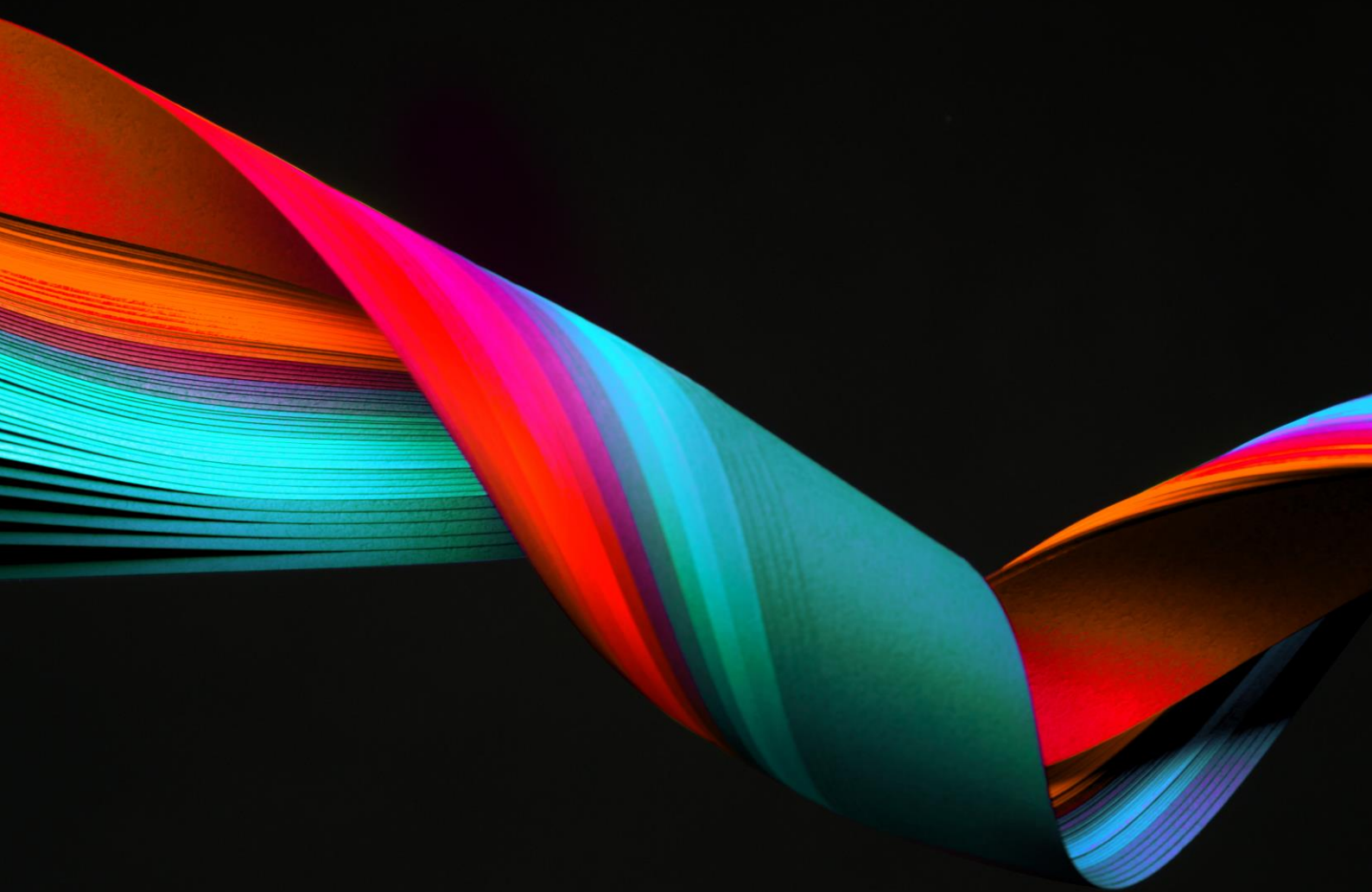


Asset Management

Privacy Notice

HSBC Global Asset Management (France)



HSBC

Opening up a world of opportunity

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HSBC takes your privacy seriously

Who is concerned by this Notice?

To meet the needs of its business activity, HSBC Global Asset Management (France) processes information relating to customers who are natural persons ("**Personal Data**"), including **our current, future and former professional customers ("you")**.

When we use the terms "**you**" or "**your**", this means any person in contact with us and, if you act on behalf of a company, trust, pension fund, etc., any person acting on behalf of that company, trust, pension fund, etc. (including authorised agents and signatories, representatives, directors, guarantors, legal representatives, partners, owners, beneficial owners, or any other person in contact with HSBC).

Similarly, when we use the terms "**HSBC**", "**we**" or "**our**", this includes HSBC Global Asset Management (France) and all HSBC entities in France and other HSBC Group companies. HSBC Group means all companies owned and/or controlled directly or indirectly by HSBC Holdings Plc. For the purposes of the personal data regulations, HSBC Global Asset Management (France) is the data controller on your personal data.

This Notice applies only to data relating to natural persons.

As part of our commitment to protecting your Personal Data, we would like to inform you transparently about:

- ◆ The data we collect, why and how we use it and store it;
- ◆ On what legal basis we process your personal data, and
- ◆ Your rights over the use of your Personal Data and how you can exercise them.

What does this Notice cover?

This Notice applies to all personal data processed by HSBC Global Asset Management (France) acting as data controllers in connection with products and services provided to professional and business customers.

It explains what data we may collect about you or your related persons, how we use this data, with whom we may share it and what measures we take to ensure its confidentiality and security.

This Notice covers all processing of personal data for which HSBC Global Asset Management (France) and its branches based in Italy, Spain and Sweden are responsible. If you are in contact with other HSBC entities, specific information will be provided to you if necessary.

Some of the links on our websites may redirect you to non-HSBC websites. They have their own privacy or data protection policies or Privacy Notices that may differ from ours: it is important that you take the time to read and understand these documents.

I. What types of data do we collect?

For potential customers with whom we have not yet contacted, we may collect (to the extent permitted by applicable law):

- ◆ Identification information (such as name, address, gender, nationality), contact details (such as telephone, email address) and family information (such as marital status);

- ◆ Information about your professional profile (such as positions held or professional networks) and information about the company and financial history

For former and current or prospective customers with whom we are in a pre-contractual phase, we collect (to the extent permitted by applicable law):

- ◆ Information relating to your identity and that of related persons such as your name, gender, date and place of birth, information on your proof of identity.
- ◆ Your contact details and those of related persons such as your postal address, email address, and telephone numbers.
- ◆ Information you provide to us by filling in forms or communicating with us, whether by telephone, in person, by email or any other means of communication online or by responding to questionnaires or satisfaction surveys.
- ◆ Information relating to our business relationship, transactions and instructions (including information relating to your accounts or assets held with other financial institutions);
- ◆ Information we use to identify you and authenticate you as your specimen signature, biometric information such as your voice and any other information we may receive from external sources to ensure your identity.
- ◆ Geographic location data (regarding the branches you visit or the ATMs/multifunction automated systems you use);
- ◆ Any information contained in the customer documentation or forms that you may complete as a prospect.
- ◆ Any information of a commercial nature, such as details on the products or services you receive.
- ◆ Data collected through “cookies”. We use “cookies” and similar technologies on our websites and in electronic messages to recognise you, remember your preferences and to show you content that may be of interest to you.
- ◆ Information relating to your risk rating, such as your credit risk rating or transactional behaviour.
- ◆ Data related to our internal investigations, including controls relating to due diligence prior to entering into a relationship or throughout our business relationship, controls relating to the application of the rules on sanctions, asset freezing measures, the fight against money laundering and the financing of terrorism and all information related to the controls carried out on our means of communication.
- ◆ Records of correspondence and communications between us, including telephone calls, emails, instant messaging, social networking communications or any other type of exchange and communication.
- ◆ Any information we need to meet our legal and regulatory obligations, including your financial transaction data and the information necessary to detect any suspicious or abnormal activity concerning you or the persons with whom you are in contact.
- ◆ Communication information (e.g., information contained in electronic messages, third party information, chat information, instant messages, media information, litigation, or minutes); and
- ◆ Information you have asked us to collect for you (information relating to your accounts or assets held with other financial institutions).

The data we collect or retain about you has been collected directly from you or others such as Related Persons, others may have been collected in compliance with applicable regulations, in the past or by other HSBC Group companies. We may also collect information about you when you interact with us, for example when you visit our websites or use our mobile apps, when you call us or visit one of our branches.

Some of this data may even come from publicly available sources (e.g., creditor, press and website registers) or from external companies (e.g., credit control agencies). We may also collect data by combining data sets (e.g., location data if you have a mobile app, if geolocation is enabled).

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To find out about our use of cookies and other tracking technologies in relation to HSBC websites, please also see our notice on the use of HSBC websites and cookies available here: [our cookie policy](#).

II. Why do we process your data?

- ◆ When entering into a business relationship with you, to verify your identity and assess your request (including the need for guarantees if you request a credit). To carry out legal checks and other regulatory compliance checks (for example, to comply with anti-money laundering regulations and to prevent fraud)
- ◆ To manage our business relationship with you - including (unless you refuse) to offer you our products, contracts and services or perform market research, provide you with products and services, we use your data to provide you with products and services and to process your transactions. This includes the conclusion, management, and performance of all contracts between HSBC and you.
- ◆ To engage in business development and/or protect and enhance the HSBC brand and take steps to improve our products and services and our use of technology, including testing and upgrading systems and processes, and conducting market research to understand how to improve our existing products and services or learn more about other products and services we may provide.
- ◆ To analyse the results of our marketing activities to measure their effectiveness and relevance of our campaigns.
- ◆ Compliance and risk management and/or crime prevention, detection, and investigation.

For example, in order to:

- Carry out legal and regulatory compliance checks as part of the relationship entry process, including compliance with anti-money laundering and fraud prevention regulations.
- Meet our regulatory and compliance obligations (e.g. financial sector, anti-money laundering and tax laws), including recording and monitoring communications, applying risk classification to ongoing business relationships, providing disclosures to tax authorities, financial services regulators and other regulatory, judicial and governmental bodies or in connection with proceedings and investigations or crime prevention;
- Receive and process complaints, requests or reports from you or third parties to dedicated units within HSBC or the HSBC Group.
- Respond to any ongoing or potential proceedings, requests, or investigations by a public or judicial authority and ensure the defence of our rights and compliance with our legal, regulatory or tax obligations.
- Prevent and detect crime, including fraud or criminal activity, abusive uses of our products and services, and the security of our IT systems, architecture, and networks.
- ◆ To manage the security and continuing our activities: we take steps to facilitate the continuation of our activities and to ensure the security of the data we keep in this respect, including physical security measures such as security measures to protect our staff and premises (including video surveillance and monitoring of incivilities found).
- ◆ To manage our internal operational needs for credit and risk management, development and planning of IT systems or products, insurance contracts, real estate investment trust units or audit.
- ◆ To enable a transfer, merger or assignment to a prospective purchaser, assignee, partner or seller and their advisors in connection with a potential transfer, merger or assignment of all or part of HSBC's business or assets, or any right or interest therein, or to acquire or enter into a merger with a business.

III. On what lawful grounds do we process your personal data?

- ◆ The performance of a contract entered into or a commitment under which you and/or we are bound.
- ◆ Compliance with a legal or regulatory obligation.
- ◆ The preservation of the public interest, such as the prevention or detection of fraud or a financial offence.
- ◆ Protecting our legitimate interests.
- ◆ With your consent to the extent required by law.

IV. How do we protect your personal data?

We implement technical and organisational measures to protect your data, including encryption, anonymisation and physical security procedures.

We require our staff and all third parties working for HSBC to adhere to strict standards of information security and protection, including contractual obligations to protect all data and to apply strict data transfer measures.

V. What are your rights and how can you exercise them?

You have the right to access your personal data:

- ◆ the right of information, when we use automated decision-making systems, for example when you wish to subscribe to a product or service, when you apply for credit or during checks to prevent the risk of fraud. You have the right to obtain specific information about how a decision is made, to request human intervention and to challenge any decision taken on this basis.
- ◆ the right to access and obtain information about the data we hold concerning you and the processing carried out.
- ◆ the right to modify or correct your data.
- ◆ under certain circumstances, the right to object to the processing of your personal data at any time (please note that we may continue to process your personal data if we have a legitimate reason to do so);
- ◆ the right to withdraw your consent at any time.

For example, you may withdraw your consent to the use of your data for commercial purposes at any time: consideration of your request and updating of our systems may take a few days during which you may receive commercial solicitations relating to marketing campaigns already launched. To request that we stop sending you marketing messages or use your data for marketing purposes, including to tailor our content or advertisements to your profile when you use one of our websites, please refer to the "More details about your data" section or when you interact with your customer advisor.

- ◆ under certain circumstances, the right to receive data in electronic form and/or to request us to transmit this information to a third party where technically possible (please note that this right is applicable only to data you have provided to us).
- ◆ under certain circumstances, the right to request that we delete your data (please note that legal or regulatory provisions or legitimate reasons may require us to retain your data).
- ◆ the right to ask us to limit the processing of your data, under certain circumstances (please note that we may continue to process your personal data if we have a legitimate reason to do so).

It may be the case that you have expressed your desire not to see your data used, but we are still obliged to use it for different reasons. In this case, we will continue to use your data if (i) the law requires us to do so, (ii) if we have to perform a contractual obligation, (iii) if it is in the public interest to do so or (iv) if we have a legitimate interest in doing so.

You can exercise your rights by contacting us at the following address:

- ◆ Either directly via your secure email.
- ◆ Or by writing to the address of the HSBC entity of which you are a customer, at the following addresses:

HSBC Global Asset Management (France)

Customer Service

Immeuble Coeur Défense, 110 Esplanade du Général de Gaulle - 92400 Courbevoie - France

- ◆ Either by contacting our personal data protection officer directly by email at the following address: dataprotection@hsbc.fr or by post:

HSBC Data Protection Officer in France

HSBC Continental Europe

38, avenue Kléber

75116 Paris

You can find more information about your rights on the CNIL website: <https://www.cnil.fr/>.

You also have the right to file a complaint with the Commission Nationale de l'Informatique et des Libertés (please [click here](#) or send a letter to the following address: CNIL - 3 Place de Fontenoy - TSA 80715 - 75334 Paris - Cedex 07).

VI. For how long do we keep your personal data?

We will retain your data for as long as you use our services and platforms (e.g., our website or mobile applications). We may also retain it even if you decide to no longer use our services or platforms, including to comply with applicable law, to defend our interests or assert our rights. We will not keep it for longer than is necessary and, when we no longer need it, will securely destroy it in accordance with our internal policy or make it completely anonymous.

Some data may be kept for an additional period of time for the management of complaints and/or disputes as well as to meet our legal or regulatory obligations or to respond to requests from authorised authorities.

Accounting data may be kept for a period of ten (10) years in accordance with the applicable regulations.

VII. With whom may we share your personal data and why?

We may share your personal data for the following reasons:

- ◆ To provide you with products or services you have requested, such as opening an account, responding to a subscription request or executing your instructions.
- ◆ To comply with a legal or regulatory obligation, for example to help detect tax fraud or evasion, to prevent financial crime.
- ◆ To respond to a request for regulatory reports, to manage a dispute or to act in defence of our rights.
- ◆ To act on the basis of a legitimate interest, for example to manage an operational risk or assess the relevance or effectiveness of our commercial campaigns of our products or services.
- ◆ To act in accordance with your previously obtained consent.

Your data may be transferred to, hosted in or accessed from a country/territory outside the European Union where the data protection legislation is not equivalent to that of France or the European Union. In the event your data is transferred to a country/territory outside the European Union, we will always ensure that it is protected. To this end, we subject all transfers of your data to appropriate and relevant safeguards (such as encryption and contractual commitments, including the agreement to EU-approved standard contractual clauses).

You can find out more about how we transfer your personal data outside the European Union by contacting us directly: see the section “More details about your data”.

We may transfer and disclose your data to:

- ◆ Other HSBC Group companies.
- ◆ Contractors, agents or service providers who work for us or other HSBC Group companies (including their employees, directors and officers);
- ◆ Joint account holders, persons who carry out your banking transactions for you, your beneficiaries, intermediary banks, correspondents and custodians, clearing houses, any market participant or counterparty, stock exchange or any company in which you hold financial instruments through us (e.g., shares or bonds);
- ◆ Other financial institutions, tax authorities, professional associations, solvency control agencies, and debt collection agencies.
- ◆ Fund managers who provide you with asset management services and all distributor intermediaries and brokers that connect you with us or deal with us on your behalf.
- ◆ Any person, company or other party who has an interest in or assumes a risk in relation to the products or services we provide to you.
- ◆ Any (new or potential) HSBC Group company (for example, if we restructure, acquire or merge with other companies) or any company that acquires all or part of a company in the HSBC Group.
- ◆ Statutory auditors, regulators, TRACFIN unit, Banque de France (in the event of registration in the Central Cheques File - FCC - or in the National Personal Credit Repayment Incident File -FICP), Caisse des Dépôts et Consignations, independent administrative authorities or dispute resolution bodies and in order to comply with their requests.
- ◆ Companies that carry out commercial or market research for us.
- ◆ Any other person involved in the event of a transaction dispute.
- ◆ The French government, the judicial or administrative authorities/jurisdictions.

Learn more about your data.

If you would like to know more about the provisions of this Privacy Notice or contact our Data Protection Officer, you can write to us at the following addresses:

HSBC Data Protection Officer in France

HSBC Continental Europe

38, avenue Kléber

75116 Paris

Or send an email at this address: dataprotection@hsbc.fr.

Appendix 1: Retention periods

In the table below you will find a description of the retention periods for your personal data and the legal grounds for this retention.

Purposes of the processing of personal data (See section II)	Legal basis for implementation	Maximum retention periods (Unless otherwise indicated)
On-boarding and Business Relationship Management i.e. Provision of products and services, processing of your operations and execution of your instructions	Legitimate interest Legal obligation Contractual performance	10 years from the end of any contractual relationship or the processing of an instruction/transaction. Such retention may be increased if required by an authority or the defence of a right or interest
Compliance with laws and regulations	Legitimate interest Legal obligation Public interest	7 years maximum for certain phone calls 10 years from the end of any contractual relationship. Such retention may be increased if required by an authority or the defence of a right or interest. 30 years for data related to the research of deceased persons or insurance products
Prevention and detection of offences	Legitimate interest Legal obligation Public interest	5 years or 20 years maximum, depending on the case, from the discovery of the offence (fight against money laundering, fraud, judicial or administrative requests)
Security and business continuity	Legitimate interest Legal obligation	3 months for video surveillance images 10 years for incivilities from the end of any contractual relationship. Such retention may be increased if required by an authority or the defence of a right or interest.
Risk Management and Compliance	Legitimate interest Legal obligation	10 years from the end of any contractual relationship, dispute or end of a legal or regulatory obligation
Improvement of products and services	Legitimate interest	3 years from collection
To engage in business development and/or protect and enhance the HSBC brand	Legitimate interest Consent	Duration related to the consent given by the data subject. 3 years for non-customer individuals Cookies 13 months from collection
Analyse the results of our marketing activities	Legitimate interest	Throughout the term of the contractual relationship
Manage our internal operational needs for credit and risk management, Protection of our rights	Legitimate interest	Duration related to any litigation or administrative or judicial proceedings
To enable a transfer, merger or assignment	Legitimate interest	Duration related to the transfer price

