

***SFIL Group***

***PRIVACY POLICY***

***PERSONAL DATA***



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## ***Introduction***

The SFIL Group does its utmost to protect the personal data that it collects as part of its activities.

In accordance with the General Data Protection Regulation (GDPR) and the legislation in force, the SFIL Group is committed to ensuring the protection, confidentiality and security of all personal data collected and processed in its activities, as well as the respect of privacy. Pursuant to these regulations, this privacy policy is an integral part of the general terms and conditions of use of the SFIL and Caisse Française de Financement Local websites.

The purpose of this privacy policy is to provide information to the SFIL Group's external stakeholders, including visitors to our websites (our "websites"), our prospective customers, our borrowers, our job applicants, our customer companies' employees, our investors, our suppliers and any other users of our services (collectively, "you").

As part of our commitment to transparently protecting your personal data, we hereby inform you of :

- the way and reasons for which the SFIL Group uses and stores your personal data ;
- the legal basis for the processing of your personal data ;
  - your rights and our obligations in regard to that processing.

This privacy policy, which is available on our website, must be read in conjunction with all other legal information and terms and conditions that the SFIL Group distributes or makes available.

## ***Who is the data controller?***

The data controller of your personal data is SFIL, a French public limited company with a board of directors authorized as a credit institution by the Autorité de contrôle prudentiel et de résolution (ACPR), with its registered address at 1-3, rue du Passeur de Boulogne, 92130 Issy-les-Moulineaux, France.

The SFIL Group has appointed a data protection officer.

To exercise your rights or for any request related to this privacy policy, you may contact the SFIL Group at the email address [dpo@sfil.fr](mailto:dpo@sfil.fr) or by writing to the following address:

DPO SFIL  
1-3, rue du Passeur  
de Boulogne 92130  
Issy-les-Moulineaux  
France.

## *What personal data do we process and why ?*

The SFIL Group is required to collect and process several types of personal data, including:

- identity data (last name, first name, date and place of birth, nationality, photo, ID number, etc.);
- business or personal contact details (email and postal addresses, business or personal telephone numbers, etc.);
- business information related to the position you hold (job title, role, employer, etc.);
- information collected as part of a recruitment process;
- data from telephone recordings and video surveillance (e.g. security surveillance of the SFIL Group's premises);
- any other personal data that may be provided to SFIL.

We may also collect data directly from you in our ongoing exchange (conversations in person or by telephone, in accordance with applicable rules), when you fill in contact forms on our websites, when you email us or when you apply for a job with us. Personal data can also be collected indirectly, through third parties such as professional social networks, publications, service providers, suppliers, internet sites and publicly available databases.

In accordance with the regulations in force, in general we use your personal data to:

- comply with our legal and regulatory obligations, including banking and financial regulations, anti-money laundering and financing of terrorism regulations and the obligation to record and retain certain data;
- enter into agreements with you, contact you in order to sign a contract and process invitations to tender issued by the SFIL

Group in respect of which contact data on potential suppliers and service providers may be collected;

- pursue relations with the SFIL Group's investors, whose contact data may be collected via its websites or by its employees and to whom the SFIL Group may send financial communications or invitations to financial communication events;
- manage an ongoing contract;
- pursue the SFIL Group's legitimate interests, i.e. to manage our risks, and to protect our rights by keeping evidence of transactions;
- manage our recruitment;
- respond to queries from you, whether you are an investor or a journalist.

In the event you use the contact form on one of the SFIL Group's websites to subscribe to our alerts, you consent to receive information related to the SFIL Group by email. You may unsubscribe at any time by clicking on the link dedicated for this purpose in each of our communications;

- respond to official requests from duly authorized public or judicial authorities.

Your data are not subject to any fully automated decision-making, profiling or further processing.

## ***Who do we give your data to ?***

The personal data we collect are intended for the SFIL Group as data controller. We ensure that only authorized persons within the SFIL Group can access these data.

To fulfil the abovementioned purposes, we may need to communicate certain personal data to:

- our service providers performing services on our behalf, including regulated professions (lawyers, notaries and auditors);
- judicial or financial authorities, state agencies or public bodies, at their request and within the limits of regulatory provisions.

Your personal data may be reconciled, pooled or shared between all entities of the SFIL Group or its shareholders. They may be provided to these entities for the purposes set out in this privacy policy. These operations are carried out in an appropriate manner to ensure that your rights are protected and upheld.

## ***How long do we store your personal data for ?***

SFIL is committed to ensuring that the retention periods applied to your personal data are proportionate to the purposes for which they were collected. The personal data retention period is variable and determined by several criteria, including:

- the purpose for which we use the data in question: the SFIL Group must keep the data for the period necessary to fulfil the purpose related to the processing; and
- legal obligations: laws or regulations may set a minimum length of time for which we must keep personal data.

For instance, under anti-money laundering and financing of terrorism regulations, personal data are retained for five (5) years from the end of the business relationship with the SFIL Group.

## ***What cookies does the SFIL Group collect ?***

The SFIL Group may process your personal data using cookie technology. When you visit one of the SFIL Group websites, the site collects a cookie, which is a small file stored on your device every time you visit a website. The cookie records information about your device, your browser and, in some cases, your preferences and browsing habits.

For the sake of information and transparency, the SFIL Group has a cookie policy designed to enable users of its websites to find out more about the origin and purpose of the browsing information processed when consulting its websites, as well as their rights.

You can find our cookie policy in the « Personal data » section on each of our websites.

## *Your rights*

### *Your right to information*

This privacy policy informs you about the data processing purposes and legal framework, related interests and the recipients or types of recipient with whom your personal data are shared.

### *Your right to access and correct your data*

You have the right to access your personal data and to have them corrected. You can exercise this right by writing to the following address, with proof of your identity: [dpo@sfil.fr](mailto:dpo@sfil.fr).

You can use this address to obtain information about the processing of your data. At your request, the SFIL Group can correct and if necessary complete your personal data if they are inaccurate or incomplete.

### *Your right to delete your data*

You can ask us to delete your personal data for any of the following reasons:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you wish to withdraw your previously given consent;
- you object to the processing of your personal data considering that there are no legal grounds for said processing; • the processing of your personal data does not comply with the laws and regulations in force.

Nevertheless, your right shall not apply to the extent that it is necessary to retain your data for the purposes of laws and regulations, in particular for the establishment, exercise or defense of legal rights.

### *Your right to restrict the processing of your data*

You may ask for the processing of your personal data to be restricted in cases provided for by laws and regulations.

### *Your right to object to the processing of your data*

You have the right to object to the processing of your personal data. In this case, we will no longer process your personal data, unless there are legitimate and compelling reasons for the processing that override your interests, rights and freedoms, or it is for the establishment, exercise or defense of legal rights.

### *Your right to data portability*

You have the right to the portability of your personal data.

The data concerned by this right are:

- exclusively your personal data, which excludes anonymized personal data or data that do not concern you;
- data that you have provided or the functional data mentioned above;

- personal data that do not infringe the rights and freedoms of third parties, such as data subject to business secrecy law.

This right is restricted to processing based on consent or a contract and to personal data that you have personally generated. This right does not include either derivative data or inferred data, which are personal data generated by SFIL.

### Your right to withdraw your consent

When our data processing is based on your consent, you may withdraw said consent at any time. We will consequently cease processing your personal data, without calling into question any previous operations for which you gave your consent.

### Your right to an effective judicial remedy

You have the right to file a claim with the French data protection agency (CNIL) on French territory, without prejudice to any other administrative or jurisdictional recourse.

CNIL  
3 place de Fontenay  
TSA 80715  
75334 Paris Cedex  
07  
France  
Tel.: +33 (0)1 53 73  
22 22

### How to exercise your rights

All the rights listed above can be exercised at the following email address: [dpo@sfil.fr](mailto:dpo@sfil.fr) or at the following postal address:

DPO SFIL  
1-3, rue du Passeur  
de Boulogne  
92130 Issy-les-  
Moulineaux  
France

Nevertheless, with regard to the exercise of your right to information, we are entitled not to respond to such a request if:

- you already have this information;
- the recording or collection of your personal data is expressly required by law;
- the provision of said information is impossible;
- the communication of said information would require disproportionate effort.

## ***How do we protect your personal data ?***

The SFIL Group takes all necessary precautions to ensure the security and confidentiality of your personal data, in particular to prevent their loss, alteration, destruction or use by unauthorized third parties.

In addition, we ask our subcontractors to implement appropriate technical and organizational security measures with regard to these personal data.

## ***What are your commitments regarding the protection of personal data ?***

If you are a data controller and you give SFIL access to these personal data, you undertake to have informed the persons concerned by this processing and to comply with the provisions of the French Data Protection Act and the GDPR.

If you are a subcontractor of SFIL, you undertake to process the personal data entrusted to you in accordance with the provisions of the applicable regulations and the reference contract.

## ***Update***

We reserve the right to amend this privacy policy to take into account changes in the various applicable regulations and practices.

Any changes to our privacy policy will be directly published on the SFIL Group's websites.

Please consult our websites regularly to ensure that you have the latest version of this policy at all times.

Date of last update : January 2020