

Privacy notice for Natixis Saudi Arabia Investment Company NSAIC Employees and Contractors

Natixis Saudi Arabia Investment Company (NSAIC) ("we", "our", "us") is committed to protecting the privacy and security of your personal data.

This privacy notice describes how we collect and use personal data about you during and after your working relationship with us, in accordance with the SDAIA Personal Data Protection Law (the "**Personal Data Protection Law**") and the SDAIA Implementing Regulation of the Personal Data Protection Law (the "**Implementing Regulations**").

It applies to all employees and contractors.

NSAIC is responsible for deciding how we hold and use personal data about you. We are required under the Personal Data Protection Law to notify you of the information contained in this privacy notice.

This notice applies to all individuals employed by NSAIC and contractors. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions along with the Natixis data protection policy ("**the Policy**") (*located on the Natixis Saudi Arabia Investment Company "NSAIC" web page*) when we are collecting or processing personal data about you, so that you are aware of how and why we are using such information.

DATA PROTECTION PRINCIPLES

We will comply with the Data Protection Law. This says that the personal data we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

THE KIND OF DATA WE HOLD ABOUT YOU

Personal data means any data about an individual from which that person can be identified. It does not include truly anonymized data which does not constitute personal data for the purpose of applicable data protection law. There are “Special Categories” of data which require a higher level of protection.

What is Personal Data?

The Data Protection Law defines “Personal Data” as any data relating to an identified or identifiable natural person. An identifiable natural person is a natural living person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name or an identification number or to one or more factors specific to their biological, physical, biometric, physiological, mental, genetic, economic, cultural or social identity.

We will collect, store, and use the following categories of Personal Data about you and where pertinent, about your dependents (*please note that the following list may be updated from time to time; if this occurs, we will distribute a revised privacy notice accordingly*):

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status and dependents.
- Religion
- Next of kin and emergency contact information.
- Insurance number.
- Bank account details and payroll records.
- Salary, annual leave, pension and benefits information.
- Start date.
- Location of employment or workplace.
- Copy of Degrees, marriage certificate, birth certificate
- Copy of driving license, Emirates ID, UAE residency visa or Passport.
- Medical certificate.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- Employment records (including job titles, work history, working hours, training records and professional memberships).
- Compensation history.
- Performance and professional development information.

- Skills and competencies (for example, professional qualifications and memberships, language skills).
- Disciplinary and grievance information, where applicable.
- CCTV footage and other information obtained through electronic means such as swipe card records.
- Telephone recordings where this is allowed under applicable law.
- Information about your use of our information and communications systems.
- Information required to assess your fitness and propriety, including data submitted by you in an annual compliance declaration.
- Personal account dealing, and investment records required for compliance reasons.
- Records of any outside business interests which may also include personal data in relation to partners, directors, shareholders, etc. in your business undertaking.
- Photographs.

HOW IS YOUR PERSONAL DATA COLLECTED?

We collect personal data about employees and contractors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers or credit reference agencies.

We will collect additional personal data in the course of job-related activities throughout the period of you working for us.

HOW WE WILL USE DATA ABOUT YOU

We will only use your personal data in the manner the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we have entered into with you.
- Where you have provided consent.
- Where it is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into such contract.
- Where it is necessary in order to protect your vital interests or that of another natural person;
- Where we need to comply with a legal obligation, notably given by the Saudi Labor Law and other Regulations applicable in Saudi Arabia.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (on the basis of a balancing test undertaken by us).

We may also use your personal data in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

Situations in which we will use your personal data

The situations in which we will process your personal data and the legal bases we rely upon are listed below.

| Purpose of processing | Legal basis |
|---|---|
| Making decisions about your recruitment or appointment. | Legitimate interests in conducting our business |
| Determining the terms on which you work for us. | |
| Checking that you are legally entitled to work in the Saudi Arabia | Legitimate interests in conducting our business and legal obligation |
| Compensating you for your services | Contractual relationship with you and legal obligation |
| Providing certain benefits to you. | Legitimate interests in conducting our business, legal obligation and our contractual relationship with you |
| Liaising with your pension provider (GOSI) | Legal obligation and our contractual relationship with you |
| Liaising with the medical and life insurance provider and related brokers | Legal obligation and our contractual relationship with you |
| Administering the contract, we have entered into with you including management of employee records and employee requests, management of working time, general resource management (e.g. supplies, equipment and other furniture allocated to <u>staff</u>) | Legitimate interests in conducting our business and our contractual relationship with you |
| Business management and planning, including accounting, auditing and internal inspections. | Legitimate interests in conducting our business |
| Conducting performance reviews, managing performance and determining performance requirements. | |
| Making decisions about salary reviews and compensation. | Legitimate interests in conducting our business and our contractual relationship with you |

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| Assessing qualifications for a particular job or task, including decisions about succession planning and promotions | <u>Legitimate interests in conducting our business and pursuant to applicable regulations</u> |
| Gathering evidence for possible grievance or disciplinary hearings. | <u>Legitimate interests in conducting our business and legal obligation</u> |
| Litigation management | |
| Making decisions about your continued employment or engagement. | <u>Legitimate interests in conducting our business and our contractual relationship with you</u> |
| Making arrangements for the termination of our working relationship. | |
| Assessing education, training and development requirements. | |
| Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work. | <u>Legitimate interests in protecting our business and legal obligation</u> |
| Ascertaining your fitness to work and ensure your health and safety in the workplace | <u>legal obligation and our legitimate interests in having an appropriate and safe workplace for all staff</u> |
| <u>Managing sickness absence.</u> | Legitimate interests in conducting our <u>business and legal obligation</u> |
| <u>Complying with health and safety obligations.</u> | Legal obligation |
| <u>To prevent fraud.</u> | Legitimate interests in conducting our business and legal obligation |
| <u>To ensure network and information security.</u> | |
| <u>To monitor your use of our information and communication systems to ensure compliance with our IT policies.</u> | Legitimate interests in conducting our business and our contractual relationship with you |
| <u>Conducting data analytics studies to review and better understand employee retention and attribution rates.</u> | Legitimate interests in conducting our business |
| <u>Equal opportunities monitoring and analysis, including, as an example, Gender Pay Gap reporting.</u> | Legitimate interests in conducting our business and legal obligation |
| <u>Recording, investigation and processing of alerts (Whistleblowing)</u> | Legal obligation |
| <u>Employee Ethics such as:</u> <ul style="list-style-type: none"> • <u>Detection of conflicts of interest</u> • <u>Maintenance of lists of insiders and participants, Declaration of gifts &</u> | Legal obligation and our legitimate interests in conducting our business |

| | |
|---|---|
| entertainment, social mandates, securities accounts and personal investment dealing, appointments and outside of business interests. | |
| Monitoring of employees and cybersecurity, this includes Control of computer hardware and software (software compliance, digital certificates); Data collection and analysis USB port blocking Encrypted USB drives Antivirus Remote access to information systems (VPN) Phone mobile and personal computer assigned to staff Listening to and recording telephone conversations and written messages (email and instant messaging) relating to trading room operations | |
| Security of the premises including CCTV and access control | Legitimate interests in ensuring the security of our premises |
| Business travel and expense management | Our contractual relationship with you and our legitimate interests in conducting our business |
| Disability management in the workplace and related health arrangements | Legal obligation and our contractual relationship with you |

Some of the above grounds for processing will overlap.

If you fail to provide personal information

If you choose not to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason which is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent where required or permitted by the Saudi Privacy Data Protection Law (PDPL).

What is “Special Categories of Personal Data”?

Special Categories of Personal Data are personal data revealing or concerning (directly or indirectly) racial or ethnic origin, communal origin, political affiliations or opinions, religious or philosophical beliefs, criminal record, and health or sex life and including genetic data and biometric data where it is used for the purpose of uniquely identifying a natural person.

HOW WE USE SPECIAL CATEGORY OF PERSONAL DATA Special Categories of personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data. We have the Policy and safeguards which we are required by law to maintain when processing such data. We may process Special Categories of Personal Data if one of the following conditions are met:

- With your explicit written consent;
- if the processing is necessary for us or for you to carry out our/your obligations or exercise our/your rights in the context of your employment;
- if the processing is necessary to protect your vital interests or another natural person where you are unable to give consent;
- if processing relates to personal data made public by you;
- if the processing is necessary in connection with legal claims;
- if the processing is necessary for compliance with laws to which we are subject (provided we have given you clear notice of such processing as soon as reasonably practicable unless this is prohibited);
- if the processing is necessary for compliance with anti-money laundering or counter-terrorist financing obligations or the prevention, detection or prosecution of any crime;
- if the processing is necessary for public health reasons or to assess the working capacity of an employee;
- if the processing is proportional and necessary to protect you from potential bias or inaccurate decision making; and
- if the processing is necessary for reasons of substantial public interest that are proportionate to the aim(s) pursued provided your rights are safeguarded.

INFORMATION ABOUT CRIMINAL CONVICTIONS

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided, we do so in line with the Policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's

interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.

AUTOMATED DECISION-MAKING

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

DATA SHARING-DISCLOSURE TO THIRD PARTIES

In the course of your employment, we may share your personal data with the Natixis group other third parties who are providing services to us or to the Natixis group for the purposes listed above. These include payroll or benefits provision providers, IT services providers, auditors, medical insurance providers etc.

We will share your personal data with third parties where required by law or regulation such as government authorities and/or law enforcement officials, for the purposes listed above or where we have another legitimate interest in doing so.

We may share any information collected about you in accordance with the Policy to other members of the Natixis group of companies for the purposes described herein.

If we disclose your personal data to any third party, we will wherever possible require these parties to protect such personal data in the same way as we do.

Transferring information outside Saudi Arabia

We may transfer the personal data we collect about you to recipients outside the NSAIC and Saudi Arabia in jurisdictions where (i) a determination has been made by the SDAIA that such jurisdictions ensure an adequate level of protection to your personal data; and (ii) the law does not provide an adequate level of protection to your personal data. To ensure that your personal data receives an adequate level of protection in other scenarios where it is transferred outside the Saudi Arabia, we will put in place appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the Saudi Arabia laws on data protection, such as but not limited to binding corporate rules or standard contractual clauses.

Your personal data may be transferred to other members of the Natixis group of companies in the European Economic Area. It may also be accessed by other members of the Natixis group of companies for example in Moscow. Where this is the case, we rely on our intra-group data transfer agreement containing European Commission approved Standard Contract Clauses to safeguard your personal data.

DATA RETENTION

For how long will my data be stored?

We will process and store personal data as long as it is lawful for us to do so.

We will normally retain your records for a minimum of six years from the termination of the employment contract, to comply with regulatory and contractual requirements unless there is a particular reason to hold the records for longer, including legal hold requirements, which require us to keep records for an undefined period of time.

Our criteria for defining our retention periods are:

- meeting our operational obligations in relation to human resources management and to secure our buildings and infrastructures; and
- legal and regulatory requirements.

In case of regulatory requests or legal claims, our retention periods may be increased.

INFORMATION SECURITY

We are committed to protecting your privacy and to keeping your personal data safe. We will ensure that appropriate measures are taken against unlawful or unauthorized processing of your personal data, which is not in accordance with this notice, and to protecting your personal data against accidental loss or damage.

MONITORING

To ensure compliance with the terms of your employment contract, our employment policies and the applicable Data protection Law, we reserve the right to monitor or record your communications and use of our IT systems and mobile devices. We may also create CCTV in public spaces controlled by Natixis for security purposes and to ensure compliance with our workplace policies.

YOUR RIGHTS

Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your working relationship with us.

Your rights in connection with personal data

Under certain circumstances, by law you have the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where data protection laws allow for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact Natixis’ Data Protection Officer (“**DPO**”) in writing (see contact details below). **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we need from you

We may need to request specific data from you to help us confirm your identity and ensure your right to access the data (or to exercise any of your other rights).

RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the DPO (see contact details below). Once we have received notification that you have withdrawn your consent, we will no longer process your data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Note that You have the right to make a complaint at any time to SDAIA Office.



CONTACT DETAILS

If you have any questions about this privacy notice or our processing of how we handle your personal data, please contact us at;

Attention: Compliance Officer

Floor 16, Al Faisaliya Center

7277, King Fahd Rd.

Al Olaya District, 3333

Riyadh 12212E-mail: Email : cco-ksa@natixis.com

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may provide updates from time to time to this privacy notice which can be referred to on our web page.

CONSENT

Based on our assessment of our processing activities, we have ascertained that we do not require your consent, as a lawful basis, to carry out the relevant processing activities and have relied on alternative lawful bases, as provided in the Regulations, to carry out the relevant processing activities. Should you require any further information pertaining to the lawful basis of processing your personal data please contact us as per the information provided under the section titled, "Contact Details".