



GAY-LUSSAC
GESTION

GDPR AND
PRIVACY
NOTICE

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Gay-Lussac Gestion – GDPR and Privacy Notice

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1. Who we are and how to contact us

Gay-Lussac is responsible for the processing of your personal information. Personal information is information about you or from which we can identify you. This Privacy Notice describes how we treat your personal information. We are responsible for the processing of such information under data protection laws because, in the context of our business relationship with you, we decide how and in what manner we process such information in accordance with the terms of this Privacy Notice.

Gay-Lussac Gestion also has registered agents established in the European Union who act on its behalf. Each authorized agent may obtain your personal information on our behalf and will apply this Privacy Policy to your personal information in the same manner as we do. Each authorized agent will need to know such personal information in order to process it for us. Each authorized agent is subject to strict contractual obligations regarding confidentiality and data transfer. We may initiate disciplinary proceedings and/or terminate our contracts with individuals and contracting parties who obtain information through malicious means, without having the right to access it.

If you have any questions about this Privacy Notice or wish to exercise any of the rights set forth in this Privacy Notice, please contact us using the contact information at the bottom of this Privacy Notice.

This Privacy Notice may be updated from time to time. You will be able to review the most current version online by clicking [here](#). If necessary, we will also send you an updated copy.

2. What kind of personal information about you do we process?

We have set out below a description of the types of personal information about you that we will process when you or your organization becomes a customer of ours, or in the course of our correspondence with you (both when you or your organization is our customer, or when you or your organization expresses an interest in becoming a customer, but is not yet a customer).

Below is a description of the different types of personal information about you that we collect and process in various circumstances.

- 2.1 The personal information we generally process, regardless of how you contact us or why you contact us, includes:
 - 2.1.1 Des Contact information, such as your title, full name, job title, email address, business address and contact information, including, for example, business and cell phone numbers (if you have provided them) and address history (usually only for existing or new customers for identification, anti-money laundering, anti-fraud and agency credit rating verification purposes); and/or

- 2.1.2 Payment data, such as data necessary for payment processing and fraud prevention, including credit card numbers, security codes and other related billing information ;
- 2.1.3 Other business information is necessarily processed as part of a project or contractual relationship of the client with Gay-Lussac Gestion or when you voluntarily provide it, including instructions provided, payments made, requests and projects; and
- 2.1.4 If you or your organization applies to become a customer, is in the process of becoming a customer or is already our customer, in addition to the personal information mentioned above, we will collect the following information from you :
- 2.1.5 Information collected from public sources, integrity databases and credit agencies ;
- 2.1.6 Proof of identification in the form of copies of your passport, driver's license or other identification such as gas and electricity bills ;
- 2.1.7 Personal information and contact details that you provide in your correspondence with us, whether by e-mail, letter, phone call or via our online inquiry system or meeting attendance or call records; and/or
- 2.1.8 Information regarding the use of our service ;
- 2.1.9 If legally required for compliance purposes, information regarding any relevant and material litigation or other legal proceedings commenced against you or any third party related to you and any interaction with you that may be relevant for antitrust purposes;
- 2.1.10 Other personal data about your preferences where relevant to the legal services we provide; and/or
- 2.1.11 Details of your visits to our premises.

This may include, as appropriate, personal data about your membership in a professional association or trade union, personal data about your health, details of your dietary preferences when we invite you to events and any criminal record concerning you.

3. How do we collect your personal information?

We may collect personal information about you in a number of circumstances, including :

- 3.1. When you or your organization seeks financial services from us ;

- 3.2. When you or your organization inquire, make an inquiry or interact with us at our branches or on our website ;
- 3.3. When you attend a Gay-Lussac Gestion event; and
- 3.4. When you or your organization offers to provide services to us.

In some cases, we collect personal information about you from a third party source. For example, we may collect personal information from your organization, other organizations you deal with, government agencies, rating agencies, a service or information provider or a publicly available source.

In general, you provide us with your personal information completely voluntarily; you may also choose not to consent or provide personal information, but this will not be to your detriment. However, in certain circumstances, it will be necessary for you to provide us with your personal information to enable us to administer our business, provide services to you or your organization, or to comply with our legal obligations.

However, please note that if you do not provide any of the personal information we request, we may not be able to maintain or provide our services to you or your organization.

If you choose not to voluntarily provide us with personal information, the quality or type of service we are able to provide may be diminished (for example, we may only be able to contact you by postal mail if you do not provide your email address, and our correspondence with you will be slower).

4. For what purposes will we use your personal information?

- 4.1. We will use your personal information to manage our relationship with you and for the following purposes ("Permitted Purposes"):
 - 4.1.1. To provide you with our financial services or solutions as requested by you or your organization;
 - 4.1.2. To manage and administer your or your organization's business relationship with Gay-Lussac Gestion, including payment processing, accounting, auditing, billing and collection, and customer support services ;
 - 4.1.3. In order to comply with our legal obligations (such as record keeping obligations), our registration or control obligations (e.g., to ensure that we are able to comply with our legal obligations), our obligations to register or control under antitrust laws, export laws, trade sanctions and embargo laws, for anti-money laundering, financial and credit rating verification, fraud and crime prevention or detection purposes), which may include automatic checks of your contact information or other information you provide about your identity against lists of sanctioned parties and to contact you to confirm your identity in the event of any correspondence or

record of interaction with you that may be relevant for compliance purposes;

- 4.1.4. For analysis purposes and to improve our services and communication with you;
- 4.1.5. To protect the security of and access to our premises, communication systems, online platforms, websites and other systems, to detect and counter security threats, fraud or other malicious or criminal activity;
 - 4.1.6. For insurance purposes ;
 - 4.1.7. To monitor and assess compliance with our policies and standards ;
- 4.1.8. To identify persons authorized to trade on behalf of our clients, suppliers and/or service providers ;
- 4.1.9. To comply with our legal and regulatory obligations and to respond to requests sent to us from anywhere in the world, including reporting and/or auditing by national and international regulatory bodies ;
- 4.1.10. To comply with a court order and to exercise and/or defend our legal rights;
- 4.1.11. To communicate with you through the communication channels that you have approved in order to keep you informed of the latest market developments, to send you announcements and other information about Gay-Lussac Gestion services, products and technologies (including information, newsletters and other informational materials sent to the client) and to inform you of Gay-Lussac Gestion events and projects; and
- 4.1.12. To send you customer surveys, marketing campaigns, market analysis, sweepstakes, contests or other activities related to promotions or events.

5. On what legal basis do we process your personal information (including when we share it with third parties)?

- 5.1. Data protection laws require us to explain the legal reasons for our processing of your personal information (including sharing it with other organisations). For some lawful processing, more than one legal basis will be relevant. We primarily use the personal information we hold about you:
 - 5.1.1. Because its processing is necessary to carry out a customer's instructions or another contract with you or your organization ;
 - 5.1.2. To comply with our legal obligations (for example, to keep records or documents relating to retirement or for tax purposes); or

- 5.1.3. Because their processing is necessary for the purposes of our legitimate interest or that of a third party beneficiary receiving your personal data, provided that your fundamental rights and freedoms do not prevail over these legitimate interests.
- 5.2. In addition, the processing may be based on your consent if you have expressly provided it to us. We rely on your consent, where you have opted to receive marketing communications (and have not subsequently opted in or requested to be removed from any mailing list - which you can do by contacting us as set out below) and/or where you voluntarily provide information in your correspondence or at meetings where attendance is noted. There may be other instances where we require your consent to process personal information or particular categories of personal information about you. If this is the case, we will provide you with further information about the purposes of the processing at the time we ask for your consent.
- 5.3. Each of the above categories or purposes for processing your personal information is generally known as a "legal basis" for processing your personal information in accordance with the Data Protection Act and the Permitted Purposes

6. When and how can you withdraw your consent?

You have the right to withdraw your consent at any time by contacting us using the contact details provided below. If you withdraw your consent, we will stop similar processing in the future. However, withdrawal of your consent does not invalidate any processing of the information that took place before you withdrew your consent.

Please note that where we need to rely on another legitimate reason to process your personal information, withdrawing your consent does not affect that processing (including where the processing is necessary to fulfill our contract with you, or where we need to process your personal information to comply with the law, as set out above) and we will continue to process your personal information for those purposes despite the fact that you no longer consent to its processing for one of the purposes set out above.

7. Will we share your personal information with third parties?

Yes, we will share your personal information with third parties. We are sometimes legally obliged to disclose your personal information to third parties (including tax authorities). In addition, we use third parties to help us conduct our business and when we do so, we also disclose your personal information to those third parties. When we use third parties to help us provide our services, we always do so under appropriate contracts and with safeguards in place.

We never sell, rent or offer your personal information to any other company.

We will share your personal information with others who have a duty to maintain the security and confidentiality of the information, and where we have a legitimate reason to do so, as explained in section 5 above.

The categories of organizations with which we will share your information are :

- Our service providers, agents (including authorized agents) and contractors who assist us in providing our services and processing information on our behalf, including if we use a third party to manage the day-to-day operations of our branches, and information technology and communications service providers, customer records management service providers (who assist us in managing customer records); financial modeling services that are used to provide you with illustrations and financial comparison service providers that help us determine what products are available to you based on your particular circumstances ;
- Financial product and service providers from whom we acquire products, either on your behalf or on your own behalf with our assistance, and who will require specific information;
- Professional advisors, including lawyers, accountants, actuaries, and others;
- An organization to which we may transfer our rights and obligations in the event of a corporate transaction (for example, if we restructure or sell our business); and/or

We may also share your information with regulatory authorities in the UK or abroad, as part of their functions (such as crime prevention), and/or as part of our compliance with laws and/or regulatory obligations.

Unless a third party is our service provider (such as our communications service provider), we cannot control all uses of your personal information by third parties with whom we may be required to share such information (such as regulators), as they process your personal information for their own specific purposes. As such, where your personal information has been shared with another entity responsible for data processing, you have rights as to how that third party processes your personal information and you can and should contact them directly if you wish to exercise your rights with respect to their use of your personal information.

8. Is your personal information transferred from France or the EEA?

- 8.1 We are based in France, but your personal information will sometimes be transferred outside France or the European Economic Area (EEA). If processed within Europe or other EEA countries, your personal information is protected by European data protection standards.
- 8.2 Certain countries outside the EEA provide adequate protection for personal information under the laws that apply to us, but this only happens when the

European Commission has confirmed and made a decision in this regard. However, in the event that your personal information is transferred outside the EEA to a country that does not offer the same level of protection as is available within Europe, we will ensure that appropriate safeguards are in place before transferring your personal information to such a country.

- 8.3 The safeguards we will use to protect your personal information in relation to international transfers include contractual obligations imposed on the recipients of your personal information. These obligations require the recipient to protect your personal information in the same way as is required in the EEA. The safeguards also involve requiring the data recipient to comply with one of the European Commission approved mechanisms for transferring personal information outside the EEA, including but not limited to :
- 8.3.1 Sending the information to countries approved by the EU Commission, i.e. countries in which the European Commission considers that data privacy laws are of a standard that complies with EU data protection laws (this is the case of the Channel Islands mentioned above) ;
 - 8.3.2 The use of standard contractual clauses approved by the European Union Commission ;
 - 8.3.3 For transfers to the United States - certification under the Privacy Shield;
 - 8.3.4 To have binding internal company rules that establish an internal standard for the processing of personal information and that meet the requirements of European data protection legislation.

Several measures have been introduced since May 25, 2018, and we will continue to review them always with the aim of ensuring that your personal information is processed appropriately and securely when it is transferred outside the EEA.

- 8.4 Where it is legitimate and necessary to do so in the course of our business activities, we will share and/or transfer some of your personal information with other companies in the Gay-Lussac Gestion group (as mentioned above). Gay-Lussac Gestion has entered into an intra-group data transfer and sharing agreement in order to ensure the secure management of your personal data. This data sharing and transfer agreement contains provisions to protect your personal data when the other Gay-Lussac Gestion company is based outside the EEA and will meet one or more obligations ensuring the secure transfer of your personal information as set out herein.

9. What if your personal information changes?

We will take steps to ensure that the personal information we hold about you is accurate and up-to-date. However, we depend on you to help us do so. As such, you should notify us promptly if any of your personal information changes so that we can update our records.

10. Do we conduct any monitoring involving the processing of your Personal Information?

By monitoring, we mean listening, viewing, recording, intercepting, logging and keeping records (as applicable) of calls, e-mails, SMS, social media messages, face-to-face meetings and other communications.

We may conduct surveillance if permitted or required by law. In particular, we will record certain telephone conversations or meetings (if any) where we are required to do so by applicable regulations. However, it is common practice at Gay-Lussac Gestion to record all external calls for training, compliance, security and evidence gathering purposes, even if these calls do not fall within our regulatory obligations. This practice is mentioned herein and forms part of our contractual terms.

Some of our monitoring activities may be required to comply with regulations, self-regulatory practices or procedures relevant to our business, to prevent or detect criminal conduct, in the interests of protecting the security of our communication systems and procedures, to keep a record of what we have discussed with you and the measures we have agreed upon with you, to protect you and your security (including with respect to the risk of fraud on your account) and for quality control and staff training purposes.

In addition to call monitoring, some of our branches use surveillance cameras for health, safety and security purposes. For example, if you wish to visit one of our branches, you may be filmed by our closed-circuit security cameras. We may also deploy other access control systems in some of our offices or branches, such as maintaining a visitor log, which you may be asked to sign in and which will also capture your personal information for security purposes.

11. How long do we keep your personal information?

We will only retain your personal information for as long as is necessary to process the request/service for which your personal information was collected. We need to keep the information long enough to be able to provide our services to you, to comply with and/or satisfy all legal obligations, including our record keeping obligations, and to protect our interests. Your personal information will be deleted when it is no longer reasonably necessary for the Permitted Purposes or if you withdraw your consent (and if we are not required by law or otherwise permitted to continue storing it). We may retain your personal information to enable Gay-Lussac Gestion to defend itself against a complaint until the end of the relevant retention period or until the complaint in question has been resolved.

If we make your personal information anonymous so that it can no longer be associated with you, it will no longer be considered personal information, and we may use it without notifying you.

If you would like more information about our data retention practices, please contact us using the contact information provided in this Privacy Notice.

12. What are your rights under data protection laws?

The following is a list of the rights available to anyone under data protection legislation. They do not apply in all circumstances. If you wish to exercise any of them, we will explain to you at that time whether or not you can do so.

- 12.1 The right to be informed about our processing of your personal information;
- 12.2 The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed ;
- 12.3 The right to object to the processing of your personal information ;
- 12.4 The right to restrict the processing of your personal information ;
- 12.5 The right to have your personal information deleted (the "right to forget") ;
- 12.6 The right to request access to your personal information and to obtain further information about how we process it;
- 12.7 The right to move, copy or transfer a copy of the personal information you have provided to us ("Data Portability") ;
- 12.8 Rights in relation to automated decision making that has legal effect or otherwise significantly affects you.

To exercise your rights as set out above, please write to us using the contact details set out in this Privacy Notice.

There is no charge for these requests. However, if your request is excessive or unfounded, we may charge a reasonable fee or refuse to comply.

You have the right to file a complaint with the CNIL, which enforces data protection laws: www.cnil.fr.

13. Anonymization of data and use of aggregate information

Your personal information may be converted into statistical or aggregate data that cannot be used to identify you. It may then be used to produce statistics and research reports. This aggregated data will be shared and used in all the ways described in this Privacy Notice, and may also be used in other ways not described here. However, because the information is in the form of anonymous aggregate data, it will no longer constitute personal information and therefore may be used more broadly than if it could identify you.

14. Subsequent Changes to this Privacy Notice

We reserve the right to update this Privacy Notice at any time. You will always have the opportunity to review the privacy notices by logging on to the website or by requesting a copy from your contact at Gay-Lussac Gestion.

15. Our Contact Information

Please contact us if you have any questions about this Privacy Notice or the information we hold about you.

Send us an e-mail: contact@gaylussacgestion.com

Write to us : Gay-Lussac Gestion Privacy, at one of the addresses below:

Gay-Lussac Gestion (GLG)
45 Avenue George V 75008 Paris
GLG est autorisée et supervisée par l'AMF

Gay-Lussac Gestion, succursale de Belgique
Avenue Louise, 40 Plan de ville, 1050 Bruxelles
La succursale de GLG en Belgique est sous la supervision de l'AMF et de la FSMA