

Data Protection Notice

This notice (Data Protection Notice) applies to personal information held by members of Mizuho Bank Ltd, Paris Branch ("MHBK") as data controllers, as described below. It explains what information we collect about you, how we'll use that information, who we'll share it with, the circumstances when we'll share it and what steps we'll take to make sure it stays private and secure. It continues to apply even if your agreement for banking or other products and services with us ends.

This Data Protection Notice covers any personal products or services you have with us. Sometimes we may need to provide you with separate or further information about specific products and services. This information will also apply.

Wherever we've said 'you' or 'your', this means you, any authorized person on your account, anyone who does your banking or deals with us for you (e.g. trustees or executors, attorneys under a Power of Attorney) and other related people (including any of your employees, officers, contractors, partners, members and trustees).

When we say 'we', we mean Mizuho Bank Ltd, Paris Branch which acts as a data controller in respect of your personal data.

In this Privacy Notice, the following definitions apply:

"Applicable Regulations" means:

- (a) ACPR Rules or any other rules of a relevant regulatory authority;
- (b) all other applicable laws, rules and regulations.

"Affiliate" means an undertaking in the same group as us.

"Data Protection Legislation" means (i) before 25 May 2018, the EU Data Protection Directive 95/46 and all national implementing laws (including "Loi Informatique et Libertes", Act N°78-17 of 6 January 1978 on Information Technology, Data Files and Civil Liberties); and (ii) on or after 25 May 2018, the EU General Data Protection Regulation 2016/679; together with all other Applicable Regulations relating to privacy or data protection; and where we use the terms "personal data", "data subject", "controller", "processor" and "process" (and its derivatives), such terms shall have the meanings given to them in the Data Protection Legislation.

"Rules" means articles, rules, regulations, procedures and standards, as in force from time to time.

Using your information

Your information

We collect and use your personal data to the extent necessary in the framework of our activities and to achieve a high standard of personalized products and services.

The data we use about you may either be directly provided by you or be obtained from a range of sources and it may related to any of our products or services you apply for, currently hold or have held in the past. Some of it will come from you whereas it can also come from your financial advisor, other companies within the Mizuho Financial Group, or other third parties (e.g. credit agencies). We might also get some of it from publicly available sources (publications/databases made available by official authorities).

If you'd like further information on anything we've said in this privacy notice or to contact our Compliance Department, please contact us at:

Legal and Compliance Department
Mizuho Bank Ltd, Paris Branch
Washington Plaza, 40 rue Washington - 75408 Paris Cedex 08
Tel.: +33 1 53 83 40 00

We may collect various types of personal data about you, including:

- (a) personal details, e.g. name, previous name, gender, date and place of birth;
- (b) contact details, e.g. an individual's home or work address, email address, landline and mobile numbers;
- (c) information concerning your identity, e.g. photo ID, passport information, National Insurance Number, National ID card and nationality;
- (d) family situation, e.g. marital status;
- (e) education and employment information, e.g. level of education, employment, employer's name;
- (f) information related to your digital activities, e.g. online banking;
- (g) other information about an individual that you disclose to us when communicating with us;
- (h) your financial information and information about your relationship with us, including the products and services you hold the channels you use and your ways of interacting with us, your ability to get and manage your credit, your payment history, transactions records, market trades, payments into your account including salary details and information concerning complaints and disputes;
- (i) information we use to identify and authenticate you, e.g. your signature and your biometric information, such as your voice, or additional information that we receive from external sources that we need for compliance purposes;
- (j) information that we need to support our regulatory obligations, e.g. information about transactions details, detection of any suspicious and unusual activity and information about parties connected to you or these activities;
- (k) information we collect when you, communicate with us; or when you apply for our products or services; or any other time you contact us; and
- (l) information we obtain from third parties, such as information that we obtain when verifying details supplied by you. This information obtained from other third party organisations or people may include other members of the Mizuho Financial Group, employers, clients, joint account holders, credit reference agencies, fraud prevention agencies or other similar organisations.

We don't collect about you, personal data related to your racial or ethnic origins, political opinions, religious or philosophical beliefs, trade union membership, genetic data or data concerning your sex orientation, unless it is required through a legal obligation. We will usually seek separate permission from you in writing to process these special categories of personal data.

Our use of your information

We may collect, record and use information about you, and the business you conduct with us in physical and electronic form and will hold, use and otherwise process the data in accordance with the Data Protection Legislation and as set out in this Data Protection Notice. This may include sharing this information with third parties and transferring it abroad. More information about sharing and transferring such information is set out below.

We and other companies within the Mizuho Financial Group may process any information we hold about you for a number of business purposes, including:

- (a) to administer and operate your client account(s) and to provide any service to you;
- (b) to monitor and analyse the conduct of your client account(s);
- (c) to assess any credit limits or other credit decisions (as well as the interest rate, fees and other charges to be applied to your account);
- (d) to enable us to carry out statistical and other analysis and to meet our legal or regulatory obligations;
- (e) for our reasonable commercial purposes (including quality control and administration and assisting us to develop new and improved products and services);
- (f) to confirm your or their identity and carry out background checks, including as part of our checks in relation to anti-money laundering, compliance screening and to prevent fraud and other crimes;
- (g) to follow up with you or them after you request information to see if we can provide any further assistance;
- (h) to comply with any requirement of Applicable Regulations, including but not limited to transaction reporting;
- (i) to fulfil our obligations under any reporting agreement entered into with any tax authority or revenue service(s) from time to time;
- (j) to check your instructions to us;
- (k) to monitor, record and analyse any communications between you and us, including telephone calls to analyse, assess and improve our services to you, as well as for training and quality purposes;

- (l) to prevent or detect abuse of our services or any of our rights (and attempts to do so), and to enforce or apply the terms of any agreement you may have with us and to protect our (or others') property or rights;
- (m) to share information with relevant third parties in the context of a sale or potential sale of a relevant part of our business, subject always to confidentiality obligations;
- (n) if instructed to do so by you or where you give us your consent to the use and/or processing involved;
- (o) to bring to your or their attention (in person or by post, email or telephone) information about additional services offered by us and/or our Affiliates, which may be of interest to you or them, unless you or they indicate at any time that you or they do not wish us to do so.

You are responsible for ensuring that other related individuals are aware of such uses of their information.

Lawful grounds for using your information

We have described the purposes for which we may use information about you. We are permitted to process such information in this way, in compliance with the Data Protection Legislation, by relying on one or more of the following lawful grounds:

- (a) to respect your choice if we requested your consent for a specific processing e.g. if we need to carry out further processing for purposes other than those above, we will inform you and, where necessary, obtain your consent;
- (b) to perform a contract with you or to take steps at your request before entering into a contract;
- (c) to comply with our legal and regulatory obligations; or
- (d) to fulfil our legitimate interest, which might be:
 - a. to ensure that our client accounts are well-managed;
 - b. to prevent fraud, and to comply with anti-money laundering laws and sanctions;
 - c. to protect our business interests;
 - d. to ensure that complaints are investigated;
 - e. to evaluate, develop or improve our products and services; or
 - f. to keep our clients informed about relevant products and services, unless you have indicated at any time that you do not wish us to do so.

In relation to any processing of special categories of personal data, we will rely on obtaining specific consent in order to process such information, although it may be necessary for us to use certain information in order to comply with our legal obligations as a regulated entity (such as in relation to an alleged offence). Where you have consented to our processing of such information (including special categories of personal data), you may withdraw such consent at any time by contacting us using the contact details above. Please note, however, that in certain circumstances it may be still lawful for us to continue processing this information even where consent has been withdrawn, if one of the other legal bases described above is applicable.

Automated processing

We do not carry out automated decision-making or profiling in relation to our clients. However, in order to comply with our obligations under anti-money laundering legislation, we are required to verify the identity of all clients and other information (including but not limited to details of any nationality, citizenship or rights of residence you or your Personnel or other relevant individuals hold) to satisfy our regulatory obligations. We may do this using an electronic verification system that we consider suitable or by asking you for documentary evidence.

If you want to know more about your rights in relation to automated decision making, please contact us using the contact details above.

Information sharing

Sharing your information with others

In order to be able to service our clients' needs to the best of our ability, we may share any information about you, or any members of your group, that you provide to us with other members of the Mizuho Financial Group or to our Affiliates' agents, counterparties and support service or data providers, wherever located. If you, have provided information to other members of the Mizuho Financial Group, those entities may also share that information with us. We will ensure that if we share such information with third parties, any such disclosure is at all times in compliance with Data Protection Legislation.

The recipients or categories of recipients of your information may be:

- (a) credit reference agencies in order to perform credit and identity checks on you;

- (b) any revenue service or tax authority, if obliged to do so under Applicable Regulations, or Common Reporting Standards, or FATCA (we may also have to report your account to the necessary tax authorities);
- (c) your advisers (including, but not limited to, accountants, lawyers or other professional advisers) where authorised to do so by you;
- (d) French and overseas regulators and authorities in connection with their duties (such as crime prevention);
- (e) fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity;
- (f) any entity that has an interest in the products or services that we provide to you, including if they take on the risk related to them;
- (g) any other person or organisation after a restructure, sale or acquisition of any member of the Mizuho Financial Group, as long as that person uses your information for the same purposes as it was originally given to us or used by us (or both).

Sharing third party information with us

If any information which you provide to us relates to any third party (such as a joint account holder or beneficiary), by providing us with such information you confirm that you have obtained any necessary permissions from such persons to the reasonable use of their information in accordance with this Data Protection Notice, or are otherwise permitted to give us this information on their behalf.

Transferring your information outside France

In certain circumstances, your information may be transferred to and stored in locations outside the European Economic Area (EEA). In the case of transfers by us, we may transfer your information:

- (a) Where the transfer is to a country deemed to provide adequate protection of your information by the European Commission; or
- (b) Where you have consented to the transfer.

We may need to transfer your information in this way to carry out our contract with you, to fulfil a legal obligation, to protect the public interest and/or for our legitimate interests. If we transfer your information outside the European Economic Area in other circumstances (for example because we have to provide such information by law), we will put in place appropriate safeguards to ensure that your information remains adequately protected.

When we, or our permitted third parties, transfer information to non-EEA countries whose level of protection has not been recognised by the European Commission, we or they will impose contractual obligations on the recipients of that data to protect such information to the standard required in the European Economic Area. We or they may require the recipient to subscribe to international frameworks intended to enable secure data sharing, such as Standard contractual clauses approved by the European Commission.

You understand and accept that these countries may have differing (and potentially less stringent) laws relating to the degree of confidentiality afforded to the information it holds and that such information can become subject to the laws and disclosure requirements of such countries, including disclosure to governmental bodies, regulatory agencies and private persons, as a result of applicable governmental or regulatory inquiry, court order or other similar process. In addition, a number of countries have agreements with other countries providing for exchange of information for law enforcement, tax and other purposes.

Your rights in relation to your information

General rights

You have a number of rights in relation to the information that we hold about you. At any time, such individuals shall have the right:

- (a) to be informed about the processing of their personal data (i.e. for what purposes, what types, to what recipients it is disclosed, storage periods, any third party sources from which it was obtained, confirmation of whether we undertake automated decision-making, including profiling, and the logic, significance and envisaged consequences);
- (b) to request access to, or a copy of, any personal data we hold about them;
- (c) to request the rectification of their personal data, if they consider that it is inaccurate;
- (d) to request the erasure of their personal data, if they consider that we do not have the right to hold it;

- (e) to object to their personal data being processed for a particular purpose or to request that we stop using their information;
- (f) to request not to be subject to a decision based on automated processing and to have safeguards put in place if they are being profiled based on their personal data;
- (g) to ask us to transfer a copy of their personal data to themselves or to another service provider or third party where technically feasible and otherwise required by Applicable Regulations;
- (h) to withdraw, at any time, any consent that they have previously given to us for our use of their personal data.

You can exercise your rights by contacting us using the details set out in the “Your Information” section above. You also right to complain to the French data protection authority (Commission Nationale de l’Informatique et des Libertés – CNIL) by visiting www.cnil.fr.

Access to your information

You may have a right of access to some, or all, of the information we hold about you or them, or to have any inaccurate information corrected, under Data Protection Legislation. Any request for access to or a copy of your personal data must be in writing and we will endeavour to respond within a reasonable period and in any event within one month in compliance with Data Protection Legislation. We will comply with our legal obligations as regards any individual’s rights as a data subject.

We aim to ensure that the information that we hold about you is accurate at all times. To assist us in ensuring that such information is up to date, please let us know if the personal details of you or other related people change by contacting us using the contact details above. We will correct any incorrect or incomplete information and will stop processing personal data, or erase it, where there is no legal reason for us to continue to hold or use that information.

Retaining your information

We will only keep the information that we collect about you on our systems or with third parties for as long as required for the purposes set out above or as required to comply with any legal obligations to which we are subject. This will involve us regularly reviewing our files to check that information is accurate and up-to-date and still required.

Most personal data collected in relation to a specified client is kept for the duration of the contractual relationship with such client plus a specified number of years after the end of the contractual relationship or otherwise required by applicable law. If you close an account that you have with us, we decline your application to open an account, or you decide not to go ahead with opening an account, we may still keep your information.

We will normally destroy or erase data after five years from the end of our agreement with you or as required by any Applicable Regulations. However, we may retain your information after you cease to be a client for longer than this, provided it is necessary for a legal, regulatory, fraud prevention or other legitimate business purpose.