



GAY-LUSSAC
GESTION

Privacy and GDPR Notice

2024

Gay-Lussac Gestion – Privacy and GDPR Notice

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1. Who we are and how to contact us

Gay-Lussac is the controller of your personal information. Personal information is information about you or from which you can be identified. This privacy notice describes how we process your personal information. We are responsible for the processing of this information under data protection laws because, in the context of our business relationship with you, we decide how and in what manner this information is processed in accordance with the terms set out in this privacy notice.

Gay-Lussac Gestion also has authorised agents established in the European Union who act on its behalf. Each authorised agent may obtain your personal information on our behalf and will apply this privacy policy to your personal information in the same way that we do. Each authorised agent will need to know this personal information in order to process it for us. Each authorised agent is subject to strict contractual obligations regarding confidentiality and data transfer. We may bring disciplinary proceedings against, and/or terminate our contracts with, any persons or contracting parties who obtain information maliciously, without being entitled to access it.

If you have any questions about this privacy notice or wish to exercise any of the rights referred to in it, please contact us using the contact details set out at the end of this privacy notice.

This privacy notice may be updated as necessary. You will be able to review the most recent version online by clicking [here](#). If necessary, we will also send you an up-to-date 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 organisation becomes a client of ours, or in the course of our correspondence with you (both when you or your organisation is our client, and when you or your organisation expresses an interest in becoming a client but is not yet one).

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

- 2.1 The personal information we generally process, regardless of how you contact us or the reason for which you do so, includes:

- 2.1.1 Contact details, such as your title, full name, job title, email address, your company's address and your contact details, including, for example, work and mobile telephone numbers (if you have provided them) and your address history (usually only for current clients, or for new clients for the purposes of identification, anti-money laundering, anti-fraud and credit-reference checks with agencies); and/or
- 2.1.2 Payment data, such as the data needed to process payments and prevent fraud, including bank card numbers, security codes and other related billing information.
- 2.1.3 Other business information that is necessarily processed in connection with a client project or contractual relationship with Gay-Lussac Gestion, or when you provide it voluntarily, including instructions given, payments made, requests and projects; and
- 2.1.4 If you or your organisation requests to become a client, is in the process of becoming a client, or is already our client, then in addition to the personal information referred to 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 identity in the form of copies of your passport, driving licence or other identity document, such as gas and electricity bills.
- 2.1.7 The personal information and contact details that you provide in your correspondence with us, whether by email, letter, telephone call or via our online enquiry system, or on attendance sheets for meetings or calls; and/or
- 2.1.8 Information about your use of our service.
- 2.1.9 Where legally required for compliance purposes, information about significant and relevant litigation or other legal proceedings brought against you or against a third party connected to you, and any interaction with you that may be relevant for antitrust purposes.
- 2.1.10 Other personal data concerning your preferences, where this is relevant to the legal services we offer; and/or
- 2.1.11 Details of your visits to our premises.

Where applicable, this may include personal data about your membership of 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 organisation seeks financial services from us.
- 3.2. When you or your organisation makes an enquiry, requests information, or interacts with us in our branches or on our website.
- 3.3. When you attend a Gay-Lussac Gestion event; and
- 3.4. When you or your organisation 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 organisation, from other organisations with which you deal, from government bodies, rating agencies, a service or information provider, or a publicly accessible source.

As a general rule, you provide us with your personal information entirely voluntarily; you may also choose not to consent or to provide personal information, without this being to your detriment. In certain circumstances, however, it will be necessary for you to provide us with your personal information in order to enable us to manage our business, to provide services to you or to your organisation, or to comply with our legal obligations.

Please note, however, 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 to your organisation.

If you choose not to provide us with personal information voluntarily, the quality or type of service we are able to provide may be reduced (for example, we will only be able to contact you by post 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 in connection with managing our relationship with you, as well as for the following purposes ("Permitted Purposes"):
 - 4.1.1. To provide you with our financial services or solutions as requested by you or your organisation.
 - 4.1.2. To manage and administer your business relationships, or those of your organisation, with Gay-Lussac Gestion, including the processing of payments, accounting, auditing, billing and collection, as well as client support services.
 - 4.1.3. To comply with our legal obligations (such as record-keeping obligations) and our registration or monitoring obligations (e.g. under antitrust laws, export laws, trade sanctions and embargo laws, for the purposes of anti-money laundering, financial and credit-reference checks, and the prevention and detection of fraud and crime), which may include automated checks of your contact details or other information you provide about your identity against lists of sanctioned parties, and contacting you to confirm your identity in the event of a possible match, or recording interactions with you that may be relevant for compliance purposes;
 - 4.1.4. For analysis purposes and to improve our services and our communications with you.
 - 4.1.5. To protect the security of, and access to, our premises, our communication systems, online platforms, websites and other systems, and 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 the persons authorised to deal 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 anywhere in the world, including in relation to reporting to and/or audits 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 via the communication channels you have approved, 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 information materials sent to clients), and to inform you of Gay-Lussac Gestion events and projects; and
- 4.1.12. To send you client surveys, marketing campaigns, market analyses, prize draws, competitions or other activities relating 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 grounds that justify our processing of your personal information (including the sharing of it with other organisations). For some lawful processing, more than one legal basis will be relevant. We mainly use the personal information we hold about you:
 - 5.1.1. Because its processing is necessary for the performance of a client instruction, or another contract entered into with you or your organisation.
 - 5.1.2. To comply with our legal obligations (for example, the retention of records or documents relating to retirement or for tax purposes); or
 - 5.1.3. Because its processing is necessary for the purposes of our legitimate interests, or those of a third-party recipient of your personal data, provided that your fundamental rights and freedoms do not override those 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 chosen to receive marketing communications (and have not subsequently chosen or requested to be removed from any distribution list – which you can do by contacting us as indicated below) and/or where you voluntarily provide information in your correspondence or at meetings where attendance is recorded. There may be other cases where we need your

consent to process personal information, or special categories of personal information, about you. If so, we will provide you with further information about the purposes of the processing at the time we request your consent.

- 5.3. Each of the categories or reasons set out above for processing your personal information is generally known as a "legal basis" justifying the processing of your personal information in accordance with data protection law 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 cease any similar processing in the future. However, the withdrawal of your consent does not invalidate the processing of information that took place before you withdrew your consent.

Please note that where we have to rely on another legitimate ground to process your personal information, withdrawing your consent does not affect that processing (in particular where the processing is necessary for the performance of our contract with you, or where we have 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 notwithstanding that you no longer consent to its processing for any of the purposes referred to 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 required to disclose your personal information to third parties (in particular to tax authorities). In addition, we use third parties to help us manage 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 protective measures in place.

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

We will share your personal information with other persons 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 organisations with which we will share your information are:

- Our service providers, agents (including authorised agents) and subcontractors who help us provide our services and process information on our behalf, in particular where we engage a third party to manage the day-to-day activities of our branches, and providers of IT and communication services, providers of client-file management services (who assist us in managing client files), financial modelling services used to provide you with illustrations, and providers of financial-comparison services who help us determine the products available to you based on your particular circumstances;
- Providers of financial products and services from whom we acquire products, whether on your behalf or in your own name with our assistance, and who will need specific information.
- Professional advisers, in particular lawyers, accountants and actuaries.
- An organisation 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 United Kingdom or abroad, in connection with their functions (such as the prevention of crime), and/or in connection with our compliance with laws and/or regulatory obligations.

Unless a third party is our service provider (such as our communication-services provider), we cannot control all uses of your personal information by third parties with whom we may be required to share that information (such as regulatory bodies), because they process your personal information for their own specific purposes. As such, where your personal information has been shared with another data controller, you have rights over how that third party processes your personal information, and you can and should contact it directly if you wish to exercise your rights in relation to its use of your personal information.

8. Is your personal information transferred outside 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). Where it is 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 of personal information under the laws that apply to us, but this only occurs where the European Commission has confirmed this and has made a decision to that effect. 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 that available within Europe, we will ensure that appropriate safeguards are put 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 required by the standard applicable in the EEA. The protective measures also involve requiring the data recipient to satisfy one of the European Commission's approved mechanisms for transferring personal information outside the EEA, including in particular:
- 8.3.1 Sending the information to countries approved by the EU Commission, namely countries in which the European Commission considers that data privacy laws are of a standard consistent with EU data protection laws (this is the case for the Channel Islands referred to above);
- 8.3.2 The use of the 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 Having binding corporate rules that establish an internal standard for the processing of personal information and that meet the requirements of European data protection legislation.

A number of measures have been introduced since 25 May 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 referred to 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 where the other Gay-Lussac Gestion company is based outside the EEA, and will satisfy one or more obligations ensuring the secure transfer of your personal information as set out herein.

9. What should you do 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 rely on you to help us do this. As such, you must notify us without delay if any of your personal information changes, so that we can update our records.

10. Do we carry out any monitoring involving the processing of your personal information?

By monitoring, we mean any listening to, viewing, recording, interception, written logging and retention of records (as applicable) of calls, emails, text messages, social media messages, in-person face-to-face meetings and other communications.

We may carry out monitoring where the law permits it or where the law requires it. In particular, we will record certain telephone conversations or meetings (where applicable) when we are required to do so under the applicable regulations. However, it is common practice at Gay-Lussac Gestion to record all external calls for training, compliance, security and evidential purposes, even where those calls do not fall within our regulatory obligations. This practice is referred to herein and forms part of our contractual terms.

Some of our monitoring activities may have to comply with regulatory provisions, self-regulatory practices or procedures relevant to our business, in order to prevent or detect criminal conduct, in the interest of protecting the security of our communication systems and procedures, to keep a record of what we have discussed with you and the measures agreed with you, to protect you and ensure your safety (in particular in relation 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. As such, 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 keeping a visitors' register, which you may be asked to sign on entry and which will also capture your personal information for security purposes.

11. How long do we keep your personal information?

We will only keep your personal information for as long as is necessary to deal with the request / satisfy the requirements for which your personal information was collected. We need to keep the information long enough to be able to provide you with our services, 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 where we are not required by law or otherwise permitted to continue storing this data). 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 anonymise your personal information so that it can no longer be associated with you, it will no longer be regarded as personal information, and we may use it without notifying you.

If you would like further information about our data retention practices, please contact us using the contact details set out in this privacy notice.

12. What are your rights under data protection laws?

Below is a list of the rights that anyone can rely on 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 you are able to 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 erased (the "right to be forgotten");
- 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 a 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.

These requests are free of charge. However, if your request is excessive or unfounded, we may charge a reasonable fee or refuse to comply with it.

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

13. Data anonymisation and use of aggregated information

Your personal information may be converted into statistical data or aggregated 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 by other means that are not described here. However, because the information is in the form of anonymous aggregated data, it will no longer constitute personal information and may therefore be used more widely 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 in on the website or by requesting a copy from your contact at Gay-Lussac Gestion.

15. Our contact details

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

Email us: 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 is authorised and supervised by the AMF

Gay-Lussac Gestion, Belgium branch, Avenue
Louise 40, 1050 Brussels
The GLG branch in Belgium is supervised by the AMF and the FSMA