

PROTECTION OF PERSONAL DATA



This privacy notice is addressed to you as a natural person who is the subject of personal data processing by Natixis Wealth Management Luxembourg, (hereinafter entitled "NWML"), in their capacity as the Controller within the meaning of the Regulation¹ in force.

It specifies the purposes for which NWML needs to collect your personal data, the manner in which it will be used and protected, the duration of its retention, and your rights.

NWML collects and processes information that allows us to identify you. This information may concern your private life, for example: name, date of birth, family situation, profession, income and expenses...

Below, this information will be entitled "Data".

We consider that the protection of Data is essential to building a relationship of trust with our customers, our prospective customers, and our partners. To this end, we continuously monitor compliance with the Regulation in order to ensure responsible governance and the utmost transparency regarding any processing of Data performed by us.

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

WHEN DO WE COLLECT YOUR DATA?

- Upon entering into a business relationship with our customers, and throughout this relationship;
- From legitimate sources such as public authorities or institutions, establishments operating professional databases, and other financial institutions;
- When you provide us with information within the context of a job application;
- When you visit our websites;
- When you use our Web Banking application;
- When you communicate with us by mail, email, or telephone;
- When you visit us at our premises.

WHICH CATEGORIES OF DATA DO WE PROCESS?

- Data identifying you and your personal characteristics, such as your name, mailing address, telephone number, country of residence, identity card, date of birth, marital status, legal representative, proxy...
- Bank identification Data, such as your account number;
- Data on your financial transactions;
- Data on your financial situation, such as income, credit, and assets;
- electronic Data identifying you, such as email address, IP address;
- The content of emails;
- Data on visits to our websites and our Web Banking application;
- The recording of certain telephone conversations;
- Video surveillance recordings inside and around the circumference of our buildings;
- The Data needed to evaluate the qualifications of a candidate for a job position, such as curriculum vitae, diplomas, professional experience, training...
- Data originating from legitimate third party sources;
- The Data that you communicate to us concerning third parties. This Data is processed in a manner identical to the manner in which your Data is processed, in function of the corresponding purposes of the processing. Nevertheless, it is therefore your responsibility to notify the data subjects that you have shared this Data.

WHY DO WE COLLECT YOUR DATA?

Your Data is collected and processed only as much as necessary for specific purposes, such as:

- ▶ **For the performance of contracts relating to products and services, when you have subscribed to these products and services or when you wish to subscribe to them:**

This processing is undertaken because it is necessary for the performance of contracts or for the performance of pre-contractual measures originating from a request made by you as a customer or prospective customer.

This processing notably concerns:

- The subscription of a product or service;
- The management and provision of a product or service;
- The administration of bank accounts and the performance of transactions;
- Asset analysis and asset management;
- Credit application analysis and management, and the monitoring of collateral;
- The management of complaints;
- The management and monitoring of collections and disputes.

Without these forms of processing, NWML would be unable to respect its contractual obligations.

► **To comply with our legal and regulatory obligations:**

We undertake data processing to comply with all our legal and regulatory obligations, such as:

- The obligation to know our customers;
- Compliance with regulatory provisions, notably the Foreign Account Tax Compliance Act - FATCA and the Markets in Financial Instruments Directive - MiFID II;
- The fight against money laundering and the financing of terrorism;
- Compliance with applicable legislation respecting international sanctions and embargoes;
- The fight against tax fraud, compliance with obligations respecting declarations to the competent authorities, notably within the context of the automatic exchange of information;
- The traceability of financial transactions (for example, the recording of communications).

► **For our legitimate interests:**

NWML may claim a "legitimate interest" in the processing of your Data, in particular where it is faced with situations that may present a risk to its activities.

For NWML, this notably involves guarding against market abuse or insider trading, fraud prevention, the fight against financial crime, ensuring the security of its information system, and monitoring access to its premises.

NWML may likewise have a legitimate interest related to the management of its business activities, notably within the context of its general accounting, balance sheet management, monitoring of relationships with our customers, business development activities, or to comply with audit, inspection, or communication requirements.

HOW DO WE PROTECT YOUR DATA?

NWML takes all the necessary technical and organisational measures to guarantee the security of the Data it collects, and the confidentiality of this Data in particular. At NWML, only the persons responsible for specific processing have access to your Data, within the limit of their authorisations.

WITH WHOM DO WE SHARE YOUR DATA?

We may communicate your Data within the Natixis Group within the context of

- granting and monitoring credit files;
- our risk management policies;
- the fight against money laundering and the financing of terrorism.

We may likewise communicate your Data to third parties such as:

- the providers or subcontractors to whom we entrust operational duties;
- supervisory authorities in the financial, judicial, and tax sectors, insofar as required under applicable law;
- certain regulated professions, such as attorneys, bailiffs, notaries, or audit firms.

Your interests and your fundamental rights are taken into consideration when any such communications are made. To this end, these communications are accompanied by measures and guarantees that ensure a balance between the protection of your interests and the continuation of our relationship.

HOW LONG IS YOUR DATA RETAINED BY US?

Once the purposes of the Data processing have been achieved, and without prejudice to any legal or regulatory obligations to retain any of this data, NWML deletes your Data.

The duration of its retention varies, and depends on the purposes of its processing by us.

When Data is collected for the purpose of managing a contract, it is retained by NWML for the duration of the contract's performance and until the applicable legal periods have expired. These periods may differ as follows:

- In conformity with the provisions of the Luxembourg Commercial Code, accounting documents and supporting documents must be retained for a duration of ten years;
- The limitation period under common law in civil and commercial matters is ten years; as such, the Data relative to your account is retained for a period of ten years from the date on which our business relationship ends;
- The period established under specific legislation and relating, for example, to the fight against money laundering and the financing of terrorism, is five years.

When personal Data is collected for multiple purposes, it is retained until the longest retention or storage period has expired.

WHAT ARE YOUR RIGHTS CONCERNING YOUR DATA?

Within the limits and conditions authorised under the Regulation, you may:

- access all of your Data;
- rectify your Data;
- request the erasure of your Data, without prejudice to a legitimate reason justifying its retention;
- object to the processing of your Data, without prejudice to legitimate reasons;
- request the portability of your Data for processing relating to the performance of a contract;
- request that the processing of your Data be restricted.

You have the right to submit a complaint to the local supervisory authority in the Grand Duchy of Luxembourg: www.cnpd.public.lu if you feel that your rights have not been respected.

CONTACTS

NWML has designated a Data Protection Officer. The Data Protection Officer ensures that the processing of personal data is carried out by NWML in compliance with current regulations.

You may exercise your rights or send questions to the Data Protection Officer by email or mail, indicating your surname, given name, and contact information and providing a copy of a piece of your ID.

For the Grand Duchy of Luxembourg:

DATA PROTECTION OFFICER	
MAILING ADDRESS	EMAIL
Natixis Wealth Management Luxembourg 51, avenue John F. Kennedy L-1855 Luxembourg Grand Duchy of Luxembourg	dpo@lu.natixis.com

Natixis Wealth Management Luxembourg

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