



## Data protection notice

<b>Responsability</b>	<b>DPO Champion France</b>
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## Table des Matières

<b>1</b>	<b>What is the purpose of this notice ?</b>	<b>3</b>
<b>2</b>	<b>What processing is covered by this notice? Who is the data controller ?</b>	<b>3</b>
<b>3</b>	<b>Which legislation applies to the processing of your personal data?</b>	<b>3</b>
<b>4</b>	<b>What information do we process ?</b>	<b>4</b>
<b>5</b>	<b>Do we process special categories of data?</b>	<b>4</b>
<b>6</b>	<b>Why do we process your data?</b>	<b>5</b>
<b>7</b>	<b>How do we obtain this information?</b>	<b>5</b>
<b>8</b>	<b>With whom do we share your data and why?</b>	<b>6</b>
<b>9</b>	<b>Is your data secure?</b>	<b>7</b>
<b>10</b>	<b>Do we make automated decisions on the basis of your data ?</b>	<b>7</b>
<b>11</b>	<b>For how long do we keep your data ?</b>	<b>7</b>
<b>12</b>	<b>What rights do you have in relation to your data ?</b>	<b>8</b>
<b>13</b>	<b>How may a claim be made relating to the processing of your personal data ?</b>	<b>9</b>



## 1 What is the purpose of this notice ?

This notice provides you with information relating to the processing of personal data carried out by IQ EQ Management SAS, a simplified shareholding company, a société d'actions simplifiée, registered under N° 431252121 on the companies and business registry, whose registered office is situated at 92, avenue de Wagram, 75017 Paris (hereinafter "IQ EQ Management" or "We") in the context of providing services to our customers.

It explains how IQ EQ Management collects and processes personal data from its customers who are individuals or represent legal entities (agents, legal representatives, beneficial owners, beneficiaries etc.) and that are provided to us by our customers relating to their own customers or other individuals (bank intermediaries, beneficiaries, investors, debtors etc) in the context of business relationships that we undertake with the latter (hereinafter "You").

This notice may be updated at any time and applies to the activities set out below and any other processing activity referring to this notice. Other uses of your personal data may be covered by separate notices for your consultation (for example when using one of our websites or in relation to particular products or services).

## 2 What processing is covered by this notice? Who is the data controller ?

This applies where IQ EQ Management acts as "data controller" within the meaning of the General Data Protection Regulation (GDPR), that is to say where IQ EQ Management decides how and why your personal data is to be used.

It does not apply to processing of personal data which may be carried out by IQ EQ management on behalf of its customers, which are governed by specific data processing agreements.

## 3 Which legislation applies to the processing of your personal data?

The processing of personal data by IQ EQ Management is governed, in particular, by EU regulation 2016/679 by the European Parliament and Council dated 27 April 2016 relating to the protection of individuals with respect to the processing of personal data and the free circulation of data, hereafter named the "GDPR" and law n° 78-17 of 6 January 1978 relating to computer processing, files and freedoms (hereinafter commonly referred to as the "Data protection regulations").

## 4 What information do we process ?

We process personal data which are of interest in our business relationship or which are necessary to provide our services.

The personal data that we collect comprises the following information :

- **Contact information**, for example your name, your personal and business contact details ;
- **Information which is necessary to order or benefit from our services** (information arising from legal or regulatory requirements or necessary for implementing services and the management of our business relationship), for example:
  - data for identifying and knowing our customers (civil status data, identity documents, country of domicile, proof of residence), particularly in the context of our obligation to know our customers (Know Your Customer-KYC),
  - taxation data (taxation domicile and other taxation documents and information such as residence for tax purposes, tax identification number, effective beneficiary, percentage of participation in share capital in a legal entity, in particular in the context of complying with United States law relating to taxation compliance of accounts ((Foreign Account Tax Compliance Act, FATCA)),
  - data relating to the professional background (duties, cv, experience, skills),
  - economic and financial information (for example, assets, sums invested, the origin of funds, bank details),
  - transactions' history (including transactional behaviour and regulatory recordings),
- **Information relating to our commercial relationship**, for example the services that we provide to you, communications, claims, minutes of meetings, previous business relations with the IQ-EQ Group, including the choices that you have made relating to products and services.
- **Information relating to how you use our website, our portal or online services** offered to you including your technical IDs and all of your communications with us including via social networks.

## 5 Do we process special categories of data?

In specific cases, where required by law, we process special categories of data :

- information necessary for identifying you as a Politically Exposed Person (PEP),
- information relating to financial sanctions and freezing of assets and/or any other data processed relating to offences, convictions and security measures pursuant to applicable legislative and/or regulatory requirements or in the context of your business relationship with us.

## 6 Why do we process your data?

We process your data at the start of our business relationship and where we provide services in the context of a contract to which you are a party, where we have a legal obligation to do so or where we have a legitimate interest in doing so. The legal bases and purposes of processing are as follows:

- To perform agreements which are binding on us or to take steps prior to entering into such agreements (for example in providing advice, making proposals, simulations or analyses etc.); Deciding whether to offer services on your behalf and where this is the case, under what conditions ;
- To pursue our legitimate interests to follow-up on and develop our business relationship with you:
  - To offer you services throughout our relationship including performance management or termination of these services ;
  - To send you marketing messages.
- To meet our legal and regulatory obligations, particularly in relation to customer identification, customer knowledge, compliance and risk management (including verification of solvency, taxation and accounting obligations, money laundering and financing of terrorism, the prevention of conflicts of interest) and for the purposes of supervision and audit ;
- To pursue our legitimate interests and those of the IQ-EQ Group in improving our products and services and developing new ones and for better understanding our customer relations :
  - To perform statistics and carry out studies and analyses and produce indicators,
  - For reporting on all of our commercial activities to current and potential shareholders of the IQ-EQ Group.
- and/or any other specific purpose for which you have given your consent.

## 7 How do we obtain this information?

In addition to personal data which you provide directly to us, or which our customers or partners and their representatives (lawyers, accountants etc.) provide to us when they ask for our services as well as those which are generated by IQ EQ Management in the context of the provision of services requested, other information which we process relating to you may derive from sources which are accessible to the public (for example registers of sanctions or convictions, public registers, the press, Websites, social networks, suppliers of business financial information for example the FACTIVA and World Check databases) or companies and external entities (for example survey companies).

## 8 With whom do we share your data and why?

We may disclose your personal data to third parties where this is necessary to provide you with the products and services that you have subscribed to where regulations requires us so to do.

Thus, your personal data is disclosed:

- to our specialist advisers such as lawyers and accountants as well as IQ-EQ Group authorised staff responsible for compliance, risk management and internal audit.
- to banks, insurance companies, investment managers and other agents acting in the context of subscription and management of services or which have been appointed by our customers,
- to public regulatory authorities (for example the Financial Markets Authority), taxation authorities, where the law requires us to do so or where these authorities require it in the context of their right to disclosure.

Moreover, your data is also shared with other entities in the IQ-EQ Group and with external service providers responsible for carrying out personal data processing on our behalf and acting as processors within the meaning of the GDPR.

Given the international dimension of the IQ-EQ Group, and in certain limited circumstances, we may transfer personal data to a country outside the European Economic Area in the context of setting up shared services to improve the quality of our services and completion times. These communications may result in transfers of personal data outside of the European Economic Area including to countries where legislation relating to the protection of data is different than that which is applicable within the European Union (Isle of Man and Mauritius).

These transfers are carried out in compliance with Data protection regulations. The IQ-EQ Group has global policies relating to the way in which it processes and protects personal data and implements appropriate safeguards in accordance with Article 46 of the GDPR. Where not covered by an adequacy decision by the European Commission (as in the case of Mauritius), transfers will be framed by the European Commission standard contractual clauses, which enable to ensure an adequate level of protection to transferred personal data.

For further information relating to transfer mechanisms implemented within the IQ-EQ Group, please contact : [france@iqeq.com](mailto:france@iqeq.com)

## **9 Is your data secure?**

We have implemented appropriate security measures to prevent your personal data from being accidentally lost, used in an unauthorised way, amended or disclosed to unauthorised third parties.

Our employees, agents and subcontractors and other third parties are subject to a duty of confidentiality.

Additionally we have set up procedures to deal with any presumed personal data breach and the competent data protection authorities as well as you yourself will be notified where we are legally bound to do so.

Sending information via the Internet is not, generally, completely secure and we cannot guarantee the security of data which you choose to send us in this way. We have set up security procedures and measures to ensure that your data is secure once we have received it.

In our efforts to ensure the confidentiality of your personal data we have obtained security certifications which are regularly assessed by third parties. All of our staff are regularly trained in making data secure and how to act in the event of risk or incident relating to your data. We impose the same requirements on our partners and suppliers in the form of contractual commitments.

## **10 Do we make automated decisions on the basis of your data ?**

Currently we make no decisions which are purely automated relating to you which means that you are not subject to decisions which are exclusively based on automated processing having legal effect relating to you or significantly affecting you in any similar way.

## **11 For how long do we keep your data ?**

Generally data which is necessary to manage our business relationship or contractual relationship is retained throughout this term increased by any time necessary to enable us to protect IQ EQ Management or IQ-EQ Group interests in the context of any possible claim or legal action.

Additionally, we will retain your personal data, collected in the context of providing our services, for as long as necessary to complete the purposes for which we process it and to meet any applicable legislative and regulatory obligations. This duration may vary based on legislation applicable to the services which we offer and your place of residence.

## 12 What rights do you have in relation to your data ?

Pursuant to the provisions set out in the General Data Protection Regulation, you have the following rights relating to personal data:

- **Requesting access** to your personal data: this right enables you to know whether we hold and process personal data relating to you and to have access to personal data which we hold relating to you upon simple request by you;
- **Requesting rectification** of personal data which we hold relating to you which may be incomplete or inaccurate.

In some circumstances, in particular where processing personal data is no longer necessary to complete the purposes for which it has been collected or where personal data which we process is inaccurate, you may:

- **Object to the processing** of your personal data or request its restriction on grounds relating to your special situation: in this respect you have the right to object to use of your data for marketing purposes;
- **Request the erasure** of your personal data upon condition that no regulatory or contractual provision or other legitimate purposes requires that they are retained.
- **Withdraw your consent relating to marketing messages.** You may withdraw your consent by clicking on the “unsubscribe” link shown on all marketing emails sent to you or by sending an email to the following address: [france@iqeq.com](mailto:france@iqeq.com). Your request will be processed within a reasonable timeframe.
- **Retrieve part of your data in a machine readable format** (the right to portability is applicable to a very limited number of cases).

If you wish to exercise any of these rights you may contact us at the following address:

IQ EQ Management  
C/O DPO Champion  
92, avenue de Wagram  
75017 Paris  
[france@iqeq.com](mailto:france@iqeq.com)





### **13 How may a claim be made relating to the processing of your personal data ?**

If you wish to make a claim relating to the processing of your personal data, please do so to the following address: [france@iqeq.com](mailto:france@iqeq.com). In the event of your claim not being resolved you have the right to make a claim to the competent data protection authority in the country in which you reside or in the country in which the processing takes place.

You will find the current list of data protection authorities within the EU and their contact information set out in:

[https://edpb.europa.eu/about-edpb/about-edpb/members\\_fr](https://edpb.europa.eu/about-edpb/about-edpb/members_fr)

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