



**EURO**TITRISATION

Tailor-made securitisation

**POLICY**

**PRIVACY**

The English translation is for information purposes only. In the event of any discrepancies in the translated versions, users should refer to the original French versions.

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## 1. Objectives and scope

EUROTITRISATION considers the protection of your personal data, and the respect for your privacy, as crucial concerns, to which it intends to devote particular attention.

Accordingly, this confidentiality policy is intended to define the processing carried out by EUROTITRISATION with the personal data collected.

EUROTITRISATION, a public limited company, whose registered office is located at 12 Rue James Watt 93200 Saint-Denis, registered in the Bobigny Trade and Companies Registe under number RCS 352 458 368 0052, is responsible for processing the personal data collected.

## 2. Types of personal data collected

EUROTITRISATION collects personal data that is strictly necessary for its activity. This may include:

- Identification data (surname, first name, address, e-mail address, etc.);
- Connection data (login, password);
- Technical data (e.g. IP address, type of browser used, etc.); and
- Any personal data contained in correspondence sent to EUROTITRISATION.

In some cases, the communication of such personal data is mandatory for regulatory, technical or operational reasons.

Any person required to communicate the personal data of third parties ensures that such third parties have been duly informed of the processing of their personal data, in accordance with this Policy and, if required, that the third party has consented to the processing of their personal data.

## 3. Use of personal data

EUROTITRISATION only collects and uses personal data for specific and limited purposes. These purposes are based on:

- Legal obligations: personal data may be processed in order to comply with applicable legal, tax statutory and regulatory requirements to which EUROTITRISATION is bound, including financial regulations, legislation relating to the fight against money laundering and the financing of terrorism, company law, tax law or to respond to any official request from a public or judicial authority;
- Performance of contracts: personal data may be collected and processed for the purposes of entering into contractual relationships and providing products and services to business customers;
- Legitimate interests: a part of the processing is necessary to satisfy the legitimate interests of EUROTITRISATION in order to provide and develop products or services, improve risk management and/or defend the legal rights of EUROTITRISATION; or
- Consent: consent to the processing of personal data of data subjects for one or more specific purposes.

## 4. Transfer of personal data

As part of its processing operations, EUROTITRISATION may communicate personal data to the following recipients:

- Service providers, suppliers, agents and co-contractors, insofar as they act to carry out the purposes defined in this policy (e.g. use of IT service providers to host personal data on behalf of EUROTITRISATION); and

- Competent jurisdictions, public authorities, government bodies and law enforcement agencies (e.g. in the context of legal or regulatory obligations).

Regardless of the recipient, EUROTITRISATION will only disclose the personal data that are strictly needed and only to the extent required to achieve the purposes identified in this Policy.

EUROTITRISATION never sells the personal data collected.

## 5. Transfers outside the European Economic Area

As part of the processing operations described in this Privacy Policy, EUROTITRISATION may transfer personal data outside the European Economic Area (EEA) in order to manage its activities.

In this context, EUROTITRISATION shall ensure that the level of protection afforded to personal data is not adversely affected by such transfers.

In practical terms, this means that each of the transfers envisaged must be based on at least one of the following mechanisms:

- The existence of an adequacy decision issued by the European Commission for the country to which your personal data is transferred; or failing that
- The conclusion of standard contractual clauses reproducing the models in force as adopted by the European Commission; or failing that
- The existence of a derogation linked to one of the specific situations exhaustively provided for by the General Data Protection Regulation n°2016/679 ("GDPR"), for example, where consent has been given to this transfer having been informed of the absence of guarantees, where the transfer is necessary for the performance of a contract concluded between EUROTITRISATION and the third party, or where the transfer is necessary for the establishment, exercise or defence of legal claims, etc.

Copies of these documents may be obtained by sending an e-mail to the Data Protection Officer ("DPO"), whose contact details are set out in Section 10 of this Policy.

## 6. Duration of storage of personal data

EUROTITRISATION keeps personal data for no longer than is necessary for the purpose of the processing.

In other words, this means that the storage periods applied varies depending on the purpose for which EUROTITRISATION processes the data.

## 7. The use of cookies on the website

EUROTITRISATION uses cookies on its [www.eurotitrisation.fr](http://www.eurotitrisation.fr) website. However, in accordance with the applicable legal framework, EUROTITRISATION ensures that it obtained, when necessary, the prior consent of the persons related before placing cookies on their equipment.

All information relating to cookies and the objectives pursued are described in the cookies policy.

## 8. Internet user's rights

In accordance with the legal framework applicable to data protection, and in particular the RGPD, all individuals have the following rights relating to their personal data: the right of access, rectification, erasure, opposition, limitation of processing, portability of their personal data and the right to give instructions concerning the fate of their personal data after their death.

When the processing of personal data is based on the consent of the person, that person may withdraw it at any time.

#### **8.1. Right of access**

Any person may, at any time, request access to his/her personal data. If this person exercises his/her right of access, EUROTITRISATION will provide him/her with a copy of the data in its possession as well as all information relating to the processing thereof.

#### **8.2. Right of rectification**

Any person has the right to request the rectification or completion of any personal data held by EUROTITRISATION that may be inaccurate or incomplete.

#### **8.3. Right of erasure**

Any person may request the deletion of personal data concerning him/her, for example if such data are no longer necessary for the processing carried out by EUROTITRISATION.

EUROTITRISATION will ensure to comply with such request. However, EUROTITRISATION may be required to retain all or part of such personal data if required to do so by law or if such data is necessary for the establishment, exercise, or defense of legal claims.

#### **8.4. Right to object**

Any person may object at any time, for reasons relating to his/her particular situation, to EUROTITRISATION's use of his/her personal data. In such case, EUROTITRISATION shall cease the processing of the personal data unless there are compelling and legitimate grounds for EUROTITRISATION to continue processing the personal data (e.g. if the personal data are necessary to establish, exercise or defend the rights of EUROTITRISATION or the rights of third parties in a court of law). If EUROTITRISATION is unable to comply with an objection request, the reasons for such refusal will be communicated to the applicant.

Any person may also object at any time to the processing of his/her data for commercial prospecting purposes.

#### **8.5. Right of limitation**

Any person may request that the processing of his/her personal data be restricted for reasons relating to his/her particular situation. For example, in the event of a dispute as to the accuracy of that person's personal data or an objection to the processing thereof, EUROTITRISATION may suspend the processing of such data for the time required to verify and examine such requests.

#### **8.6. Right to portability**

Any person may request the portability of personal data communicated as part of their relationship with EUROTITRISATION. In this case, EUROTITRISATION will provide the personal data in a readable and structured format that allows for easy re-use.

However, the portability of personal data only applies to personal data communicated to EUROTITRISATION or resulting from an activity on the EUROTITRISATION website, provided that the communication of such personal data doesn't infringe the rights of third parties. If EUROTITRISATION is unable to comply with a portability request, the reasons for such refusal will be communicated to the applicant.

### 8.7. Right to withdraw consent

Where the processing of personal data is based on consent, such consent may be withdrawn at any time. Withdrawal of consent prevents EUROTITRISATION from processing the data subject's personal data but doesn't affect the lawfulness of the processing carried out prior to such withdrawal.

### 8.8. Right to specify instructions concerning the use of your personal data after your death

Any person may provide EUROTITRISATION with instructions concerning the use of his/her personal data after death, such as the retention, deletion, or communication of his/her personal data to a third party designated by him/her.

## 9. Exercise of rights

The Data Protection Officer (DPO), whose contact details are given in Section 10, is responsible for responding to any person wishing to exercise the rights mentioned in Section 8. In order to process requests, the DPO may ask for certain additional information to confirm the identity of the person making the request and/or to make it easier to locate the personal data related to the request.

Some of these rights are subject to specific conditions dictated by the applicable data protection legal framework. Thus, in the event that a particular situation doesn't meet these conditions, EUROTITRISATION will not be able to respond favorably to the request. Where applicable, the DPO will inform the applicant of the reason for such refusal.

In any event, the applicant may lodge a complaint with the Commission Nationale de l'Informatique et des Libertés ("CNIL").

## 10. Processing requests

All questions or requests relating to personal data, including the exercise of rights as detailed above, should be sent to the following address:

EUROTITRISATION

Data Protection Officer

12 Rue James Watt

93200 Saint-Denis

Email: [dpo@eurotitrisation.fr](mailto:dpo@eurotitrisation.fr)