

GDPR information Notice cards for Natixis SA

Date	23/06/2020
From	DPO
A	All public
Object	Presentation of GDPR information Notice cards related to Personal Data Processing operated by Natixis SA
Pièce jointe	None
Update	23/06/2020: Test of the concept by performing a pilot implementation on the limited perimeter around the need of “Market Abuse (Compliance)” Processing

Warning

- *The maintenance of this database of Information Notice cards is part of a dynamic review process.*
- *As such, this database is subject to regular updates.*
- *Each notice card incorporates the information listed in Articles 13 (direct collection) and 14 (indirect collection) of the GDPR.*

Usage convention

- Any term beginning with a capital letter has the meaning given to it by the GDPR¹ or the literature usually associated with it

Table of content

1. Purpose of the document	2
2. Structure du document.....	2
3. Notice cards par business team	2
3.1. Notice cards of Compliance team	2
3.1.1. Notice card for « Market Abuse (Compliance) » Processing	2
3.2. Notice cards of IT team	4
3.2.1. Notice card for « Provision of IT tools (IT) »	4
4. Notice cards per category of Data Subject	6

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data (GDPR)

1. Purpose of the document

The purpose of this document is to present the cards of the GDPR Information Notices relating to the Processing of Personal Data (DCP) operated by Natixis SA.

As a Data Controller (DC), Natixis SA is responsible for the compliance of its Processing with the laws and regulations that apply to it, including the GDPR.

Each Processing performed is described in a Processing Record which is integrated into a Register containing Records of Processing Activities (RPAs). This Register is reserved for internal use and for those who need to know about it.

For an all public use, for example for the information of external and internal stakeholders, each Processing card is associated with a Notice card so that the latter can be made public.

2. Structure du document

Natixis SA is organized internally in a set of operational and functional departments, for example the one in charge of Corporate Investment Banking (CIB) or the one in charge of Human Resources (HR).

Each department, also called the business team, is responsible for its Processing.

Thus, this document presents in section "[3. Notice cards par business team](#)" the Notice cards under the responsibility of each business team. Accordingly, these Information cards apply to all categories of Data Subjects identified.

This document also presents in section "[4. Notice cards per category of Data Subject](#)" a selective view of the Notice cards that apply to each category of Data Subjects identified.

3. Notice cards par business team

3.1. Notice cards of Compliance team

3.1.1. Notice card for « Market Abuse (Compliance) » Processing

Data Controller (DC)	<u>Identity and contact details of the DC:</u> - Corporate name: NATIXIS – Joint-stock company established under French law, with a share capital of € 5,049,354,392 registered in Paris under no. 542 044 524 - Registered office: 30, avenue Pierre Mendès-France - 75013 Paris - Tel.: +33 1 58 32 30 00 - website: www.natixis.com
Contact details of the Data Protection Officer (DPO) and, if applicable, the specific contact details for the exercise of the rights of Data Subjects (DS)	<u>Coordonnées du DPO:</u> - Mailing address: Natixis – BP 4 – 75060 Paris Cedex 02 France - Email address: dpo@natixis.com <u>Specific contact details for this Processing for the exercise of the rights of Data Subjects (if applicable):</u> - Same contact details as for DPO
Precision on GDPR role (DC, JC, disjoint C...)	Joint-Controller (JC)
Title of the Processing	Market Abuse (Compliance)

Purpose	<p>Macro-Purpose: Tool to fight against market abuse on Natixis/CIB perimeter (market manipulation and insider dealing)</p> <p>Sub-Purposes: (1) Potential market abuse detection tool (2) Follow-up of Executive managers transactions</p>
Legal basis for Processing	Legal obligations (MAR 586/02014 Commission delegated regulation (eu) 2016/957 ; MIFID II - Directive 2014/65/Eu of the European Parliament and of the Council of 15 May 2014)
Management of consent including the terms of the right of withdrawal (if applicable)	N/A
Legitimate interests pursued (if applicable)	N/A
Categories of Data Subjects	<ul style="list-style-type: none"> - DC's staff whose exchanges are monitored, including Collaborators and Consultants - Others (their interlocutors involved in the monitored exchanges, including Clients) - Data Processor (DP)'s staff in charge of IT systems and applications concerned by the Processing
Categories of Personal Data processed	<ul style="list-style-type: none"> - Identification and connection Data of concerned staff including: Name, first name, email address, Personal Unique Identifier (Identifiant Unique Personnel – IUP - in French) - Content of oral and written electronic communications between monitored staff and their interlocutors (external or internal ones) - Monitoring reports (which will include the Name, first name, IUP of the monitored person as well as the context and the extract of concerned communications) - Content of "financial trading" Data (which will include the Name, first name of the Trader or of the Seller involved in the operation)
Personal Data source	IT systems and applications concerned by the Processing and made available by the DC to the monitored staff
Mandatory or optional nature of Personal Data collection and consequences in case of not providing them	N/A
Categories of recipients of Personal Data	<ul style="list-style-type: none"> - Within the limits of their respective needs, all or part of the Personal Data can be sent to: - the internal teams of the DC, including that of Compliance, in charge of monitoring, and those in charge of financial operations (Trading) whose exchanges are monitored - the teams in charge of subcontracting the relevant IT systems and applications

	- Control authorities (internal and external)
Transfers of Personal Data to a third country outside the European Union or to an international organization	Yes, to DC's Subsidiaries and Branches, that may be located outside European Union and that are concerned by the Processing
Automated decision making	N/A
Personal Data retention period	Legal retention period
Rights of Data Subjects (DS)	<p>Within the limits and conditions authorized by the regulations in force, rights to:</p> <ul style="list-style-type: none"> - Access - rectification - Erasure <p>In addition, it is possible to provide to the DC with guidelines on the retention, erasure and communication of DS' Personal data after death, which can also be registered with a "certified digital trusted third party". These directives, or a sort of "digital will", may designate a person responsible for their execution; otherwise, the heirs will be appointed.</p>
Right to lodge a complaint with a competent supervisory authority	<p>The DS may lodge a complaint with a competent supervisory authority. In France, this authority is the CNIL:</p> <ul style="list-style-type: none"> - To contact: www.cnil.fr/en/you-request-contacter-la-cnil - To make a complaint (complaint): www.cnil.fr/en/complaints

3.2. Notice cards of IT team

3.2.1. Notice card for « Provision of IT tools (IT) »

Data Controller (DC)	<p><u>Identity and contact details of the DC:</u></p> <ul style="list-style-type: none"> - Corporate name: NATIXIS – Joint-stock company established under French law, with a share capital of € 5,049,354,392 registered in Paris under no. 542 044 524 - Registered office: 30, avenue Pierre Mendès-France - 75013 Paris - Tel.: +33 1 58 32 30 00 - website: www.natixis.com
Contact details of the Data Protection Officer (DPO) and, if applicable, the specific contact details for the exercise of the rights of Data Subjects (DS)	<p><u>Coordonnées du DPO:</u></p> <ul style="list-style-type: none"> - Mailing address: Natixis – BP 4 – 75060 Paris Cedex 02 France - Email address: dpo@natixis.com <p><u>Specific contact details for this Processing for the exercise of the rights of Data Subjects (if applicable):</u></p> <ul style="list-style-type: none"> - Same contact details as for DPO

Precision on GDPR role (DC, joint-DC, disjoint DC..)	Data Controller (DC)
Title of the Processing	Provision of IT tools (IT)
Purpose	<ul style="list-style-type: none"> - Macro-Purpose: Supply of computer work equipment to staff - Sub-Purposes: (1) Supply of hardware and software for work to staff such as Laptop, office applications, professional softwares, directories, networks (2) Parameter systems and applications to produce and save data and logs (3) Feed the "Market abuse (Compliance)" processing of data and logs produced by the systems and applications concerned
Legal basis for Processing	<ul style="list-style-type: none"> - Necessary for the legitimate interest of the Data Controller - Necessary for compliance with a legal obligation
Management of consent including the terms of the right of withdrawal (if applicable)	N/A
Legitimate interests pursued (if applicable)	- Processing necessary for the execution of staff assignments
Categories of Data Subjects	<ul style="list-style-type: none"> - DC's staff including the Collaborators and the Consultants - Others (certain persons in business with the DC, including Clients, Candidates and Visitors of the concerned websites) - DP's staff in charge of the IT systems and applications concerned by the processing
Categories of Personal Data processed	<ul style="list-style-type: none"> - Identification data: Surname, first name, address, email - Connection data: IP address, log - Data relating to working life: Cvs, diplomas of clients or employees: HR or other data - Communication channel logs
Personal Data source	<ul style="list-style-type: none"> - The users of systems and applications - The teams in charge of these systems and applications - The services in charge of staff
Mandatory or optional nature of Personal Data collection and consequences in case of not providing them	The collection of Personal Data is necessary for the management of the described purposes and for the proper functioning of the services
Categories of recipients of Personal Data	- Within the limits of their respective needs, all or part of the Personal Data can be sent to:

	<ul style="list-style-type: none"> - the internal teams of the DC, including that of IT, in charge of the implementation and maintenance of the systems and applications concerned, of Compliance, in charge of the monitoring of certain activities - the teams in charge of subcontracting the relevant IT systems and applications - Control authorities (internal and external)
<i>Transfers of Personal Data to a third country outside the European Union or to an international organization</i>	Yes, to DC's Subsidiaries and Branches, that may be located outside European Union and that are concerned by the Processing
<i>Automated decision making</i>	N/A
<i>Personal Data retention period</i>	<ul style="list-style-type: none"> - Retention period necessary for the operational requirement in relation to the duration of staff presence - Retention period necessary for the proper functioning of the services - Retention period needed to meet legal and regulatory obligations
<i>Rights of Data Subjects (DS)</i>	<p>Within the limits and conditions authorized by the regulations in force, rights to:</p> <ul style="list-style-type: none"> - Access - rectification - Erasure - Restriction - Objection <p>In addition, it is possible to provide to the DC with guidelines on the retention, erasure and communication of DS' Personal data after death, which can also be registered with a "certified digital trusted third party". These directives, or a sort of "digital will", may designate a person responsible for their execution; otherwise, the heirs will be appointed</p>
<i>Right to lodge a complaint with a competent supervisory authority</i>	<p>The DS may lodge a complaint with a competent supervisory authority. In France, this authority is the CNIL:</p> <ul style="list-style-type: none"> - To contact: www.cnil.fr/en/you-request-contacter-la-cnil - To make a complaint (complaint): www.cnil.fr/en/complaints

4. Notice cards per category of Data Subject

The table below indicates for each processing, listed in the rows of the first column, the categories of Data Subject, in column two and following, whose personal data are handled.

Title of Processing (reference to the section)	Staff, including Collaborators and Consultants	Business relationship, including Clients and Prospects	Providers	Candidates	Web site visitor	On site visitor
3.1.1 Notice card for « Market Abuse (Compliance) » Processing	✓	✓	✓			
3.2.1 Notice card for « Provision of IT tools (IT) »	✓	✓	✓	✓	✓	