

Information sheet on personal data protection

This information sheet is intended for OPPCI shareholders, whose personal data will be processed by Normandie. It states the reasons why Normandie REIM may collect your data, how it will be used, protected, and kept, and what your rights are.

This information is hereinafter referred to as "Personal Data" or "Data".

Normandie REIM collects and processes information about both your private life (date and place of birth, address, family situation) and your professional life.

Normandie REIM believes that data protection is essential to build a trustful relationship with its customers. Normandie REIM is constantly monitoring its compliance with regulations concerning the protection of Personal Data and intends to apply responsible governance of its electronic files and the greatest transparency in the data processing it carries out.

Normandie REIM has appointed a Data Protection Officer (or DPO) who ensures that the processing of personal data by Normandie REIM complies with the regulations in force.

For what purposes is your Data collected and used?

A) Pre-contractual measures and/or contract execution

We process your Data to provide you with products and services. Processing is necessary for pre-contractual measures following your request and/or the execution of the contract, such as:

- Subscription of a product or service,
- Management of a subscribed product or service.

Otherwise, Normandie REIM will not be able to enter the contract.

B) To comply with our legal and regulatory obligations

We are subject to numerous legal obligations such as:

- Knowing our customers,
- Fighting against money laundering and terrorism financing,
- Preventing fraud.

We process Data in compliance of all the above.

The legitimate interests pursued by Normandie REIM to implement the processing are varied and specifically consist of:

- The improvement of customer knowledge,
- The improvement of our products and services,
- The improvement of our risk management.

This processing is carried out having your interests and fundamental rights in mind. In that respect, measures and guarantees are in place to ensure the protection of both your interests and rights in a way that is balanced with the Normandie REIM's legitimate interests.

C) Processing subject to your consent

Normandie REIM intends to collect your consent only when it comes to transferring your Data (which are not essential for the performance of your contract) to third party partners.

D) Profiling

Your personal Data is never used for any profiling activity by Normandie REIM.

The GDPR requires an impact analysis relating to Data Protection to be carried out whenever there are profiling activities.

E) Cookies and other tracers

Cookies are small text files that websites place on your device (computer, tablet, or smartphone) as you are browsing, installing, or using a software, or opening an e-mail.

When you visit Normandie REIM website, cookies might be placed on the device you use.

Other information regarding cookies is available on the Legal Notice page of Normandie REIM website.

F) Data transfer

The data collected is not intended to be transferred outside the European Union; it will mainly be used on French territory.

What data do we collect and where does it come from?

As part of our obligations to fight against money laundering, we collect directly from you the data that is strictly necessary to identify you, your family situation (contact details), as well as information about your professional activity, your economic situation (to determine your capacity to enter into contracts) and financial and banking data, or data relating to the transactions that you carry out in order to make the payment of any dividends.

This information may be collected during your interviews using paper or electronic forms.

The document on which we collect your data informs you of the mandatory nature of your declarations and of the fact that, in certain cases, not responding to a request for information may have consequences for the processing of your request.

When you use our products or services, we collect Personal Data about you, such as data relating to your subscription.

Your Personal Data may also come from distributors, or partners if their privacy policies allow it or if you have authorised them to share it.

In some cases, we may also collect Personal Information about you even though we have not directly entered a relationship with you. This may occur if your contact details are provided to us by one of our customers.

Who has access to your data?

Normandie REIM takes all necessary measures to guarantee professional secrecy and ensure the security and confidentiality of your Data: only authorised people have access to it.

Only people authorised in the departments in charge of the Data processing, have access to your Data within a pre-defined framework.

Similarly, our service providers may have access to all or part of your Data in a secure manner while performing their services.

However, we also transmit your Data to third parties such as:

- Service providers to whom Normandie REIM entrusts operational functions or services,
- Judicial, financial or other government authorities,
- Certain regulated professions, such as lawyers, bailiffs, notaries, or audit firms.

How long is your data kept?

Normandie REIM keeps your Data only for the purposes for which it is processed, and in compliance with its legal and regulatory obligations.

The length of time your Data is kept varies and depends on the purposes for which it is processed:

Type of treatment	Storage life
Products and services management	5 years from the end of the contractual relationship
If no contract has been concluded	6 months
Claims management	5 years from the end of the contractual relationship
Fight against money laundering and terrorist financing	5 years from the execution of the operation as regards the information justifying the operation
Fight against fraud	5 years maximum from the closure of the fraud case. When legal proceedings are initiated, Data are kept until the legal proceedings are completed.
Cookies	12 months maximum
Fiscal Data storage	10 years

What are your rights over your Data?

You have various rights over your Data within the limits and under the conditions authorised by the regulations, including the following:

- Access to all your Data: you can obtain information related to the processing of your Data as well as a copy of them,
- Correct and update your Data: if you consider that your personal data is inaccurate or incomplete, you have the right to obtain the modification of the Data accordingly,

- Delete: you may request the deletion of your Personal Data,
- Request a limitation on our processing of your Data,
- Request the portability of your Data: you have the right to request that your Data be recovered or transferred to a third party if this is technically possible,
- Withdraw your consent: the processing of your Data is always subject to your consent,
- Object to the processing of your Data: you may, for legitimate reasons related to your situation, object to the processing of your Personal Data, but you may also object, at any time, to the processing of your Data for profiling or canvassing purposes,
- File a complaint with a supervisory authority (in France, the CNIL: www.cnil.fr).

How to exercise your rights?

To exercise your rights, you can contact our Data Protection Officer by e-mail or post, indicating your surname, first name, contact details and providing a copy of your ID:

***Normandie REIM – DPO – 39 Avenue George V
75008 PARIS***

DPO@normandie-reim.com

How will you be informed of any changes to this information notice?

This notice may change to enhance the protection of your Personal Information.

These changes may come from applicable regulations or changes to our data processing policy.

We will keep you informed of any significant changes to this information notice through one of our usual communication channels and invite you to read it on our website www.normandie-reim.com.