

**APPENDIX II  
DETAIL OF PERSONAL DATA USAGE IN THE MAIN BANK PROCESSES**

1.1 Refer to table with notice: **Prospecting and overseeing the relationship** mainly includes the following purposes:

	Purposes	Legal Basis allowing processing	Data obtained from Third Party	Transferring data to a non-member state of the European Union
1.1.1	Defining the business offer and pricing	CONTRACT	NO	NO
1.1.2	Event leadership	LEGITIMATE INTEREST (personalisation of relationship and quality of service)	NO	NO
1.1.3	Customer base review			

1.2 Refer to table with notice: **Onboarding and managing the banking relationship and accounts** mainly includes the following purposes:

	Purposes	Legal Basis allowing processing	Data obtained from Third Party	Transferring data to a non-member state of the European Union
1.2.1	Onboarding, tracking, and administering accounts	LEGAL OBLIGATION	NO	NO
1.2.2	Classifying clients based on relationship ties for the purposes of adapting the offer and pricing, on the following basis : - legally linked accounts - family or close relatives - business links - same referral channel	LEGITIMATE INTEREST (global relationship management – linked accounts) The client can at any time and without any condition refuse or oppose to any third grouping. Other linked accounts would not be communicated due to bank secrecy rules	NO	NO
1.2.3	Disclosing financial and tax information to clients	CONTRACT	NO	NO
1.2.4	Relationship with external managers and business introducers	LEGITIMATE INTEREST (managing the introducer or external manager/client relationship)	YES ( <i>external managers</i> )	NO
1.2.5	Complaints and exercising of rights, pre-litigation/litigation and garnishments and estates	LEGAL OBLIGATION	NO	NO

2 Refer to table with notice: **Offering and managing products and services** mainly includes the following purposes:

	Purposes	Legal Basis allowing processing	Data obtained from Third Party	Transferring data to a non-member state of the European Union
2.1	2.1 Advisory and wealth engineering activities	CONTRACT	NO	NO
2.2	2.2 Securities transactions, investment	CONTRACT	NO	NO
2.3	2.3 Credit activities	CONTRACT	NO	NO
2.4	2.4 Cash transaction, payment, and payment method (cards and cheques) activities	CONTRACT	YES	YES (US)
2.5	2.5 Online banking and safe deposit box activities	CONTRACT	NO	NO

3 Refer to table with notice: **Logistics management (safety and security of people and property, mail and archive management)** mainly includes the following purposes:

	Purposes	Legal Basis allowing processing	Data obtained from Third Party	Transferring data to a non-member state of the European Union
3.1	Safety and security of people, property, and information	LEGAL OBLIGATION	NO	NO
3.2	Mail and archiving	CONTRACT	NO	YES (mailing company US)

4.1 Refer to table with notice: **Adherence to legal and regulatory obligations with respect to outside authorities** mainly includes the following purposes:

	Purposes	Legal Basis allowing processing	Data obtained from Third Party	Transferring data to a non-member state of the European Union
4.1.1	Response to warrants and administrative/judicial requests	LEGAL OBLIGATION	NO	YES (regulatory body)
4.1.2	Financial regulatory disclosure	LEGAL OBLIGATION	NO	YES (regulatory body)
4.1.3	Statistical disclosures to regulators	LEGAL OBLIGATION	NO	YES (regulatory body)
4.1.4	Tax reporting (automatic information exchange and tax collection)	LEGAL OBLIGATION	NO	YES (regulatory body)

4.2 Refer to table with notice: **Adherence to legal and regulatory obligations with respect to internal auditing obligations** mainly includes the following purposes:

	Purposes	Legal basis allowing processing	Data obtained from Third Party	Transferring data to a non-member state of the European Union
4.2.1	Consolidation of data for the purposes of financial oversight and internal reporting	LEGITIMATE INTEREST (Oversight of the Bank)	NO	NO
4.2.2	Periodic and permanent controls and corresponding reporting	LEGAL OBLIGATION	NO	NO
4.2.3	Compliance controls, particularly for financial security, combating fraud, and monitoring transactions on financial markets	LEGAL OBLIGATION <i>except for preventing and tracking fraud, based on legitimate interest (protecting the bank and its customers)</i>	NO	NO