

Your privacy is important to us and we are committed to respecting your personal information.

This Privacy Policy explains how Crédit Agricole Corporate and Investment Bank ("we") complies with its obligations under the *Privacy Act 1988* (Cth) (**Privacy Act**) in collecting, holding, using and disclosing the personal information of its corporate and institutional customers (or prospective customers) ("you").

If you have any questions or concerns about this Privacy Policy or how your personal information is handled by us, please contact our Privacy Officer at [robert.traouslard@ca-cib.com](mailto:robert.traouslard@ca-cib.com) +61 2 9258 5373.



**Michel Roy**

Senior Regional Officer for Asia-Pacific  
Credit Agricole CIB



**Donald PARSONAGE**

Senior Country Officer  
Credit Agricole CIB Sydney Branch

## Table of Contents

<b>1. PERSONAL INFORMATION.....</b>	<b>3</b>
<b>2. THE KINDS OF PERSONAL INFORMATION WE COLLECT AND HOLD.....</b>	<b>3</b>
<b>3. WHY WE COLLECT, HOLD, USE AND DISCLOSE YOUR PERSONAL INFORMATION .....</b>	<b>4</b>
a. Who we may share your personal information with .....	4
b. Disclosure of personal information outside of Australia.....	5
<b>4. HOW WE COLLECT YOUR PERSONAL INFORMATION .....</b>	<b>5</b>
<b>5. HOW WE STORE YOUR PERSONAL INFORMATION.....</b>	<b>6</b>
a. Storage of personal information .....	6
b. Protecting your personal information .....	6
c. How long we will keep your personal information for .....	7
<b>6. HOW YOU CAN CONTACT US TO CORRECT OR ACCESS YOUR PERSONAL INFORMATION.....</b>	<b>7</b>
• the scope of the request; .....	7
• the nature of the request/type of right exercised; and .....	7
• the personal information concerned, and provide any other relevant information on the context. ....	7
<b>7. HOW YOU CAN COMPLAIN ABOUT OUR HANDLING OF YOUR PERSONAL INFORMATION .....</b>	<b>8</b>
How we will deal with your complaint .....	8
<b>8. PRIVACY POLICY UPDATE .....</b>	<b>8</b>

## 1. PERSONAL INFORMATION

"Personal information" means information or an opinion about an individual that can be used to reasonably identify that individual. Personal information generally does not include anonymised information where the individual the subject of the information cannot be identified.

In some instances, you may deal with us anonymously or under a pseudonym. However, where it is impractical or unlawful for us to deal with you on such basis, we will require you to identify yourself.

## 2. THE KINDS OF PERSONAL INFORMATION WE COLLECT AND HOLD

We may collect and hold personal information relating to your:

- identification information (name, date and place of birth, nationality, address/country of residence, passport and/or identity card number, photo, etc.);
- private life (family situation, etc.);
- professional life (occupation/function, employment, contact information, certifications/authorisations, telephone conversations/emails/chats etc.);
- economic and financial information (income, assets, tax situation, debts, expenses, transactional, account etc.);
- technical information relating to the use of our services, mobile application and website (IP address, connection logs, cookies, geographical location, dates and times of visits to webpages etc.); and
- information of persons related to you (employees, shareholders, agents, legal representatives, beneficial owners, family members, third-party representatives, etc.).

The personal information we collect and hold will generally depend on the product or service we offer or provide. We will only collect your personal information where it is reasonably necessary to for us to carry out the purposes set out in section 3 below.

### **3. WHY WE COLLECT, HOLD, USE AND DISCLOSE YOUR PERSONAL INFORMATION**

We may collect, hold, use or disclose your personal information for the following purposes:

- to offer and provide our products and services;
- to improve our products, services and marketing activities, including improving your browser experience or for statistical analysis;
- as required or authorised under Australian law or the laws of a foreign jurisdiction, including to allow us to comply with any legal and regulatory obligations such as for KYC checks during the on boarding process. We may collect your personal information as required under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) or the Income Tax Assessment Act 1936 (Cth);
- to manage risks, prevent and detect money laundering, the financing of terrorism, and fraud, and to determine tax status;
- to operate our business and manage business relationships (customer knowledge, designation of correspondents, information on our products, etc.);
- commercial prospecting, targeted event campaigns and commercial events;
- to carry out services or perform contracts (structured finance, flows, investment, corporate finance, international activity, etc.); and
- to manage transactions (identification of counterparty contacts for payments and confirmation correspondence, sample signatures of authorised signatories, etc.).

We will not collect, hold, use or disclose your personal information other than for the primary purpose the personal information was collected, or for a reasonably related secondary purpose. A secondary purpose may include for example, instances where our service providers and third party contractors (e.g. technology and support service providers) require access to your personal information in order to provide services to us.

If you do not allow us to collect, hold, use or disclose your personal information, or if you provide us with incomplete information, we may not be able to provide our products or services.

#### **a. Who we may share your personal information with**

In addition to the above purposes, the personal information we collect may be communicated to the following persons or entities to whom we normally disclose personal information to:

- our related entities in and outside of Australia;

- any entity of the Crédit Agricole Group for the purpose of pooling resources or grouping companies;
- our suppliers, service providers, subcontractors, dealers and agents for the sole requirements of operational or technical subcontracting;
- our business partners and agents (future or existing);
- representatives or other persons authorised by you to receive information held by us (e.g. under powers of attorney);
- independent agents, intermediaries or brokers;
- French and foreign supervisory authorities, French and foreign administrative and judicial authorities, public bodies on request and within the limits of what is permitted by the regulations;
- professional advisers such as statutory auditors, lawyers and notaries; and
- other persons, such as regulators and law enforcement agencies, as required or permitted by law.

#### **b. Disclosure of personal information outside of Australia**

In order to perform our services or meet our legal and regulatory obligations, we may have to transfer your personal information to organisations outside of Australia. Your personal information may be disclosed to organisations located in the following countries (as may be required from time to time):

- France, USA, UK, HKG, SGP, Japan

## **4. HOW WE COLLECT YOUR PERSONAL INFORMATION**

There are a number of ways in which we may collect personal information. In most instances, we will collect information about you when you provide it to us including when you complete a form for us, call us, or email us.

We will normally collect your personal information directly from you, unless it is unreasonable or impractical to do so. We may collect information about you from third party sources including commercial and business information providers, public registers maintained by the Australian Securities and Investments Commission, or other publicly available information.

## 5. HOW WE STORE YOUR PERSONAL INFORMATION

### a. Storage of personal information

We will take reasonable steps to protect the personal information which we hold from misuse or loss and from unauthorised access, modification or disclosure. Your personal information will generally be stored in electronic form on our systems or the systems of our service providers outside Australia. Subject to our legal obligations to retain our business records for particular periods, we will destroy or de-identify personal information once we no longer require it for our business purposes.

### b. Protecting your personal information

Ensuring the security of the data you entrust to us is one of our most important responsibilities. To ensure the security and confidentiality of the personal data we collect and use, we have been implementing technical and organisational measures for a long time, including:

- control of access and authorisations for IT equipment relative to the processing of personal data;
- measures to secure technical infrastructure (workstation, network, server) and data (backup, business continuity plan);
- taking data security and processing into account in the design of a product or solution;
- restricting the persons authorised to process personal data according to purpose and the processing means provided for in each case;
- strict confidentiality obligations imposed on our subcontractors;
- raising the awareness of all our employees worldwide and training those employees most concerned by the collection or management of personal data; and
- the establishment of procedures making it possible to react promptly in the event of a personal data security incident.

Where your information is transferred overseas, we have implemented appropriate measures to ensure there is a sufficient level of privacy protection as required by the privacy protection regimes of other countries which offer substantially similar levels of privacy protection and enforceability required under the Privacy Act, such as the General Data Protection Regulation.

If you provide personal information to us, you consent to the disclosure of the information overseas and acknowledge that we will not be required to take further steps to ensure that the overseas recipient handle your personal information in compliance with the Australian Privacy Principles under the Privacy Act.

**c. How long we will keep your personal information for**

We will only keep personal information for the duration necessary to achieve the intended purpose and for the time during which we need the personal information. This length of time depends on why we use it, such as to provide our services or products, to pursue our legitimate interests, to comply with our legal and regulatory obligations, or to exercise or defend our rights in court. It may also be kept or archived for statutory limitation periods.

**6. HOW YOU CAN CONTACT US TO CORRECT OR ACCESS YOUR PERSONAL INFORMATION**

We will take reasonable steps to ensure personal information collected by us is accurate, up to date and complete.

If you want to access, or ask us to correct or update the personal information held by us, please contact us through:

Robert TROUSLARD

The Privacy Officer/ Local Compliance officer

**Phone:** +61 2 9258 5373 -9AM-5PM week days-

**Email:** robert.traouslard@ca-cib.com

**Mail:** Level 15, Aurora Place, 88 Phillip Street, Sydney NSW 2000

We will take reasonable steps to correct information held about you, which you believe is inaccurate, out of date, incomplete, irrelevant, misleading or is otherwise incorrect, within a reasonable time of receiving your request. To allow us to reply quickly to you, please specify where possible:

- the scope of the request;
- the nature of the request/type of right exercised; and
- the personal information concerned, and provide any other relevant information on the context.

You will first be asked to provide proof of your identity.

We may refuse your request to access your personal information where permitted under the Privacy Act or other Australian laws.

## **7. HOW YOU CAN COMPLAIN ABOUT OUR HANDLING OF YOUR PERSONAL INFORMATION**

If you want to complain about the way we handled your personal information, including any breaches of the Australian Privacy Principles, you can contact us through:

Robert TROUSLARD

The Privacy Officer/ Local Compliance officer

**Phone:** +61 2 9258 5373 -9AM-5PM week days-

**Email:** robert.traouslard@ca-cib.com

**Mail:** Level 15, Aurora Place, 88 Phillip Street, Sydney NSW 2000

### **How we will deal with your complaint**

If you have a complaint about the way in which we have handled your personal information, you should advise us through our contact details below.

Once you lodge a complaint with us, we will send you a written receipt within 10 working days unless the complaint has already been resolved within that timeframe. We will investigate your complaint within two months from the date you lodge your complaint and keep you informed about the progress of the complaint throughout the process. We will endeavour to resolve any issue to your satisfaction and notify you of the outcome of our investigation as soon as possible

If you are not satisfied with the way we have handled your privacy complaint, you can contact the Office of the Australian Information Commissioner through:

**Mail:** GPO Box 5218, Sydney NSW 1042

**Phone:** 1300 363 992

**Internet:** <http://www.oaic.gov.au>

## **8. PRIVACY POLICY UPDATE**

This Privacy Policy was last updated on January 2022.

This Privacy Policy is regularly updated to take into account regulatory evolutions and business requirements. Any updates to this Privacy Policy will be published on our website (<https://www.ca-cib.com/our-global-markets/asia-pacific/australia>).

You may also obtain a copy of the Privacy Policy free of charge by contacting us through the details provided above. It is your responsibility to check for changes to our Privacy Policy from time to time.