

INFORMATION NOTICE ON THE USE OF YOUR PERSONAL DATA

The protection of your personal data is important to the BNP Paribas Group, which has adopted strong principles in that respect for the entire Group in its Group Privacy Policy available on the BNP Paribas website.

This Information Notice provides you with detailed information relating to the protection of your personal data by BNP Paribas Personal Finance (“we”).

We are responsible, as a controller for collecting and processing your personal data. The purpose of this Information Notice is to let you know which personal data we collect about you, the reasons why we use and share such data, how long we keep it, what your rights are and how you can exercise them.

Further information may be provided where necessary when you apply for a specific product or service.

1. WHICH PERSONAL DATA DO WE USE ABOUT YOU?

We are committed to collect and use your personal data only to the extent necessary in the framework of our activities and to achieve a high standard of personalised products and services. We pay close attention to your data and have implemented adequate security measures to ensure it is protected at all times.

We may collect various types of personal data about you, including:

- **identification information** ;
- **contact information** ;
- **family situation** ;
- **tax status** ;
- **education and employment information** ;
- **banking, financial and transactional data** ;
- **data relating to your habits and preferences** :
 - data which relate to your use of our products and services
 - data which relate to your interactions with us: (eg. interview or phone conversation records);

We are also likely to use data we already possess relating to your personal, economic, financial and banking situation.

We may collect the following sensitive data only upon obtaining your explicit prior consent:

- **biometric data** : e.g. fingerprint, voice pattern or face pattern which can be used for identification and security purposes;
- **health data** : for instance for the drawing up of some insurance contracts; this data is processed on a need-to-know basis and only when necessary.

We never ask for personal data related to your racial or ethnic origins, political opinions, religious or philosophical beliefs, trade union membership, genetic data or data concerning your sex orientation, unless it is required through a legal obligation.

The data we use about you may either be directly provided by you or be obtained from the following sources in order to verify or enrich our databases :

- publications/databases made available by official authorities;
- our corporate clients or service providers;
- third parties such as fraud prevention agencies or data brokers in conformity with the data protection legislation;
- websites/social media pages containing information made public by you (e.g. your own website or social media); and
- databases made publicly available by third parties.

2. SPECIFIC CASES OF PERSONAL DATA COLLECTION, INCLUDING INDIRECT COLLECTION

In certain circumstances, we may collect and use personal data of individuals with whom we have, could have, or used to have a direct relationship, such as prospects.

For some reasons, we may also collect information about you whereas you have not direct relationship with us.

This may happen for instance when your employer provide us with information about you or your contact details are provided by one of our client if you are for example :

- Family members;
- Co-borrowers / guarantors;
- Legal representatives (power of attorney);
- Beneficiaries of insurance policies and trusts;
- Ultimate beneficial owners;
- Company shareholders;
- Representatives of a legal entity (which may be a client or a vendor);
- Staff of service provider and commercial partners.

3. WHY AND ON WHICH BASIS DO WE USE YOUR PERSONAL DATA?

a. To comply with our legal and regulatory obligations

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

- banking and financial regulations in compliance with which we:
 - set up security measures in order to prevent abuse and fraud;
 - detect transactions which deviate from the normal patterns;
 - issue and maintain electronic certificates related to electronic signatures;
 - define your credit risk score and your reimbursement capacity;
 - monitor and report risks that institution could incur; and
 - record, when necessary, phone calls, chats, email, etc.
- detect situations of financial fragility in order to propose appropriate support measures to our customers
- reply to an official request from a duly authorised public or judicial authority;
- prevention of money-laundering and financing of terrorism;
- compliance with legislation relating to sanctions and embargoes;
- fight against tax fraud and fulfilment of tax control and notification obligations.

Data related to you may be used for sending information to the French central cheque database (FCC).

Furthermore, and as part of the credit granting process, we are required to consult the French Database of defaults in payment of credits granted to individuals (FICP), and in the event of a characterized payment incident, to request the registration of information related to you included in this file. In the case of refusal of your demand, you may request an interview to make your observations.

b. To perform a contract with you or to take steps at your request before entering into a contract

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

- provide you with information regarding our products and services;
- assist you and answer your requests;
- to carry out operations necessary for the management of the products or services to which you have subscribed
- evaluate if we can offer you a product or service and under which conditions;
- to manage and handle payment incidents, unpaid debts and amicable and judicial recovery operations resulting therefrom.

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:

- proof of transactions;
- IT management, including infrastructure management (e.g. : shared platforms) & business continuity and IT security;
- fraud prevention;
- establishing individual statistical models, based on the analysis of transactions, for instance in order to help define your credit risk score;
- establishing aggregated statistics, tests and models, for research and development, in order to improve the risk management of our group of companies or in order to improve existing products and services or create new ones;
- training of our personnel by recording phone calls to or from our call centres;
- personalising our offering to you and that of other BNP Paribas entities and:
 - improving the quality of our products or services, by segmenting our prospects and clients in order to provide them with the most appropriate products and services ;
 - advertising products or services that match with your situation and profile.
This can be achieved by :
 - analysing your habits and preferences in the various channels (emails or messages, visits to our websites, etc.);
 - sharing your data with another BNP Paribas entity, notably if you are – or are to become – a client of that other entity;
 - offering products or services that match your situation and the products or services that you already own or use;
 - monitoring transactions to identify those which deviate from the normal routine

d. To respect your choice if we requested your consent for a specific processing

In some cases, we must require your consent to process your data, for example:

- where the above purposes lead to automated decision-making, which produces legal effects or which significantly affects you. At that point, we will inform you separately about the logic involved, as well as the significance and the envisaged consequences of such processing;
- if we need to carry out further processing for purposes other than those above in section 3, we will inform you and, where necessary, obtain your consent.

4. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

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

- BNP Paribas Group entities (e.g. you can benefit from our full range of group products and services);
- Service providers which perform services on our behalf;
- Independent agents, intermediaries or brokers, banking and commercial partners, with which we have regular relationship;
- Financial 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.

Your data may also be transmitted, for the purposes of assessing and granting loans and the prevention of non-payments, to the entities of the BNP Paribas Personal Finance group as well as credit institutions subject to professional secrecy, related to BNP Paribas Personal Finance, for the management of their loans to individuals.

5. TRANSFERS OF PERSONAL DATA OUTSIDE THE EEA

In case of international transfers originating from the European Economic Area (EEA), where the European Commission has recognized a non-EEA country as providing an adequate level of data protection, your personal data may be transferred on this basis.

For transfers to non-EEA countries whose level of protection has not been recognized 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 one of the following safeguards to ensure the protection of your personal data:

- Standard contractual clauses approved by the European Commission;
- Binding corporate rules, where applicable.

To obtain a copy of these safeguards or details on where they are available, you can send a written request as set out in Section 9.

6. HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

We will retain your personal data for the longer of the period required in order to comply with applicable laws and regulations or another period with regard to our operational requirements, such as proper account maintenance, facilitating client relationship management, and responding to legal claims or regulatory requests. For instance, most of client's information is kept for 10 years after the end of the contractual relationship. For prospects, and in the event that a request does not succeed, data allowing us to contact you is kept for 6 months.

7. WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?

In accordance with applicable regulations, you have the following rights:

- 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 are inaccurate or incomplete, you can require that such personal data be modified accordingly.
- To **erase**: you can require the deletion of your personal data, to the extent permitted by law.
- To **restrict**: you can request the restriction of the processing of your personal data.
- To organize the management of your data after your death.
- To **object**: you can object to the processing of your personal data, on grounds relating to your particular situation.

You have the absolute right to object to the processing of your personal data for direct marketing purposes, which includes profiling related to such direct marketing.

- To **withdraw your consent**: where you have given your consent for the processing of your personal data, you have the right to withdraw your consent at any time.
- 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.

If you wish to exercise the rights listed above, please send a letter or e-mail to the following address

Service Consommateur
CS 71015
FR-44010 NANTES cedex 1
consommateur.donneespersonnelles@cetelem.fr

Please include a scan/copy of your identity card for identification purpose.

In accordance with applicable regulation, in addition to your rights above, you are also entitled to lodge a complaint with the French data protection authority (CNIL).

8. HOW CAN YOU KEEP UP WITH CHANGES TO THIS DATA PROTECTION NOTICE?

In a world of constant technological changes, we may need to regularly update this Information Notice.

We invite you to review the latest version of this notice online and we will inform you of any material changes through our website or through our other usual communication channels.

9. HOW TO CONTACT US?

If you have any questions relating to our use of your personal data under this Information Notice, please contact our data protection officer, who will investigate your query:

delegueprotectiondonneesfrance@cetelem.fr

Délégué à la protection des données France

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If you wish to learn more about cookies and Security, please read our [cookies policy](#)