

# Personal data protection notice

HSBC Global Asset Management (France)

May 2025



**HSBC** Asset Management

PUBLIC

# HSBC takes your privacy seriously

## Who is affected by this Notice?

To meet the needs of its business activity, HSBC Global Asset Management (France) processes information relating to customers who are natural persons ("**Personal Data**"), including **our current, future and former professional customers ("you")**.

When we use the terms "you" or "your", this means any person in contact with us and, if you act on behalf of a company, trust, pension fund, etc., any person acting on behalf of that company, trust, pension fund, etc. (including authorised agents and signatories, representatives, directors, guarantors, legal representatives, partners, owners, beneficial owners, or any other person in contact with HSBC), as well as company correspondents for transaction processing in relation to your employee savings scheme.

Similarly, when we use the terms "**HSBC**", "**we**" and "**our**", this includes HSBC Global Asset Management (France) and all HSBC entities in France and other HSBC Group companies. HSBC Group means all companies owned and/or controlled directly or indirectly by HSBC Holdings Plc. For the purposes of the personal data regulations, HSBC Global Asset Management (France) is the data controller on your personal data.

As part of our commitment to protect your Privacy, we would like to inform you transparently about:

- ◆ The data we process, why we process those data and how we use it and store it;
- ◆ On what legal basis we process your personal data, and
- ◆ Your rights over the use of your Personal Data and how you can exercise them.

## What does this Notice cover?

This Notice applies to all personal data processed by HSBC Global Asset Management (France) acting as data controllers in connection with products and services provided to professional and business customers.

It explains what data we may collect about you, how we use this data, with whom we may share it and what measures we take to ensure its confidentiality and security.

This Notice covers all processing of personal data for which HSBC Global Asset Management (France) and its branches based in Italy and Spain are responsible. If you are in contact with other HSBC entities, specific information will be provided to you if necessary.

Some of the links on our websites may redirect you to non-HSBC websites. They have their own privacy or data protection policies or Confidentiality Notices that may differ from ours: it is important that you take the time to read and understand these documents.

### 1. What types of personal data do we process?

For potential customers with whom we have not yet contacted, we may process (to the extent permitted by applicable law):

- ◆ Identification information (such as name, address, gender, nationality), contact details (such as telephone, email address) and family information (such as marital status).

As the contact or correspondent for your company with which we are in the pre-contractual phase, we may collect (to the extent permitted by applicable law):

- ◆ Information relating to your identity such as your name, gender, date and place of birth, information on your proof of identity;
- ◆ Your contact details such as your postal address, email address and telephone numbers;
- ◆ Information you provide to us by filling in forms or communicating with us, whether by telephone, in person, by email or any other means of communication online or by responding to questionnaires or satisfaction surveys;
- ◆ The information we use to identify and authenticate you, such as your specimen signature;
- ◆ Any information contained in the customer documentation or forms that you may complete as a prospect;
- ◆ Data collected through “cookies”. We use “cookies” and similar technologies on our websites and in electronic messages to recognise you, remember your preferences and to show you content that may be of interest to you.
- ◆ Data related to our internal investigations, including controls relating to due diligence prior to entering into a relationship or throughout our business relationship, controls relating to the application of the rules on sanctions, asset freezing measures, the fight against money laundering and the financing of terrorism and all information related to the controls carried out on our means of communication;
- ◆ Records of correspondence and communications between us, including telephone calls, emails, instant messaging, social networking communications or any other type of exchange and communication;
- ◆ Any information we need to meet our legal and regulatory obligations, including your financial transaction data and the information necessary to detect any suspicious or abnormal activity concerning you or the persons with whom you are in contact.
- ◆ Communication information (e.g. information contained in electronic messages, third party information, chat information, instant messages, media information, litigation or minutes); and

The data we collect or process about you has been collected directly from you or others, in compliance with applicable regulations, in the past or by other HSBC Group companies. We may also process information about you when you interact with us, for example when you visit our websites.

To find out about our use of cookies and other tracking technologies in relation to HSBC websites, please also see our notice on the use of HSBC websites and cookies available here: [our cookie policy](#).

## 2. Why do we use your personal data?

- ◆ Entering into a business relationship with you, to verify your identity and to carry out legal and other regulatory compliance checks (for example, to comply with anti-money laundering regulations and prevent fraud);
- ◆ To engage in business development and/or protect and enhance the HSBC brand and take steps to improve our products and services and our use of technology, including testing and upgrading systems and processes, and conducting market research to understand how to improve our existing products and services or learn more about other products and services we may provide;
- ◆ To analyse the results of our marketing activities to measure their effectiveness and relevance of our campaigns.
- ◆ Compliance and risk management and/or crime prevention, detection and investigation.

For example, in order to:

- Carry out legal and regulatory compliance checks as part of the relationship entry process, including compliance with anti-money laundering and fraud prevention regulations;
- Meet our regulatory and compliance obligations (e.g. financial sector, anti-money laundering and tax laws), including recording and monitoring communications, applying risk classification to ongoing business relationships, providing disclosures to tax authorities, financial services regulators and other regulatory, judicial and governmental bodies or in connection with proceedings and investigations or crime prevention;

- Receive and process complaints, requests or reports from you or third parties to dedicated units within HSBC or the HSBC Group or distributors/intermediaries;
  - Respond to any ongoing or potential proceedings, requests or investigations by a public or judicial authority and ensure the defence of our rights and compliance with our legal, regulatory or tax obligations;
  - Prevent and detect crime, including fraud or criminal activity, abusive uses of our products and services, and the security of our IT systems, architecture and networks.
- ◆ To enable a transfer, merger or assignment to a prospective purchaser, assignee, partner or seller and their advisors in connection with a potential transfer, merger or assignment of all or part of HSBC's business or assets, or any right or interest therein, or to acquire or enter into a merger with a business;
  - ◆ Organise the supervisory boards of our Employee Mutual Funds (FCPE) in accordance with the regulations of each FCPE by contacting you as correspondent

### 3. On what legal grounds do we process your personal data?

- ◆ The performance of a contract entered into or a commitment under which you and/or we are bound;
- ◆ Compliance with a legal or regulatory obligation;
- ◆ Protecting our legitimate interests;
- ◆ With your consent to the extent required by law.

### 4. How do we protect your personal data?

We implement technical and organisational measures to protect your data, including encryption, anonymisation and physical security procedures.

We require our staff and all third parties working for HSBC to adhere to strict standards of information security and protection, including contractual obligations to protect all data and to apply strict data transfer measures.

### 5. What are your rights and how can you exercise them?

You have the right to access your personal data:

- ◆ The right of information, when we use automated decision-making systems, for example when you wish to subscribe to a product or service, when you apply for credit or during checks to prevent the risk of fraud. You have the right to obtain specific information about how a decision is made, to request human intervention and to challenge any decision taken on this basis;
- ◆ The right to access and obtain information about the data we hold concerning you and the processing carried out;
- ◆ The right to modify or correct your data;
- ◆ Under certain circumstances, the right to object to the processing of your personal data at any time (please note that we may continue to process your personal data if we have a legitimate reason to do so)
- ◆ The right to withdraw your consent at any time;
  - For example, you may withdraw your consent to the use of your data for commercial purposes at any time: consideration of your request and updating of our systems may take a few days during which you may receive commercial solicitations relating to marketing campaigns already launched. To request that we stop sending you marketing messages or use your data for marketing purposes, including to tailor our content or advertisements to your profile when you use one of our websites, please refer to the "More details about your data" section or when you interact with your customer advisor.
- ◆ Under certain circumstances, the right to receive data in electronic form and/or to request us to transmit this information to a third party where technically possible (please note that this right is applicable only to data you have provided to us);

- ◆ Under certain circumstances, the right to request that we delete your data (please note that legal or regulatory provisions or legitimate reasons may require us to retain your data);
- ◆ The right to ask us to limit the processing of your data, under certain circumstances (please note that we may continue to process your personal data if we have a legitimate reason to do so);

It may be the case that you have expressed your desire not to see your data used, but we are still obliged to use it for different reasons. In this case, we will continue to use your data if (i) the law requires us to do so, (ii) if we have to perform a contractual obligation, (iii) if it is in the public interest to do so or (iv) if we have a legitimate interest in doing so

You can exercise your rights by contacting us at the following address:

- ◆ Either directly via your secure email;
- ◆ Or by writing to the address of the HSBC entity of which you are a customer, at the following addresses:

**HSBC Global Asset Management (France)**

**Customer Service**

**Immeuble Cœur Défense, 110 Esplanade du Général de Gaulle, 92400 Courbevoie, France**

- ◆ either by contacting our personal data protection officer directly by email at the following address: [dataprotection@hsbc.fr](mailto:dataprotection@hsbc.fr) or by post:

**Data Protection Officer of HSBC Global Asset Management (France)**

**HSBC Continental Europe**

**38 Avenue Kléber**

**75116 Paris**

You can find more information about your rights on the CNIL website: <https://www.cnil.fr/>

You also have the right to file a complaint with the Commission Nationale de l'Informatique et des Libertés (please click here or send a letter to the following address: CNIL - 3 Place de Fontenoy - TSA 80715 - 75334 Paris - Cedex 07).

## 6. For how long do we keep your personal data?

We will retain your data for as long as you use our services and platforms (e.g. our website). We may also retain it even if you decide to no longer use our services or platforms, including to comply with applicable law, to defend our interests or assert our rights. We will not keep it for longer than is necessary and, when we no longer need it, will securely destroy it in accordance with our internal policy or make it completely anonymous.

Some data may be kept for an additional period of time for the management of complaints and/or disputes as well as to meet our legal or regulatory obligations or to respond to requests from authorised authorities.

Accounting data may be kept for a period of ten (10) years in accordance with the applicable regulations.

## 7. With whom may we share your personal data and why?

We may share your personal data for the following reasons:

- ◆ To comply with a legal or regulatory obligation, for example to help detect tax fraud or evasion, to prevent financial crime;
- ◆ To respond to a request for regulatory reports, to manage a dispute or to act in defence of our rights;
- ◆ To act on the basis of a legitimate interest, for example to manage an operational risk or assess the relevance or effectiveness of our commercial campaigns of our products or services;
- ◆ To act in accordance with your previously obtained consent.

Your data may be transferred to, hosted in or accessed from a country/territory outside the European Union where the data protection legislation is not equivalent to that of France or the European Union. In the event your data is transferred to a country/territory outside the European Union, we will always ensure that it is protected. To this end, we subject all transfers of your data to appropriate and relevant safeguards (such as encryption and contractual commitments, including the agreement to EU-approved standard contractual clauses).

You can find out more about how we transfer your personal data outside the European Union by contacting us directly: see the section “More details about your data”.

We may transfer and disclose your data to:

- ◆ Other HSBC Group companies;
- ◆ Contractors, agents or service providers who work for us or other HSBC Group companies (including their employees, directors and officers);
- ◆ Other financial institutions or tax authorities;
- ◆ Any (new or potential) HSBC Group company (for example, if we restructure, acquire or merge with other companies) or any company that acquires all or part of a company in the HSBC Group;
- ◆ Statutory auditors, regulators, the TRACFIN unit, independent administrative authorities or dispute resolution bodies and in order to comply with their requests;
- ◆ Any other person involved in the event of a transaction dispute;
- ◆ The French government, the judicial or administrative authorities/jurisdictions.

Learn more about your data

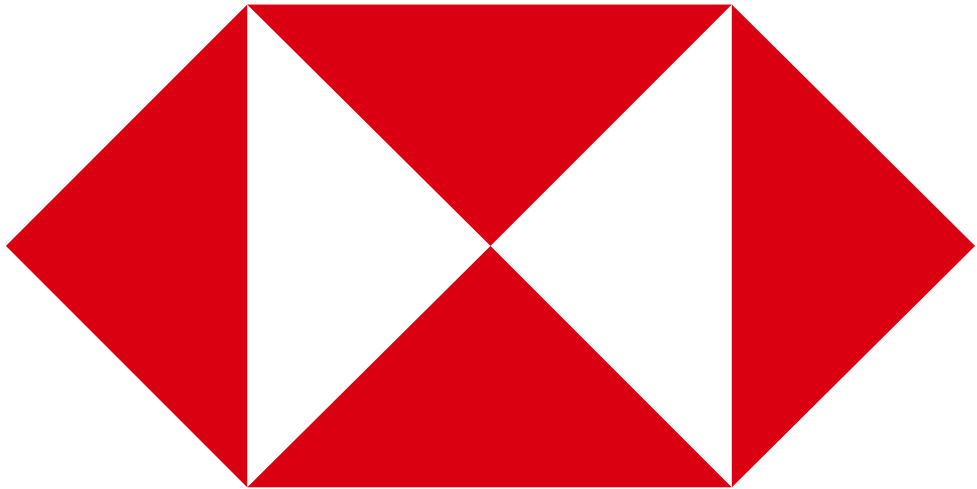
If you would like to know more about the provisions of this Data Protection Notice or contact our Data Protection Officer, you can write to us at the following address:

**Data Protection Officer of HSBC Global Asset Management (France)**

**HSBC Continental Europe**

**38 Avenue Kléber**

**75116 Paris**



(amend as appropriate)