



PROCEDURE

2026

Protection of personal data

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PURPOSE

Creation

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STAFF CONCERNED

All internal and external staff

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I Purpose of the procedure

The purpose of this procedure is to set out the technical and organisational measures put in place by Fintis to ensure a high and lasting level of protection for the data processed, to document its compliance with the French Data Protection Act and with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the “GDPR Regulation” or “Regulation (EU) 2016/679”), and to inform the natural persons concerned of the way in which Fintis processes personal data and of the means available to them to control that processing.

This procedure is the subject of training provided to staff.

II Definition of personal data

Within the meaning of Regulation (EU) 2016/679 of 27 April 2016 (see in particular Article 4), personal data means “any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

Data Subject: an identified or identifiable natural person to whom the personal data processed by Fintis relates.

III

Categories of personal data collected and processed

Fintis may collect and process the following categories of personal data:

- **Civil status and identification data:** surname, first name(s), gender, date of birth, copies of identity documents, specimen signatures, etc.;
- **Contact details:** postal addresses, email addresses, telephone numbers, etc.
- **Data relating to your personal situation:** family situation, matrimonial regime, number and age of children, etc.;
- **Data relating to your professional situation:** position held, name of employer, place of work, etc.;
- **Economic and financial information:** income, financial and tax situation, etc.;
- **Banking operations and transaction data:** nature of the transactions, date, card payments, transfers, direct debits, amount, etc.;
- **Data from correspondence and communications with Fintis:** meetings, telephone calls, electronic messages, instant messaging, communications on social media or any other type of communication;
- **Data relating to the products and services taken out:** type of product, method of payment, maturity, amount, etc.;

This personal data is collected either directly from you or, where necessary, indirectly from public sources relevant to the various purposes described in the following section.

IV

Purposes of the collection of personal data

Personal data is collected fairly and lawfully for specified, explicit and legitimate purposes and is not further processed in a manner incompatible with those purposes.

It is accurate, complete and, where necessary, kept up to date in the light of the purposes for which it is collected.

It is kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which it is collected and processed.

The data is collected and processed for the needs of Fintis's business, and in particular in connection with Fintis's business relationships and the provision of services.

In addition, Fintis processes personal data for the following purposes: to meet the regulatory and professional requirements relating to Fintis's activities; to identify needs in order to provide better tailored services; to enable the management of Fintis's marketing activities; and any other purpose connected with Fintis's business.

V

Data retention period

Personal Data collected in connection with the Services is retained for the entire duration of the contractual relationship with Fintis. The data may be retained for a maximum period of three (3) years from the end of the business relationship or, for prospective clients, from the last contact.

VI

Processing of personal data

1 Purpose limitation

Before any processing of personal data, Fintis must ensure that the processing is based on a specified, explicit and legitimate purpose for which the personal data is processed.

2 Compliance with legal validity, fairness and transparency

When processing personal data, Fintis must ensure that the processing is based on a legal basis.

Where the processing arises from the features of the contractual relationship, it is regarded as lawful. Where the processing does not arise from the performance of a contract or an undertaking, Fintis must demonstrate that the processing meets a legitimate interest. The purpose of the processing must represent a legitimate interest for Fintis in the light of its principal business and must not infringe the privacy of the data subjects.

Where the processing does not meet the conditions set out above, Fintis may seek the prior consent of the data subjects on the following cumulative conditions:

- Consent must constitute a specific, informed and unambiguous indication of the data subject's agreement to the processing of the personal data;
- Consent must be freely given.

3 Reducing collection and processing to the strict minimum

The collection and processing of personal data must be strictly necessary for the purpose initially determined.

4 Keeping data up to date

Throughout the data lifecycle, Fintis must ensure the accuracy and the updating of that data.

The Data Subject may exercise their right of rectification in order to update their personal data.

5 Data security

Fintis puts in place security measures designed to protect its IT environment against unauthorised or unlawful processing and against accidental loss, destruction or damage.

VII**Processing of sensitive data**

Within the meaning of Regulation (EU) 2016/679 (see in particular recital 51), sensitive data means all information which is by its nature particularly sensitive in relation to fundamental rights and freedoms and merits specific protection, as the context of its processing could create significant risks to those rights and freedoms. Such personal data should include personal data revealing racial or ethnic origin. Such personal data should not be processed unless processing is allowed in specific cases set out in the GDPR Regulation.

Fintis processes sensitive personal data in limited cases.

In those limited cases, processing is possible only under the following alternative conditions:

- The data subject has given consent;
- The data subject is not in a position to give consent but the processing is necessary to protect the vital interests of the data subject or of another person;
- The processing is required under applicable law;
- The data subject has manifestly made the sensitive data public;
- The processing is essential for the establishment, exercise or defence of legal claims, provided that there is no reason to assume that the data subject has an overriding legitimate interest in the data not being processed;
- The processing is expressly authorised by national legislation.

VIII

Personal data breach

Where Fintis determines that there has been unauthorised or unlawful processing or access, or use or disclosure of personal data for which it is responsible, whether potential or actual, Fintis determines whether the breach must be notified to the competent supervisory authority in accordance with the procedure applied by Fintis in the event of a Personal Data breach.

IX

Transfer of data to third parties or to third countries

Fintis may be required to transfer this data to third parties (banking partners, insurers, asset management companies, etc.) in the course of its business, in compliance with its contractual undertakings or with applicable regulations.

Where personal data is transferred to third parties, Fintis ensures that the third party is subject to the applicable data protection legislation. This applies throughout the European Economic Area. In the event of a transfer outside the European Economic Area, Fintis must satisfy itself that the third party has equivalent data protection procedures in place.

X

Rights of data subjects

Data subjects may require Fintis to apply this data protection policy.

If data subjects consider that Fintis has breached this policy, they must follow the procedure described in this document.

If an amicable settlement of the dispute fails, data subjects may bring legal proceedings.

1 Right to object

Data Subjects have the following rights:

- To access the data concerning them which is processed by the company;
- To request the rectification, erasure, deletion or restriction of inaccurate or incomplete personal data concerning them and of personal data for which the purpose of the processing is no longer lawful or appropriate; in this context, deletion of the data cannot be required in the following cases:
 - Where processing of the data is necessary for exercising the right of freedom of expression and information;
 - Where processing of the data is necessary for compliance with a legal obligation;
 - Where processing of the data is necessary for reasons of public interest in the area of public health;
 - Where processing of the data is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes;
 - Where processing of the data is necessary for the establishment, exercise or defence of legal claims.

- To object at any time to the processing of their personal data, unless that processing is required by legislation and provided that the data subject demonstrates a legitimate ground relating to their particular situation.
- To receive their personal data in a structured, commonly used and machine-readable format, where the processing is based on a contract or on the data subject's consent. Where the processing is based on the legitimate interest of the Data Controller or on a legal obligation, the right to portability will not be mandatory;
- The right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

2 Requests for information, comments and complaints

Data subjects must submit their complaints in accordance with this complaints handling procedure.

Fintis undertakes to handle such complaints within reasonable time limits and at the latest within the month following receipt of the complaint.

This procedure will also apply to requests by data subjects to exercise their rights of access, updating and deletion of their personal data.

For any information or to exercise your rights in respect of the processing of your personal data carried out by Fintis, you may contact our Data Protection Officer (DPO) at the following address: **contact@fintis.fr**

Or by signed letter accompanied by a copy of an identity document, sent to the following address: **1 rue de Chazelles, 75017, Paris, France.**

XI**Rights of data subjects**

Fintis undertakes to maintain a record of processing activities.

Fintis is responsible for ensuring that every new processing operation is entered in the record together with the relevant information concerning the context of the processing.

XII**Relations with supervisory authorities**

Fintis undertakes to maintain good relations with the data protection authorities. To that end, Fintis will cooperate with the data protection authorities, will accept being audited by them and will follow their guidance on matters of which those authorities may become aware.

Fintis will determine which data protection authorities are competent for each processing operation in place.