



ODDO BHF

Data protection information of ODDO BHF Aktiengesellschaft pursuant to EU-General Data Protection Regulation for „natural persons“

The following information is intended to provide you with an overview of the way in which we process your personal data and of your rights under data protection law. Which data is processed in detail, and how the data are used is largely determined by the requested respectively the agreed services.

Preamble

a) Who are we?

ODDO BHF AG is a German Credit Institution, seated in Frankfurt am Main. We are part of the Franco-German ODDO BHF Group with the ODDO BHF SCA based in Paris, France, as the parent company.

b) For whom does this Data Protection Information apply?

When we process personal data, this means that we e.g. collect, store, use, transmit or delete such data. This Data Protection Information concerns personal data of:

- Interested parties and clients of ODDO BHF AG who are natural persons.
- All other natural persons being in contact with our bank, e.g. agents, guardians, messengers and representatives or employees of legal entities, but also visitors to our website and people who register on the website or our apps.
- Economic beneficiaries of our clients (here we have to meet our monitoring obligations, e.g. according to the Anti Money Laundering Laws).

1. Who is responsible for data processing and who can I contact?

The data controller is:

ODDO BHF Aktiengesellschaft
Bockenheimer Landstraße 10
60323 Frankfurt am Main
Telefon: 069 718-0
E-Mail: info.frankfurt@oddo-bhf.com

Our data protection officer can be reached at the following address:

ODDO BHF Aktiengesellschaft
Datenschutzbeauftragter/Data Protection Officer
Bockenheimer Landstraße 10
60323 Frankfurt am Main
Telefon: 069 718-0
E-Mail: dataprotection.frankfurt@oddo-bhf.com

2. Which sources and data do we use?

We collect your personal data in particular when you contact us, e.g. as an interested party, applicant or customer. We process personal data that we receive from our clients in connection with our business relationship. Where necessary in order for us to render our services, we also process personal data that we lawfully obtain from publicly available sources (e.g. land registers, commercial registers and registers of association, press, internet) or that is legitimately provided to us by other companies within the ODDO BHF Group or other third parties (e.g. credit agencies).

Relevant personal data includes your particulars (name, address and other contact details, date and place of birth and nationality), data concerning your credentials (e.g. ID data), and authentication data (e.g. template signature). This might extend to order data (e.g. payment order), data from the fulfilment of our contractual obligations (e.g. sales data in payments processing), information regarding your financial situation (e.g. data regarding your creditworthiness, credit scoring/ratings, or the source of your assets), marketing and sales information (including promotional scores), documentation data (e.g. record of advice) and other with these categories comparable data.

3. Why do we process your data (purpose of data processing) and what is the legal basis for this?

We process personal data in accordance with the provisions of the European General Data Protection Regulation (GDPR) and the German Data Protection Act (BDSG):

a) For the fulfilment of contractual obligations (Art 6 (1) b) GDPR)

Data is processed in order to perform banking business and financial services as part of the execution of our contracts with our clients or in order to implement pre-contractual measures that are performed further to our clients' request. Data processing is primarily carried out for reasons relating to the specific product

(e.g. account, credit, securities, deposits or brokerage) and its objectives can include needs analyses, provision of advice, asset management services and the execution of transactions. Further information on the objectives of data processing can be found in the contractual documents and terms and conditions applicable to the products or transactions in question.

b) Based on the balancing of interests (Art. 6 (1) f) GDPR)

If necessary, we will process data that goes beyond what is necessary simply for the fulfilment of the contract in order to safeguard our own, or a third party's legitimate interests. Examples of this include:

- Consultation and exchange of data with credit agencies in order to determine creditworthiness and counterparty credit risks for credit transactions, and perform a needs analysis for accounts exempt from attachment and basic accounts,
- Review and optimization of needs analysis procedures for the purpose of direct customer contact,
- Promotion or market research and opinion surveys, unless you have objected to the use of your data,
- Assertion of legal claims and defence in the event of legal disputes,
- Guaranteeing IT security and the bank's IT operations,
- Prevention and resolution of criminal offences,
- Video surveillance in order to exercise our right to determine who shall be allowed or denied access, to gather evidence in the event of robberies or fraud, or to substantiate cash receipts or pay-outs, e.g. at cash dispensers, (see also section 4 BDSG),
- Building and site security measures (e.g. access controls),
- Measures to guarantee the domiciliary rights,
- Measures related to business management and the further development of products and services,
- Group-wide Measures related to business management and the further development to products and services and for the risk management within ODDO BHF Group.

c) Based on your consent (Art. 6 (1) a) GDPR)

If you have given us your consent to process personal data for specific purposes (e.g. forwarding data within the Group, evaluating payment transaction data for marketing purposes), the processing of this data is lawful on the basis of your consent. Consent can be withdrawn at any time. This also applies to the withdrawal of declarations of consent granted to us before the entry into force of the General Data Protection Regulation, i.e. before 25 May 2018. Withdrawing your consent will not affect the lawfulness of the data processed until consent was withdrawn.

d) Due to statutory provisions (Art. 6 (1) c) GDPR) or in the public interest (Art. 6 (1) e) GDPR)

As a bank, we are also subject to a range of legal obligations, i.e. statutory requirements (e.g. under the German Banking Act, anti-money laundering legislation, German Securities Trading Act, and tax legislation for example) and regulatory requirements (imposed by institutions such as the European Central Bank, European Banking Authority, Deutsche Bundesbank, and the Federal Financial Supervisory Authority). Data is processed for purposes including credit checks, identity and age checks, prevention of fraud and money laundering, the fulfilment of monitoring and reporting obligations under tax law, and the evaluation and management of risks within the bank and group-wide within ODDO BHF Group.

4. Who will receive my data?

Access to your data is provided to those departments within the bank that need this data in order to meet our contractual and legal obligations. Service providers and agents used by us may also be provided with data for these specific purposes, provided that they maintain banking secrecy. These are companies and businesses operating in the following areas: credit services, IT services, logistics, printing services, telecommunications, debt collection, advice and consultancy, and sales and marketing.

With regard to the forwarding of data to recipients outside our bank, it should firstly be noted that we as a bank are obliged to maintain secrecy in respect of all customer-related facts and assessments of which we become aware (banking secrecy pursuant to no. 2 of our German Terms and Conditions). We are permitted to pass on information about you only if we are required by law to do so, if you have

consented to this, or if we are empowered to issue a banker's reference. Subject to these conditions, recipients of personal data could include:

- Public bodies and institutions (e.g. Deutsche Bundesbank, the German Federal Financial Supervisory Authority, the European Banking Authority, the European Central Bank, tax authorities, and law enforcement authorities) if a legal or official obligation exists.
- Other banks and financial service institutions or similar bodies to which we provide personal data in order to conduct our business relationship with you (e.g. correspondent banks, depositary banks, stock exchanges, and credit agencies, depending on the contract).
- Other companies within ODDO BHF Group for risk management purposes based on legal or regulatory obligation.

Other data recipients could include bodies to whom we are entitled to provide information, based on the consent you have given us, and in respect of which you have released us from banking secrecy by means of your agreement or consent.

5. Will data be transferred to a third country or international organisation?

Data is transferred to bodies in countries outside the European Union ("third country") to the extent

- this is necessary for the execution of your orders (e.g. payment orders and orders to buy or sell securities),
- this is prescribed by law (e.g. reporting obligations under tax law) or
- you have given us your consent.

Furthermore Data may be transferred to bodies in countries outside the European Union ("third country") in the following cases:

- Affiliated companies or external service providers located in a third country can be appointed for data processing. Compliance with the European data protection standards is ensured by contracts with standard data protection clauses adopted by the EU Commission. In case of affiliated companies, this can alternatively be ensured by binding corporate rules on data protection in accordance with Article 47 GDPR.
- Your personal data will be processed in particular by affiliate companies of our bank in Tunisia. Such companies are acting on behalf of our bank and support us in the care, maintenance, new and further development of our IT systems.

6. How long is my data stored?

We process and store your personal data for as long as it is required in order to fulfil our contractual and statutory duties. It should be noted that our business relationship is a contract of continuing obligation that is intended to run for a number of years.

If the data is no longer required for the fulfilment of contractual or statutory duties, it is periodically deleted unless its continued processing – for a limited time – is necessary for the following purposes:

- Fulfilment of duties to preserve records under commercial and tax law: relevant legislation in this respect includes the German Commercial Code (HGB), the German Tax Code (AO), the German Banking Act (KWG), the German Anti-Money Laundering Act (GwG), and the German Securities Trading Act (WpHG). The time periods specified in these laws for the retention of records and/or documentation range from two to ten years.
- Preservation of evidence in line with the statutory limitation periods. In accordance with section 195 et seq. of the German Civil Code (BGB), these limitation periods can last up to 30 years although the standard limitation period is three (3) years.

7. What data protection rights do I have?

Each data subject has the right of access under Article 15 GDPR, the right to rectification under Article 16 GDPR, the right to erasure under Article 17 GDPR, the right to restriction of processing under Article 18 GDPR, the right to object under Article 21 GDPR, and the right to data portability under Article 20 GDPR. Regarding the right of access and the right to erasure the restrictions due to section 34 and 35 BDSG apply. There is also a right to lodge a complaint with a supervisory authority (Article 77 GDPR in conjunction with section 19 BDSG).

You can withdraw any consent given to us for the processing of personal data at any time. This also applies to the withdrawal of declarations of consent granted to us before the entry into force of the General Data Protection Regulation, i.e. before 25 May 2018.

Please note that this withdrawal of consent is not retroactive. Data processing that took place before consent was withdrawn is not affected.

8. Do I have a duty to provide data?

Within the scope of our business relationship, you must provide any personal data that is necessary for the commencement and execution of a business relationship and the fulfilment of the associated contractual duties, and any information that we are legally obliged to collect. Without this data, we will generally be unable to conclude our contract with you or execute the contract.

In accordance with the anti-money laundering regulations, we are specifically obliged to identify you using your identification document prior to the

establishment of the business relationship and to collect and record your name, place and date of birth, nationality, address, and identification data. So that we can satisfy this statutory obligation, the German Anti-Money Laundering Act requires you to provide us with the necessary information and documentation and to promptly notify us of any changes that arise during the course of the business relationship. If you do not provide us with the necessary information and documents, we are not permitted to commence or continue the business relationship desired by you.

9. To what extent do we use automated decision-making?

We do not use any fully-automated decision-making pursuant to Article 22 GDPR for the establishment and execution of the business relationship. Should we use these methods in individual cases, we will inform you separately of this if this is required by law.

10. Is „Profiling“ carried out?

We process your data on a partially automated basis with the aim of evaluating certain personal aspects (profiling). We use profiling for example in the following situations:

- Due to legal and regulatory obligations we are required to combat money laundering, terrorist financing and other criminal offences which lead to the risk of damaging property. In this context data analyses (i.a. concerning payment transaction data) are conducted. These measures also serve your security.
- To provide you tailored information and advice regarding products we use analysis instruments. These allow us an appropriate communication and advertisement including market research and public opinion polling.
- In the course of assessing your creditworthiness we use scoring. Thereby the likelihood of a customer meeting his or her payment obligations in accordance with the terms of the contract are calculated. The following attributes could be taken into account for the calculation: income level, expenses, existing liabilities, profession, employer, duration of employment, experiences from the previous business relationship, contractual repayment of earlier loans and information received from credit agencies. The scoring is based on a mathematically and statistically approved and proven procedure. The calculated score values support us during the decision making concerning product sales and flow into our ongoing risk management.

Information regarding your right to object pursuant to Article 21 of the General Data Protection Regulation (GDPR)

1. Right to object on a case-by-case basis

You have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you that is based on Article 6 (1) e GDPR (data processing in the public interest) and Article 6 (1) f GDPR (data processing on the basis of a balancing of interests); this also applies to any profiling based on this provision within the meaning of Article 4 no. 4 GDPR.

If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for processing the data which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal rights.

2. Objection to a processing of data for direct marketing purposes

In individual cases, we use your personal data for direct marketing purposes. You have the right to object at any time to the processing of personal data concerning you for such marketing; this also applies to profiling, to the extent that it is related to such direct marketing.

If you object to processing for direct marketing purposes, we will no longer process your personal data for this purpose.

The objection is not subject to any formal requirement and should preferably be addressed to:

ODDO BHF Aktiengesellschaft
Datenschutzbeauftragter/Data Protection Officer
Bockenheimer Landstraße 10
60323 Frankfurt am Main
E-Mail: dataprotection.frankfurt@oddo-bhf.com