordings will be for the Banks own internal purposes and will not be disclosed to any third party, except within the BNP Paribas S.A. group.

## Retention periods

In general and unless there are special reasons for a longer retention period, personal data will be stored for up to 10 years after the business relationship with us has terminated or the single transaction conducted pursuant to requirements in the Portuguese law.



#### **Questions**

If you have any questions relating to our use of your personal data under this Data Protection Notice (including for clients of BNP Paribas SA in the context of Securities Services activities), or if you would like a copy of this Data Protection Notice in your native language, please contact our Data Protection Office dpo.portugal@bnpparibas.com.

We, BNP Paribas, Portugal Branch ask that for any queries you may have about the Bank's processing of Personal Data, please send your queries to the following address:

BNP Paribas, Portugal Branch Email: dpo.portugal@bnpparibas.com

#### **Qatar**

This section applies solely to data subjects in the State of Qatar as defined under Law No. (13) of 2016 Concerning Personal Data Protection (the "QDPL") and BNPP Group policies that have been adjusted in line with the provisions of the QDPL which took effect in 2017. The QDPL applies to personal data when this data is any of the following: (1) Processed electronically; (2) Obtained, collected or extracted in any other way in preparation for electronic processing; and (3) Processed by combining electronic processing and traditional processing.

Personal data is defined under the QDPL as data relating to a natural person whose identity is identified or is reasonably identifiable, whether through this data or by means of combining this data with any other data or details. In addition to the above disclosures, the following applies to Qatar data subjects protected by the QDPL

We will only collect, process and transfer personal data with your consent, unless it deemed necessary for realizing a "lawful purpose".

We make sure to transfer your personal data to countries and regions with legal frameworks that provide an adequate level of protection for the privacy and fundamental rights and freedoms in respect of the processing of your personal data. Such transfers are done pursuant to the provision of the QDPL.

Furthermore, in case of international transfers, we will only disclose your personal data to such third party or parties where they have undertaken, in advance and in writing, to maintain the confidentiality, integrity and security of the personal data concerned, in accordance with applicable laws.

Unsolicited direct marketing is prohibited under the QDPL, we will always obtain your prior consent to send electronic marketing communications (including by wired or wireless communication).

Data subjects may at any time withdraw a previous approval they had granted to process their personal data. Processing of sensitive personal data (related to racial origin, children, health or physical or psychological status, religious beliefs, marital relationship and criminal offence) is prohibited without the consent of the data owner, or the approval of the relevant authority in line with the QDPL.

You have a right to file a complaint with us or any regulator with jurisdiction about an alleged contravention of the protection of your personal information. If you wish to exercise the rights listed above, please send an email to the following address: mea.communications.data.rights@bnpparibas.com; or send a letter to the following address:

BNP Paribas SA – Qatar Branch Al Fardan Office Tower, 6th Floor, 61 Al Funduq Street Diplomatic District, West Bay, Qatar Attention: Data Protection Officer

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



#### Saudi Arabia

This section applies solely to data subjects in the Kingdom of Saudi Arabia ("KSA") as defined under the Personal Data Protection Law ("PDPL") promulgated by Royal Decree No. M/19, dated 09/02/1443H (corresponding to 16 September 2021). BNPP's Group policies have been adjusted to ensure all applicable personal data will be treated in accordance with the provisions of said PDPL. In addition to the above disclosures, the following applies to data subjects protected by the PDPL:

In some instances, we may be required to transfer your personal data outside the KSA, in case of cross-border transfers, we will only disclose your personal data to the extent necessary and to such third party or parties where we can ensure sufficient guarantees regarding the measures to protect the confidentiality, integrity and security of the personal data.

We shall notify you on becoming aware of any personal data breach that would have a serious harm to your data or yourself. You have a right to file a complaint with us or any regulator with jurisdiction about an alleged contravention of the protection of your personal information. If you wish to exercise the rights listed above, please send an email to the following address: mea.communications.data.rights@bnpparibas.com;or send a letter to the following address:

Information Officer

4th floor of the Al-Faisaliah Tower, King Fahad Road in the Olaya District, P.O. Box 18771, Riyadh 11425, Kingdom of Saudi Arabia.

Please include a scan/copy of your identity card for identification purpose. In accordance with applicable regulation, in addition to your rights above, you are also entitled to lodge a complaint with the competent supervisory authority.

## **South Africa**

To the extent BNP Paribas SA South Africa Branch, with registered office at 11 Crescent Drive, Melrose Arch, Johannesburg, ("we") is a controller of your personal data, please be informed of the specific provisions below. The below specific provisions are in addition to the above disclosures noted on this Data Protection Notice:

- (a) We will use the information you provide in a manner that conforms with the (i) Promotion of Access to Information Act 2 of 2000 as well as (ii) the Protection of Personal Information Act, 4 of 2013, which regulates and controls the processing of natural and juristic persons' personal data.
- (b) If you are a juristic person:
- we may collect and use personal data relating to the juristic person's directors, officers, employees, beneficial owners, partners, shareholders, members, authorised signatories, representatives, agents, payers, payees, customers, guarantors, spouses of guarantors, sureties, spouses of sureties, other security providers and other persons related to the juristic person (hereafter referred to as "Related persons");
- you may provide the personal data of a Related Person to us, on condition that you warrant that the Related Person is aware that you are sharing their personal data with us, and that the related person has consented thereto. We will process the personal Data of related persons as stated in this Data Protection Notice, thus references to "you" or "your" in this Data Protection Notice will include related persons with the necessary amendments.
- (c) Information we may share with other banks or request from other banks (Banker's Code) Another bank may ask us, at the request of that bank's customer or for the bank itself, to provide information about your financial position. This is done by issuing what is known as a "Banker's Code". A Banker's Code will only be provided with your express, implied, or tacit consent.

You have a right to file a complaint with us or any regulator with jurisdiction about an alleged contravention of the protection of your personal information. If you wish to exercise the rights listed above, please send an email to the following address: mea.communications.data.rights@bnpparibas.com; or send a letter to the following address:

BNP Paribas SA – South Africa Branch 4th Floor 11 Crescent Drive Melrose Arch 2196 Johannesburg



#### South Africa

#### Attention: Information Officer

Please include a scan/copy of your identity card for identification purpose. In accordance with applicable regulation, in addition to your rights above, you are also entitled to lodge a complaint with the competent supervisory authority.

## **Spain**

Provided that a contractual relationship exists, please note the legal obligation of Spanish Credit Institutions to inform the legal representatives and authorised persons of the transfer of data to the filing System "Fichero de Titularidades Financieras" whose controller is the Secretaría de Estado de Economía, acting SEPLAC as its data processor.

For any question you may have, as well as to exercise your rights, please send your request to the following email address: DPOdeskSpain@bnpparibas.com.

#### Sweden

Provided that a contractual relationship exists, the relevant data controller for the processing of your personal data in relation to the BNP Paribas Group's Corporate & Institutional Banking Business services and activities, as well as certain services of BNP Paribas Securities Services, in Sweden is:

BNP Paribas SA, Bankfilial Sverige Corporate registration number: 516406-1029 Postal address: P.O. Box 7763 103 96 Stockholm Visitors: Hovslagargatan 3 111 48 Stockholm

Email: gdpr.desk.cib@bnpparibas.com Telephone no: +46 8 562 347 00

We will only disclose your personal data as set out in this Data Protection Notice to the extent this does not violate provisions of Swedish banking secrecy law and/or Swedish anti-money laundering obligations and/or other local statutory requirements.

## Recording of telephone conversations

The Bank may record telephone conversations with clients for the purposes of documenting the content of agreements and to ensure the level of client services. Any and all recordings of telephone conversations will be done for the Bank's internal purpose and in accordance with Swedish law and shall not be disclosed to any third party, except within the BNP Paribas SA Group.

## Retention periods

In general, and unless there are special reasons for a longer retention period, personal data will be stored for up to 5 years after the business relationship with us has terminated or the single transaction conducted pursuant to requirements in the Swedish Money Laundering and Terrorist Financing (Prevention) Act (as amended from time to time).

#### Questions

We, BNP Paribas SA, Bankfilial Sverige ask that for any questions that you may have, please direct such questions to the following address:

BNP Paribas SA, Bankfilial Sverige P.O. Box 7763 103 96 Stockholm Attention: DPO



#### **Switzerland**

This Data Protection Notice applies to each BNP Paribas entities registered in Switzerland, including BNP Paribas local branch(es) and can be found at http://www.bnpparibas.ch/en/privacy-policy.

Please note that the BNP Paribas entities in Switzerland will only disclose your data as set out in this Data Protection Notice to the extent this does not violate provisions of the Swiss banking secrecy laws and/or other local requirements.

Sharing with Group companies may extend to intragroup processors which perform services on our behalf (such as our hubs in India, Luxembourg, Poland, Portugal and Spain).

In order to fulfil some of the purposes described in this Data Protection Notice, we may, where necessary, share your personal data with data processors which perform services on our behalf and this include also external clouds solutions including data storage.

## TRANSFERS OF PERSONAL DATA OUTSIDE SWITZERLAND

In case of international transfers originating from Switzerland to a third country the transfer of your personal data may take place where the Swiss competent Authority 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.

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 and recognized by the Federal Data Protection and Information Commissioner (FDPIC) with appropriate Swiss adaptations.

To obtain a copy of these safeguards or details on where they are available, as well as for any other question you may have, including questions related to the exercise of your rights, please contact BNP Paribas Data Protection Officer in Switzerland at the following email address: dataprotection.switzerland@bnpparibas.com.

If you wish to learn more about Cookies and Security, please refer to the concerned policies on our website www.bnpparibas.ch/en/cookies.

#### UAE - Abu Dhabi Global Market Free Zone

This section applies solely to data subjects in Abu Dhabi Global Market ("ADGM") as defined under ADGM Data Protection Regulations ("DPR") enacted on the 11 February 2021. BNPP's Group policies have been adjusted to ensure all applicable personal data will be treated in accordance with the provisions of the DPR. In addition to the above disclosures, the following applies to data subjects protected by the DPR:

In case of transfers of personal data outside the ADGM, we make sure to transfer your personal data to countries and regions that provide sufficient level of protection for your personal data. Such transfers, to the extent practicable, shall be in accordance with any applicable lists recognized by the ADGM commissioner.

Furthermore, in case of transfers of personal data outside the ADGM, we will only disclose your personal data to such third party or parties ("data processor(s)") where they have undertaken, in advance and in writing, to maintain the confidentiality, integrity and security of the personal data concerned, in accordance with the DPR and any applicable laws and regulations. In some instances, we may be required to transfer your personal data to other countries whose level of protection has not been recognized by the ADGM commissioner. In such cases, we may rely on (i) your written consent. (ii) the exceptions provided by the DPR (e.g. transfers subject to appropriate safeguards, binding corporate rules...etc); as well on (iii) sufficient guarantees regarding the measures to protect the confidentiality and security of the personal data.

We shall notify you without undue delay and where feasible in case of a data breach that would likely result in a high risk to your data rights.

In some instances we may be exempted from complying with your request to rectify or erase data, where such rectification or erasure of personal data is not technically feasible, we must provide explicit, clear and prominent information explaining that



rectification or erasure of the personal data would not be feasible.

You have a right to file a complaint with us or any regulator with jurisdiction about an alleged contravention of the protection of your personal information. If you wish to exercise the rights listed above or to raise any queries, you may send an email to the following address: mea.communications.data.rights@bnpparibas.com; or send us a letter to the following address:

BNP Paribas SA - ADGM Branch Part of 28th floor, 28, Al Khatem Tower, Adgm Square, Al Maryah Island P.O. Box 26114, Abu Dhabi United Arab Emirates Attention: Data Protection Officer

Or you may directly contact our Data Protection Officer: Dmitri Hubbard MEA & APAC Data Protection Officer BNPP Paribas c/o 18/F Lincoln House Quarry Bay, Hong Kong Tel: +852 2909 8888

Email: mea.communications.data.rights@bnpparibas.com

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

#### UAE - Dubai International Financial Centre

This section applies solely to data subjects in Dubai International Financial Centre ("DIFC") as defined under DPL No. 5 of 2020 (together the "DIFC DPL") and BNPP Group policies have been adjusted to ensure all applicable personal data will be treated in accordance with the provisions of the DIFC DPL. In addition to the above disclosures, the following applies to data subjects protected by the DIFC DPL:

We make sure to transfer your personal data to countries and regions that (i) provide sufficient levels of protection for your personal data; and (ii) provide adequate legal remedies. Such transfers, to the extent practicable, shall be in accordance with any applicable lists recognized by the relevant authorities and laws.

Furthermore, in case of international transfers, we will only disclose your personal data to such third party or parties where they have undertaken, in advance and in writing, to maintain the confidentiality, integrity and security of the personal data concerned, in accordance with applicable laws.

In some instances, we may be required to transfer your personal data to other countries whose level of protection has not been recognized by the relevant authorities in terms of the DIFC DPL. In such cases, we may rely on (i) the exceptions provided by the DIFC DPL (e.g. appropriate safeguards have been provided by the controller or processor of data and that enforceable data subject rights and effective legal remedies for data subjects are available

Data subjects may at any time withdraw a previous approval they had granted to process their personal data. Processing of special categories of personal data (related to Personal Data revealing or concerning (directly or indirectly) racial or ethnic origin, communal origin, political affiliations or opinions, religious or philosophical beliefs, criminal record, trade-union membership and health or sex life and including genetic data and biometric data where it is used for the purpose of uniquely identifying a natural person) is prohibited without the consent of the data owner, or one of the exception outlined under the DIFC DPL.

You have a right to file a complaint with us or any regulator with jurisdiction about an alleged contravention of the protection of your personal information. If you wish to exercise the rights listed above, please send an email to the following address: mea.communications.data.rights@bnpparibas.com; or send a letter to the following address:



BNP Paribas Wealth Management (DIFC) Ltd DIFC, The Gate Building East, Level 12 P.O. Box 506573, Dubai United Arab Emirates Attention: Chief Operating Officer

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

## **United Arab Emirates**

This section applies solely to data subjects in the United Arab Emirates (the "UAE") as defined under the Personal Data Protection Law ("PDPL") No. 45 of 2022. BNPP's Group policies have been adjusted to ensure all applicable personal data will be treated in accordance with the provisions of said PDPL. In addition to the above disclosures, the following applies to data subjects protected by the PDPL:

We make sure to transfer your personal data to countries and regions that (i) provide sufficient levels of protection for your personal data; and (ii) provide adequate legal remedies. Such transfers, to the extent practicable, shall be in accordance with any applicable lists recognized by the UAE data protection office and the relevant authorities and laws.

Furthermore, in case of international transfers, we will only disclose your personal data to such third party or parties where they have undertaken, in advance and in writing, to maintain the confidentiality, integrity and security of the personal data concerned, in accordance with applicable laws.

In some instances, we may be required to transfer your personal data to other countries whose level of protection has not been recognized by the relevant authorities in terms of the UAE PDPL. In such cases, we may rely on the exceptions provided by the UAE PDPL (e.g. transferring personal data under a contract that applies the requirements of the PDPL...etc) ); as well on (ii) sufficient guarantees regarding the measures to protect the confidentiality and security of the personal data. We shall notify you on becoming aware of any personal data breach that would prejudice the privacy, confidentiality and security of your personal data.

You have a right to file a complaint with us or any regulator with jurisdiction about an alleged contravention of the protection of your personal information. If you wish to exercise the rights listed above, please send an email to the following address: mea.communications.data.rights@bnpparibas.com or send a letter to the following address:

Data Protection Officer Abu Dhabi Branch, Etihad Tower-3, Level 12, Unit 1201 & 1206, UAE, Abu Dhabi. P.O. Box 2742, Abu Dhabi United Arab Emirates

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

## **United Kingdom**

For other questions relating to our use of your personal data, please contact the BNP Paribas UK Data Protection Officer at the following email address: data.protection@uk.bnpparibas.com.

