
GDPR information notice

"THIS DOCUMENT IS A FREE NON-BINDING TRANSLATION OF THE FRENCH LANGUAGE "NOTICE D'INFORMATION RGPD": [Données personnelles / AFL](#). IN THE EVENT OF ANY AMBIGUITY OR CONFLICT BETWEEN CORRESPONDING STATEMENTS OR OTHER ITEMS CONTAINED IN NOTICE, THE RELEVANT STATEMENTS OR ITEMS OF THE FRENCH LANGUAGE " NOTICE D'INFORMATION RGPD " SHALL PREVAIL. THIS TRANSLATION INTO ENGLISH HAS BEEN PREPARED EXCLUSIVELY FOR INFORMATION PURPOSES."



The entities of the Agence France Locale Group (Agence France Locale and Société Territoriale) - hereinafter referred to as "AFL" - ensure compliance with the General Data Protection Regulation (GDPR) and the French Data Protection Act (*Loi Informatique et Libertés*).

The purpose of this Notice is to provide information on how AFL, in its capacity as data controller, collects, retains and protects your personal data.

It details how your data is obtained, the purposes for which it is processed, and with whom it may be shared. It also details the measures implemented to ensure its confidentiality and security, and reminds you of your rights and how to exercise them.

Who is this notice for?

This information notice is intended for you as an individual concerned by the processing of personal data carried out by AFL. It concerns you in particular if you are:

- An AFL customer or prospect;
- A service provider, supplier or contact of AFL;
- A counterparty to a contract with AFL;
- A press contact of AFL;
- A member of the governing bodies of the AFL Group;
- An individual with a contractual relationship with AFL: employees, work-study students, interns, etc.

Agence France Locale's commitment

AFL is committed to ensuring that the personal data processing it undertakes complies with the General Data Protection Regulation (GDPR) and the French Data Protection Act (*Loi Informatique et Libertés*).

It guarantees the protection, confidentiality and security of the personal data entrusted to it and aims for full transparency regarding the processing and use of personal data.

AFL has therefore updated its principles for the use of personal data. This document informs you of our commitments regarding the protection of your personal data and enables you to better understand which data is collected and how it is used, in accordance with your rights.

1. Methods of collecting and accessing your personal data

Who collects your data

AFL collects and processes the personal data necessary for its activities. In this capacity, it acts as the Data Controller.

How AFL obtains your personal data

During your relationship with AFL, we collect and process personal data about you. This data may vary depending on the nature of the relationship between you and AFL.

Data you provide to AFL

At the beginning of the relationship between AFL and an individual, we collect the data necessary for the relationship directly from that individual.

Data from third parties or other services

This data may come from third-party suppliers, partners of AFL or other individuals involved in our relationship (such as your representatives, designated contacts, agents, beneficial owners, legal representatives, etc.).

Publicly available data

We may use publicly available personal information or data when permitted by law and in compliance with applicable regulations. This data consists of personal information or data produced or received by an administrative authority in the course of its public service mission, published by an administrative authority or communicable to any person who requests it.

Who has access to your data

AFL takes the necessary technical and organisational measures to ensure that access to your data is strictly limited to the purpose for which it was collected. Every effort is made to ensure that no unauthorised third parties gain access to your data.

As a credit institution, AFL is held to the highest standards of data protection, and we can only share your data under strict conditions or with your consent. This principle applies to all parties involved, whether they are our employees, our service providers, our partners or their own employees.

AFL may share some of your data in the following cases:

- With certain regulated professions, such as lawyers, bailiffs, notaries or audit firms;
- With regulatory authorities;
- With our subcontractors and service providers for the sole purpose of providing services on behalf of AFL.

We are also required to share your data when professional secrecy is lifted by law, in particular with regard to the tax and customs authorities, the *Banque de France*, the *Autorité de contrôle prudentiel et de résolution* (French Prudential Supervision and Resolution Authority) and parliamentary committees of inquiry. Professional secrecy cannot be invoked against judicial authorities acting in the context of criminal proceedings, or in civil proceedings when a specific legal provision expressly permits it.

2. Why we process your personal data

AFL may collect personal data for three main purposes:

To perform a contract that you have entered into or wish to enter into

If you are an **employee** or collaborator of AFL, we use data for the purposes of human resources process management, physical access management and expense report management.

If you are a **prospect** or potential customer of AFL, we collect personal data as part of pre-contractual activities in order to get to know you, advise you and meet your needs in the best way possible (for example, with a view to providing advice or a financing proposal).

If you are a customer of AFL, we also use the personal data necessary for the performance of a contract, in order to manage financing services.

If you are a service provider, supplier or partner of AFL, we use personal data to ensure the proper performance of the contractual relationship, etc.

To meet our legal and regulatory obligations

We collect personal data to comply with our legal and regulatory obligations. For example, we have obligations related to customer identification (KYC), tax requirements, anti-money laundering and combating the financing of terrorism (AML/CFT), and reporting obligations to supervisory, control and resolution authorities.

To pursue AFL's legitimate interests

AFL also reserves the right to use personal data in certain specific situations, for example to defend a right or legitimate interest, in particular to meet development objectives, improve our products and services, and carry out our communication activities.

3. The limited retention period for your data

As all personal data has its own specific lifespan, AFL only uses and retains personal data for the period strictly necessary for the purpose for which it was collected, and in accordance with regulatory requirements.

Category	Retention period *	Starting point
Prospecting – Initial contact with a local authority (without a previously established contractual relationship)	3 years	From the collection of the data or the contact with the local authority
Acquisition of a stake in a local authority, relationship with a shareholder	5 years	From the end of the relationship
Market – Initial contact with a market partner, verification of the identity of market contacts, compilation of an external rating file and authentication of market contacts at Bloomberg	5 years	From the end of the relationship
Accounting - Accounting documents (suppliers, expense reports, travel, business reimbursements, etc.)	10 years	From the end of the relevant financial year
Fraud prevention Prevention and detection of offences and crimes. Anti-money laundering and combating the financing of terrorism – customer due diligence procedures	5 years	From the date of the offence. When legal proceedings are initiated, the data is retained until the end of those proceedings and until the expiry of the applicable statutory limitation periods.
IS – Management of IT authorisations, the intranet site, badges, telephony, email access (if the emergency and business continuity plan is activated)	5 years	From the end of the relationship with the employee or collaborator
HR – Access to communication and access tools, personnel management, general resources.	5 years	From the end of the relationship
HR – Information collected during recruitment	2 years	From the last contact with the candidate
Social relations: employee elections	8 years/60 days	The minutes are retained for eight years, corresponding to two electoral cycles. This retention period is reduced to 60 days for data relating to the organisation of the election
Legal - bond issues, insider lists ¹ , director appointments, management reports and other financial communication documents, shareholder directory	5 years	From the end of the execution of the transaction or the end of the relationship with a shareholder, executive or director
Compliance – Outsourced internal audits	10 years	From the date of approval of the mission report
Prevention and detection of operational/IS incidents and compliance breaches*	5 years	Database cleaning every 5 years
Telephone recordings/management calls	6 months	From the recording
Telephone recordings/audit trails in accordance with current regulations	5 years	

* These retention periods may be extended in specific situations, when required by regulation, or for the defence of a right or interest.

- When personal data is collected for multiple purposes, it is retained until the longest retention or archiving period has expired.

¹ In accordance with the European Market Abuse regulation

4. How we ensure the security and confidentiality of your data

AFL protects your personal data using technical and administrative security measures to reduce the risk of loss, misuse, unauthorised access and disclosure. These protection measures include, in particular, firewalls and access controls. Furthermore, when AFL must outsource certain services, it carefully selects its subcontractors and service providers, ensuring they implement a level of personal data protection equivalent to that of AFL.

Where is your data stored?

Your personal data is stored in our information systems located in AFL's premises in Lyon or Paris, or in the storage facilities of our subcontractors or service providers.

In this context, we select subcontractors and service providers who meet our quality and security criteria. They must provide sufficient guarantees, particularly in terms of knowledge, reliability and resources, for the implementation of technical and organisational measures, including in the area of data processing security.

As such, we impose confidentiality rules on our subcontractors and service providers that are at least equivalent to AFL's own.

The vast majority of our service providers store data in France or in data centres within the European Union. However, when service providers and, where applicable, their subcontractors, are located in third countries, AFL takes the necessary measures to ensure that subcontractors and service providers offer adequate security and protection measures.

5. Respect for your rights

Objective

AFL respects your right to access your personal data, to rectify it, or to request its modification or deletion. AFL also takes all necessary measures to ensure that the personal data collected is accurate and up-to-date.

As such, you can*:

- **Access** your personal data;
- Request the **rectification**, update or **deletion** of your personal data;
- **Object to** or **restrict** the processing of your personal data for reasons relating to your particular situation;
- **Receive** the personal data concerning you that you have provided to us and request the portability of this data to a third party;
- Where processing is based on your consent, **withdraw this consent** at any time;
- File a **complaint** with: CNIL - 3 place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07, France - www.cnil.fr

* Some of these rights do not apply in certain specific situations, when required by regulation, or for the defence of a right or interest. For example, the right to object cannot be exercised for processing necessary for compliance with a legal obligation to which the data controller is subject.

How to exercise your rights

For further information, you can contact the AFL Data Protection Officer (DPO). Your rights can be exercised directly with the AFL DPO.

To exercise your rights by post, you must provide proof of your identity, clearly stating your full name and the address to which you would like the reply to be sent, and signing your request. We recommend attaching a copy of your identity document to facilitate the processing of your request. The exercise of your rights of access, rectification, objection, erasure, restriction or portability of personal data is free of charge. In accordance with the right of access, we will provide you with a copy of the personal data being processed.

Your contact

The contact for exercising your rights is the Data Protection Officer, who can be reached at the following address: dpo@agence-france-locale.fr.