



## Privacy Policy

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## 1) Preamble

CFE S.A.M. takes into account the protection of personal data by default and ensures that you receive clear and transparent information about the processing of your personal data.

This privacy policy informs you about how CFE S.A.M. collects and processes your personal data, as well as how you can control their use.

This policy complies with the requirements of Monegasque and European standards, namely the European regulation on the protection of personal data (GDPR) of 27 April 2016 and Monegasque Law No. 1.565 of 3 December 2024.

## 2) Definitions

Personal Data or Personal Data : Any data that directly or indirectly identifies a natural person.

*Examples: name, registration number, telephone number, photograph, date of birth, municipality of residence, fingerprint, IP address, etc.*

Sensitive data : Information concerning racial or ethnic origin, political, philosophical or religious opinions, trade union membership, health, offences and convictions incurred or sexual life or orientation.

Data controller : CFE S.A.M. is the data controller of personal data collected directly or indirectly from Data Subjects. As such, we guarantee that your data will be processed in accordance with the applicable personal data protection standards.

Processing of personal data : "Processing" means any operation or set of operations which is performed on personal data, such as collection, recording, use, transmission or disclosure.

Processor : A legal entity that processes personal data on behalf of the controller in the course of its business.

GDPR: General Data Protection Regulation of 27 April 2016.

APDP: Personal Data Protection Authority, the independent Monegasque administrative authority competent in terms of personal data protection.

Data subject: Natural person whose data is processed, i.e. within the framework of this policy, customers, counterparties, users of the website, recipients of emails, prospects and, more broadly, any person whose personal data is processed by CFE S.A.M.

Recipient: Natural or legal person, public authority, agency or other body that receives communication of personal data.



Counterparties: A natural or legal person who uses the company CFE S.A.M. as part of a dedicated order routing service.

### **3) Principles applicable to the protection of your personal data**

Principle of lawfulness, fairness and transparency : CFE S.A.M. undertakes to obtain your consent whenever it is required and to inform you of the processing of your personal data. CFE S.A.M. is transparent in informing the persons concerned, when collecting their personal data, of how it uses it and when it may be shared with third parties.

Principle of purpose limitation : CFE S.A.M. ensures that your personal data is collected for specific, explicit and legitimate purposes.

Principle of limiting data retention : Your personal data is kept by CFE S.A.M. for a limited period of time that does not exceed the time necessary for the purposes of collection.

Principle of accuracy : CFE S.A.M. ensures that your personal data processed is accurate and complete. It is therefore regularly updated and will be deleted if it is inaccurate.

Principle of proportionality and minimisation : CFE S.A.M. ensures that it collects and processes the relevant personal data that is adequate, not excessive and strictly necessary to achieve the purposes that have been previously determined.

Principle of security and confidentiality : CFE S.A.M. takes all necessary organisational and technical measures to guarantee the confidentiality of this data and to prevent any intrusion, loss or damage to it or to unauthorised communication with individuals.

### **4) Personal data processed**

#### **a) The source of the personal data**

In general, the company CFE S.A.M. collects data to provide order routing services to prospects and counterparties and to carry out any action necessary to operate its market order execution activities.

Personal data is collected in the following ways:

- To the person concerned directly, in particular when sending KYC documents sent by email;
- To prospects, counterparties and visitors to the website;
- To the data subject writing an email to the company CFE S.A.M.



- By the total or partial acceptance of cookies by Site Visitors recording how they browse our site, for example by receiving error reports, or usage data from software.

## b) Types of personal data

The personal data collected may include the following:

- Identity/marital status: Surname, first name, company name
- Addresses and contact details: Contact details (professional and/or personal email address, professional and/or personal telephone number), place of residence.
- Data relating to professional life: Professional position held, nature of the position held and status (exhibitor, service provider, etc.).
- Copy of official document: ID (if required for concierge services for private clients)
- Financial characteristics: data related to beneficial owners and banking history research.
- Electronic identification data
- Time information
- Other: E-mail content, contacts, log files, access logging.

CFE S.A.M. ensures that it collects and processes personal data in compliance with the principles applicable to the protection of your personal data.

## 5) Purpose of the processing of personal data

### a) The purposes of the processing

The processing of your personal data carried out by CFE S.A.M. meets explicit and specific purposes:

- Respond effectively to any relevant person involved in the company's activities (prospects, counterparties, etc.)
- Respond to any request for information concerning CFE S.A.M.'s order delivery services;
- Collect the information necessary for the proper functioning of the activity;
- Collect the User's needs (prospects, counterparties) to provide the most suitable services;
- Management of the commercial relationship with prospects and counterparties;
- Management of the website and cookies;
- Exploitation of statistical studies.

It is specified that this policy applies to the aforementioned processing and to all those that may occur. In this case, the information contained in this policy will be communicated to the persons concerned at the appropriate time.



**b) The legal basis for processing**

CFE S.A.M. carries out the processing in question on the basis of:

- The execution of contractual measures with regard to counterparties wishing to work with CFE S.A.M.
- Of its legitimate interest in the management of the website, the establishment of statistics and the communication, marketing or promotion of the company. In addition, CFE S.A.M. must respond to any request requiring the collection of personal data through the exchange of electronic messages and inform those interested in the company's activity.
- The consent of the person concerning the cookies placed on the website.

**6) Retention of personal data**

All Personal Data collected is kept for a limited period of time depending on the purpose of the processing and the storage period provided for by the legislation in force. CFE S.A.M. refers to the prescription data and recommendations of the APDP to adapt its storage periods to the various treatments concerned.

Finally, CFE S.A.M. takes into account, in establishing retention periods, the need to retain certain information in order to be able to comply with these obligations and the mandatory annual audits in the field of the exercised activity.

**7) Security and privacy**

The company CFE S.A.M. as a data controller, determine and implement the means necessary for the protection of personal data processing systems to avoid, as far as possible, any malicious intrusion and to prevent any loss, alteration or disclosure of data to unauthorised persons.

Thus, CFE S.A.M. implements technical and organizational measures to guarantee the security and confidentiality of personal data in accordance with good IT security practices. To do this, specialized subcontractors support CFE S.A.M.

The measures implemented to guarantee security and confidentiality:

- Awareness : CFE S.A.M. raises awareness of the processing of personal data, and is committed to compliance with the provisions of the GDPR and Law No. 1.565, of all its employees.
- Securing workstations, internal network and servers : Workstations are secured thanks to the implementation of anti-virus software, the installation of a firewall and the collection of user consent before any intervention on their workstation. Similarly, the internal network and servers are secured thanks to precise flow management with the implementation of a firewall and a VLAN through the switch and the firewall.



- Backup and business continuity: A backup and backup system ensures the recovery and continuity of our activities in a secure manner.
- Strictly regulated access: Authorized personnel have restricted access to strictly necessary information, as charters are intended to frame the main prerogatives and obligations of IT administrators in the exercise of their duties.

## 8) Cookies

You are informed that, during your visits to our website, cookies are installed on your browser software to allow you to browse optimally, in compliance with the GDPR and Monegasque Law No. 1.565 of 3 December 2024.

Cookies are data stored on the user's terminal equipment. They are used by our site to send information to the user's browser, and allow that browser to send information back to the originating site (e.g. a session ID, choice of language or date). However, no personal data is collected via tracking systems.

For more information, please consult our cookie management policy by clicking on the following link: <https://cfe-finance.com/cookie-policy/>

It is specified that the CFE Finance Group manages the website in accordance with the policies available on the website.

To find out more about managing cookies, please refer to the APDP's advice by clicking on the following link: <https://apdp.mc/apdp/fiches-pratiques/internet-et-reseaux-sociaux/fiche-memo-les-cookies/>

## 9) Recipients and data transfer

CFE S.A.M. may transmit your personal data to several types of recipients who need to receive it:

- Internal services concerned within CFE S.A.M. in order to process your requests and ensure the follow-up of commercial relations;
- Public entities that need to receive data to ensure that the activity is properly regulated
- Service providers and subcontractors for technical and service operating needs (operation of the website, software, cookies, etc.)
- CFE Finance Group

In any case, the personal data of the persons concerned are only communicated to authorised and specific recipients.

Certain types of data may be transferred to external recipients for specific purposes.



For example, the personal data necessary for the management of mandatory legal audits may be transmitted to external consultants such as an audit or accounting and financial consulting firm.

In any case, each transfer will be made to a country with adequate protection and, failing that, will be subject to standard contractual conditions or measures justifying its relevance.

In the cases required, the transfer will be justified by the conclusion of a contract between CFE S.A.M. and the person concerned, in the same way as a counterparty located in a country that does not benefit from adequate protection.

## **10) Rights of data subjects**

All the means necessary to guarantee the effectiveness of your rights over personal data are implemented by CFE S.A.M. in accordance with the GDPR and Monegasque Law No. 1.565, namely:

- The right of access and copy : You have the right to obtain confirmation as to whether or not personal data concerning you is being processed and, where it is, to obtain access to such data and a copy thereof.
- The right to rectification : You have the right to obtain the rectification of inaccurate personal data concerning you.
- The right to erasure : In certain cases, you have the right to obtain the erasure of your personal data. However, this right is not absolute, as CFE S.A.M. may have legal or legitimate reasons to keep said data.
- The right to object : You have the right to object at any time, for reasons relating to your particular situation, to the processing of personal data concerning you when such processing is based on the legitimate interest of CFE S.A.M.
- The right to restriction of processing : You have the right to obtain from the controller the restriction of processing if the accuracy of the data is questioned, when the processing is unlawful, when the controller no longer needs the data for the purposes of the processing or when the data subject has objected to the processing.
- The right to human supervision : You have the right not to be subject to a decision that has been made solely on the basis of automated processing.
- The right to lodge a complaint with a supervisory authority : You have the right to contact the APDP in order to lodge a complaint concerning the personal data protection practices of the company CFE S.A.M. or any other competent data protection authority.



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## **11) Policy Changes**

CFE S.A.M. may update this Personal Data Protection Policy at any time to adapt it to any new regulations or practices. It is then your responsibility to check for any updates to this data protection policy on our website and to click on the links made available to you.

If material changes are made, you will be notified by means of information on our websites.

## **12) Contact**

If you have any questions about this policy or to exercise your rights, you can send a request:

- By post : 7 Rue du Gabian; 98000 Monaco
- On site : 7 Rue du Gabian; 98000 Monaco
- Electronically: [dpo@cfefinance.com](mailto:dpo@cfefinance.com)

If you have any doubts about your identity, you may be asked to provide proof.