

# Charter on the protection of workers' personal data

## "Employee Privacy Charter"

June 21, 2018

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# 1. Introduction

The purpose of this charter ("the Privacy Charter") is to provide a formal description of the way which Degroof Petercam<sup>1</sup> processes its workers' personal data ("the Data").

Within the scope of this charter, "worker" designates applicants, workers, former workers, students, trainees, temporary workers, managers or directors, external consultants or any other natural person who offers their services and who comes under the control of or works for Degroof Petercam and third parties, whose information is communicated through the assignment or employment relationship (hereinafter "**the Employee**").

Where Degroof Petercam uses the terms "employee", "member of staff", "employment" or "employment relationship", it also designates, where applicable, individuals who work for Degroof Petercam on any basis other than under a contract of employment; this does not mean, however, that they are Degroof Petercam employees.

The protection of Data is of paramount importance for Degroof Petercam and through this Charter we hope to provide a clear overview of our policies and practices in this respect. Please read the information in this Privacy Charter carefully to fully understand the purposes for which Degroof Petercam uses your Data.

Furthermore, and in accordance with regulations in force, this Privacy Charter applies only to Data which might directly or indirectly identify an individual person. It complements the provisions of existing policies, the terms of employment and specific agreements between you and Degroof Petercam.

In particular, you will find more detailed information in this document about your rights in relation to the protection of your personal data and the way in which you can exercise these rights.

Your Data are processed in compliance with applicable legal provisions and in particular Regulation (EU) no. 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of individuals with regard to the processing of personal data and the free movement of such data ("the GDPR") and relevant national laws. Certain aspects of this Privacy Charter relating to the implementation of the GDPR will only take effect as of May 25, 2018.

If you would like further information about data protection, this is available from the Data protection authority ([www.autoriteprotectiondonnees.be](http://www.autoriteprotectiondonnees.be)).

Degroof Petercam reserves the right to amend this Privacy Charter to reflect more recent practices. The most recent version of the Privacy Charter is always available on the Degroof Petercam website [www.degroofpetercam.be](http://www.degroofpetercam.be), and on the Degroof Petercam Intranet site (Wallstream).

We will inform you of any significant changes via the usual communication channels.

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<sup>1</sup> Banque Degroof Petercam SA, DPAM SA, Imofig SA and/or DPCF SA.

## 2. Who is your Data Controller?

The data controller depends on your employment relationship, contract (of employment) or, if you are submitting an application, the place you are applying for (in Belgium):

- If you are submitting an application or are a Bank Degroof Petercam Employee, the data controller is **Bank Degroof Petercam SA**, whose registered office is located at Rue de l'industrie 44, 1040 Brussels, and which is registered with the Crossroads Bank for Enterprises under VAT number BE 0403.212.172. (Tel. +32 (0) 2 287 99 19);
- If you are submitting an application or are a DPAM SA Employee, the data controller is **DPAM SA**, whose registered office is located at Rue Guimard 18, 1040 Brussels, and which is registered with the Crossroads Bank for Enterprises under VAT number BE 0886.223.276. (Tel. +32 (0) 2 287 99 19);
- If you are submitting an application or are a DPCF SA Employee, the data controller is **DPCF SA**, whose registered office is located at Rue Guimard 18, 1040 Brussels, and which is registered with the Crossroads Bank for Enterprises under VAT number BE 0864.424.606. (Tel. +32 (0) 2 287 99 19);
- If you are submitting an application or are an Imofig SA Employee, the data controller is **Imofig SA**, whose registered office is located at Rue Guimard 18, 1040 Brussels, and which is registered with the Crossroads Bank for Enterprises under VAT number BE 0403.363.018. (Tel. +32 (0) 2 287 99 19);

Degroof Petercam is an independent financial institution held by family shareholders with a long-term commitment which offers its services to private and institutional investors.

Its clients enjoy a unique combination of services including private banking, institutional management, investment banking (corporate finance and financial intermediation) and asset services.

The Degroof Petercam Group operates in Belgium, Luxembourg, France, Spain, Switzerland, Holland, Germany, Italy and Canada, among others.

You can find more information on Degroof Petercam's activities at [www.degroofpetercam.com](http://www.degroofpetercam.com).

Degroof Petercam shall be accountable to the supervisory authorities for compliance with data regulations.

It shall determine the purposes for which the Data are processed, as well as the procedures implemented and all processing-related characteristics, as explained in this Charter.

### 3. When are your Data collected?

Your Data are collected and processed in the context of the employment relationship with Degroof Petercam.

Some of your Data may be collected in the context of an existing, previous or potential future employment relationship or professional relationship (hereinafter "**the Employment Relationship**") with Degroof Petercam. Degroof Petercam collects and processes any Data you provide, as well as Additional Data that are collected during the Employment Relationship or recruitment process.

For example, some of your Data may be collected:

- When you express an interest in a vacancy at Degroof Petercam, for example by sending your CV and educational background;
- As soon as you respond to invitations to events organized by Degroof Petercam as part of the Employment Relationship, such as participating in job or networking events;
- As soon as you provide Data as part of a Degroof Petercam process;
- As part of Data inspections by an authorized third party (e.g. inspection and monitoring services);
- As part of a visit to our offices during which you are filmed by our surveillance cameras;
- As soon as you publish your Data on social networks (e.g. Wallstream) or on free-access websites;
- As soon as your Data are published, made public or passed on to authorized third parties (e.g. Moniteur Belge, agents or brokers, companies belonging to the Group) or in the press.

When personal data are collected and processed, the Employee must be aware that any misrepresentation, omission or false declaration constitutes gross misconduct.

The Data transmitted by the Employee must be correct and accurate.

## 4. For what purposes does Degroof Petercam process your Data?

The purposes for which Degroof Petercam collects and processes your Data include, but are not limited to:

- the management of Employees (e.g. identification of Employees, monitoring professional experience, evaluations, training, internal communication, etc.);
- Employee administration (e.g. administration of wages: preparing pay slips, managing benefits of any kind, etc.);
- compliance with legal, regulatory and administrative obligations and the application of social security and tax regulations (e.g. relations with social partners, reporting obligations to authorities, social security and tax inspections, questionnaires relating to identifying prevention measures for Employees, etc.);
- examining and handling court proceedings and defending itself in cases before a court and/or administrative body, during an arbitration or mediation (e.g. monitoring disputes, litigation management, etc.);
- protecting and securing property, services and access to Degroof Petercam buildings (e.g. video surveillance, etc.)

Degroof Petercam alone determines these purposes, based on the needs of its business activities, and ensures **that only the data which are necessary and relevant to a specific purpose** are processed.

The purposes for which the Data are further processed must be compatible with the initial purposes mentioned above (taking into account reasonable expectations and applicable regulations).

Degroof Petercam maintains a record of processing activities which is available to the Data Protection Authority for this purpose.

## 5. What are the legal bases for processing?

Degroof Petercam processes your Data in the situations permitted by the law, in other words:

- 5.1. Processing is necessary for the performance of a contract (of employment) or at the request of the Employee prior to entering into a contract (of employment) (**Article 6.1.b of the GDPR**);
- 5.2. Processing is necessary for compliance with a legal obligation to which Degroof Petercam is subject (**Article 6.1.b of the GDPR**);
- 5.3. Processing may also take place when it is necessary for the purposes of the legitimate interests of Degroof Petercam (**Article 6.1.b of the GDPR**);
- 5.4. Where processing has no grounds on one of the legal bases mentioned above, Degroof Petercam may request your consent, in accordance with **Article 6.1.b of the GDPR**, provided that this consent may be freely given.

### 5.1. THE PERFORMANCE OF A CONTRACT (OF EMPLOYMENT) AND PROCESSING OF DATA PRIOR TO ENTERING INTO A CONTRACT (OF EMPLOYMENT)

The aspects of the Employment Relationship include, but are not limited to, the recruitment process (pre-contractual reports before you become a Degroof Petercam Employee), entering into an Employment Relationship, the follow-up and end of the Employment Relationship.

Examples of activities relating to these aspects include, but are not limited to:

- determining the aptitude for commitment;
- including checking references and qualifications;
- including the processing of test results as part of the recruitment procedure;
- administration of payment and pay;
- business travel and other reimbursements of expenses;
- monitoring absences;
- project management;
- auditing, compliance and risk management activities;
- communicating with employees and third parties (e.g. family members and friends);
- performance evaluation;
- disciplinary measures;
- internal and external investigations;
- career management, including evaluations of qualifications for a job or specific assignment;
- handling procedures relating to an Employee (e.g. compensation, insurance);
- estate planning;
- assistance;
- purchasing and maintaining insurance;
- storing personal data;
- processing data in social balance sheets and other reports;
- other administrative, financial and HR activities.

## 5.2. COMPLIANCE WITH LEGAL OBLIGATIONS

Degroof Petercam is required to comply with certain legal and regulatory obligations that require specific processing of your Data (e.g. well-being and safety at work, salary administration, employment law, issues relating to ethics, tax regulations), as well as legal and administrative obligations relating to individual workers (e.g. deductions, allowances).

As a result, it may be required to pass on your Data to the competent administrative or legal authorities, as well as to different entities of the Degroof Petercam Group or to third parties.

Degroof Petercam operates within a strict regulatory framework in which, under certain conditions, some Data are recorded, such as telephone conversations.

We will make sure that your Data are transferred only when and where Degroof Petercam is concerned.

You can obtain further information on the legal and regulatory obligations to which Degroof Petercam is bound using the contact details provided in Article 12 of this Privacy Charter.

## 5.3 LEGITIMATE INTERESTS OF DEGROOF PETERCAM

For the purposes of balancing and taking into account rights and freedoms, including the right to the protection of privacy, Degroof Petercam processes your Data to pursue its legitimate interests.

In this situation, Degroof Petercam will always try to minimize the impact of the envisaged processing operations in order to ensure this balance.

If, however, you object to such processing, you may exercise your right to object, taking into account the conditions and restrictions set out in Article 11.4.

The Data are therefore processed for:

- developing health and safety programs;
- providing technical support, including collecting passwords;
- ensuring safety and protection of the workplace, visitors and property and equipment (including controlling and facilitating access and monitoring activities in buildings and activities using our computers, devices, networks, communication and other assets and tools);
- storing contact data and details in the case of an emergency;
- managing means of recourse or disputes;
- archiving and evidence purposes;
- carrying out the preventive and operational management of physical and information security;
- improving operations within Degroof Petercam, the quality of service and its processes;
- using inquiries, statistics and reviewing comments posted by you on different platforms and social networks (Wallstream, Twitter, LinkedIn, Facebook, Instagram, etc.);
- providing continuous training for our employees;
- for other purposes which are part of our business activities that are reasonably requested by Degroof Petercam.



#### 5.4 CONSENT

You may be asked to consent to the processing of certain personal data. In such cases, you can withdraw your consent at any time.

## 6. What are the legal bases for the processing of special categories of personal data?

In certain cases, Degroof Petercam also processes specific categories of data (e.g. data relating to health, trade union membership). Processing will always be justified by one of the following legally permitted situations:

- Processing is necessary for the purposes of carrying out the obligations and exercising Degroof Petercam or your specific rights in the field of employment and social security and social protection law in so far as it is authorized by national law or a collective agreement entered into on the basis of national legislation (**Article 9 2.b of the GDPR**);
- Processing is necessary for the establishment, exercise or defense of legal claims (**Article 9 2.f of the GDPR**);
- Processing is necessary for reasons of substantial public interest and authorized by local law (**Article 9 2.g of the GDPR**).
- Where processing has no grounds on one of the legal bases mentioned above, Degroof Petercam may request your explicit consent, in accordance with **Article 9.2.a of the GDPR**, provided that your consent may be freely given.

# 7. What type of Data is processed by Degroof Petercam?

Degroof Petercam may be required to collect and process several types of personal data that will be sent by you or by third parties, in accordance with applicable national laws and good business practices, in so far as necessary to achieve the purposes described above in section 4.

Degroof Petercam requires your personal data to prepare, execute and terminate your Employment Relationship and to fulfill the legal and contractual obligations related thereto. Without these personal data, Degroof Petercam will not be able to enter into a contract with you or comply with the resulting obligations.

The categories of personal data that are processed by Degroof Petercam include, but are not limited to, the categories mentioned below. They may also vary depending on the position for which you are applying, the function performed, the location and any other employment or contractual conditions applicable to you.

➤ The information that is collected in the **employee - identification form** includes:

CATEGORIES OF DATA	TYPE OF DATA
Your identification Data	Name and surname, gender, nationality, date and place of birth, identification data (e.g. national registration number, data on your electronic identity card, driving license), photos, diplomas
Your contact Data	Address, cellphone or land line number, private e-mail address, language
Your personal and demographic status	Civil status, family situation, information about your training and level of education
Your family situation	Personal data about your partner/legal cohabitant: name and surname, date of birth, occupation Personal data of your dependents: name and surname, date of birth, gender, entitlement to benefits. Next of kin contact information in the event of an emergency: name, cellphone number, relationship
Your bank, financial and transaction data	Account number(s), bank details and other financial data
Your professional data	Function/department where you work, user ID and professional identification reference numbers

➤ Other information that is collected by **Employee Management** includes:

CATEGORIES OF DATA	TYPE OF DATA
Documents	Copy of your identity card, certificates of vacations, proof of receipt of the internal code of conduct, statement - payroll tax, AG form, scanned copy of the Employee's public transport season ticket, copy of diplomas/educational background, professional certificates, documents transmitted to authorities such as applications for time credit, C4 certificates
Data exchanged between you and Degroof Petercam during the recruitment process	Letters including offers and acceptance of employment, information from interviews and telephone conversations that you may have had, your CV, application letter, relevant or previous professional experience or other experience, cover letters, notes made during the application interview, training, transcripts, test results or other information that you or an external person sends us in support of an application and/or during the application and recruitment process
Professional data	Data relating to the contract, date of entry into service or of the end of contract, date(s) of promotion(s), place of work, professional background, technical skills, languages, skills, data relating to training, access to EBlox, evaluation forms, data relating to the function, category of the function, data on trade union representation, mandates
Payroll information	National registration number, address, length of service, age, civil status, bank account number(s), composition of family, number of children, date of birth, remuneration and pay slips, tax certificates, individual accounts, gender, data relating to remuneration
Image and sound recordings	Films, photos, video recordings, telephone recordings, internet & e-mail recordings and monitoring and internal and external social networks
Data collected and processed during the performance of work	Reports, evaluations, warnings, e-mails

➤ **Sensitive personal data** collected include:

CATEGORIES OF DATA	TYPE OF DATA
Criminal data	Criminal convictions, extracts from police records
Data concerning health	Medical data, data concerning health and restrictions, results of analyses, medical certificates, occupational physician reports and external prevention service reports
Professional data	Results of online assessments (e.g. by the SHL Belgium Group)

In accordance with the law, Degroof Petercam shall not, **as a matter of principle**, process Data relating to specific categories, i.e. those relating to your race or ethnic origin, religion or philosophical beliefs, trade union membership (except information concerning mandates relating to social elections) or your sex life.

No genetic or biometric Data are processed or used by Degroof Petercam within the scope of the Employment Relationship. If we are required to process Data of this nature, we shall only do so in accordance with the conditions and requirements set down in law and informing you specifically beforehand of the purposes of the processing.

## 8. Who does Degroof Petercam share your Data with?

For the purposes mentioned above, Degroof Petercam may pass on your Data to the recipients listed below.

### 8.1. WITHIN THE DEGROOF PETERCAM GROUP

In general, access to personal data is limited to specific HR professionals and other Degroof Petercam Employees and their representatives who require your personal data to perform their duties and where such access is relevant for carrying out their assignments. These Employees are subject to an obligation of confidentiality.

### 8.2 OUTSIDE DEGROOF PETERCAM

#### A. Supervisory authorities and public authorities

Degroof Petercam is required, pursuant to regulations in force, to report certain Data (information or documents about its employees, their assignees and/or ultimate beneficiaries) to supervisory authorities and public authorities such as:

- public authorities, national and international regulators, supervisory authorities, tax authorities, inspection services and other similar foreign, European or international authorities;
- more generally, any judicial or administrative authority;

We always try to limit the transmission of your Data and to circumstances where Degroof Petercam is required to do so only.

## B. Subcontracting and external experts

Degroof Petercam may decide to communicate your Data to third parties if it decides to subcontract certain services to external experts or if based on a legitimate interest.

The communication of your Data in this respect is always within the limits strictly necessary to enable the services concerned to be provided by these subcontractors. We are also particularly attentive to the choice of these external experts.

As such, Degroof Petercam always seeks to obtain commitments to security and confidentiality from subcontractors if they will be processing your Data, particularly commitments to limit access to your Data and to protect your Data by the appropriate technical and organizational measures.

Degroof Petercam also verifies that processing is in accordance with the instructions it gives to its subcontractor in a subcontracting agreement.

In this respect, Degroof Petercam currently shares your Data for example:

- on third-parties' websites on which it is possible to apply for a position at Degroof Petercam (e.g. an online recruitment platform);
- on third-parties' websites on which an applicant must do an online assessment (e.g. personality tests);
- with services available to Employees (e.g. public transport companies);
- with external service providers within the framework of the Employment Relationship (e.g. leasing companies, external services for safety and prevention on-site, occupational health, external service providers and experts, social security service);
- with insurance companies within the framework of the Employment Relationship (e.g. occupational accident insurance, hospitalization insurance, pension funds);
- with training institutions (e.g. Febelfin Academy);
- in connection with the management of opinions and disputes with the involvement of legal firms or enforcement officers;
- for the development and maintenance of Degroof Petercam IT and assistance tools and applications;
- for the organization of events.

## C. Degroof Petercam as a subcontractor

Although this Charter only concerns the activities of Degroof Petercam in its capacity as data controller, we would also draw your attention to the fact that Degroof Petercam is also a subcontractor of third parties within the context of certain relations with commercial partners. Therefore, and as part of these contractual relations, Degroof Petercam may also be required to communicate certain Data, for example, when performing the following roles:

- intermediary for an insurance firm;
- intermediary in banking services;
- intermediary in investment services;
- intermediary for a company issuing investment products.

## 8.3 TRANSFER OF DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

Degroof Petercam may, as a result of our activities, be required to communicate Data outside the EEA.

In this respect, Degroof Petercam will not communicate Data to countries which do not guarantee adequate protection, except in the cases strictly set out in the General Data Protection Regulation (GDPR). Degroof Petercam will therefore adopt all appropriate measures to guarantee that your Data are duly protected in the destination country, notably by ensuring the protection of personal Data is guaranteed by appropriate contractual provisions or by any other means offering an adequate level of protection.

## 9. How long is your Data stored?

Degroof Petercam shall retain your Data for the time required to achieve the specific purposes for which it was collected, but also to fulfil its legal and tax obligations, for evidence purposes, to carry out internal audits or to respond to information requests from employees and the competent authorities.

Degroof Petercam shall not retain your Data for longer than is necessary to achieve these purposes.

The basic principle, subject to some exceptions, is that your Data will be stored for five years after the end of your Employment Relationship. For example, we are legally obliged to retain social documents (e.g. pay

slips and annual accounts) for five years after the end of the Employment Relationship.

Regarding the data collected from applicants during a recruitment process, the Data may be processed as long as the applicant's profile remains on the recruitment tool portal (e.g. CVWarehouse).

For more information on Degroof Petercam storage practices, please contact the Data Protection Officer who will inform you of the Degroof Petercam Data Retention Policy.

# 10. Security of your Data

Degroof Petercam shall take the necessary measures, particularly organizational and technical, to ensure the confidentiality, integrity and availability and resilience of the Data, systems and processing services under its control and the security of processing in compliance with legal requirements.

Only HR professionals and other Degroof Petercam Employees and their representatives will have access to (some of) your Data when this access is relating to the performance of their duties.

Our Employees must therefore exercise strict professional discretion and are required to respect the confidentiality of your Data. Our premises and access to our servers and networks are strictly protected and we pay particular attention when selecting our providers and commercial partners, to ensure that any Data transfer or processing by those parties is completely secure.

Technical protection measures are also implemented by Degroof Petercam to offer an even higher level of security for your Data.

These measures might notably consist of the encryption of your Data and the installation of firewalls or antivirus systems.

Where an Employee has access to the personal data of others, it is important that there are adequate safeguards to protect the data.

You can help us secure your Data, for example, by following the advice set out below:

- Never leave copies in insecure places;
- Do not make or distribute unauthorized copies of documents or other documentation that contain Data;
- Save computer files containing personal data on secure computers only and do not copy or pass on by any other means this information to unauthorized persons within or outside Degroof Petercam;
- If the Data are no longer necessary for business reasons, destroy paper copies and hard copies immediately by disposing of them in the basket intended for confidential material (or any other accepted means for the processing of confidential information);
- Store paper documents and other hard copies that contain Data in a secure place;
- Shut down computers that are not being used and other forms of access on which Data are stored;
- Always run updates on your web browser or your cellphone applications;
- Never disable failsafe features on your devices;
- Make sure that a firewall is enabled on your devices to permanently control incoming and outgoing information flows;
- Install a trusted antivirus program and ensure you update it;
- Secure your wireless connection (WiFi);
- Do not choose passcodes with easy combinations (e.g. 111111, 12345), classic combinations (typical passwords) or relating to personal information (date of birth, etc.);
- Never communicate your passcodes to third parties (including family members and friends) and never let third parties use them;
- Report immediately any risk of fraud or misuse to Degroof Petercam;
- Report immediately any leak in personal data to the Data Protection Officer.



# 11. What are your rights?

Your rights concerning the processing of your Data are as follows:

## 11.1 RIGHT TO ACCESS AND RECEIVE YOUR DATA

As an Employee, you can obtain your personal Data and ask us the following information: whether we are processing your Data or not; the purposes for which we process your Data; the different categories of Data processed; the recipients to whom your Data are communicated and the way in which we obtained your Data.

This right can be exercised except for Data already available via other channels and providing the rights of third parties are met.

If your Data are also processed by an automated system, this right also entitles you to ask Degroof Petercam to provide you with your personal Data it holds in a structured format which is machine accessible and readable.

This right to access Data is not absolute. There are cases in which applicable laws or regulatory obligations authorize us or require us to deny you access to certain personal data that we have.

In addition, it is possible that your personal data has been destroyed, erased or anonymized..

In the event that we cannot give you access to your personal data, we will inform you, within 30 days, after receipt of the request and will also inform you of the reasons for the refusal, subject to legal or regulatory restrictions.

## 11.2 RIGHT TO HAVE YOUR DATA RECTIFIED

You can always ask us to correct your Data if you find it is incomplete, incorrect or outdated.

Please also note that you may amend your Data using the self-service IT application systems at Degroof Petercam (e.g. EBlox, CV Warehouse, etc.).

Employees are responsible for the accuracy of and for reporting changes in their Data (e.g. if they move house, renew their identity card, or their family situation changes, etc.).

## RIGHT TO HAVE YOUR DATA ERASED

You can ask Degroof Petercam to erase your Data or render it unusable, depending on the reasonable technical resources available to it.

However, Degroof Petercam may refuse to carry out the erasure if it must continue to process your Data for imperative reasons, notably if the Data are necessary for Degroof Petercam to fulfill its legal obligations, for evidence purposes to retain a history of transactions or to fulfill its contractual obligations.

In the event that we cannot erase your Data, we will inform you, within 30 days, after receipt of the request and will also inform you of the reasons for the refusal, subject to legal or regulatory restrictions.

## 11.3 RIGHT TO OBJECT TO THE PROCESSING OF YOUR DATA

You have the right to object to the processing of your Data by Degroof Petercam, where said processing is not based on the legitimate interests of Degroof Petercam.

Degroof Petercam may, however, refuse this request in the event of an imperative reason, notably in a situation in which the processing of the Data is necessary, for example with a view to preventing fraud.

#### 11.4 RIGHT TO WITHDRAW YOUR CONSENT

When the processing of Employee Data is based on consent, Employees may withdraw their consent at any time.

You can make your request via the various communication channels made available to you by Degroof Petercam. You can also change your mind via these same channels.

The withdrawal of consent will not, however, affect the legality of prior processing on the basis of consent prior to withdrawal. As soon as the consent is withdrawn, Degroof Petercam will delete future Data.

#### 11.5 RIGHT TO THE PORTABILITY OF YOUR DATA

Where we process your Data on the basis of your consent or the existence of a contract, you can ask us to transmit your Data directly to another data controller if this is technically feasible for Degroof Petercam.

This right is relating to Data that you send to Degroof Petercam only.

#### 11.6 RIGHT TO RESTRICT THE PROCESSING OF YOUR DATA

You can ask for the processing of your Data to be restricted to certain specific cases.

# 12. How can you send us a request relating to the Privacy Charter?

## 12.1 GENERAL REQUEST

Any request relating to this Privacy Charter or the exercise of your rights may be made and addressed in writing to Degroof Petercam at any time and at no charge.

Simply send us a dated and signed written request which is clear and accurate. We would ask you to attach a copy of your identity card so that we are sure that no one is exercising your rights in your name. We reserve the right to make direct contact with you to verify the authenticity of the request.

You can send your request via the different means made available to you by Degroof Petercam:

- To the **Data Protection Officer**: the Degroof Petercam Data Protection Officer ("DPO") by sending a letter with a copy of your identity card to:

Degroof Petercam  
c/o Data Protection Officer  
Rue de l'Industrie 44  
1040 Brussels (Belgium)

The Data Protection Officer is the advisor and supervisor who ensures that Degroof Petercam retains and processes Data in accordance with the rules set out in the GDPR. In other words, the Data Protection Officer may investigate how data are processed, the systems used, and may, depending on the outcome, recommend that certain items are amended.

- By sending a letter with a copy of your identity card to the **Degroof Petercam Operations Risk Management Department**:

Degroof Petercam  
Operational Risk Management  
Department  
Rue de l'industrie 44  
1040 Brussels (Belgium)

- To the **HR department** by sending an e-mail with a copy of your identity card to the following address:

[privacy.hr@degroofpetercam.com](mailto:privacy.hr@degroofpetercam.com)

The HR manager who has the expertise in the area of privacy will process your request and if necessary, report and/or send the request to the Degroof Petercam Data Protection Officer.

## 12.2 RIGHT TO COMPLAIN

In the event of a dispute regarding the processing of your Data, you can contact **Degroof Petercam** directly via the channels indicated in point 11.1 above.

You also have the right to file a complaint with the **Data Protection Authority**:

- either by post:

**Data Protection Authority**  
Rue de la Presse 35  
1000Brussels

- or by sending an e-mail to:

[contact@apd-gba.be](mailto:contact@apd-gba.be)

- or by telephone  
**+ 32 (0) 2 274 48 00**

The Employee acknowledges having read this Charter and undertakes to consult regularly the latest version of the Employee Privacy Charter on the Intranet or Extranet sites.

