BGL BNP PARIBAS

PERSONAL DATA PROTECTION INFORMATION NOTICE

Last update: 01.09.2025

Foreword: key changes

As a trusted partner, the protection of your personal data is extremely important to us. We have made changes to this Notice to make it more transparent by improving the information about:

- Processing related to direct marketing;
- Processing related to the fight against money laundering and terrorist financing and international sanctions (asset freezing).

Introduction

The protection of your personal data ("personal data") is extremely important to the BNP Paribas Group. This is why the BNP Paribas Group has adopted strong principles for the protection of your data, which you can find in the Personal Data Confidentiality Charter available at the following address:

https://cdn-group.bnpparibas.com/uploads/file/bnpparibas_personal_data_privacy_charter.pdf

We therefore invite you to read this Personal Data Protection Notice ("Notice"), which will provide you with detailed information about how BGL BNP Paribas S.A., whose registered office is located at 60, avenue J.F. Kennedy, L-1855 Luxembourg ("we" or "us"), will protect your personal data when acting as a data controller or joint controller within the meaning of the General Data Protection Regulation (EU 2016/679 "GDPR").

This Notice is intended for customers, direct business contacts and business partners of BGL BNP Paribas and any persons listed in point 1 below.

Its purpose is to provide you with comprehensive information about the personal data that we collect about you, the reasons why we use them, who we share them with, how long we retain them for, and how you can exercise your rights relating to these data. Additional information may also be provided to you, where appropriate, when you purchase a specific service or product.

1. DOES THIS NOTICE APPLY TO YOU?

We collect data about you directly, whether you are a customer or a prospect, and also data about other people indirectly. We collect information about certain people because they have a connection to you, even if they do not have a direct connection to us, whether you are a customer, a prospect or a business partner, including:

- people who are our customers or in a contractual relationship with us (e.g. as guarantors);
- family members of our customers. Our customers may sometimes share information about their families with us where this is necessary to provide them with a product or service or to get to know them better;
- heirs and assigns;
- co-borrowers;
- insured parties;
- beneficiaries of insurance contracts or policies, or trusts/fiducies;
- beneficial owners;
- creditors (in the event of bankruptcy, for example);
- shareholders;
- legal representatives;
- agents, representatives or employees of legal entities (whether these legal entities are customers or business partners);
- originators or beneficiaries of payment operations;
- employees of our business partners;
- people who are interested in our products or services when you provide us with your personal data (at a branch, through our websites or applications, or in connection with referral events or schemes) so that we can contact you.

When you provide us with personal data about other people, please make sure that you inform them of the disclosure of their data and invite them to read this Notice. We will take care to do the same whenever we can (i.e. if we have the contact details of the people in question).

2. HOW CAN YOU CONTROL THE PROCESSING OF YOUR PERSONAL DATA BY US?

You have rights allowing you to exercise meaningful control over your personal data and how we process them.

If you wish to exercise the rights described below, or if you have any questions regarding the use of your personal data, please send us a request with a scan/copy of your ID to the address given in section 10 of this Notice.

2.1. You can request access to your personal data

If you wish to have access to your personal data, we will provide you with a copy of the personal data to which your request relates and the information regarding their processing.

Your right of access may be restricted where this is provided for by the regulations. In this case, you must exercise your right of access by contacting the National Commission for Data Protection, which will contact us.

2.2. You can request the rectification of your personal data

If you believe that your personal data are inaccurate or incomplete, you can ask for them to be corrected or completed. In some cases, you may be asked to provide supporting documentation.

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2.3. You can request the erasure of your personal data

If you wish, you can ask for your personal data to be erased, to the extent permitted by law.

2.4. You can object to the processing of your personal data on legitimate interest grounds

If you do not agree with processing carried out on legitimate interest grounds, you can object to it, for reasons relating to your specific circumstances, by precisely indicating the processing in question and the reasons for your objection. We will no longer process your personal data unless there are compelling legitimate grounds for processing them, or if this is necessary in order to establish, exercise or defend legal rights.

2.5. You can object to the processing of your personal data for direct marketing purposes

You have the right to object at any time to the processing of your personal data for direct marketing purposes, including for profiling, if such profiling relates to direct marketing.

2.6 You can ask for the processing of your personal data to be restricted

You can ask for the processing of your personal data to be restricted, particularly if you dispute the accuracy of the data that we use or object to the processing of your data (the processing of the data in question will be restricted for the time it takes us to verify or investigate your request).

2.7. You have rights with respect to automated decisions

You have the right not to be subject to solely automated decisions, including profiling, which have a legal or similarly significant effect on you. This right does not apply, however, where the decision:

- is necessary for the concluding or performance of a contract between you and the Bank;
- is permitted by EU law, or the law of the member state to which we are subject, and which also lays down suitable measures to safeguard your rights and freedoms and your legitimate interests; or
- is based on your explicit consent.

In any case, you can challenge the decision, express your point of view and request human involvement in the reviewing of the decision.

2.8. You can withdraw your consent

If you have given your consent to the processing of your personal data, you can withdraw such consent at any time.

2.9. You can request the portability of part of your personal data

You can request a copy of the personal data that you have provided us with in a structured, commonly used and machine-readable format. Where technically possible, you may request that we transmit this copy to a third party.

2.10. You can also lodge a complaint with the National Commission for Data Protection

In addition to the abovementioned rights, you can also lodge a complaint with the competent supervisory authority, the National Commission for Data Protection (cnpd.public.lu).

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

The purpose of this section is to explain why we process your personal data and the legal basis for doing so.

3.1. Your personal data are processed in order to comply with our various legal and regulatory obligations

Your personal data are processed where necessary to enable us to comply with the laws/regulations to which we are subject, including banking and financial regulations.

We use your personal data to:

- monitor operations and transactions to identify those which deviate fro the normal routine/patternsl (for example, if you withdraw a large sum of money in a country other than your country of residence);
- monitor your transactions in order to manage, prevent and detect abuse and fraud;
- manage and report the risks (financial, credit, legal, compliance and reputational risks, etc.) to which the BNP Paribas Group may be exposed in the course of its business;
- record, in accordance with the Markets in Financial Instruments Directive (MIFID 2), communications in any form (e-mails, discussions, telephone calls, etc.) relating, at least, to transactions concluded in connection with proprietary trading, and the provision of services relating to customer orders involving the receipt, transmission and execution of customer orders;
- establish your investment profile and carry out an assessment of the appropriateness and suitability of the provision of investment services to each customer, in light of their profile, in accordance with the Markets in Financial Instruments Directive (MiFID 2);
- contribute to the fight against tax fraud and meet our tax notification and control and reporting obligations;
- meet our obligations, under the applicable legislation, to identify shareholders of listed companies or to maintain a data file identifying any natural persons or legal entities who hold or control payment accounts or bank accounts identified by an IBAN, or safe deposit boxes;
- record operations for accounting purposes;
- prevent, detect and report risks related to Corporate Social Responsibility and sustainable development;
- detect and prevent corruption;
- meet our obligations in terms of international sanctions and embargoes and the fight against money laundering and terrorist financing;
- comply with the provisions applicable to trust service providers issuing electronic signature certificates;
- exchange and report various operations, transactions or requests, or respond to an official request from a duly authorised local or foreign judicial, criminal, administrative, tax or financial authority, arbitrator or mediator, law enforcement authorities, government bodies or public organisations.

We can rely on systems set up and managed by the BNP Paribas Group to meet our anti-money laundering obligations. As such, we may be joint controllers together with BNP Paribas SA, the parent company of the BNP Paribas Group (the term "we" or "us" in this section also includes BNP Paribas SA). The processing covered by this provision is described in Appendix 1.

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3.2. Your personal data are processed to perform a contract to which you are a party or to implement pre-contractual measures taken at your request

Your personal data are processed when it is necessary for the concluding or performance of a contract in order to:

- determine your credit risk score and your repayment capacity;
- assess (based on your credit risk score, for example) whether we can offer you a product or service and, where applicable, subject to which terms and conditions (such as the price);
- provide you with the products and services purchased in accordance with the applicable contract;
- manage existing debts (identification of customers in arrears);
- respond to your requests and help you navigate various processes;
- ensure the settlement of your estate.

3.3. Your personal data are processed in our legitimate interests or those of a third party

Where the basis for processing is legitimate interests, we will balance these interests against your interests, or your fundamental rights and freedoms, to ensure that there is a fair balance between them. If you would like more information about the legitimate interest that is the basis for processing, please contact us using the contact details provided in section 10 of this Notice.

3.3.1. In the course of our business, we use your personal data to:

- Manage the risks to which we are exposed:
  - we retain proof of operations or transactions, including in electronic format;
  - we collect debts;
  - we handle legal claims and the evidence in our defence in the event of litigation;
  - we develop individual statistical models to help define your borrowing capacity.
- enhance cyber security, manage our platforms and websites, and ensure business continuity;
- Prevent bodily injury and attacks on property and people through video surveillance;
- Improve the automation and efficiency of our operational processes and customer services (e.g. automatic filling out of complaints, follow-up of your requests and improvement of your satisfaction based on data collected during our interactions with you, such as phone records, e-mails or chats);
- Help you to manage your budget through the automatic categorisation of your transaction data;
- Carry out financial transactions such as sales of debt portfolios, securitisations, and the financing or refinancing of the BNP Paribas Group;
- Conduct statistical studies and develop predictive and descriptive models for:
  - commercial purposes: to identify the products and services that we could offer you to best meet your needs, to create new offers or identify new trends amongst our customers, and to develop our commercial policy, by taking our customers' preferences into account;
  - security purposes: to prevent potential incidents and improve security management;
  - the purposes of compliance (such as the fight against money laundering and terrorist financing), risk management and the fight against fraud, particularly relating to payment operations.
- Organise competitions, lotteries and promotional operations, and conduct opinion and customer satisfaction surveys.

3.3.2. We use your personal data to send you sales offers by e-mail, post and telephone

We want to be able to offer you access to a full range of our products and services that best meet your needs.

If you are a customer, and unless you object, we may send you such offers for our products and services electronically if they are similar to those that you have already purchased.

We ensure that these sales offers are for similar products or services to those that you already have with us.

Unless you object, we may also send you offers relating to our products and services by telephone and post.

3.3.3. We analyse your personal data to adapt our product and service range.

We need to know which customer segment you belong to, to improve your experience and satisfaction. For this purpose, and unless you object, we determine the customer category that you belong to from the relevant data that we select from information:

- that you directly communicated to us during our interactions with you or when you purchased a product or service;
- based on your use of our products or services, including account-related information such as account balances, regular or atypical transactions, the use of your card abroad, and the automatic categorisation of your transaction data, i.e. the breakdown of your expenses and income by category, as can be seen in your customer area;
- based on your use of our various channels, websites and applications (e.g. to determine whether you are digitally savvy, or whether you prefer a self-care customer pathway when purchasing a product or service);
- obtained by extracting data publicly available from social media sites that can be used to identify trending topics.

We can go further to better meet your needs, if you agree, through personalisation, as described below.

3.4 Your personal data are processed if you have agreed to this

For some personal data processing, we will provide you with specific information and ask for your consent. Remember that you can withdraw your consent at any time.

In particular, we will request your consent for:

- The personalisation of our offers and our products or services based on sophisticated profiling to anticipate your needs and behaviour;
- Any electronic offers for products and services that are not similar to those that you have purchased or products and services from our trusted partners;
- The personalisation of our offers, products and services based on data relating to your accounts held with other banks;
- The use of your browsing data (cookies) for sales purposes or to develop our knowledge of your profile.

You may be asked to provide further consent for the processing of your personal data if necessary.

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4. WHAT TYPES OF PERSONAL DATA DO WE COLLECT?

We collect and use your personal data, meaning any information that identifies you or allows you to be identified.

We collect different types of personal data about you, depending on factors such as the type of product or service that we are providing to you and our interactions with you. These data include:

- Identification data: e.g. full name, gender, place and date of birth, nationality, identity card number, passport number, driving licence number, vehicle registration number, photograph and signature;
- Contact information: (private or business) postal address, e-mail address and telephone number;
- Information about your financial circumstances and family status: e.g. marital status, matrimonial property regime, number of children and age, education or employment status of children, composition of household, date of death of children, parents or spouse and assets that you own: apartment or house;
- Major milestones in your life: e.g. you have moved in with a partner or you have just got married, divorced or had children;
- Lifestyle: hobbies and interests, travel, your environment (nomadic, sedentary);
- Economic, financial and tax information: e.g. tax ID, tax status, country of residence, salary and other income, and amount of assets;
- Information about your education and job: e.g. level of education, job, name of employer and pay;
- Banking and financial information related to the products and services that you hold: e.g. bank details, products and services held and used (credit, insurance, savings and investments, leases and home insurance), card number, fund credit transfers, assets, stated investor profile, credit history and payment incidents;
- Transaction data: account movements and balances, transactions including data relating to beneficiaries, such as their full names, addresses and contact details, and details of bank transactions, i.e. the amount, date, time and type of transaction (credit card, credit transfer, cheque or direct debit);
- Data relating to your habits and preferences in connection with your use of our products and services;
- Data collected through our interactions with you:
  - Your login and tracking data, such as cookies and trackers placed for non-advertising or analytical purposes on our websites, online services, applications and social media pages;
  - Your comments, suggestions and needs collected during our interactions with you in our Branches (minutes) and online during telephone communications (conversations), discussions by e-mail, chat and chatbot, and interactions on our social media pages, and your most recent complaints and claims.
- Data from the video protection system (including video surveillance cameras) and geolocation system: e.g. the locations of withdrawals or payments for security purposes, or to determine the location of the branch or service provider closest to you;
- Data regarding your devices (mobile phone, computer, tablet, etc.): IP address, technical characteristics and unique identification data;
- Personalised login credentials or security features used by you to log in to the BGL BNP Paribas website and applications: electronic signature and remote login data.

As a general rule, we do not collect sensitive data within the meaning of the GDPR, i.e. data relating to your racial or ethnic origins, your political opinions, your religion, your philosophical beliefs or trade union membership, your genetic data, your sex life or your sexual orientation.

We may collect and use biometric data (e.g. digital fingerprints, voice or facial recognition, or a dynamic signature that may be used for identification or security purposes), subject to your prior and explicit consent.

We may collect sensitive data relating to criminal offences, subject to compliance with the strict conditions set out in data protection regulations

In the course of our activities as an insurance intermediary, we may process health-related data on behalf of and under the responsibility of the insurance company with which you take out an insurance contract.

5. WHO DO WE COLLECT PERSONAL DATA FROM?

We collect personal data directly from you (when you contact us, visit one of our branches, visit our website or one of our applications, use our products and services, participate in a survey or event that we organise, or interact with us via our social media pages and posts) and from other sources.

We sometimes collect data from public sources:

- publications/databases made available by official authorities or third parties (e.g. the trade and companies register or databases managed by the financial sector's supervisory authorities);
- the websites and social media pages of legal entities or professional customers containing information made public by you (e.g. your own website or your page on a social media site);
- public information such as information published in the press.

We also collect personal data from third parties:

- from other BNP Paribas Group entities;
- from our customerss (companies or individuals);
- our business partners and our suppliers/service providers;
- providers of payment initiation and account aggregator services (providers of account-related information services);
- third parties such as credit reference agencies and fraud prevention agencies;
- data brokers who are responsible for ensuring that they collect relevant information in a lawfull manner.

6. WHO DO WE SHARE YOUR PERSONAL DATA WITH AND WHY?

a. With BNP Paribas Group entities

As a member of the BNP Paribas Group, we work closely with the other Group companies worldwide. Your personal data may therefore be shared between BNP Paribas Group entities, where necessary, and subject to the legal and regulatory constraints specifically applicable (particularly relating to professional secrecy), in order to:

- ensure compliance with our various legal and regulatory obligations described previously, such as consolidated risk

management, and the fight against money laundering and terrorist financing and payment fraud;

- allow other BNP Paribas Group entities to provide services on our behalf;
- satisfy our legitimate interests, which are to:
  - conduct statistical studies and develop predictive and descriptive models for security, compliance, risk management and anti-fraud purposes;
  - improve the reliability of certain data about you held by other Group entities;
  - personalise the content and prices of products and services.

b. With recipients who are third parties to the BNP Paribas Group and subcontractors

In order to achieve some of the purposes described in this Notice, we may, where necessary, share your personal data with:

- service providers who provide services on our behalf, for example IT, printing, telecommunication, debt collection, consultancy, distribution, marketing, and electronic signature services, services in connection with our legal and regulatory obligations to combat money laundering and terrorist financing, such as the collection, provision or updating of information relating to knowledge of customers, video identification services, or services to facilitate the exercising of voting rights for customers who are shareholders of listed companies;
- banking and business partners, independent agents, intermediaries or brokers, financial institutions, counterparties, trade repositories with which we have a relationship if such a transfer is necessary to provide you with services or products or to fulfil our contractual obligations or complete transactions (e.g. banks, correspondent banks, custodians, securities issuers, paying agents, trading platforms, insurance companies, payment system operators, payment card issuers or intermediaries, mutual guarantee companies or financial guarantee institutions);
- local or foreign financial, tax, administrative, criminal or judicial authorities, arbitrators or mediators, or public authorities or institutions, to whom we or any member of the BNP Paribas Group are required to disclose data:
  - at their request,
  - as part of our defence or a legal action or proceedings,
  - in order to comply with any regulations or recommendations issued by an authority with jurisdiction over us or any member of the BNP Paribas Group;
- third-party payment service providers (information about your bank accounts), for the purposes of providing a payment initiation or account information service if you have consented to the transferring of your data to that third party;
- certain regulated professionals, such as lawyers, notaries, or auditors when specific circumstances so require (litigation, audit, etc.), and to our insurers or any current or potential buyer of BNP Paribas Group companies or activities.

7. INTERNATIONAL TRANSFERS OF PERSONAL DATA

In the event of international transfers from the European Economic Area (EEA) to a non-EEA country, your personal data may be transferred on the basis of a decision rendered by the European Commission, whereby the latter has recognised the country to which your data will be transferred as providing an adequate level of protection. In the event that your data are transferred to a country where the level of data protection has not been recognised as adequate by the European Commission, we will either rely on a derogation applicable to the specific situation (for instance, if the transfer is necessary to perform a contract concluded with you, i.e. for the execution of an international payment), or we will take one of the following measures to ensure the protection of your personal data:

- the use of standard contractual clauses approved by the European Commission;
- binding company rules.

To obtain a copy of these data protection measures or to receive details of where they can be accessed, you can send us a written request to the address given in section 10 of this Notice.

8. HOW LONG DO WE RETAIN YOUR PERSONAL DATA FOR?

We retain your personal data for as long as necessary to comply with the applicable regulations, or for a period determined on the basis of our operational constraints, such as proper account maintenance, efficient customer relationship management, and to respond to court orders and requests from authorities and regulators. For example, most of the personal data relating to our customers are retained throughout the period of the contractual relationship and for a period of 10 years after the end of the contractual relationship.

9. HOW CAN CHANGES TO THIS PERSONAL DATA PROTECTION NOTICE BE MONITORED?

In a world where technologies are constantly evolving, we will review this Notice on a regular basis and update it if necessary.

You can read the latest version of this document online, and we will inform you of any material changes through our website or our other usual communication channels.

10. HOW TO CONTACT US

If you have any questions concerning the processing of your personal data, please contact our Data Protection Officer by letter addressed to

Data Protection Officer BGL BNP Paribas
60, avenue J.F. Kennedy, L-1855 Luxembourg

Or using the e-mail address: **dpo@bgl.lu**

BGL BNP Paribas Société Anonyme - 60, avenue J.F. Kennedy, L-1855 Luxembourg - R.C.S. Luxembourg B 6481
Credit institution approved and supervised by the Commission de Surveillance du Secteur Financier

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Appendix 1

Personal data processing to combat money laundering and terrorist financing

We are part of a Banking Group that must have a robust anti-money laundering and counter-terrorist financing (AML/CTF) system at entity level, managed centrally, an anti-corruption system, and a system to ensure compliance with international sanctions (this refers to all economic or trade sanctions, including all laws, regulations, restrictive measures, embargoes or asset freezes enacted, governed, imposed or implemented by the French Republic, the European Union, the US Department of the Treasury's Office of Foreign Asset Control, or any authorities with jurisdiction in the territory in which we are established).

As such, we are joint controllers together with BNP Paribas SA, the parent company of the BNP Paribas Group (the term "we" or "us" used in this section therefore also covers BNP Paribas SA).

For AML/CTF purposes, and to comply with international sanctions, we carry out the processing listed below to meet our legal obligations:

- A Know Your Customer (KYC) system reasonably designed to identify, update and confirm the identity of our customers, including that of their beneficial owners and agents where applicable;
- Enhanced identification and verification measures for high-risk customers, Politically Exposed Persons (PEPs) (PEPs are persons designated by regulation who, because of their job description or position (political, judicial or administrative), are more exposed to these risks) and high-risk situations;
- Written policies and procedures, and checks reasonably designed to ensure that the Bank does not enter into or maintain relationships with shell Banks;
  A policy, based on an assessment of the risks and the economic situation, of generally not conducting or engaging in any business activities or relationships, regardless of the currency:
  - for, on behalf of, or for the benefit of, any person, entity or organisation subject to sanctions brought by the French Republic, the European Union, the United States, the United Nations, or, in some cases, other local sanctions in the territories in which the Group operates;
  - directly or indirectly involving territories subject to sanctions, including Crimea/Sebastopol, Cuba, Iran, North Korea and Syria;
  - involving financial institutions or territories that may be linked to, or controlled by, terrorist organisations, recognised as such by the competent authorities in France, the European Union, the United States or the United Nations.
- Screening of our customer databases and transactions that is reasonably designed to ensure compliance with the applicable laws;
- Systems and processes to detect suspicious transactions and report them to the relevant authorities;
- A compliance programme reasonably designed to prevent and detect corruption and influence peddling in accordance with the Sapin II Act, the US FCPA, and the UK Bribery Act.

  Within this framework, we may make use of:
  - services provided by external providers such as Dow Jones Factiva (provided by Dow Jones & Company, Inc.) and the World-Check service (provided by REFINITIV, REFINITIV US LLC and London Bank of Exchanges), which maintain lists of PEPs;
  - public information available in the press about events related to money laundering, terrorist financing or corruption;
  - knowledge of high-risk behaviour or a high-risk situation (existence of a suspicious transaction report or the equivalent) that may be identified at BNP Paribas Group level.

We carry out these checks when you are onboarded by us, and also throughout our relationship with you, on you and on the transactions that you carry out. At the end of the relationship, and if you have been the subject of an alert, this information will be retained in order to identify you and to adapt our checks if are you onboarded again by a BNP Paribas Group entity, or in connection with a transaction to which you are a party.

To meet our legal obligations, we exchange information collected for AML/CTF, anti-corruption and international sanction purposes between BNP Paribas Group entities. When your data is exchanged with countries outside the European Economic Area that do not offer an adequate level of protection, the transfers are governed by the European Commission's standard contractual clauses. Where additional data are collected and exchanged in order to comply with non-EU regulations, such processing is necessary to enable the BNP Paribas Group and its entities to comply with both their legal obligations, and to avoid sanctions locally, which is in our legitimate interest.

Appendix 2

Automated decisions, including profiling

As a general rule, BGL BNP Paribas does not use decision-making processes based solely on fully automated processing, including profiling, within the meaning of Article 22 of the General Data Protection Regulation (GDPR - EU 2016/679).

If we use such a process from time to time, and the processing is not necessary for the concluding or performance of a contract, you will be informed in advance and will be able to either consent to the processing, or request human involvement in the decision-making process.

At the date of publication of this Data Protection Notice, BGL BNP Paribas uses fully automated processing in the following situations:

- To speed up the decision-making process for authorisations to exceed overdraft limits on current accounts. The automated processing consists of calculating a probability of repayment default by the debtor and authorising the exceeding of the limit if the probability of default is low.
- BGL BNP Paribas may use your data to assess certain personal aspects relating to you, in particular to define groups of people who are homogeneous in terms of the products they hold and/or their use of banking services, and who may be interested in a new product or sales offer.