

## COMPLEMENTARY PROVISIONS FOR PROTECTING PERSONAL DATA OF DATA SUBJECTS IN THE EUROPEAN UNION

This policy is aimed at describing the additional safeguards and rights provided by CA Indosuez (Switzerland) SA, Hong Kong Branch (hereafter known as the "Bank") to any Data Subject, particularly its clients, in the European Union. For information related to the general safeguards and rights provided by the Bank to any Data Subject and all its clients, please refer to the Bank's personal data policy.

*Important personal data protection concepts - Glossary in Appendix I*

### PERSONAL DATA

In the course of its activities, the Bank may process, whether automatically or not, personal data of natural persons: existing and potential clients, users of this Site (when they fill out online forms provided to them on this Site) and any other natural person (such as an agent, executive or beneficial owner) (these people all being individually known below as the "Data Subject" and collectively as the "Data Subjects").

#### Rights of the Data Subject in the European Union

The Data Subject in the European Union, at all times, has the following rights, under the conditions and subject to the limitations set out by applicable regulations:

- the right to access his or her personal data;
- the right to have his or her data rectified if inaccurate or incomplete;
- the right to object, on legitimate grounds, to the processing of his or her data;
- the right to request the erasure of his or her data when it is no longer needed for the purposes for which it was collected or processed, or when the Data Subject withdraws consent (when the processing of the data in question requires such consent);
- the right to request restrictions on the processing of his or her data; and
- the right to request the portability of the data entrusted to the Bank on the basis of the consent of the Data Subject or for the purposes of performing a contract: for the Data Subject, this right consists of receiving his or her data in digital format.

The Data Subject may also, at any time and without justification, oppose the use of his or her data for the purposes of commercial prospecting, including profiling<sup>1</sup> when it is linked to that purpose, by the Bank or by third parties, or when the processing is legally based on consent, withdraw his or her consent, by writing a letter to the Data Protection Officer (see below the section entitled "Data Protection Officer").

The Data Subject may exercise his or her rights by contacting the Data Protection Officer, whose contact information appears below in the section entitled "Data Protection Officer".

The Data Subject is informed that exercising some of the aforementioned rights may prevent the Bank from providing him or her with certain products or services in some cases.

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<sup>1</sup> "profiling": any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

The Bank undertakes to handle the Data Subject's requests according to the provisions and within the time frame indicated in the General Data Protection Regulation (GDPR).

#### **Profiling and automated individual decisions**

The Bank may evaluate certain characteristics of Data Subjects based on personal data processed automatically (profiling), in particular to provide, in compliance with applicable regulations, the Data Subjects with information on its products and services or those of its affiliates and commercial partners, personalised advice and/or other information and contents. The Bank may also use technologies allowing to identify the level of risks linked to a Data Subject or to the activity of a bank account.

Moreover, the Bank, in principle, does not resort to automated decision-making within the framework of its business relationships with the Data Subjects. Should the Bank do this, it would comply with applicable legal and regulatory requirements.

#### **Data Protection Officer (DPO)**

The Bank has designated a Data Protection Officer, whom the Data Subject may contact at the following address:

The Data Protection Officer  
CA Indosuez (Switzerland) SA, Hong Kong Branch  
29th Floor, Two Pacific Place  
88 Queensway  
Hong Kong  
Telephone: + 852 3763 6888  
Fax: + 852 3763 6868

#### **Representative of the Indosuez Group within the EU**

The Indosuez Group has designated a Representative within the EU, whose address is the following:

dpo@ca-indosuez.com  
  
CA Indosuez  
Data Protection Officer  
17, rue du Docteur Lancereaux  
75382 Paris cedex 08  
France

#### **Complaints to authorities**

The Data Subject may, in the event of a dispute, file a complaint with the competent local authority.

## APPENDIX I: GLOSSARY

### **GDPR**

*General Data Protection Regulation*

*Refers to 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, and repealing Directive 95/46/EC.*

### **Data Subject**

*Any natural person, in the European Union, whose personal data is being processed.*

### **Personal data**

*Any information that can be used to identify, directly or indirectly, in particular by reference to an identifier or to one or more factors specific to the identity of that natural person.*

*Thus, to determine whether a person is identifiable, all the means that could be used to identify him or her which the data processor or controller could have access to should be considered.*

### **Personal data processing**

*Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.*

### **Data controller**

*The data controller is the entity which determines the purposes and means of the processing.*

### **DPO**

*Refers to the "Data Protection Officer".*

### **Profiling**

*Refers to any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.*