

APPENDIX II

1.1

Prospecting and overseeing the relationship mainly includes the following purposes:

Purposes	Legal Basis allowing processing	Data obtained from Third Party	TRANSFERRING DATA TO A NON-MEMBER STATE OF THE EUROPEAN UNION (*)
1.1.1 Defining the business offer and pricing	CONTRACT	No	No
1.1.2 Event leadership	LEGITIMATE INTEREST (personalisation of relationship and quality of service)	No	No
1.1.3 Customer base review			
1.1.4 Using browsing data for the purposes of enhancing the knowledge of the client	CONSENT	No	No

(*) Excluding transfers to Switzerland mentioned here for the purposes of subcontracting certain computer processing.

1.2

Onboarding and managing the banking relationship and accounts mainly includes the following purposes:

Purposes	Legal Basis allowing processing	Data obtained from Third Party	TRANSFERRING DATA TO A NON-MEMBER STATE OF THE EUROPEAN UNION (*)
1.2.1 Onboarding, tracking, and administering accounts	LEGAL OBLIGATION	Yes: external asset managers and business introducers	No
1.2.2 Classifying clients based on relationship ties for the purposes of adapting the offer and pricing, on the following basis : - legally linked accounts - family or close relatives - business links - same referral channel	LEGITIMATE INTEREST (global relationship management – linked accounts) <i>The client can at any time and without any condition refuse or oppose to any third grouping. Other linked accounts would not be communicated due to bank secrecy rules</i>	No	No
1.2.3 Disclosing financial and tax information to clients	CONTRACT	Yes: lawyers, tax specialists, accounting firms	Depending on each individual case
1.2.4 Complaints and exercising of rights, pre-litigation/litigation and garnishments and estates	LEGAL OBLIGATION	Depending on each individual case	Depending on each individual case

2

Offering and managing products and services mainly includes the following purposes:

Purposes	Legal Basis allowing processing	Data obtained from Third Party	TRANSFERRING DATA TO A NON-MEMBER STATE OF THE EUROPEAN UNION (*)
2.1 Advisory and wealth engineering activities	CONTRACT	Yes: lawyers, notaries, accountants	Depending on each individual case
2.2 Securities transactions, investment, and life insurance activities	CONTRACT	Yes: insurers, external asset managers, business introducers	American legislators: CFTC and CME
2.3 Credit activities	CONTRACT	Yes: insurers, lawyers, notaries,	Depending on each individual case
2.4 Cash transaction, payment, and payment method (cards and cheques) activities	CONTRACT	No	If the bank receiving the payment, the correspondent bank, intermediary bank, or receiving bank for the cheque is outside the EU, yes
2.5 Online banking and safe deposit box activities	CONTRACT	No	No

3

Logistics management (safety and security of people and property, mail and archive management) mainly includes the following purposes:

Purposes	Legal Basis allowing processing	Data obtained from Third Party	TRANSFERRING DATA TO A NON-MEMBER STATE OF THE EUROPEAN UNION (*)
3.1 Safety and security of people, property, and information	LEGAL OBLIGATION	No	No
3.2 Mail and archiving	CONTRACT	No	No

4.1

Adherence to legal and regulatory obligations with respect to outside authorities mainly includes the following purposes:

Purposes	Legal Basis allowing processing	Data obtained from Third Party	TRANSFERRING DATA TO A NON-MEMBER STATE OF THE EUROPEAN UNION (*)
4.1.1 Response to warrants and administrative/judicial requests	LEGAL OBLIGATION	lawyers, notaries, directors, legal representatives	No
4.1.2 Financial regulatory disclosure	LEGAL OBLIGATION	No	No
4.1.3 Statistical disclosures to regulators	LEGAL OBLIGATION	No	No
4.1.4 Tax reporting (automatic information exchange and tax collection)	LEGAL OBLIGATION	No	No

4.2

Adherence to legal and regulatory obligations with respect to internal auditing obligations mainly includes the following purposes:

Purposes	Legal basis allowing processing	Data obtained from Third Party	TRANSFERRING DATA TO A NON-MEMBER STATE OF THE EUROPEAN UNION (*)
4.2.1 Consolidation of data for the purposes of financial oversight and internal reporting	LEGITIMATE INTEREST	No	No
4.2.2 Periodic and permanent controls and corresponding reporting	LEGAL OBLIGATION	No	Depending on each individual case
4.2.3 Compliance controls, particularly for financial security, combating fraud, and monitoring transactions on financial markets	LEGAL OBLIGATION	No	If the client's legal authority, regulator, or tax authority is outside the EU, yes