



TSAF - TSAF OTC

MANAGEMENT AND DATA PROTECTION POLICY

Tradition Paris ¹ manages and protects the personal data it collects, in accordance with regulations on the protection of personal data².

This policy on the management and protection of personal data sets out the important information relating to personal data and specifies the use made of such data by the relevant departments of Tradition Paris.

This policy applies to all processing of personal data by Tradition Paris.

¹ TSAF & TSAF OTC

² Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data.
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1. What is a personal data?

The General Data Protection Regulation ('GDPR') defines personal data as 'any information relating to an identified or identifiable natural person [...]'.

Thus, personal data is any information that enables a person to be identified, directly or indirectly by reference to an identifier, such as a name, an identity card or passport number, a date and place of birth, or a postal or e-mail address.

It may also include banking, financial and transactional data, or information relating to the use of products or services subscribed to.

Finally, data linked to digital activities is also considered personal data. Examples include IP addresses and browsing activity.

2. How are personal data collected?

In the course of entering into a business relationship, certain personal data directly communicated by the customer may be collected by Tradition Paris.

This information may also be transmitted by third parties authorised to communicate it, such as credit reference providers or regulatory bodies, or through commercial information files or other public sources accessible to banking and financial institutions.

3. How are personal data used?

The General Data Protection Regulation ('GDPR') defines data processing as any operation or set of operations carried out on personal data, whether or not the process is automated.

As the data controller, Tradition Paris collects, uses and records personal data that can be used to identify individuals so that it can be transmitted to and analysed by the various departments concerned.

Tradition Paris determines the purposes and means of the processing.

Personal data are collected, communicated, transferred and stored when strictly necessary. The data collected in this way must be adequate, relevant and not excessive in relation to the purpose of the processing.

Personal data may also be processed in order to comply with legal and regulatory obligations.

These include, in particular, controls related to the fight against money laundering and the financing of terrorism, financial and solvency checks, or the communication of reports to national and international regulatory bodies or auditing bodies.

Tradition Paris may also process personal data where this is necessary for the pursuit of its legitimate interests, provided that these interests are not overridden by the interests and fundamental rights of the client.

This includes monitoring and evaluating compliance with Tradition Paris' internal policies and standards.

The processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership is prohibited, with the exceptions defined in the 'GDPR'.

4. How long are personal data kept?

Tradition Paris retains personal data only for as long as is strictly necessary for the purposes set out above, in accordance with applicable legal requirements, in particular in order to respond to requests from authorities and regulators.

5. To what extent may personal data be transferred outside the European Economic Area (EEA)?

Due to Tradition Group's international dimension, and in order to optimise the quality of its services, personal data may be transferred to countries outside the European Economic Area, such as Switzerland.

The transfer of personal data outside the EEA is subject to obtaining a decision from the European Commission, where it finds that the third country or international organisation, as the case may be, ensures an adequate level of protection.

This decision is issued following an assessment of the rule of law and the existence and effective operation of one or more independent supervisory authorities in the third country, or to which an international organisation is subject, responsible for ensuring compliance with data protection rules and for enforcing them.

6. What are Tradition Paris engagements facing to data protection regulation?

To ensure optimum protection of personal data, the data controller implements appropriate technical and organisational measures to guarantee a level of security appropriate to the risk associated with the processing of personal data.

These measures are designed to ensure the security and confidentiality of the personal data collected, in particular to protect it against loss, destruction, alteration or unauthorised access.

Tradition Paris ensures the confidentiality of personal data collected, in accordance with regulatory requirements.

7. What are your rights with regard to your personal data?

You may exercise your right to access, rectify, delete, restrict processing, withdraw consent, port your data and object to the use of your personal data, in accordance with the General Data Protection Regulation.

In order to exercise these rights, or if you would like further information about this personal data management policy, please contact the Data Protection Officer at the following address:

dpo@tsaf-paris.com