

PRIVACY POLICY

This privacy policy provides information on the personal data we may process throughout our banking relationship with you. It covers our existing clients and prospects and any natural persons involved in the relationship with a client, such as an agent, a legal representative, a guarantor, a designated contact point, a designate or a beneficial owner.

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1. WHO COLLECTS YOUR PERSONAL DATA?

You already use Compagnie de Financement Foncier's services on a daily basis and you are familiar with us. We provide support to you via our branch network, our employees, remote services, our sales agents and distributors.

We play a central role in the banking relationship and are responsible for collecting and processing the personal data linked to this relationship. To this end, we intervene as DATA CONTROLLER.

We are not alone in providing you with a range of different products designed to meet your needs. We are part of a larger group of companies, Groupe BPCE, and we also form partnerships with other companies.

All these companies and intermediaries contribute to the services we deliver to you and they all observe the same principles.

Your personal data may be transferred to them to enable them to provide these services to you.

Information on the protection of personal data relating to any product you purchase from one of our partners is provided by the partner's own DATA CONTROLLER, who is responsible for the collection and processing of data for its own activities.

For instance:

You may purchase products or services that we market but which are provided by another company.

In this case, you establish a direct contractual relationship with this partner. Depending on the product or service in question, we intervene either as distributor (we will issue and sign the contract

as the partner's representative), or as business finder or introducer (you will sign the contract directly with the partner we refer you to).

In these cases, your personal data will be collected and processed by both us as a distributor or business finder/introducer and by the partner, each within our own scope and for specific purposes associated with the purchased products and services.

Information on the protection of personal data relating to any product you purchase from one of our partners is provided by the partner's own DATA CONTROLLER, who is responsible for the collection and processing of data for its own activities.

If you want to learn more about the companies that make up Groupe BPCE and their various business lines, please visit: www.groupebpce.fr

2. HOW DO WE OBTAIN YOUR PERSONAL DATA?

We will be collecting and processing your personal data throughout our relationship. The data we process may change based on the type of product or service purchased.

THE PERSONAL DATA AND INFORMATION YOU PROVIDE TO US

When we enter into a relationship with you and when you purchase a product or service (loan, insurance, ancillary services, etc.), we collect the information we need for this transaction directly from you.

Such information is needed to:

- allow us to fulfil our legal and regulatory obligations, such as Know Your Customer rules, taxation requirements and anti-money laundering and counter terrorist financing regulations,
- learn more about you, provide you with advice and offer you products and services that meet your needs,
- complete the purchase of the product or service concerned,
- execute the product or service.

It is on this basis that you provide us with personal details concerning your identity, marital status, occupation and, more broadly, your economic, tax, wealth and financial situation.

You also provide us with your contact details, in particular your e-mail address and mobile phone number, so that we can send you information related to delivery of the service, notifications relating to the management of your contract and paperless documentation or to allow us to carry out banking transactions. The same applies if you agree to receive marketing information from us (by e-mail, text message or MMS).

Some personal data may be collected for regulatory or contractual purposes or may be required to finalise a contract. If applicable, you will be informed of the consequences if you refuse to communicate this information.

For instance:

- refusing to give us mandatory information for the opening and administration of an account may prevent us from opening the account,
- refusing to provide us with information on your financial situation will prevent us from reviewing your loan application,
- refusing to provide us with the information necessary to review your situation and your needs could prevent us from giving you the right advice.

Some data may also be collected:

- when you participate in any competitions we organise,
- when you run simulations on one of our websites, ask a question or contact us.

PERSONAL DATA RESULTING FROM THE USE OF PRODUCTS AND SERVICES

When you use our products or services or carry out transactions and operations, your personal data are processed in our information systems.

PERSONAL DATA PROVIDED BY THIRD PARTIES OR OTHER SERVICES

We may also receive personal data from:

- third-party suppliers and subcontractors, such as the Carte Bancaire, Visa and Mastercard networks,
- our partners, if their privacy policies allow it,
- other products or services provided to you by third parties, if you have authorised them to share your details with us,
- databases that we must consult before providing certain services, such as the French National Register of Household Credit Repayment Incidents (FICP) maintained by the Banque de France, or the Central Cheque Database (FCC).

PUBLIC PERSONAL DATA

We may collect personal data available publicly about you.

Public personal data means personal data or information produced or received by a public authority in connection with its public service mission, and which is disclosed by a public authority or transferable to anyone who requests it.

We may use publicly-available personal data or information when such use is authorised by legislative and regulatory texts and with due regard for the specific transfer and reuse rules laid down by these texts.

PERSONAL DATA ENHANCED BY COMPAGNIE DE FINANCEMENT FONCIER

We may generate or calculate new personal data about you based on the personal data that you provide or we obtain.

This mainly applies to loan applications, when we review your application and calculate a statistical score or when we assess the credit risk or the risk of fraud or make any other assessments in accordance with our legal and regulatory obligations.

Furthermore, in order to know our customers, tailor our products and services or customise offers that may be extended to you, we define profiles and use customer segmentation models.

EXCLUSION OF SPECIAL CATEGORIES OF PERSONAL DATA

We define special categories of personal data as being information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade-union membership, genetic data and biometric data for the purpose of identifying a natural person unambiguously, and data concerning health, sex life or sexual orientation.

As a general rule, we do not collect or process any special categories of personal data.

Nonetheless, some of this information may be collected and processed in certain cases.

For instance:

- To set up a strong user authentication system allowing you to access online banking services, make a payment or electronically sign documents using biometric identification devices (voice or facial recognition, fingerprints, etc.). In particular, this information is used to prevent fraud and identity theft by third parties. These biometric recognition systems are alternatives to other verification mechanisms and are covered by special security measures to guarantee the security and confidentiality of personal data.
- When taking out an insurance policy, such as borrower's insurance. In this case, the insurer may need information pertaining to your health in order to grant you coverage and to establish any exclusions. The procedures implemented are aimed at ensuring adherence with the principle of compartmentalisation: this information will be transferred solely to the insurer, which will process your details in accordance with its own rules and the applicable regulations, while we will be notified only of the decision to grant or refuse insurance.

In any event, if we are compelled to process special categories of personal data, provided such processing is not prohibited by applicable laws or regulations, we will obtain your consent in advance.

3. WHO CAN ACCESS YOUR PERSONAL DATA?

As a bank, we are bound by professional secrecy and we can only share your data under strict conditions or with your consent.

This same principle of secrecy and confidentiality applies to all parties involved, whether they are our employees, service providers, partners or our partners' employees.

Within Groupe BPCE, we may disclose your personal data to the following entities:

- BPCE S.A., to enable it to fulfil its legal responsibilities as the central institution of Groupe BPCE and acting on behalf of our institution and the group, particularly in the area of

prudential reporting to all the competent regulatory authorities or for the purposes of data governance on behalf of the institutions of Groupe BPCE.

Data governance means the organisation and the procedures put in place to regulate data collection and use within Groupe BPCE and to maximise the effectiveness of the use made of such data in compliance with the legal and ethical framework.

- Any entity of Groupe BPCE, in order to offer you the products and services managed by these entities.
- To the entities of our group (BPCE, Banques Populaires/Caisses d'Épargne, Natixis Assurance, Natixis Financement, Natixis Lease, etc.), to analyse or draw up any and all types of contracts or transactions involving you.
- Any entity of Groupe BPCE with which you enter into or maintain a contractual relationship, for the purposes of updating information collected by these entities on your vital statistics, your marital, wealth and financial status, the functioning of your account and the score assigned to you pursuant to banking regulations, including information concerning your tax status. This information may also be used to review your client file, for the use of any products and/or services you have purchased or for payment collection purposes.
- To the entities and service providers of Groupe BPCE, in the event of the pooling of technical resources, in particular information systems, on behalf of our institution. To this end, any of your personal data may undergo pseudonymisation for the purposes of research or the creation of statistical models. Pseudonymisation means that the information in question can no longer be attributed to your person without the use of additional information that it is kept separately and is protected by technical and organisational measures that ensure that the personal data initially provided cannot be attributed to an identified or identifiable natural person.

We may share your data with **third parties** in the following cases:

- with companies that insure or guarantee your loans (such as insurance companies or mutual guarantee companies),
- with companies on whose behalf we distribute loans (such as consumer credit); with credit institutions and, more broadly, with institutions licensed to provide payment services and the Banque de France, the payment card providers whose logos appear on your card (such as CB, Visa, Mastercard, etc.), merchants or service providers accepting payment cards, for purposes associated with payment cards and payment instruments,
- with collection agencies working on our behalf,
- with third parties (service providers, subcontractors, etc.), with a view to entrusting them with operational functions (such as issuing overdraft facility use alerts, using mobile payment solutions, managing payment cards or printing chequebooks),
- with third-party companies to allow the assignment of receivables or securitisation operations,
- with the bank's partners, to enable you to enjoy the benefits of a partnership which you have decided to join in the sole context of partnership agreements,
- in connection with games and competitions, with officers of the court in charge of monitoring and managing the game or competition,
- with our banking intermediaries,

- with our subcontractors and service providers, exclusively for the purpose of the services to be supplied on our behalf and, in particular, the delivery of banking or financial products or services or the production of statistical studies.

We share your data with these third parties in the following cases:

- where provided for under this policy,
- where necessary to deliver the products and services you purchased,
- when you agree to such sharing.

We are required to share your information when professional secrecy is waived by the law, in particular with respect to the taxation authorities, customs, and the Banque de France (for example the FCC (central cheque database) or the FICP, (National Register of Household Credit Repayment Incidents)), social security institutions (under the conditions set forth in Articles L. 114-19 to 114-21 of the Social Security Code), the French Prudential Supervisory and Resolution Authority (ACPR), and investigative parliamentary commissions. Secrecy may also be waived with respect to information needed for the enforcement of agreements signed by France regarding the automated exchange of information for tax purposes (Article 1649 AC of the General Tax Code). Secrecy is not enforceable against a judicial authority in criminal or civil proceedings where a specific text makes express provision for it.

4. WHY DO WE PROCESS YOUR PERSONAL DATA?

During our relationship, Compagnie de Financement Foncier may use all or some of your personal data for the purposes described below and on the basis of the following principles:

EXECUTING THE CONTRACT GOVERNING THE PRODUCTS AND SERVICES YOU HAVE PURCHASED OR INTEND TO PURCHASE

We mainly process your personal data with a view to delivering the products or services you purchase or intend to purchase.

Processing carried out as part of managing your relationship with us primarily concerns administering your bank accounts, carrying out transactions, managing your banking and savings products, creating your payment instruments and managing their use, ensuring the security of payment transactions particularly when the payment instrument has been cancelled (or frozen), granting and administering your loans, issuing and granting guarantees, issuing or granting sureties, preventing and managing past due amounts and excessive indebtedness, administering insurance policies, collecting debts and settling litigation.

Without such processing, we cannot conclude or execute the contract.

Before authorising a payment transaction, we may use automated decision-making, based on an analysis of the information relating to the payment instrument, the context of the transaction, the balance of the account on which the payment instrument operates, and any restrictions on its use. Automated decision-making may lead to the authorisation or the refusal of a payment transaction.

MEETING OUR LEGAL AND REGULATORY OBLIGATIONS

Our activities take place in a highly regulated environment, whether in connection with executing bank transactions or any associated transactions, distributing insurance products or other intermediation activities.

To meet our legal obligations, we may process personal data.

As a result, we may request specific information regarding some transactions if required by laws or regulations.

Automatic exchange of tax-related information

For tax purposes, we are required to identify the account holder's country of residence and to report annually to the French tax administration on the reportable accounts of non-tax residents of France (including U.S. Persons within the meaning of the Foreign Account Tax Compliance Act).

The French tax administration then transmits this information to the tax administration in the reportable account holder's country of tax residence if required by regulations on the automatic exchange of information.

Combating money laundering and the financing of terrorism

We are required to identify our customers and, where applicable, any beneficial owners of transactions. We are also obliged to carry out client due diligence throughout the business relationship (amount and type of transactions, origin and destination of funds, monitoring of the customer's occupational, economic and financial status, etc.). The information that you provide us must be regularly updated.

Accordingly, we are required to apply enhanced due diligence measures to politically exposed persons as defined by the French Monetary and Financial Code.

We are also required to report certain transactions to the competent authorities, in particular:

- the amounts showing on our books and transactions involving any funds that may have originated from an offence punishable by imprisonment or that may be involved in the financing of terrorism,
- transactions where the identity of the instructing party or the beneficial owner remains doubtful despite the due diligence carried out by Compagnie de Financement Foncier under its obligation to perform identity checks.

INFORMATION REQUIRED FOR REGULATORY REGISTERS

As an example, we disclose personal data required for the following regulatory data files, which we may also consult:

- FCC. The Central Cheque Database records personal data that must be supplied by banks relating to the identity of the persons having issued cheques with insufficient funds and the

identity of persons who are subject to a prohibition for other reasons (such as certain co-holders of a joint account).

- Central database of CB credit card confiscations. This database, managed by the Banque de France, records decisions to confiscate bank cards when a payment incident directly stemming from the use of a CB bank card has not been remedied.
- FICOBA. When banks open a bank account or similar account for a customer, they are obliged to supply certain information to the Directorate-General for Public Finances, which is responsible for managing the FICOBA database, and they must also inform it of any changes or the closure of the account. This requirement applies for a period of ten years after the account is closed.
- FICP. Banks are obliged to report any payment incidents on loans granted to natural persons for non-business purposes to the National Register of Household Credit Repayment Incidents (FICP). They are also obliged to consult this register in specific cases (before issuing a loan or an overdraft facility where the amounts can be repaid over more than one month, and for the annual renewal of a revolving credit facility). This register must also be consulted when issuing means of payment or when issuing or renewing a payment card.

Our insurance partners have similar obligations, in particular to provide information to FICOVIE (national database of endowment and life insurance policies).

OTHER REGULATORY OBLIGATIONS

We are expected to anticipate situations in which customers might encounter difficulties and to take appropriate and customised measures in response to these difficulties.

Dormant accounts. Regulations require banks to identify inactive accounts open on their books each year. To this end, we must consult the National Directory for the Identification of Natural Persons (RNIPP) every year to determine whether the holder of an inactive account is deceased.

Similar obligations apply to inactive safety deposit boxes and, for insurers, life insurance contracts.

Replies to requests to exercise rights under personal data protection legislation. If you wish to exercise your rights, referred to in Article 12 of this document, we will need to process your personal data for the purpose of identification, handling your requests and retaining evidence.

MEETING OUR LEGITIMATE INTERESTS

We may have a “legitimate interest” in processing your data, in particular when we encounter situations that might pose a risk to our business, for example to protect ourselves from market manipulation or insider trading, prevent payment fraud, handle any lawsuits, combat financial crime both with respect to the financial sector and our customers and employees, prevent and address disrespectful behaviour toward our employees, ensure the security of our networks and information systems, and monitor access to our premises, in particular by using video surveillance systems.

This legitimate interest may be associated with the analysis of our risk exposure, in particular when assessing the risks related to loan applications and throughout the contractual relationship. Automatic processing carried out in this respect always involves human intervention and leads to a decision to grant or refuse the loan. You have the right to express your opinion and to object to the decision reached at the end of this process.

Our legitimate interests may also be linked to the management of our activity as a company (general accounting, invoicing, asset/liability management, reporting, statistical studies, or satisfaction surveys), customer relationship management (improving our knowledge of the customer and improving our products and services), marketing activities, profiling and segmentation, including, where applicable, combining data for the purposes of analysis or anonymisation, or for our auditing, inspection and communications activities.

Such processing is carried out with due regard for your interests and basic rights. Accordingly, such processing is accompanied by measures and guarantees allowing us to ensure the proper balance between protecting your rights and interests and pursuing our own legitimate interests.

CARRYING OUT CERTAIN PROCESSING OPERATIONS WITH YOUR CONSENT

We may carry out processing operations when you have given us your consent for such processing for one or more specific purposes.

In these cases, you will be asked in advance to give your specific consent to the collection and processing of your data for one or more specific purposes.

Accordingly, when we want to engage in marketing activities by e-mail, we will seek your consent before sending you messages.

5. FOR HOW LONG IS YOUR DATA RETAINED?

Once our data processing has achieved its purpose, and, taking due account of any legal or regulatory obligations requiring the retention of particular details, we will delete your information or make it anonymous.

The retention period may vary and depends on the type of information and the objectives pursued.

Personal data collected for the purposes of contract management: information is retained for the time required to execute the contract and until any applicable statutory time limits expire.

There are three types of time limits:

- in accordance with the provisions of the Commercial Code, accounting records and supporting documentation must be retained for a period of 10 years. Accordingly, the personal data required to fulfil this obligation are retained for the same length of time. As a general rule, the 10-year period runs from the date of the transaction. For example, information about a transaction made on your bank account will be kept for 10 years from the transaction date,
- the limitation period in ordinary law in civil and commercial matters is five years. For example, information related to your account will be retained for a period of five years from the account closure date or the termination of our relationship,
- time limits governed by specific laws, such as combating money laundering and the financing of terrorism, are five years,
- the time needed to achieve the intended objectives, such as combating fraud, is five years.

These time limits may be longer in some special situations where required by law, such as for managing dormant accounts or satisfying tax requirements (relating, in particular, to regulated savings accounts). Such limits may also be longer where legal action is ongoing. In this case, the data are stored until the end of the legal proceedings and then retained based on applicable statutes of limitation.

When personal data are collected for more than one purpose, they are retained until the end of the retention period or archiving period, whichever is longer.

After the relationship is terminated, we may also store your data and use some of this information (your family name, given name(s), address, date and place of birth, characteristics of the product you purchased in the past) for the purpose of marketing activities for a maximum of five years (starting on the date of the last contact from you). You have the right to object to the processing of your personal data for marketing purposes at any time under the conditions set out in Article 12 of this document.

Personal data collected for pre-contractual purposes without a contract being signed

When you contact us to request a product, service or simulation and your request is not followed up with a purchase, we will keep your information for a limited period of time for the purpose initially pursued (such as to carry out another simulation or keep a record of the advice we gave you).

If you apply for and are offered a loan but do not take up the offer, we will keep the relevant information until the limitation period expires.

Where applicable, the results of the risk analysis performed in connection with a loan application are stored for a period of six months from the date of the application.

Personal data about a potential new customer

Personal data about a potential new customer are kept for marketing purposes for up to three years from the most recent contact received from the prospect.

These data are also retained for five years for the purpose of combating money laundering and the financing of terrorism and for fighting fraud.

6. HOW DO WE ENSURE THE SECURITY AND CONFIDENTIALITY OF YOUR DATA?

Our priorities include respect for privacy and banking secrecy, security and the confidentiality of information, in particular the personal data entrusted to us by our customers.

Given the nature of personal data and the risks posed by their processing, we implement the necessary technical and organisational measures to ensure the security of your data and, specifically, to prevent the distortion, corruption, access by unauthorised third parties and improper use of these data.

Accordingly, we pledge to implement all physical, technical and organisational security measures needed to:

- protect the personal data we hold on our customers against unauthorised access, tampering, distortion, disclosure or destruction,
- protect our activities.

We regularly conduct internal audits to verify that your personal data are secure and to prevent unauthorised intrusion into our information systems.

However, the security and the confidentiality of personal data rely on good practice by all, and so you are urged to be vigilant.

In order to safeguard the confidentiality of your personal data, we urge you, in particular when using the internet, to take every precaution by erasing your browsing history at the end of your visit and forbidding access by unauthorised third parties when you download this information to any management software application.

We urge you to read any security tips available, in particular the ones on our website.

In line with our obligations, we carefully select our subcontractors and service providers and require:

- a level of protection of your personal data equivalent to our own,
- that they access and use your personal data or information only to the extent that is strictly necessary for the services they supply,
- strict adherence with laws and regulations applicable to confidentiality, banking secrecy and personal data,
- implementation of all appropriate measures to ensure that any personal data they might process is protected,
- the definition of adequate technical and organisational measures to ensure data security.

We undertake to sign contracts with our subcontractors that clearly set out the terms and conditions applicable to the processing of personal data, in compliance with legal and regulatory requirements.

7. WHERE IS YOUR PERSONAL DATA STORED?

Personal data and information about our customers are stored in our information systems or in those of our subcontractors or service providers.

We undertake to select subcontractors and service providers who satisfy quality and security requirements and offer sufficient guarantees, notably in terms of expert knowledge, reliability and resources, regarding the implementation of technical and organisational measures, including in the area of data processing security.

On this basis, our subcontractors and service providers must observe confidentiality rules that are at least equivalent to our own.

As a general rule, we prioritise technical solutions and the storage of personal data at hosting sites located within the European Union. If not, then we take the necessary measures to ensure that our subcontractors and service providers offer adequate security and protection measures as described below.

IS YOUR DATA TRANSFERRED TO OR ACCESSIBLE FROM A COUNTRY OUTSIDE THE EUROPEAN UNION?

For some transactions, the personal data that are transferred for the agreed purpose may be transferred to a country within or outside the European Union.

If personal data are transferred outside the European Union, rules are in place to ensure the protection and security of these data.

For the same reasons, when transferring funds, some personal data must be transferred to the beneficiary's bank, which may be located in a country within or outside the European Union.

This personal data may be transferred to official bodies, the competent administrative or judicial authorities or to third parties, at their request.

Potentially, some personal data or information may be transferred outside Compagnie de Financement Foncier's home country and/or to countries outside the European Union. Such transfers may be subject to laws or regulations different from those enforced in the European Union.

For instance, some personal data may be hosted in the United States when the Bank executes certain transactions, such as transfers via the Society for Worldwide Interbank Financial Telecommunication (SWIFT) secure network.

In all cases, we take every necessary and appropriate measure to maintain banking secrecy and to safeguard the security of personal data.

To secure the transfer outside the European Union of any personal information or data that are not necessary for the execution of the transaction, the contract binding upon us or for the implementation of pre-contractual measures taken at your request, we may, for example, apply standard clauses drafted by the European Commission to regulate such flows.

8. OUR MARKETING ACTIVITIES

We may contact you to offer you new products and services that appear to be suitable for your needs or wishes or that respond to new trends.

You can object to the processing of your personal data for marketing purposes at any time, free of charge, according to the procedures laid down in Article 12 below.

MARKETING ACTIVITIES USING E-MAIL AND AUTOMATIC CALLING MACHINES

We may canvass you by e-mail, automatic calling machines or text messaging if you have given us your consent when you gave us your e-mail address or your personal details.

Each marketing e-mail message contains a link allowing you to opt out.

Messages and notifications associated with the administrative management of a product or service you have purchased (alerts, notice of availability of a paperless document in your online user account, etc.) are not considered marketing messages. You can set your message and notification

preferences for each service you purchase with the understanding that such notifications may be mandatory under regulatory obligations.

MARKETING BY TELEPHONE

We may also canvass you by telephone.

Pursuant to Article L. 223-2 of the Consumer Code, you are advised that you can register for the Bloctel Do Not Call list. However, even if you do so, we may canvass you by telephone if we have an ongoing contractual relationship with you unless you have stated your objection to such calls or if you object when you receive the call.

9. OUR PROFILING ACTIVITIES

Profiling consists of using personal data to assess particular aspects of the data subject concerned, or to analyse or predict his/her interests, behaviours or other attributes.

As part of our relationship, we may carry out two different types of profiling:

- marketing-related profiling, which does not have any legal effects for you, such as marketing segmentation to suggest innovative products and services that may meet your expectations/needs and any additional or promotional offers that target your needs,
- profiling likely to produce legal effects for you and culminating in a decision, such as a credit rating.

For its marketing-related profiling, Compagnie de Financement Foncier uses methods to implement segmentation and make choices that do not produce any legal effects for you.

Accordingly, the personal data that we collect also help us customise and continually improve the banking relationship and the business relationship so we can offer you products and services suited to your needs. In this respect, we use different profiling techniques (including the use of algorithms).

You have the right to object to the processing of your personal data for marketing purposes at any time.

We may also aggregate and anonymise such data in order to produce marketing reports and create models.

When we use such techniques, we take the necessary steps to limit the risk of error and to avoid any violation of your fundamental rights and freedoms.

In cases where such profiling produces legal effects for you, such as using risk assessment processing with a view to granting a loan (scoring), the results of such techniques will only be used to provide decision-making support:

- Compagnie de Financement Foncier's decision-making process always allows for human intervention,
- you have the right to express your opinion or receive an explanation as to the decision made based on this type of assessment and to challenge that decision.

10. SPECIAL PROCESSING USING SPECIFIC TECHNOLOGY

VIDEO SURVEILLANCE

As part of the implementation of security measures by our branches and facilities, we use video surveillance systems with due regard for the rules laid down by the Internal Security Code and, in particular, authorisations issued by the competent prefectures and regulations relating to the protection of personal data.

We inform you that such images are recorded and retained and that they may lead to the identification of the persons filmed, either by the systems implemented or by employees authorised to access the images.

Signboards in the monitored area indicate the existence of such devices, the name of the person responsible and information on how you can exercise your rights to access any video recordings concerning you.

The images are kept for one month, unless a criminal proceeding is ongoing. If such a proceeding is ongoing, the images will be exported from the device (after documenting this operation in a special repository) and retained for the duration of the proceeding.

COOKIES AND OTHER TRACKING TECHNOLOGY

By cookies and other tracking technology, we mean cookies installed and read when you visit a website, read an e-mail, and install and use software or a mobile app, irrespective of the type of device used.

When you visit one of our websites, cookies and additional tracking technology may be installed on your device.

You can consult the cookie policy on the website in question.

Where necessary, we ask for your prior consent before installing such tracking technology on your device and when we access information stored on your device.

The maximum lifetime of such cookies is 13 months.

RECORDING TELEPHONE CONVERSATIONS

Telephone conversations between you and our departments may be recorded for the purposes of training, evaluating and improving the quality of our products and services or as proof of a remote transaction.

We will inform you that we are recording the conversation before doing so.

Recording media or any reproduction thereof will be kept for a length of time proportionate to the purpose of the recording in question.

11. YOUR RIGHTS

Subject to the limitations and conditions established by the laws in force, you can:

- **access** all your personal data,
- **have your personal data rectified**, updated or erased with the understanding that erasure may take place only when:
 - the personal data are no longer needed for the purposes for which they were collected or otherwise processed,
 - you have withdrawn the consent on which the processing was based,
 - you have objected to the processing of your data and where there is no overriding legitimate reason to continue such processing,
 - your personal data have been processed unlawfully,
 - your personal data must be erased to satisfy a legal obligation laid down by the French or EU laws governing Compagnie de Financement Foncier ,
 - you object to the processing of your data,
- **object** to the processing of your personal data for your own reasons;
- **object** to the processing of your personal data for **marketing** purposes,
- **receive** the personal data that you provided to us for automatic processing requiring your consent or for the execution of a contract and ask us to transmit the data to a third party;
- **request a limitation** on the processing of your personal data when:
 - you dispute the accuracy of the personal data we hold, for a period that allows the data controller to verify the accuracy of the personal data,
 - you object to the erasure of your data when it is found that their processing was unlawful,
 - we no longer need these data but you still need them to dispute, exercise or defend your rights before a court of law,
 - you objected to the processing of your data during an investigation to determine whether the legitimate aims pursued by Compagnie de Financement Foncier override yours,

- **withdraw your consent** at any time, where processing is based on your consent,
- **lodge a complaint** with a supervisory authority.

In France, the supervisory authority is the French Data Protection Authority (CNIL) – 3 place de Fontenoy – TSA 80715 – 75334 PARIS CEDEX 07 <http://www.cnil.fr/>.

You also have the right to send us instructions regarding the retention, erasure and disclosure of your data following your death; you may also have these instructions recorded by a “certified digital trusted third party”. These instructions may designate a person responsible for their implementation. However, these rights may not be construed to conflict with the rights of heirs or allow the disclosure of information to which only they have access.

12. HOW TO EXERCISE YOUR RIGHTS

If you wish to find out more about the provisions of this policy, exercise your rights or contact our Data Protection Officer, you can write to the following address:

Crédit Foncier de France – CNIL Department – 4 quai de Bercy – 94224 Charenton CEDEX.

You can also contact the CNIL Department by e-mail using the following address: protection-des-donnees-personnelles@creditfoncier.fr.

You must prove your identity by clearly specifying your family name, given name(s), the address at which you wish to receive a reply, sign your request and attach a photocopy of an identification document that includes your signature.

There is no charge for exercising your rights to access, rectify, object to, erase or restrict the processing of your personal data, or to ask us to transmit your personal data to a third party.

If you exercise your right of access, we will supply you with a copy of the personal data subject to processing. Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive nature, we may demand payment of a reasonable fee to cover the administrative costs incurred to provide you with this information, draw up communications, take the requested measures or reject your request.

This policy is subject to change.