

Data Statement for the Saint Vincent Holdings group of companies

This policy applies to all companies within the Saint Vincent Holdings group.

This Data Protection Notice provides you with transparent and detailed information relating to the protection of your personal data by the Saint Vincent Holdings group of companies.

We are responsible, as a controller, for collecting and processing your personal data, in relation to our activities. The purpose of this statement is to let you know which personal data we collect about you, the reasons why we use and share such data, how long we keep it, what your rights are and how you can exercise them.

Further information may be provided where necessary when you apply for a specific product or service.

1. Which personal data do we use about you?

We collect and use your personal data, meaning any information that identifies or allows to identify you, to the extent necessary in the framework of our activities and to achieve a high standard of personalised products and services.

Depending among other things on the type of products or services we provide to you, we collect various types of personal data about you, including

- identification information (e.g., full name, identity (e.g., ID card, passport information, etc.), nationality, place and date of birth, gender, photograph);
- contact information private or professional (e.g., postal and e-mail address, phone number).
- family situation and family life (e.g., marital status, number and age of children, number of persons composing the household, etc.).
- economic, financial and tax information (e.g., tax ID, tax status, income and other revenues, value of your assets);
- education and employment information (e.g., level of education, employment, employer's name, remuneration);
- banking and financial information (e.g., bank account details, product and services owned and used, credit card number, money transfers, assets, declared investor profile, credit history, payment incident);
- transaction data (including full beneficiary names, address and details including communications on bank transfers of the underlying transaction).

- data relating to your habits and preferences (data which relate to your use of our products and services);
- data from your interactions with us, our depots (contact reports), our internet websites, our apps, our social media pages, (connection and tracking data such as cookies, connection to online services, IP address) meeting, call, chat, email, interview, phone conversation.
- information about your device (IP address, technical specifications and uniquely identifying data);

We may collect the following sensitive data only upon obtaining your explicit prior consent:

- **health data:** for instance, for the conclusion and the performance of some insurance contracts; this data is processed on a strict need-to-know basis. We never ask for any other sensitive personal data such as data related to your racial or ethnic origins, political opinions, religious or philosophical beliefs, trade union membership, genetic data or data concerning your sex life or sexual orientation, unless it is required through a legal obligation.

2. Who is concerned by this notice and from whom do we collect personal data?

We collect data directly from you as a customer or prospect (when you contact us, visit us, our website or our apps, use our products and services, participate to a survey or an event with us) but also regarding other individuals indirectly. Thus, we collect information about individuals whereas they have no direct relationship with us but are related to you, customer or prospect, such as for instance your:

- Family members.
- Successors and right holders.
- Legal representatives (power of attorney).
- Beneficiaries of your payment transactions.
- Landlords.
- Debtors (e.g., in case of bankruptcy);
- Company shareholders.

When you provide us with third party personal data like the examples listed above, please remember to inform the individuals providing the data that we process their personal data and direct them our statement. We will also provide them the information when possible (for instance if we don't have their contact details, we will not be able to contact them).

In order to verify or enrich our database, we may also obtain personal data from:

- our customers (corporate or individuals);
- our business partners.
- payment initiation service providers and aggregators (account information service providers);
- third parties such as credit reference agencies and fraud prevention agencies or data brokers which are responsible for making sure that they gather the relevant information lawfully.
- websites/social media pages of legal entities or professional customers containing information made public by you (e.g. your own website or social media);
- public information such as information from the press

3. Why and on which basis do we use your personal data?

a) To comply with our various legal and regulatory obligations

We use your personal data to comply with various legal and regulatory obligations, in particular banking and financial regulations, to:

- monitor transactions to identify those which deviate from the normal routine/patterns
- manage, prevent and detect fraud.
- monitor and report risks (financial, credit, legal, compliance or reputational risks, default risks etc.) that we could incur.
- record, when necessary, phone calls, chats, email, etc. notwithstanding other usages described hereafter.
- prevent and detect money laundering and financing of terrorism and comply with regulation relating to sanctions and embargoes through our Know Your Customer process (to identify you, verify your identity, screen your details against sanctions lists and determine your profile);
- detect and manage suspicious orders and transactions.
- contribute to the fight against tax fraud and fulfil tax control and notification obligations.
- record transactions for accounting purpose.
- prevent, detect and report risks related to Corporate Social Responsibilities and sustainable development.
- detect and prevent bribery.
- exchange and report different operations, transactions or orders or reply to an official request from a duly authorised local or foreign financial, tax, administrative, criminal or judicial authorities, arbitrators or mediators, law enforcement, state agencies or public bodies.

b) To perform a contract with you or to take steps at your request before entering into a contract

We use your personal data to enter into and perform our contracts as well as to

manage our relationship with you, including to:

- define your credit risk score and your reimbursement capacity.
- evaluate (e.g., based on your credit risk score) if we can offer you a product or service and under which conditions (including price);
- assist you in particular by answering your requests.
- provide you or our corporate clients with products or services.
- manage outstanding debts (identification and exclusion of customers with outstanding debts).

c) To fulfil our legitimate interest

We use your personal data, including your transaction data, for:

- Risk management purpose:
- proof of transactions including electronic evidence.
- management, prevention and detection of fraud.
- debt collection.
- assertion of legal claims and defence in case of legal disputes.
- development of individual statistical models in order to help defining your creditworthiness.
- consultation and exchange of data with credit agencies to identify credit risks.
- Personalisation of our offering to you to:
- improve the quality of our products or services.
- advertise products or services that match with your situation and profile.
- deduct your preferences and needs to propose you a personalised commercial offer.

This personalisation can be achieved by:

- segmenting our prospects and clients.
- analysing your habits and preferences in our various communications channels
- matching the products or services that you already hold or use with other data we hold about you
- considering common traits or behaviours among current customers and seeks other individuals who share those same characteristics for targeting purposes.
- Research & Development consisting of establishing statistics and models to:
- optimise and automate our operational processes.
- offer products and services that will best meet your needs.
- adapt products and services distribution, content and pricing in accordance with your profile.
- create new offers.
- prevent potential security failures, improve customer authentication and access rights management.
- enhance security management.
- enhance risk and compliance management

- enhance the management, prevention and detection of fraud.
- Security reasons and IT systems performance, including:
 - manage IT, including infrastructure management (e.g.: shared platforms), business continuity and security (e.g., internet user authentication);
 - prevent personal injury and damages to people and goods (for instance video protection).
- More generally:
 - inform you about our products and services.
 - perform client satisfaction and opinion surveys.
 - improve process efficiency (train our staff by recording phone calls in our offices and improve our calling scenario);
 - implement process automation of our processes such as application testing, automatic filling complaints handling, etc.

In any case, our legitimate interest remains proportionate, and we verify according to a balancing test that your interests or fundamental rights are preserved. Should you wish to obtain more information please contact us using the contact details provided in the “How to contact us” below.

d) To respect your choice if we requested your consent for a specific processing. For certain personal data processing, we would give you specific information and invite you to consent such processing. Note that you may request to revoke your consent at any time.

4. Who do we share your personal data with?

a) Sharing of information

We share personal data through the company for commercial and efficiency needs such as:

- based on our legal and regulatory obligations
- sharing of the data collected for AML/FT, sanctions, embargoes and for KYC; and
- risk management including credit and operational risks (risk rating /credit scoring/etc.)
- based on our legitimate interest:
 - prevention, detection and fight against fraud.
 - R&D activities in particular for compliance, risks and communication and marketing purposes.
 - Personalisation of products and services’ contents and pricing for the client.

b) Disclosing information outside Saint Vincent Holdings group

In order to fulfil some of the purposes described in this notice, we may disclose from time to time your personal data to:

- service providers which perform services on our behalf (e.g., IT services, logistics, printing services, telecommunication, debt collection, advisory and consulting and

distribution and marketing).

- banking and commercial partners, independent agents, intermediaries or brokers, financial institutions, if such transmission is required to allow us to provide you with the services and products or execute our contractual obligations or transaction.
- credit reference agencies.
- local or foreign financial, tax, administrative, criminal or judicial authorities, arbitrators or mediators, law enforcement, state agencies or public bodies, we are required to disclose to pursuant to:
 - their request.
 - defending or responding to a matter, action or proceeding; and
 - complying with regulation or guidance from authority applying to us.
 - service payment provider(s) (information on your payment account(s)) based on the authorisation granted by you to this third party; and
 - certain regulated professionals such as lawyers, notaries, rating agencies or auditors when needed under specific circumstances (litigation, audit, etc.) or our insurers.

c) Sharing aggregated or anonymised information

We share aggregated or anonymised information within and outside of Saint Vincent Holdings group with partners such as research groups, universities or advertisers.

You won't be able to be identified from this information.

Your data may be aggregated into anonymised statistics that may be offered to professional clients to assist them in developing their business. In this case your personal data will never be disclosed and those receiving these anonymised statistics will be unable to identify you.

5. How long do we keep your personal data for?

We will retain your personal data over the period required to comply with applicable laws and regulations or another period with regard to our operational requirements, such as proper account maintenance, facilitating client relationship management, and responding to legal claims or regulatory requests. For instance, most of client's information is kept for the duration of the contractual relationship and 7 years after the end of the contractual relationship. For prospects, information is kept 1 year from the date the data was collected.

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

In accordance with applicable regulations and where applicable, you have the following rights:

- To access: you can obtain information relating to the processing of your personal data, and a copy of such personal data.
- To rectify: where you consider that your personal data are inaccurate or

incomplete, you can request that such personal data be modified accordingly.

- To erase: you can require the deletion of your personal data, to the extent permitted by law.
- To restrict: you can request the restriction of the processing of your personal data.
- To object: you can object to the processing of your personal data, on grounds relating to your particular situation. You have the absolute right to object to the processing of your personal data for direct marketing purposes, which includes profiling related to such direct marketing.
- To withdraw your consent: where you have given your consent for the processing of your personal data, you have the right to withdraw your consent at any time.
- To data portability: where legally applicable, you have the right to have the personal data you have provided to us be returned to you or, where technically feasible, transferred to a third party.

If you wish to exercise the rights listed above, please send a letter to the Data Protection Manager at Saint Vincent Holdings, School Lane, Norwich, NR7 8TL. Please include a scan/copy of your proof of identity for identification purpose when required.

In accordance with applicable regulation, in addition to your rights above, you are also entitled to lodge a complaint with the competent supervisory authority.

7. How to contact us?

If you have any questions relating to our use of your personal data under this Data Protection Notice, please contact our Data Protection Manager, Saint Vincent Holdings, School Lane, Norwich, NR7 8TL at who will handle your query.

This policy was approved and endorsed by the Saint Vincent Holdings Limited directors in October 2021.

Last updated October 2021