

## PERSONAL DATA PROTECTION POLICY

Crédit Mutuel Asset Management makes privacy and personal data protection a priority.

This document demonstrates the commitment to implement the appropriate technical and organisational measures, when collecting and using your data in connection with the subscription to products and/or services and throughout our relationship, for the responsible use of your personal data.

Crédit Mutuel Asset Management undertakes to comply with all of its obligations under the regulations applicable to the processing of personal data, specifically:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 applicable from 25 May 2018 (hereinafter the '*General Data Protection Regulation*' or 'GDPR').
- the French Data Protection Act (Loi informatique et Libertés) No. 78-17 of 6 January 1978 as amended;
- Any recommendations of any Supervisory Authority.

Personal data are also protected by the professional secrecy to which we are bound.

### 1. Some definitions

'Personal Data': Any information that relates to an identified natural person, or a person that can be identified directly or indirectly by an identification item such as a name, telephone number, postal address, email address, identification number, location data, etc.

'**Processing of personal data**': Any operation carried out on personal data such as collection, recording, organisation, retention, adaptation, modification, extraction, consultation, use, interconnection, limitation, erasing, destruction, etc.

'**Controller**': The natural person or legal entity, public or private, or the service, which determines alone or together with others the purposes and means of processing.

'**Subcontractor**': The natural person or legal entity, public or private, or the service that processes personal data on behalf of the controller.

### 2. Data Protection Officer

Specialised in the area of personal data protection, responsible for informing and advising the controller, ensuring compliance with the applicable regulations, and privileged contact with the French national commission for information technology and freedoms (Commission Nationale de l'Informatique et des Libertés, CNIL), the data protection officer is a guarantee of confidence and a guarantor of the exercise of the rights of individuals on data processing.

### 3. Collected personal data

Personal data that we collect or hold from you is strictly necessary for our business to enable us to offer you suitable products and/or services.

We have to collect:

- Identity data such as your first name(s), last name(s), date and place of birth, etc.

- Data relating to your contact details such as mailing address, email address, telephone number(s),
- Identification and authentication data, IP address, etc.
- Data relating to your professional situation and investor profile,
- Data collected through cookies (Article 11 below).

Data can be collected directly from you or from the following sources (non-exhaustive list):

- Crédit Mutuel federations or CIC banks
- Publications or databases such as the Journal Officiel, the Bulletin Officiel des Annonces Civiles et Commerciales
- Anti-fraud bodies
- Websites, social networks for data that you have made public.
- Sponsorship
- The use of business prospecting files

Finally, we may be required to know personal data of persons who are not customers of the management company. Example (non-exhaustive list):

- Prospective customers
- Guarantees and/or guarantors
- Legal representatives of legal entities or natural persons such as minors or protected adults.
- Agents
- Persons dealing with our customers, with you, or on your behalf (notary, lawyer, accountant, etc.)

#### **4. Purposes of processing**

The processing carried out by Crédit Mutuel Asset Management serves specific, explicit, and legitimate purposes.

In particular, your data can be processed to:

- Provide you with suitable products and services,
- Provide you with information on these products and services, in particular by email, mobile alerts, letters, text messages or telephone calls. These communications concern our existing services and products as well as new services and exclusive offers that may be of interest to you. Electronic communications (emails, text messages, etc.) that are sent to you may involve products and services similar to those you have subscribed to, in accordance with Article L. 34-5 of the French Postal and Electronic Communications Code (Code des Postes et Communications Electroniques).  
You can inform us at any time that you no longer wish to receive marketing communications. If you ask not to receive any more marketing communications or if you wish to receive these communications again, we will keep a computer record of these requests as documentation.
- Manage and perform our services for the products and services you have subscribed to,
- Business prospection, marketing, profiling and segmentation, and statistical studies,
- Comply with legal and regulatory obligations, in particular with respect to customer knowledge, the fight against money laundering and terrorist financing, risk assessment,

security and prevention of delinquencies and fraud, the fight against tax fraud, financial market obligations,

- Record and maintain some of the conversations and communications we may have with you, regardless of their medium (mainly electronic messages, in-person interviews, telephone calls, etc.), particularly for the purposes of improving the quality of communications via telephone, complying with legal and regulatory requirements relating to the financial markets, and securing the transactions made.

## **5. Legal basis for processing**

We collect and use your personal data on the basis of the following:

- To execute a contract entered into with you or to provide you with pre-contractual information,
- To respond to our legal and regulatory obligations,
- To respond to our legitimate interests,
- To ask for your consent for specific processing.

## **6. The recipients of personal data that are collected and processed**

Your personal data are only communicated to authorised and specified recipients.

These recipients may access your data within the limits necessary to achieve the purposes described above.

Please be advised that recipients may be:

- Our institution as controller,
- Authorised staff at the level of the sales network and the sales department,
- The institutions and companies that are part of the group to which we belong and our partners,
- Service providers and subcontractors performing services on our behalf,
- Guarantors,
- Brokers and insurers,
- Duly empowered judicial and/or administrative authorities,
- Regulated professions (examples: notaries, lawyers, bailiffs).

## **7. Retention of your personal data**

Your personal data are stored throughout the relationship as long as you use our products and services. They may be kept beyond the time frame of the relationship, particularly in order to comply with applicable regulations, to assert our rights or to defend our interests.

Your data can be archived for a longer period for claims and/or litigation management, to meet our regulatory obligations, or to satisfy requests of duly authorised judicial or administrative authorities.

For customers, depending on the data type involved and applicable legislation, data may be retained for up to 10 years after the end of the relationship or transaction.

Data for business prospects may be kept for a period of 3 years from their collection or from the last contact made with you.

Personal data collected upon subscription to our newsletters via our website will be retained throughout the duration of said subscription and for up to five years from the date of unsubscription to said newsletters.

Your personal data are therefore kept for the period necessary to achieve the purposes for which they are collected and processed. They will then be safely destroyed or anonymised.

Where personal data are collected for several purposes, they are kept until the longest retention or archiving period has run out.

## **8. Transfer of personal data outside the European Union**

Your personal data may be transferred in limited cases and for strictly controlled purposes to a country outside the European Union. We will ensure that they are protected via:

- The existence of an adequacy decision issued by the European Commission which recognises an adequate level of protection in the recipient country;
- If the level of protection has not been recognised as equivalent by the European Commission, we rely on the establishment of appropriate guarantees such as standard contractual clauses approved by the European Commission.

## **9. Your rights**

You have rights concerning the collection and processing of your personal data, which can be exercised under the conditions laid down by the regulations in force, namely:

- The right to be informed in a comprehensible and easily accessible way about the processing of your data that is implemented;
- The right to access your data;
- The right to correct and obtain changes to your data that are inaccurate or incomplete;
- The right to erase your data, unless we have legal or legitimate reasons to keep them;
- The right for you to oppose processing when it is based on the legitimate interest of the controller;
- The right for you to oppose, at no cost and without having to justify said opposition, the use of your data for business prospecting;
- The right to limit the processing of your personal data;
- The right to portability of your data when processing is based on consent or contract execution and processing is carried out using automated processes;
- The right to withdraw your consent at any time when the processing of your personal data is based on your consent;
- The right to give specific or general instructions concerning the retention, erasing and disclosure of your personal data, applicable after your death;
- The right to lodge a complaint with the Commission Nationale de l'Informatique et des Libertés (CNIL), 3 Place de Fontenoy, TSA 80715, 75334 Paris Cedex 07, or on the website, [www.cnil.fr/fr/plaintes](http://www.cnil.fr/fr/plaintes).

We would like to point out that the exercise of some of these rights may result, on a case-by-case basis, in the management company being unable to provide the service.

On the other hand, we can be justified in continuing to process your personal data despite the exercise of your right to erase, to limit or to oppose the processing of your data if we have a legitimate interest in doing so or if regulatory provisions force us to keep your data.

You may exercise any of the rights listed above by writing to the following address: DATA PROTECTION OFFICER, 63 chemin Antoine Pardon, 69814 Tassin Cedex, France.

#### **10. Security of your personal data**

We implement technical and organisational measures to protect your data,

In particular, the implementation of appropriate physical, logical, and organisational security measures, encryption, anonymisation to ensure the confidentiality and integrity of your data and to avoid unauthorised access.

#### **11. Cookies**

Our cookies policy is available on our website:

<https://www.creditmutuel-am.eu/ie-en/non-professionals/regulatory-information/cookies.html>

#### **12. Updating the personal data protection policy**

Our personal data protection policy will be regularly updated to take legislative and regulatory developments into account.

The latest version is available on our websites.