

Group Sfil

PRIVACY POLICY

PERSONAL DATA



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2 Introduction

Sfil Group takes utmost care to personal data protection collected for necessary processing for its activities.

With respect to the **General Data Protection Regulations ("GDPR")** and the legislation in force, Sfil Group is committed to ensure the protection, confidentiality, security as well as the respect of privacy to all personal data collected for necessary processing for its activities. To comply with these regulations, this Privacy Policy has to be considered as an integral part of the general terms and conditions of the Sfil and Caisse Française de Financement Local web sites.

The Privacy Policy aims to inform Sfil Group external persons with whom we interact, including visitors to our web sites ("**Web sites**"), our prospects, our borrowers, our recruitment applicants, our clients companies employees, our investors, our suppliers and any other users of our services (jointly, "**you**").

As part of our commitment to protect your personal data in a transparent way, we would like to inform you about:

- way and purposes for which Sfil Group process and store your personal data;
- the legal ground which legitimate the processing of your personal data
- your rights and our obligations related to such data processing.

This privacy policy available on our web site is to be jointly read with other legal terms and conditions communicated or made available by Sfil Group.

3 Who is responsible for the processing ?

The personal data controller of your personal data is Sfil , a public limited company with a board of directors approved as a credit institution by the Autorité de contrôle prudentiel et de resolution (“ACPR”), whose registered address is located at 112-114, avenue Emile Zola - 75015 Paris.

Sfil Group has a data protection officer.

To exercise your rights or for any request related to this Privacy Policy, you may contact Sfil Group at the

following e-mail address dpo@Sfil.fr or by writing to the following address :

DPO Sfil
112-114, avenue Emile Zola
75015 Paris.

4 What personal data do we process and for what purposes?

Sfil group collects and processes several categories of personal data among which:

- Identities (surname, first name, date and place of birth, nationality, photo, ID number...);
- professional or personal contact details (e-mail and postal addresses, professional or personal telephone numbers...);
- professional information related to the position you hold (job title, position, employer...);
- information collected as part of a recruitment process;
- data from telephone recordings, video surveillance (e.g. security surveillance of Sfil Group’s premises);
- any other personal data that may be communicated to Sfil.

Data may also be collected directly from you during business contact with Sfil Group (physical or by phone call in accordance with applicable rules in force within the group), When you visit Sfil Group’s Web sites by filling in the contact form, when you send an e-mail to Sfil Group, or when you apply for a job offer. Personal data can also be indirectly collected through third part (professional social network, publications, providers, suppliers, internet websites, public database available,...)

With respect to regulations in force, in general, we use your personal data in order to:

- comply with our legal and regulatory obligations, including banking and financial regulations, the anti-money laundering regulations and the financing of terrorism, and the obligation to record and retain certain data;
- contract with you, contact you in order to sign a contract, process invitations to tender issued by Sfil Group – in that respect, data on potential suppliers and service providers may be collected;
- to ensure relations with Sfil Group’s investors for whom contact data may be collected via Sfil Group’s Web sites or by Sfil employees and to whom Sfil Group may send financial communications or invitations to financial communication events;
- to manage an ongoing contract;
- to pursue Sfil Group legitimate interests, i.e. to manage our risks, to ensure the defence of our rights by keeping evidence of transactions;
- to manage our recruitment;
- responding to your inquiries, whether you are investors, journalists;
- When Sfil Group has collected your consent with the contact form on one of our Sfil Group’s Web sites. By subscribing to our alerts, you consent to receive information related to 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.

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

5 Who are the addressee of your data?

Personal data collected is to be used by Sfil Group as data controller.

We make sure that only authorized persons within Sfil Group could access these data.

In order to accomplish the above-mentioned purposes, we may need to communicate certain personal data to:

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

Your personal data may be reconciled, pooled or shared between all entities of Sfil Group or its shareholders. It may be communicated to these entities for the purposes set out in this Privacy Policy. These operations are processed in an appropriate manner in order to ensure the adequate protection and respect of your rights.

6 How long does we store your personal data?

Sfil is committed to ensuring that the retention period 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 so-called data: Sfil Group must keep the data for the period necessary for the fulfilment of the purpose related to the treatment; and
- legal obligations: laws or regulations may set a minimum length of time for which we must keep personal data.

For instance, regarding anti-money laundering and terrorist financing, personal data is retained for five (5) years up from the end of the business relationship with Sfil Group.

7 What cookies does Sfil Group collect?

Sfil Group may process your personal data using "cookie" technology. Indeed, when you visit one of Sfil Group Web sites, it collects a "cookie" which is a small file stored on your device when you visit a website. The cookie makes it possible to record information about your device, your browser and, in some cases, your preferences and browsing habits.

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

Our cookie policy can be consulted on each of our web sites, in the legal notice section.

8 Your rights

8.1 Your right to information

This Privacy Policy informs you of the purposes, legal framework, interests, and recipients or categories of recipients with whom your personal data is shared.

8.2 Your right to access and to rectification

You have the right to access to your personal data and to rectify. You can exercise such right by proving your identity at the following address:

dpo@Sfil.fr.

In this respect, you can obtain information about the processing of your data. At your request, we Sfil Group can rectify, complete if necessary, your personal data if they are proved to be inaccurate or incomplete.

8.3 Your right to erasure

You have the right to obtain from the controller the erasure of your personal data concerning 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 withdraw the consent previously given;
- you object to the processing of your personal data considering that there is no legal grounds for the processing,
- the processing of personal data does not comply with legislation and regulation in force ;

Nevertheless, your right shall not apply to the extent that processing is necessary with regard to legislation and regulation in particular for the establishment, exercise or defence of legal claims.

8.4 Your right to restriction of processing

You may request the restriction of processing of your personal data in cases provided for by laws and regulations.

8.5 Your right to object to the processing of your personal 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 for the establishment, exercise or defence of legal rights.

8.6 Your right to data portability

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

Data concerned by this right are :

- exclusively your personal data, which excludes anonymized personal data or data that does not concern you;
- Data based on consent as well as the personal data mentioned above;
- personal data concerned shall not infringe the rights and freedoms of third parties, such as data under protection of business secrecy.

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 concern neither other derivate data nor personal data generated by Sfil.

8.7 Your right to withdraw your consent

When our data processing is based on your consent, you may withdraw it at any time. We will cease processing your personal data without reconsideration for the previous operations for which you have consented.

8.8 Your right to an effective judicial remedy

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

CNIL

3 place de Fontenay
TSA 80715
75334 Paris Cedex 07
Tél : 01 53 73 22 22

8.9 How to exercise your rights

All the rights listed above can be exercised at the following email address:

dpo@Sfil.fr

or at the following mailing address:

DPO Sfil
112-114, avenue Emile Zola
75015 Paris

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

- you already have this information;
- recorded or data collection is expressly required by law;
- communication of information is impossible;
- Communication of information would require disproportionate efforts.

9 How do we protect your personal data?

All useful precautions are taken within the Sfil Group to ensure the security and confidentiality of your personal data, in particular to prevent their loss, alteration, destruction or use by unauthorised third parties.

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

10 What are your commitments regarding the protection of Personal Data?

If you are a processor and you give Sfil communication of this personal data, you undertake to have informed the persons concerned by this processing and to respect the provisions of the French Data Protection Act and the RGPD.

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 provisions of the reference contract.

11 Update

We reserve us the right to amend this privacy policy to integrate regulatory and practices evolutions in force.

Any changes to our Privacy Policy will be directly published on Web sites of Sfil Group.

In order to ensure that you have the latest version at any times, we invite you to consult our Web sites regularly.

Date of last update : October 2023