



BANQUE SBA

GROUPE BANQUE LIBANO-FRANÇAISE

PERSONAL DATA PROTECTION POLICY

The present document informs about the way BANQUE SBA Group uses and protects personal data as well as the reason why these data are treated. It is applied to all items and services rendered.

1. PERSONAL DATA TREATED BY BANQUE SBA GROUP

Only personal data necessary to the group's activity are gathered and used in order to propose personalized and high quality items and services.

BANQUE SBA Group may be compelled to gather different categories of personal data from its customers as soon as accounts are opened or throughout the business relationship and, more particularly :

Identity and contact information : first name, last name, place and date of birth, numbers and information linked with identity documentation (identity card, passport), postal and electronic address, telephone number or signature ;

- *Fiscal data : fiscal number, fiscal status, address/fiscal residence country ;*
- *Data relating to the family situation : marital status, matrimonial system, number of children ;*
- *Information relating to employment : employment, name of employer, salary ;*
- *Identification and authentication data, particularly when using bank on line services, technical logs, information regarding connection security ;*
- *Financial, banking and transactional information : inheritance, account ID, credit card number, data relating to transactions, including transfer information ;*
- *Data relating to customers' practice and preferences linked with :*
 - *the use of items and services subscribed in relation with banking, financial and transactional data ;*
 - *Interactions with BANQUE SBA Group : place of public reception (video surveillance system), during meetings and telephone conversations, in electronic mails.*

BANQUE SBA Group is also allowed to gather information regarding its indirect customers such as :

- *Guarantors ;*
- *Legal representative, corporate officers, authorized persons, beneficial owner and shareholders, legal entity acting as BANQUE SBA Group customer ;*

- *Contractors or beneficiaries during transactions effected in relation with BANQUE SBA Groups customer ;*
- *Service providers employees.*

2. WHY AND ACCORDING TO WHICH TREATMENT BASIS ARE OUR CUSTOMERS PERSONAL DATA USED ?

a. Carrying out a contract

Gathered personal data are used in order to strike and execute a contract concluded with customers, such as :

- *Assist them when subscribing our items and services ;*
- *The management and execution of items and services such as payment instruments and credit allocation.*

b. Respecting legal obligations to which BANQUE SBA Group is submitted to

Among which :

- *Anti money laundering and terrorism financing ;*
- *Compliance with laws applied regarding international sanctions and embargos ;*
- *Fight against tax evasion, respect of the law regarding tax and declaration control ;*
- *Respect of banking and financial rules according to which banking institutions are compelled to :*
 - *- estimate their customers financial solvency and prevent outstanding payments ;*
 - *- control and declare risks which the banking institution might have to face ;*
 - *- meet the official requirements from public or legal duly authorized authorities.*

c. Serve BANQUE SBA Group legitimate interest

Customers personal data are used to set up and develop items or services rendered by BANQUE SBA Group, and enhance risk management, to protect its interests in legal actions, such as:

- *Transactions or operations proof ;*
- *Management of IT system and business activity plan, including persons security ;*
- *Fraud and misuse prevention (security measures, control of unusual transactions) ;*
- *Bank collection ;*

3. TO WHICH CATEGORY OF ENTITIES CUSTOMERS PERSONAL DATA WILL BE ALLOWED TO BE DISCLOSED ?

In order to fulfil above mentioned aims, BANQUE SBA Group may be obliged to disclose the customers personal data, only to :

- *BANQUE LIBANO-FRANCAISE Group entities (included out of the European Union) ;*
- *Service providers and subcontractors achieving services for their own account ;*
- *Banking partners ;*
- *Financial, legal authorities or State agencies, public organizations (according to each case) ;*
- *Regulated professions, such as barristers, solicitors, statutory auditors (according to each case).*

4. DATA TRANSFERS EFFECTED OUT OF THE EUROPEAN ECONOMIC AREA

In case of international transfers and if the level of personal data protection regarding the addressee country is not considered as similar by the European Commission, BANQUE SBA Group must apply either to an applicable

dispensation to the situation (for example : in case of a payment to be effected at the international level, the transfer is necessary in order to fulfil a contract), or to the settlement of appropriate guarantees to protect personal data (such as standard contract terms approved by the European Commission).

5. HOW LONG MUST PERSONAL DATA BE KEPT ?

Personal data must be kept for the period necessary to the respect of applied legal and statutory requirements. They may be increased if required by authorities or rights and interests defense. The majority of information is kept during the contractual relationship and ten years after the end of the contractual relationship, except regarding above mentioned particular cases.

6. WHICH ARE THE CUSTOMERS RIGHTS AND HOW CAN THEY BE EXERCISED ?

Individuals have at their disposal different rights relating to personal data they are concerned with, such as :

- Access rights : it is allowed to obtain information regarding our customers data and data processing ;
- Rectification right : it is allowed to require the modification or correction of personal data obtained if the customer decides that they are inaccurate or incomplete ;
- Opposition, processing limits or cancelling rights regarding personal data. Legal or regulatory measures, legitimate reasons or also carrying out a contract can initial these rights as partially or totally non applicable according to circumstances ;
- Right to data portability : the customer is allowed to recover his personal data and, if technically possible, to transfer them to a third person.

a. Exercise my rights with Banque SBA in Paris :

You are allowed to exercise your rights by emailing to the person in charge of your data protection: conformite@ebf-sbaparis.com or to the following postal address :

Banque SBA SA
To the kind attention of the Compliance Department
68 avenue des Champs Elysées 75008 Paris France

You will also find more information regarding your rights on the Commission Nationale de l'Informatique et des libertés (CNIL) internet website: <https://www.cnil.fr/>.

If you cannot exercise your rights with Banque SBA or if you would like to report a personal data breach, you can also lodge a complaint to the 'Commission Nationale de l'Informatique et des Libertés' at the following link <https://www.cnil.fr/fr/agir> or also to the following postal address :

CNIL
3 Place de Fontenoy - TSA 80715
75334 Paris - Cedex 07
France

b. Exercise my rights with Banque SBA in Cyprus :

For the person who has business relationship with Banque SBA in Cyprus, you are allowed to exercise your rights by emailing to the person in charge of your data protection: compliance@ebf-sbacyprus.com or to the following postal address :

Banque SBA
Complexe Kanika Enaerios - Bloc 1
Iris House 8C, rue John Kennedy
3724, Limassol - Chypre

You will also find more information regarding your rights on the Commissioner for Personal Data Protection website:

http://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/home_en/home_en?opendocument

If you cannot exercise your rights with Banque SBA or if you would like to report a personal data breach, you can also lodge a complaint to the Commissioner for Personal Data Protection in Cyprus at the following link

<http://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/All/2FBD2ACD407DEF8C22582B9002E7019> or also to the following postal address :

*Commissioner for Personal Data Protection
1 Iasonos Street,
1082 Nicosia
P.O. Box 23378, CY-1682 Nicosia*