



## **About this privacy notice**

OCTO FINANCES SA strives to protect the privacy and the confidentiality of Personal Data that it processes in connection with the services it provides to clients, including individuals' use of its website(s). This privacy notice was updated to comply with the EU General Data Protection Regulation (GDPR) which came into force on 24 May 2016.

In this notice, “**we**”, “**us**” and “**our**” means **OCTO FINANCES SA**, the entity providing services to you. This privacy notice applies to you if you are a representative of a client or a prospective client of us, so “**you**” means an employee, officer, third party representative or director of a client or prospective client of OCTO FINANCES SA. The privacy notice sets out the basis on which personal information about you (“Personal Data”) may be processed by us. For the purposes of data protection law, we are a ‘data controller’ within the meaning of the GDPR in respect of your personal data and we are responsible for ensuring that we use your personal data in compliance with data protection laws.

Please take the time to read and understand this privacy notice.

## **Personal data that we may collect and process**

We may collect and process the following personal information about you:

- Information that you provide to us or one of our affiliates. This includes information about you that you give to us by filling in forms or by communicating with us, whether face-to-face, by phone, e-mail or otherwise. This information may include:

your full name, date of birth, nationality, postal address and related contact details, including your telephone number, fax number, email address and identification documentation (i.e. your passport and/or other government or state issued forms of personal identification) photographic or video images, telephone or electronic registration; and

- Relevant information about you that we might obtain from other sources.

We presume that you have the right, power and authority, and have taken all action necessary to provide us with the personal data of you or your representatives in compliance with applicable laws and regulations. We confirm that we will collect, use, store, disclose and otherwise process (hereinafter “process”) personal data of you and/or your representatives in accordance with this privacy notice.

## **Our purposes and legitimate interest for processing your personal data**

We may process your personal data in the following ways and for the following purposes:

- To meet our legal obligations as a service provider, and to fulfil our obligations and exercise our rights under our general terms of business. For example, we may use your personal data to communicate to you or to comply with certain anti-money laundering rules and compliance requirements.



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We are legally authorised to process your personal data in this manner on the following grounds:

- in order to fulfil our legal and regulatory obligations;
- in order to establish, exercise or defend our legal rights, for example in the context of legal proceedings; or
- based on our legitimate business interests, because the processing of your private data:
  - o allows us to effectively administer and manage the day-to-day running of our business;
  - o ensures a consistent approach to the management of the agreed services;
  - o maintains compliance with internal policies and procedures; or
  - o enables us to contact you.

### **Disclosure of your information to third parties**

No personal data will be disclosed to third parties except for the following reasons:

- to comply with applicable laws, or if required by a competent governmental or administrative authority and then, so far as is reasonably practicable, subject to customary confidentiality undertakings;
- in connection with legal proceedings or otherwise to assert and protect our legal interests;
- as part of a corporate transaction, for example with a successor or affiliated entity; or
- to third party service providers, outside counsel, auditors, and other independent professionals in connection with the services and the purposes as described in this privacy notice.

### **Retention period**

The period during which we store your personal data may vary, and is based on the following criteria:

- the purpose for which we are using your personal data: we will need to keep the data for as long as is necessary for that purpose; and
- legal obligations: laws or regulations may set a minimum period for which we are obliged to keep your personal data.



### **Your rights under this privacy notice**

With respect to our use of your personal data, you have the right to:

- obtain information regarding the processing of your personal data and gain access to the personal data about you which we are storing;
- withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so.
- in certain circumstances, receive some personal data in a structured, commonly used and machine-readable format and/or to request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to personal data which has been provided to us by you;
- request that we rectify your personal data if it is inaccurate or incomplete;
- in certain circumstances, request that we erase your personal data. Please note that there may be circumstances where, despite your request to have personal data erased, we are legally entitled to retain them;
- in certain circumstances, object to, or request us to restrict, our processing of your personal data. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally entitled to continue processing your personal data and / or to refuse that request; and
- lodge a complaint with the competent data protection regulator (details of which are provided below) if you believe that we have breached any of your rights.

You can submit your requests and questions by contacting us, using our contact details at the end of this document.

### **Conflict with other consent given / questions**

This privacy notice is not intended to limit or override the scope of any other consent given by you, relating to personal data, such as in a separate memorandum or agreement. Any confidentiality or non-disclosure clause or agreement in force between you and OCTO FINANCES SA remains in full force and effect. In the event of conflict, the terms set out in this notice shall prevail (over those of such other agreement or clause) only to the extent necessary for the parties to comply with the applicable laws and regulations.

### **Updates and changes to this privacy notice**

We reserve the right to amend this privacy notice from time to time, without notifying you. We invite you to visit this page regularly via <https://www.octofinances.com/en>



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### **Further information**

Please submit any questions you may have on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of your rights under this policy, to your contact at OCTO FINANCES or get in touch with our Data Protection Officer directly, at: [adlane.megherbi@octofinances.com](mailto:adlane.megherbi@octofinances.com).

Further information can also be obtained through the data protection regulator or the Information Commissioner's Office. In France, this is the *Commission Nationale de l'Information et des Libertés* (CNIL, <https://www.cnil.fr/en/home>).

### **Our contact details**

OCTO FINANCES

*Société Anonyme* (under French law) with a Management Board and a Supervisory Board

Registered office: 117 avenue des Champs Elysées 75008 Paris - France

RCS Paris 383 214 103

Email: [adlane.megherbi@octofinances.com](mailto:adlane.megherbi@octofinances.com)

Telephone: +33 (0) 1 45 02 66 44

Telephone: +33 (0) 1 45 02 66 12

Website: <https://www.octofinances.com/en>

### **Our Data Protection Officer**

Mr. Adlane MEGHERBI

Compliance Officer

117 avenue des Champs Elysées 75008 Paris - France

Email: [adlane.megherbi@octofinances.com](mailto:adlane.megherbi@octofinances.com)

Telephone: +33 (0) 1 45 02 66 44