

ODDO BHF UK Limited

*Privacy notice*

PERSONAL DATA  
PROTECTION POLICY



ODDO BHF

# *Table of contents*

INTRODUCTION .....	02
WHAT PERSONAL DATA ARE PROCESSED BY ODDO BHF UK LIMITED? .....	02
WHY DOES ODDO BHF UK LIMITED PROCESS YOUR PERSONAL DATA AND ON WHAT LEGAL BASIS? .....	03
WHO ARE THE RECIPIENTS OF YOUR PERSONAL DATA AND WHY IS IT SHARED? .....	03
ARE YOUR PERSONAL DATA TRANSFERRED OUTSIDE THE UK ? .....	04
HOW LONG DOES ODDO BHF UK LIMITED KEEP YOUR PERSONAL DATA ? .....	04
HOW DOES ODDO BHF UK LIMITED PROTECT YOUR PERSONAL DATA ? .....	04
WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM ? .....	05
ON YOUR RIGHT TO LODGE A COMPLAINT WITH THE ICO .....	05

## 1. INTRODUCTION

In this Privacy Policy, «ODDO BHF UK Limited», «we», «us» and «our» refers to ODDO BHF UK Limited, a UK investment firm, regulated by the Financial Conduct Authority (FCA), incorporated in England and Wales, and domiciled at 91 Jermyn Street, London, SW1Y 6JB United Kingdom.

ODDO BHF UK Limited specializes in Corporates & Markets (which forms part of the broader ODDO BHF Group Corporate and Investment Banking) and Asset Management (fund management) and has always cultivated trust with its clients. With this in mind, we have made the security and protection of your personal data a priority.

### **About this Information Notice:**

The purpose of this information notice is to inform clients or prospective clients of ODDO BHF UK Limited (including representatives, directors, officers or beneficial owners of prospective companies, clients or companies in a business relationship with ODDO BHF UK Limited) about the processing of personal data by us, how we use such personal data, how it is shared and protected and what rights you have in relation to such personal data.

ODDO BHF UK Limited has a UK representative of the ODDO BHF Group Data Protection Officer (DPO), who can be contacted as follows

- By post: ODDO BHF UK Limited (DPO Representative)  
3rd Floor, 91 Jermyn Street,  
London. SW1Y 6JB UK
- By email: [chika.ogbulie@oddo-bhf.com](mailto:chika.ogbulie@oddo-bhf.com)

## 2. WHAT PERSONAL DATA ARE PROCESSED BY ODDO BHF UK LIMITED?

Personal data is any information relating to an identified or identifiable natural person. A natural person may be identified directly (surname, first name) or indirectly (telephone number or identifier, postal or e-mail address, etc.).

The personal data that may be processed by ODDO BHF UK Limited, in whole or in part, are as follows

- Information relating to your civil status and contact details: surname, first name, telephone number, address, e-mail address, professional details, company, position;
- Data relating to representatives of legal entities: identity of managers, partners, agents and beneficial owners;
- Identification data: nationality, date and place of birth, copy of an identity document;
- Information concerning the follow-up of the commercial relationship: letters, emails, telephone conversations;
- Information collected in the context of events: meetings, events, webinars, etc.;
- Data relating to the use of the website: authentication data to access the personal area, cookies, tracers, logs and navigation data.
- Data collected as part of the fight against money laundering and the financing of terrorism (LCB-FT): identity of the beneficiary, income or turnover, proof of resources or assets, proof of the origin of funds, information on an account, a product or a financial transaction, identity of the originator, declaration of suspicion, etc.

We recognise our privileged position in receiving these data. The Bank is committed to protecting the privacy of the subjects whose data we process, and to meeting its responsibilities to process personal data in a way that is consistent with the principles set out in the UK data protection laws.

You may have expressed your wish not to have your personal data used but we may still need to use it for various reasons. In such a case, we will continue to use it (i) if we are required to do so by law, (ii) if we need to perform a contractual obligation, or (iii) if we have a legitimate interest in doing so (unless your interests, freedoms or fundamental rights prevail) and in any event (iv) proportionate to the purpose.

## 3. WHY DOES ODDO BHF UK LIMITED PROCESS YOUR PERSONAL DATA AND ON WHAT LEGAL BASIS?

The legal bases and purposes for which your personal data is collected and processed by ODDO BHF UK Limited are as follows:

### 3.1 To perform a contract or to contact you, at your request, with a view to entering a contract:

- Carrying out any communication to investors in relation to their investments in a fund;
- In general, to fulfil contractual obligations arising for us.

### 3.2 To comply with a legal or regulatory obligation:

- Fighting money laundering and the financing of terrorism: your personal data are processed by ODDO BHF UK Limited when it carries out checks to ensure that the assets from its clients are not from fraudulent sources and are not used to finance terrorist activities;
- Fighting tax evasion (FATCA - CRS): ODDO BHF UK Limited may process data relating to your tax situation and, in certain circumstances, share this information, as well as other financial information relating to your interests, with competent tax authorities;
- Compliance with UK MIFID: your personal data are processed to determine your investor profile, including your risk appetite;
- Compliance with national and international financial sanctions: ODDO BHF UK Limited may process your personal data as part of the checks it carries out to identify persons who should be subject to asset freezing measures;
- Your personal data may also be processed for the purpose of sending you regulatory communications or for the recording of telephone conversations to meet a legal requirement.

### 3.3 Where ODDO BHF UK Limited pursues a legitimate interest which does not override your interests, freedoms and fundamental rights:

- To disclose information to other data recipients such as service providers and their affiliates, auditors, regulators and technology providers;
- To monitor and record electronic calls and communications (i) for the processing and verification of instructions, for the investigation and prevention of fraud, (iii) for the detection, prevention, investigation and prosecution of crime, (iv) to enforce or defend the rights of ODDO BHF UK Limited, to comply with any legal obligation that is imposed, or (v) for quality purposes, business analysis, training, to improve its services in relation to these matters;
- Send you commercial communications in connection with existing products or services or for the further marketing of similar products or services (marketing);
- To protect the security and integrity of our IT systems;
- For the communication of information to legitimate third parties: tax authorities, regulatory authorities, lawyers, auditors, statutory auditors;
- For the processing of claims and litigation.

### 3.4 Consent:

If ODDO BHF UK Limited carries out processing for purposes other than those described in this chapter;

You may, at any time and without justification, object to the use of your data for commercial (marketing) prospecting purposes by ODDO BHF UK Limited or by third parties. Where the legal basis for processing is consent, you may withdraw it by contacting us in accordance with the contact details given in this policy.

## 4. WHO ARE THE RECIPIENTS OF YOUR PERSONAL DATA AND WHY IS IT SHARED?

### **Personal data transferred to public authorities:**

In accordance with the Regulations in force, your personal data may be transferred at the request of public authorities.

### **Personal data transferred internally:**

ODDO BHF UK Limited may communicate your personal data to other entities of the ODDO BHF Group whose intervention is necessary to fulfil the purposes described above.

### **Personal data transferred to ODDO BHF UK Limited service providers**

ODDO BHF UK Limited may also communicate your personal data to technical service providers and partners whose involvement is strictly necessary to achieve one of the above purposes.

ODDO BHF UK Limited works with service providers who implement appropriate technical and organizational measures to ensure that the processing of personal data they carry out meets the requirements of the Regulation and guarantees the protection of your rights, confidentiality, and security of your personal data.

## 5. ARE YOUR PERSONAL DATA TRANSFERRED OUTSIDE THE UK?

The transfer and disclosure of your personal data may take place outside the UK. Where this happens, it will be on the basis of either:

- Appropriate or suitable safeguards as required by applicable laws or regulations
- An adequacy decision by the UK Government.

You can find out more information on the safeguards we rely on by contacting the DPO representative using the contacts provided.

## 6. HOW LONG DOES ODDO BHF UK LIMITED KEEP YOUR PERSONAL DATA?

ODDO BHF UK Limited will keep your personal data only for as long as is necessary to fulfil the purposes set out in this Information Notice and will destroy, anonymize or archive it once it is no longer required to fulfil these purposes, unless the retention of such data is necessary to comply with legal or regulatory requirements or is justified by the need to assert one's rights in the context of legal proceedings, investigations or similar procedures.

It is also worth remembering that personal data collected and processed for the above-mentioned purposes may be kept for a longer period than that initially envisaged if the defense of a right or interest so requires, or in order to meet the requirements of a law enforcement agency, a UK or international regulator.

In this case, the personal data will only be accessible to authorized persons.

## 7. HOW DOES ODDO BHF UK LIMITED PROTECT YOUR PERSONAL DATA?

ODDO BHF UK Limited ensures to minimize the collection of personal data to the strict necessary, to keep it up to date and to ensure its security. Technical and organizational measures are implemented to guarantee the appropriate protection of your data against any access, loss, accidental destruction, modification or unauthorized disclosure.

ODDO BHF UK Limited staff and affiliates are trained on personal data protection issues and undertake to guarantee the confidentiality and security of the personal data to which they have access in the context of their tasks and missions.

In the event of a data breach affecting your personal data, presenting a risk for your rights and freedoms, ODDO BHF UK limited will notify the violation in question to the Information Commissioners Office ("ICO") within the time limits prescribed by the UK DPA 2018.

If this violation presents a high risk for the rights and freedoms of the persons concerned, ODDO BHF UK Limited also undertakes to:

- Notify the persons concerned under the conditions prescribed by the DPA 2018;
- Provide them with the information and recommendations necessary to implement to remedy the situation.

## 8. WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?

In accordance with the Data Protection Act 2018, you have the following rights over your personal data

- Right to have access to your personal data: this allows the data subject to know whether the personal data concerning him or her are being processed and to obtain a readable copy of it. It also makes it possible to check the accuracy of the data;
- Right of rectification of your personal data: Allows the data subjects to modify, correct or update data concerning them in order to avoid the use or dissemination of erroneous data;
- Right to erasure ("Right to be forgotten"): Allows the data subjects to obtain the erasure of their personal data;
- Right to restrict the processing of your personal data: Allows data subjects to temporarily object to the use of their personal data;
- Right to object to the processing of your personal data: The data subjects may, at any time, object to their data being used for the purposes of commercial prospecting or for other purposes based on our respective interests. If your opposition request does not concern prospecting, ODDO BHF UK Limited may justify its refusal on the grounds set out in Article 21 of the GDPR.
- Right to the portability of your personal data: this involves returning your data to you in a machine-readable format so that they can be transferred to a third party or for their own use;
- The right to human intervention in the face of profiling or a fully automated decision.

## PRIVACY NOTICE

The exercise of your rights is free of charge. However, in the event of manifestly unfounded or excessive requests, in particular because of their repetitive nature, we may demand the payment of reasonable costs.

### 9. ON YOUR RIGHT TO LODGE A COMPLAINT WITH THE ICO?

Data subjects have the option of lodging a complaint with the Information Commissioner's Office (ICO) or get advice from the ICO, if they believe that the processing of their personal data does not comply with applicable regulations. You can call the ICO on +44(0) 303 123 1113, from Monday to Friday, 9am to 5pm.