

## Privacy Policy

This Privacy Policy provides you with detailed information relating to the use and the protection of your personal data by BLOM Bank France including the reasons why we share such data. It applies to all our products and services.

### 1. Which personal data do we use about you?

We collect and use your personal data to the extent necessary in the framework of our activities and to achieve a high standard of personalised products and services. We may collect various types of personal data about you at the account opening or during our relationship, it includes:

- Identification information: name, place and date of birth, numbers and information on your identity documents (ID card and passport), nationality, signature;
- Contact information: postal address and email address, phone number;
- Tax status: tax ID, tax country/address;
- Family situation: marital status, number of children;
- Employment information: employment, employer's name, remuneration;
- Financial, banking and transactional data: bank account details, credit card number, money transfers, assets, credit history, debts and expenses;
- Data relating to your habits and preferences:
  - Data which relates to your use of our products and services including banking, financial and transactional data;
  - Data from your interactions with us: in our branch (CCTV), our internet website, emails, interviews, phone conversations;

BLOM Bank France may collect and use personal data related to people with whom we are or could be in relation with. This may happen in the following cases:

- Guarantors, co-borrowers;
- Family members of our clients;
- Legal representatives (power of attorney); authorized persons, ultimate beneficial owners; company shareholders;
- Beneficiaries of payment transactions made by our clients;
- Legal representatives and staff members of our service providers;

At last, we can collect and use data from:

- The Banque de France when accessing to regulatory database (FICP, FCC)
- The INSEE when accessing to the RNIPP register (inactive accounts regulation)
- The trade and companies register

### 2. Why and on which legal basis do we use your personal data?

#### a. To perform a contract with you

We use your personal data to enter into and perform our contracts, including to:

- Assist you and answer your requests;
- Manage and execute the products and services such as payment instruments and the granting of credit.

#### b. To comply with our legal and regulatory obligations

We use your personal data to comply with various legal and regulatory obligations, including:

- Prevention of money-laundering and financing of terrorism while identifying and verifying the identity of clients, politically exposed persons, representatives and beneficial owners, identifying a risk profile and monitoring the operations and transactions;
- Compliance with legislation relating to sanctions and embargoes; and
- Fight against tax fraud and fulfilment of tax control and notification obligations especially by identifying the clients and the accounts concerned.
- Banking and financial regulations in compliance with which we:
  - fulfil our obligations related to regulatory database (Banque de France FICP and FCC);
  - fulfil our obligation related to INSEE database (RNIPP for the inactive accounts);
  - communicate information about your accounts to the payment providers that act on your request (information services of "aggregator" and/or of payment)
  - Evaluate your financial solvency (credit risk scores, reimbursement capacity) and prevent unpaid bills;

- monitor and report risks that institutions could incur;
- Record, when necessary, phone calls and emails;
- Reply to an official request from a duly authorised public or judicial authority.

#### **c. To fulfil our legitimate interest**

We use your personal data in order to deploy and develop our products or services, to improve our risk management and to defend our legal rights, including:

- Storage of the proof of transactions, fraud prevention;
- Recovery
- Prevention of fraud and abuse (security measures, control of unusual transactions)
- IT management, IT security and business continuity;

### **3. Who can we share your personal data with?**

In order to fulfil the aforementioned purposes, we may disclose your personal data only to:

- BLOM Bank entities;
- Service providers which perform services on our behalf;
- Banking partners with which we have a regular relationship;
- Financial, taxation, regulatory or judicial authorities, state agencies or public bodies, upon request and to the extent permitted by law;
- Certain regulated professionals such as lawyers, notaries or auditors.

### **4. Transfers of personal data outside the EEA**

In case of international transfers originating from the European Economic Area (EEA), to a non-EEA country where the level of protection of your data has not been recognised as adequate by the European Commission, we will either rely on a derogation applicable to the specific situation (e.g. if the transfer is necessary to perform our contract with you such as when making an international payment) or implement standard contractual clauses approved by the European Commission to ensure the protection of your personal data.

### **5. How long do we keep your personal data for?**

We will retain your personal data (including inactive accounts) for the period required by applicable law that can be increased if an authority or the defense of a right or interest requires it. Most personal data collected in relation to a specified client is kept for the duration of the contractual relationship with such client plus ten years after the end of the contractual relationship except in specific cases set out above.

### **6. What are your rights and how can you exercise them?**

You have the following rights in respect of your personal data:

- To access: you can obtain information relating to the processing of your personal data, and a copy of such personal data;
- To rectify: where you consider that your personal data is inaccurate or incomplete, you can require that such personal data be modified accordingly;
- To object, to restrict or to erase your personal data. Regulatory requirements, contract execution or legitimate interest may limit or cancel these rights;
- To data portability: where legally applicable, you have the right to have the personal data you have provided to us be returned to you or, where technically feasible, transferred to a third party.

For any question you may have, as well as to exercise your rights, please send your request to the Data Protection Officer [dpo@blomfrance.fr](mailto:dpo@blomfrance.fr) or by post at the following address:

BLOM Bank France  
A l'attention du responsable Protection données  
21 Avenue George V - 75008 Paris

You may find additional information regarding your rights on the French data regulator website (CNIL.fr). You are also entitled to lodge a complaint with the competent supervisory authority to the following link: <https://www.cnil.fr/fr/agir> or by post at the following address: CNIL - 3 Place de Fontenoy - TSA 80715 - 75334 Paris - Cedex 07.