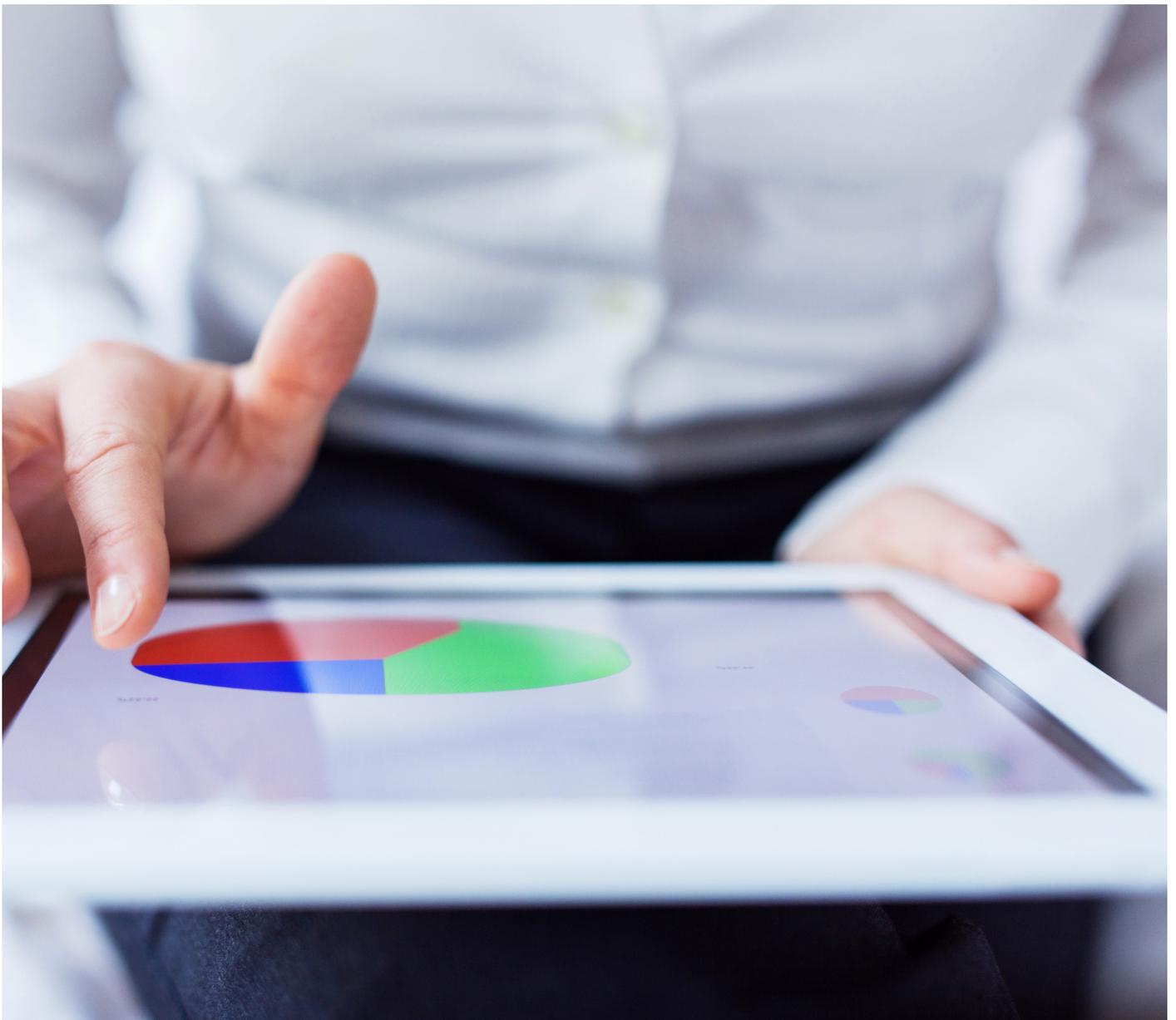




DATA PROTECTION NOTICE





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01 | WHAT IS THE PURPOSE OF THIS NOTICE?

The purpose of this Data Protection Notice (the “Notice”) is to describe how SGEF SA (which is part of the Société Générale Group) processes personal data about its affiliates’ customers and their representatives, and representatives of its commercial partners, the vendors (hereinafter: “you”, “your”).

SGEF SA whose head office is at 17 cours Valmy, 98200 PUTEAUX (hereinafter: “SGEF”, “we”, “our”, or “us”) collects, stores, processes, uses and discloses personal data about you in connection with your relation to SGEF or SGEF affiliate, the provision of services to you and/or your use of certain websites and/or mobile applications.

This Notice relates the conditions of processing your personal data carried out by SGEF.

In some cases, your personal data may be processed by SGEF under the instructions of a SGEF affiliate or your company. In such cases, SGEF will comply with this Notice, but we invite you to review the privacy policy issued by the relevant SGEF affiliate and/or your company to understand the specific conditions of processing and protection of your personal data.

02 | DOES THIS NOTICE APPLY TO YOU?

This Notice applies to all sources of data collection and data processing performed by SGEF globally, which occur in the context of various SGEF activities such as the management our relationship with vendors, to manage and report SGEF affiliate’s client data and to conduct “Know-Your-Customer” processes for its own account or for the account of SGEF affiliates.

Your personal data may be then collected and processed if you are part of the following categories of data subjects:

- customers or representatives of customers of a SGEF affiliate; and
- representatives of vendors with which SGEF has entered into a contractual relationship with.

03 | WHO IS THE DATA CONTROLLER?

SGEF SA carries out the data processing activities described in this Notice as data controller, but may also process them as a data processor on behalf of SGEF affiliates under certain circumstances.

At SGEF SA, the Data Protection Officer in respect of your personal data may be reached at the following address: dpo.sgef@socgen.com .

04 | WHAT ARE SGEF’S VALUES FOR DATA PRIVACY?

SGEF respects your concerns regarding the confidentiality of personal data. This Notice allows you to know more notably about the nature and the use that we make of your personal data, the origin and the use of such data and finally, on your rights.

This Notice represents the minimum standards that SGEF has set with respect to data privacy to ensure that we collect, use, retain and disclose personal data in a fair, transparent and secure way.

05 | WHAT PRINCIPLES GOVERN THE WAY WE PROCESS PERSONAL DATA?

SGEF cares about protecting fully the processing of your personal data.

- (a) **Transparency and fairness:** When collecting and processing your personal data, we provide relevant information and notice on who collects your personal data, for what purposes and who are the recipients. When required by applicable law, we will seek your prior express and specific consent. We do not use personal data obtained from individuals for purposes that are incompatible with the purposes stated in our Notice.
- (b) **Legitimate Purposes:** SGEF does not collect or process personal data without having a lawful reason to do so. We process your personal data in a reasonable and lawful manner for relevant and appropriate business purposes (for example to manage our relationship with vendors, to manage and report SGEF affiliate's client data, to conduct "Know-Your-Customer" processes, etc.).
- (c) **Relevant and Accurate Data and Data Minimization:** we collect only the personal data that is necessary for the purpose of the data processing as set out in the relevant privacy policy or notice. We collect sensitive data only if relevant to such purposes. We take all reasonable measures to ensure that the personal data kept is accurate, complete and up to date.
- (d) **Privacy by design and privacy by default:** we take all reasonable measures to incorporate privacy by design and privacy by default principles when implementing personal data processing.
- (e) **Privacy Impact Assessment:** where necessary, we also carry out for high risk data processing, a privacy impact assessment to adopt appropriate safeguards and ensure the protection of your personal data.

06 | HOW DO WE USE YOUR PERSONAL DATA?

In accordance with the general data privacy principles described above, SGEF SA may use your personal data for the following purposes:

- (a) **When necessary to perform a contract for the management of SGEF SA's relationship with vendors within the International Vendor Management Activity:**
 1. to review of each vendor's commercial performance;
 2. to communicate information to vendors' representatives in the course of the contractual relationship with them
 3. to report SGEF affiliate's client data to vendors.
- (b) **When the processing of the personal data is conducted for SGEF SA's legitimate interest to carry out its commercial activities and more specifically to:**
 1. conduct a yearly vendor review to renew a vendor's credit line based on the vendor's performance, development perspectives, risk calculation and credit line request;
 2. coordinate international programs with local SGEF affiliates;
 3. organizing a yearly vendors' conference;

4. provide commercial, risk and financial reports to SGEF affiliates;
5. conduct internal risk, commercial and financial reporting of SGEF affiliates' client data within the Société Générale Group; and

(c) When required under regulatory obligations:

1. to perform “Know Your Partner” processing in the context of approving vendors or reviewing such approval;
2. to comply with the Société Générale Group obligations with regards to credit risk reporting regulatory reporting.

Please note that SGEF SA may also provide services and act as a data processor on behalf of SGEF affiliates with which you may be in contact, for the following purposes:

- (a) provide computing tools and maintenance services to SGEF affiliates.
- (b) perform “Know Your Client” processing in the context of approving new clients of SGEF affiliates, when required.

For further information on the applicable legal bases and conditions of processing of your personal data, please consult the local Data Protection Notice of the relevant entity.

07 | WHAT TYPE OF DATA DO WE COLLECT?

Your personal data is any data that can be used to identify, locate or contact you. We may process the following types of personal data:

(a) For SGEF affiliates' customers and representatives of customers:

1. Identification and Contact data, such as your name, last name, city, telephone/mobile number or e-mail address;
2. Financial/Credit information, such as your potential payment defaults in the course of the financing provided to you by a SGEF affiliate in relation to a certain vendor's equipment;
3. Data related to criminal convictions and offences, such as any conviction coming to light in the course of the “Know-Your-Customer” or “Know-Your-Partner”;

(b) For representatives of vendors:

1. Identification and Contact data, such as your name, last name, telephone/mobile number or e-mail address;
2. Professional data, such as your job title or professional address;
3. Connection data, such as the time and date on which you connected to an online SGEF platform;

(c) For certain representatives of vendors, and only where relevant and necessary, the following categories of data may be processed:

1. Private life, such as personal preferences, and data related to religious beliefs (such as food restrictions) (for the organization of our yearly vendor's conference);
2. Data related to criminal convictions and offences, such as any conviction coming to light in the course of the "Know-Your-Partner" process.

Your personal data is collected either directly from you (e.g., when SGEF SA and a vendor enter into a contract), from your employer (as far as you are a vendor's representative), from a SGEF affiliate or from an entity of the Société Générale Group.

08 | WITH WHOM DO WE SHARE THE PERSONAL DATA?

We need to use partners or processors as the case may be to achieve the purposes described in section 6 above. We therefore limit our sharing of your personal data on a need-to-know basis as follows:

- (a) We may share your personal data with, or otherwise make it available to, internal business departments such as international vendor management team, the risk team, business projects/process organization team, IT services, support and maintenance teams. Inside the SGEF Group, your personal data may be shared with SGEF affiliates, who may only use your personal data in compliance with this Notice.
- (b) We may also share your personal data with other entities of the Société Générale Group in compliance with this Notice.
- (c) For SGEF affiliates' customers and representatives of customers, we may share your personal data with the vendor or affiliates of the vendor from which you have purchased equipment.
- (d) We may share your personal data with our service providers, such as data hosting or maintenance service providers. Such providers are instructed to only use your personal data in accordance with our instructions.
- (e) We may also disclose your personal data where needed to affect the sale or transfer of business assets, in connection with a bankruptcy proceeding, to enforce our rights, protect our property, or protect the rights, property or safety of others, or, as needed, support external auditing, compliance and corporate governance functions. We may also disclose personal data when required to do so by law, including to law enforcement agencies and courts in the countries where we (directly or through our SGEF affiliates) operate.
- (f) Please note that we may also use and disclose personal data about you that is not personally identifiable i.e. personal data in an aggregate form that no longer identifies you.

09 | WHERE IS THE PERSONAL DATA TRANSFERRED?

Some of the countries where these recipients are located may not provide the same level of data protection as the country in which you provided the data.

For SGEF affiliates' customers and representatives of customers, your data may be transferred to vendors in non-European Economic Area (EEA) countries (such as Japan, South Korea or the United States of America) and for the purpose client data reporting.

For SGEF affiliates' customers and representatives of customers, data we collected about you from our SGEF affiliates may be transferred to, stored and processed in any country or territory where one or more SGEF affiliates are located outside of the EEA for the purpose of providing commercial, risk and financial reports to SGEF affiliates in Brazil, China (including Hong-Kong) and the United States of America to the extent that you have entered into a contract with one of these SGEF affiliates.

We may also transfer your personal data to the Societe Generale Group affiliate and service provider involved in the provision of IT support and maintenance services located in India.

When we transfer your data, we protect and provide adequate protection for the transfer of your personal data to recipients in those countries by entering into data transfer agreements based on the European Commission standards clauses with such data recipients. You can request a copy of such agreements by contacting us at: data.protection.sgef@socgen.com .

10 | HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

We retain your personal data collected only for a period that does not exceed the duration necessary for the purpose of your relationship with SGEF or as required to comply with SGEF's or SGEF affiliates legal obligations.

If a judicial action is initiated, the personal data may be stored until the end of such action, including any potential periods for appeal, and will then be deleted or archived as permitted by applicable law.

In any event, your personal data will not be kept in a form that allows you to be identified for any longer than is reasonably considered necessary by SGEF for achieving the purposes for which it was collected or processed or as it is established in the applicable laws related to data retention periods.

11 | HOW DO WE ENSURE THE SECURITY AND INTEGRITY OF YOUR PERSONAL DATA?

We provide an adequate level of protection to your personal data and make sure that appropriate technical and organizational security measures are in place to protect your personal data (including education and training of relevant personnel) against accidental or unlawful destruction, accidental loss or alteration, unauthorized disclosure or access, and against all other unlawful forms of processing.

We only allow access to your personal data to the teams and employees who need to know the data within SGEF, we make sure that administration rights and policies are implemented within SGEF, and we implement procedures and contractual arrangement designed to ensure that such employees, advisers and service providers keep the personal data they process confidential.

12 | HOW TO EXPRESS YOUR RIGHTS RELATED TO THE USE OF YOUR PERSONAL DATA?

You will find below the rights that you can exercise in relation to your personal data by contacting us as detailed in section 13 below.

You may request access to your personal data we may maintain about you for the period stated in section 10 above. If you request such access, we will provide you with all the information on the purposes of the processing, categories of data processed, categories of recipients, data retention term, your rights to rectify, delete or restrict the data accessed if applicable, etc.

You may also obtain a copy of any personal data that we hold about you in our records in a format compatible and structure to allow you to exercise your right to data portability.

You can request the restriction of the processing of your personal data (1) for a period enabling SGEF to verify the accuracy of your personal data in the event you contest the accuracy of your personal data, (2) the processing is unlawful and you wish to restrict your personal data rather than deleting it, (3) if you wish SGEF to keep your personal data because you need it for your defense in the context of legal claims (iv) if you have objected to the processing but SGEF conducts verification to check whether it has legitimate grounds for such processing which may override your own rights.

You may also request that we correct, amend, erase, any data which is incomplete, out of date or inaccurate. You can request the deletion of your personal data as permitted by applicable law and notably (1) if your personal data is no longer necessary for the purpose of the data processing, (2) if you have withdrawn your consent on the data processing based exclusively on such consent, (3) if you objected to the data

processing, (4) if the personal data must be erased to comply with a legal obligation applicable to SGEF. We will take reasonable steps to inform all relevant recipients which may be involved in the data processing of such erasure.

You can also object to the processing of your personal data when such processing is based on SGEF's legitimate interest (pursuant to article 6-1.f) of EU General Data Protection Regulation (GDPR).

You also have the right to lodge a complaint with the competent supervisory authority.

You can also provide your instructions regarding the storage, deletion or disclosure of your personal data after your death. Such instructions may be general or specific.

13 | HOW TO CONTACT US OR CONTACT THE SUPERVISORY AUTHORITY TO LODGE A COMPLAINT?

If you have any questions, complaints, or comments regarding this Notice or our data collection practices, please contact us by writing, or sending an email to: data.protection.sgef@socgen.com .

You are informed that you can also lodge a complaint with the supervisory authority of the country where you are located if you have any concern about the conditions of processing of your personal data by SGEF.

14 | CHANGES TO THIS NOTICE

Our Notice may change from time to time to reflect changes in our processing of your personal data. However, these changes stay at the best state of art and are in any event compliant with applicable law. We encourage you to periodically review this page for the latest information on our privacy practices. We will notify you of any material changes as required by law.