

## Annexe 1

### Outsourcing summary table Shared data and data location

IT	Anti-Money Laundering, Terrorist Financing, Fight against corruption Market abuse	Credit and Risk Management and default management, recoveries and litigation	Centralized databases
<b>Description of contracted service</b>			
Enable IT providers to maintain, develop, host the IT infrastructure of SG Luxembourg.	Enable the conduct of analyses and controls in accordance with applicable international laws and standards on the identification of Clients and beneficial owners and the fight against money laundering and terrorist financing (monitoring national and international lists, combating corruption and preventing market abuse) both when opening an account and when monitoring the Client relationship.	Enable the monitoring of Client commitments, the associated level of risk, individually and in a consolidated manner, for the management and monitoring of unpaid payments and defaults, as well as the processing of recoveries and disputes arising therefrom.  Enable the control and supervision of the resulting risks.	Enable the sharing of data within centralized databases, hosted, managed and maintained at Societe Generale group level.
<b>Nature/type of data shared</b>			
The data transferred concern all data relating to the business relationship with a Client and include in particular his identity, IBAN number, details of transactions, account balances, relationships with third parties associated with the Client's account, and more generally all data collected by SG Luxembourg relating to the management of the business relationship.	The data concerned relate to all the identification data of the Client (identity, personal documents such as the identity card or passport and more generally all the identification elements of a person such as the date of birth, country of residence and others) its beneficial owner(s) and, where applicable, its managers in the case of a legal person.	The shared data covers all the identification data of Clients (identity, accounts, addresses, buildings, property, etc.), associated persons (beneficial owners, guarantors and others) and their property (addresses of residence, buildings, etc.).	The data concerned relate to the identification of "corporate" or "legal persons" Clients and their countries of business relations within the Societe Generale Group.
<b>Data Location</b>			
All data is securely hosted on the bank's servers or Service Providers' servers (including the cloud). Service Providers can access the data to perform specific maintenance, development, integration and other tasks. The Service Providers concerned are:  - Entities of the Societe Generale group <sup>1</sup> - Service Providers working on the IT environment having the status of support PFS or on an ad hoc basis to meet the specific needs of IT service providers established in Europe or in Canada and bound by a strict confidentiality obligation.	The data may be accessed by various Societe Generale group' entities in all countries where the group is established, as defined in the group's activity report available on the parent company's website <a href="http://www.societegenerale.com">www.societegenerale.com</a> , to meet the regulatory requirements listed below:  - Anti-money laundering - Financing of terrorism - Fight against corruption - Market abuse.	The data may be accessed by various Societe Generale group' entities in all countries where the group is established, as defined in the group's activity report available on the parent company's website <a href="http://www.societegenerale.com">www.societegenerale.com</a> to meet the needs of monitoring and consolidated supervision in the areas listed below:  - Credit and Risk Management - Default management - Recoveries and litigation.	The data are accessed by the entire Societe Generale group in all countries where the group is established, as defined in the group's activity report available on the parent company's website <a href="http://www.societegenerale.com">www.societegenerale.com</a> to meet the needs listed below:  - Centralized management of Clients databases - Feeding Clients databases.

<sup>1</sup> This includes its head office in France, as well as the Group's shared service centres in Romania and India.

<b>Financial activities</b> <b>Accounting Output</b> <b>Financial reporting</b> <b>Management control and management of supplier invoices</b>	<b>Payment operations</b>	<b>Transactions in financial instruments</b> <b>Custody of financial instruments</b> <b>Reporting of transactions in financial instruments</b>
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**Description of contracted service**

<p>Enable the production of accounting and financial regulatory reports, the processing of management control and the management of supplier invoices.</p>	<p>Process payment transactions of any kind, their preparation, monitoring and execution, regardless of currency, including but not limited to the SWIFT platform, including the storage and archiving of associated messages, filtering of associated transactions.</p>	<p>Process transactions on financial instruments of all kinds, their preparation, monitoring, execution, and holding in custody, whatever the nature (shares, bonds, structured products and others).</p> <p>Carry out regulatory reporting in connection with the processing of transactions in financial instruments.</p>
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**Nature/type of data shared**

<p>The data concerned relate to the financial transactions and transactions carried out and under certain situations may also contain direct Client identification data.</p> <p>Invoice processing, in certain exceptional cases, may contain the reference to the Client's identity/name.</p>	<p>The data concerned cover all the fields in the payment systems, in particular the SWIFT platform, and concern the identity of the Client, his address, his account number, all the elements associated with a transaction such as the identification of the beneficial owner and the Client, their IBAN, and the details of the transaction.</p>	<p>The data concerned relate to all the data relating to the transaction and the accounts (nature, amount, quantity and others) but also in some cases the name of the holder.</p>
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**Data location**

<p>The data may be accessed by various Societe Generale group' entities in all countries where the group is established, as defined in the group's activity report available on the parent company's website <a href="http://www.societegenerale.com">www.societegenerale.com</a> to meet the needs listed below:</p> <ul style="list-style-type: none"> <li>- Preparing, producing, and carrying out analyses, financial statements, accounting reports, and risk and/or regulatory reports</li> <li>- Management control and management of supplier invoices .</li> </ul> <p>Luxembourg Service Providers with the status of support PFS or, on an ad hoc, IT providers established in Europe and bound by a strict obligation of confidentiality may also have access, on an exceptional basis, to this type of data in order to carry out specific tasks related to the aforementioned needs.</p>	<p>The data may be accessed by various Societe Generale group' entities in all countries where the group is established, as defined in the group's activity report available on the parent company's website <a href="http://www.societegenerale.com">www.societegenerale.com</a> and- by all payment transaction intermediaries necessary for the proper execution of payment transactions.</p>	<p>The data may be accessed by various Societe Generale group' entities in all countries where the group is established, as defined in the group's activity report available on the parent company's website <a href="http://www.societegenerale.com">www.societegenerale.com</a> and- by all payment transaction intermediaries necessary for the proper execution of payment transactions.as well as all intermediaries operating on financial instruments, depositaries, brokers, counterparties, etc. necessary for the proper execution of operations and the custody of financial instruments.</p> <p>As part of reporting on financial instruments, the Bank may also use the services of its parent company Société Générale in France and a Service Provider in France.</p>
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Physical archives management and storage of telephone conversations	Bank administrative management
<b>Description of contracted service</b>	
<p>Outsourcing archives management and storage of telephone conversations :</p> <ul style="list-style-type: none"> <li>- Storage of archives and telephone conversations</li> <li>- Collection of archives for secure transport to the storage warehouse</li> <li>- Return of archives for consultation purposes</li> <li>- Destruction: with delivery of the certificate of destruction</li> </ul> <p>Internal archivist agent:</p> <ul style="list-style-type: none"> <li>- Provision of an archivist on the Client's site.</li> <li>- The agent will also take care of various administrative tasks (management of incoming mail).</li> </ul>	<p>Reception :</p> <ul style="list-style-type: none"> <li>- Booking lounges;</li> <li>- Welcoming Clients and visitors;</li> <li>- Telephone switchboard reception.</li> </ul> <p>Executive secretary.</p>
<b>Nature/type of data shared</b>	
<p>All types of data are contained in the archives and telephone conversations.</p> <p>The provider manages the container not the data it contains. Data used for traceability of consultation/destruction instructions.</p>	<p>The shared data covers all the identification data of Clients (identity, accounts, addresses, buildings, property, etc.), associated persons (beneficial owners, guarantors and others) and their property (addresses of residence, buildings, etc.) and data relating to the business relationship with the Clients necessary for the Bank's administrative management.</p>
<b>Data location</b>	
<p>For the physical archives: Luxembourg For telephone conversations: France and the United Kingdom</p> <p>The data may be accessed by various Societe Generale group' entities in all countries where the group is established, as defined in the group's activity report available on the parent company's website <a href="http://www.societegenerale.com">www.societegenerale.com</a> to meet the needs listed below:</p> <ul style="list-style-type: none"> <li>- Physical archives management</li> <li>- Storage of telephone conversations.</li> </ul> <p>Service Providers may also have access, on an exceptional basis, to this type of data in order to carry out specific tasks related to the aforementioned needs.</p>	<p>For welcoming Clients and visitors: Luxembourg For executive secretary: Romania</p>