## Addendum to the Information Notice on the Processing of Personal Data

## Caisse d'Epargne - Hauts de France, Belgian branch

The following provisions supplement and amend the personal data processing notice (as appended hereto and hereinafter referred to as the "Notice") and apply to the processing of personal data by the Caisse d'Epargne, as data controller, in the context of the activities of its Belgian branch, whose registered office is located at Avenue Louise 143, 1050 Brussels (company number 0674.826.723 - Brussels RPM).

## General comments:

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- Competent authorities: throughout the Notice, references to the Banque de France, the
  French tax authorities or other competent French authorities are supplemented by
  references to the National Bank of Belgium, the Financial Services and Markets Authority
  (FSMA), the Belgian tax authorities and other Belgian competent authorities, to the extent
  applicable;
- **Duty of professional discretion:** in the Notice, references to professional secrecy, as well as the principle of secrecy, are understood to refer to the duty of professional discretion to which the Caisse d'Epargne is subject in Belgium;
- <u>Specific comments</u>: Special categories of data (see "How we obtain your personal data" section in the Notice): The following categories of data are added to the special categories of data already listed in the Notice: data relating to criminal offences and convictions.

In principle, such data is not collected or processed by the Caisse d'Epargne, except in the following cases:

- (i) insofar as required by management of the Caisse d'Epargne's own litigation,
- (ii) where the processing is necessary for reasons of public interest important for the performance of tasks of general interest entrusted by or by virtue of the law, or
- (iii) where the data subject has authorised the processing of such personal data, explicitly and in writing, for a specific purpose or purposes and its processing is limited to those purposes;
- Communication of data (see "Who accesses your data" section of the Notice): the Caisse d'Epargne may also be required to communicate or consult data from the following regulatory records in Belgium:
  - Legal communications to judicial or administrative authorities,
  - Legal communications to the Central Contact Point of the National Bank of Belgium (NBB), as more fully described below,
  - Legal notifications to the Corporate Credit Register of the National Bank of Belgium.
- Data retention (see "How long your data is retained" section in the Notice): personal data is generally retained by Caisse d'Epargne for the entire duration of the contractual relationship with the Customer and for a period of 10 years following the end of the contractual relationship, unless shorter or longer retention periods are imposed under applicable law or the data is required to exercise legal rights, in which case the data shall be retained until the end of the proceedings, including the expiry of any remedies.



- Data transfers (see "Where your data is stored" section of the Notice): when the personal data is transferred outside the European Economic Area to countries that are not recognised as offering an adequate level of personal data protection and those transfers are not necessary for performance of the transaction or the Agreement between the Customer and Caisse d'Epargne or implementation of pre-contractual measures taken at the Customer's request (on the basis of the exceptions provided for in Article 49 of the GDPR), the Caisse d'Epargne implements appropriate safeguards, such as the Standard Contractual Clauses adopted by the European Commission. You can obtain a copy of these appropriate safeguards by contacting us at our address above.
- Prospecting (see "Our prospecting actions" section of the Notice): all prospecting actions are carried out in accordance with applicable law and, in particular, the provisions of the Belgian Code of Economic Law, and will be subject to your prior consent when required by applicable law.
- Surveillance camera (see "Implementation of special processing based on specific technology" section of the Notice): The Caisse d'Epargne premises in Belgium are protected by surveillance cameras, in accordance with the Law of 21 March 2007 on the use of surveillance cameras, as amended. Data subjects are informed of the presence of cameras using appropriate pictograms. Images collected by surveillance cameras are processed for the purposes of safety of persons and property and are deleted after one month, unless they can contribute to proof of an offence, damage or rudeness or can identify a perpetrator, a disruptor of public order, a witness or a victim.
- Telephone recordings (see "Implementation of special processing based on specific technology" section of the Notice): Telephone conversations between the Customer and Caisse d'Epargne may be subject to telephone recordings for the purposes of training, quality control, evaluation or improving the quality of products and services or as evidence of a transaction carried out remotely, in accordance with applicable law. We inform you of this prior to carrying out recording and, to the extent required by applicable law, obtain your consent to the recording. The recording media, or any copies of them, recorded as evidence of a business transaction or other professional communication, shall be deleted no later than the end of the period during which the transaction may be challenged in court. The recording media, or any copies of them, of which the purpose is to check the quality of the services in call centres (or for other purposes with the Customer's consent) are kept for a maximum of one month.
- Exercising your Rights as a data subject (see "Your rights" and "How to exercise
  your rights" sections of the Notice). In accordance with applicable data protection
  legislation, you have the rights to access, rectify and delete your personal data, to limit the
  processing and portability of your data, as well as the right to object, at any time, to the
  processing of your personal data for commercial prospecting purposes, including profiling
  when it is related to such prospecting.
  - Where the processing is based on your consent, you may withdraw your consent at any time, without prejudice to the lawfulness of processing based on that consent and carried out prior to withdrawal of that consent. For a description of your rights or how to exercise them, please refer to Sections 11 and 12 of the Notice. You can also exercise your rights by contacting the Bank's Data Protection Officer by sending an email to <a href="mailto:delegue-protection-donnees@hdf.caisse-epargne.fr">delegue-protection-donnees@hdf.caisse-epargne.fr</a> or by sending a letter to: Caisse d'Epargne et de Prévoyance Hauts de France Customer Relations Department 8 Rue Vadé 80064 Amiens Cedex 9 France; or to its Belgian Branch at: Avenue Louise 240, 1050 Brussels, Belgium. Finally, you can lodge a complaint with the Belgian Data Protection Authority:





Autorité de Protection des Données, Rue de la Presse 35, 1000 Brussels, https://www.autoriteprotectiondonnees.be.

## Additional comments:

- The database on banking risks and credit granted by credit institutions to companies is an integral part of the Banque de France's business banking database (FIBEN Fichier Bancaire des Entreprises). An entry in the Central Corporate Credit Register can be made by contacting the Banque de France's central risk database: 07-1050 Relations avec le Public 75049 PARIS CEDEX 01 Tel: 01.42.92.39.08 Website: www.Banque-France.fr in accordance with the relevant legal provisions.
- As mentioned below, certain data relating to the Customer and account(s) opened or closed in Belgium with the Caisse d'Epargne are recorded with the Central Contact Point (PCC Point de Contact Central) of the National Bank of Belgium (NBB), in accordance with the Law of 8 July 2018 on the organisation of a central contact point for accounts and financial contracts and on extending access to the central file of notices of seizure, delegation, transfer, collective settlement of debts and recourse, Article 322, paragraph 3 of the IPP code '92 and the Royal Implementing Order of 17 July 2013.
- The NBB (address: Boulevard de Berlaimont 14 1000 Brussels) is responsible for processing the data transmitted. The data recorded in the PCC may, among other things, be used in the context of a tax investigation, the search for criminally punishable offences and the fight against money laundering and the financing of terrorism and major crime, in accordance with the conditions imposed by law. The data communicated to the PCC is also used to determine the amount of the customer's taxable income, to ensure collection of taxes and withholding taxes due in principal and incidentals, tax gross-up and administrative fines, interest and costs. Each Customer has a right to view the data recorded in its name by the PCC with the NBB. Each Customer may, free of charge, request the correction or deletion of identity or current account data reported to the PCC regarding him/her. To exercise this right, the Customer sends its request to the Caisse d'Epargne which, where applicable, will send the correction to the NBB. The data is retained in the PCC for 10 years. The NBB maintains a list of PCC information requests for two calendar years.

