

# Privacy notice for self-employed board members and suppliers

**Applicable to self-employed board members and suppliers of  
Euroclear SA/NV, Euroclear Belgium, Euroclear France,  
Euroclear Nederland, Euroclear UK & Ireland Ltd and  
Euroclear Bank SA/NV, Euroclear Holding SA/NV**



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## 1 What is the purpose of this notice?

This notice applies to the personal data of individuals who are self-employed board members, or suppliers of one of the Euroclear companies listed below, or who work for our suppliers, or who act as an agent or representative of our suppliers (“you”, “your”).

Suppliers are understood as any third party that provides goods or services, to any of the following companies:

- Euroclear SA/NV;
- Euroclear Belgium;
- Euroclear France;
- Euroclear Nederland;
- Euroclear UK & Ireland Ltd;
- Euroclear Bank SA/NV;
- Euroclear Holding SA/NV

Each Euroclear group company listed here above shall be collectively referred to in this notice as “Euroclear”, “we”; “us” or “our”.

We have written this notice to let you know:

- what personal data is collected;
- why we collect that personal data;
- how we use it;
- who we share it with and why; and
- to provide an explanation of your rights in relation to that personal data.

This notice also includes the information that we are required by the General Data Protection Regulation (GDPR) to provide to you.

Euroclear is the “data controller” of the personal data that is processed about you in the context of this notice for the purposes of the GDPR (which means that we are responsible for deciding how we hold and use personal data about you).

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.

## 2 Why do we collect your personal data?

We will only collect and use your personal data for a specific purpose and when we have legal grounds to do so under the GDPR.

Most commonly, we will use your personal data in the following circumstances:

- It is necessary to enter into a contract or carry out a contract with the organisation you represent. In this respect, we use your personal data in order to approve, manage, administer or effect the agreement we have entered into with you, to organise our sourcing activities, to issue purchase orders, to process invoices and payments, to perform accounting, to manage our contract or to review the services or products you supply us with;
- It is necessary to comply with our legal obligations, e.g. record keeping obligations, screening duties, verifying working permits (Limosa declarations), managing suppliers from countries included on AML screening lists;
- It is in our legitimate business interests (e.g. prevent and detect security threats to our IT infrastructure or buildings);

- It is necessary to protect our legal position in the event of legal proceedings); or
- You have, in strictly defined circumstances, given your consent to the processing, e.g. for the use of a picture of you taken during an event.

Details of what personal data we process and the types of processing can be found in Appendix 1.

Please note, if you do not provide us with personal data: (i) which is needed to enter into a contract, manage a contract and/or pursue business relations with you, or the supplier you represent; or (ii) which is necessary to comply with legal or regulatory requirements, then we may not be able to enter into that contract and/or to pursue our contractual relationship.

### 3 How long is personal data kept?

As a general rule, we keep personal data as long as we have a business relationship. However, we keep all or part of such data for an additional period of 10 years when this is necessary to ensure we can answer contractual liability issues (as imposed by the statutory period of limitations set by the Belgian Civil Code<sup>1</sup>).

For certain directors falling under the scope of this notice and who are eligible to a pension plan, we may hold data longer than 10 years after the contractual relationship (in order to be able to make the pension payments).

Images recorded by security cameras in and around our premises are kept for 30 days from the visit, except otherwise requested by the police / public prosecutor and / or legal department (this will notably be the case if the recorded images show potential criminal activity or incidents).

### 4 How is your personal data collected?

The personal data we collect from you comes from the following sources:

#### a) From you

- When you send us personal data on forms, e-forms and contract templates, such as your name, address, telephone number, tax identification number, date of birth, copy of passport or ID card; or
- When you provide us personal data necessary to enter into a contract, such as your name, address, professional phone number and e-mail address, function and/or position held within our supplier's organisation.

#### b) From other sources

- background information from third party providers; or
- publicly available sources (e.g. Belgian Official Gazette) to confirm signatory powers.

### 5 Who do we share your personal data with?

#### a) Transfer within the Euroclear Group or to third parties

- We may transfer personal data only to other Euroclear affiliated entities or our business partners (e.g. joint venture companies), which are or will be involved in receiving services from the supplier you are working for. We take precautions to allow access to personal data only to those staff members who have a legitimate business need for access.

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<sup>1</sup> For other local retention requirements, this notice will be updated as required.

- We may also provide your personal data to any competent law enforcement body, regulatory, government agency, court or other third party such as but not limited to, the police, the financial supervisory authorities, tax and social security agencies, where we believe disclosure is necessary (i) as a matter of applicable law or regulation, or (ii) to exercise, establish or defend our legal rights.
- We may also disclose your personal data to our third party vendors, service providers and partners who provide data processing services to us (e.g. IT platform management or support services, infrastructure and application services, data analytics, security agents, billing tool, etc.), or who otherwise process personal data for purposes that are described in this privacy notice or notified to you when we collect your personal data.
- We may also disclose your personal data with our auditors, advisors, legal representatives and similar agents in connection with the advisory services they provide to us for legitimate business purposes.
- Finally, we may also disclose your personal data to a potential buyer, seller or joint venture (and its agents and advisers) in connection with any proposed purchase, merger, acquisition or transaction, provided that we inform our contractual party that it must use your personal data only for the purposes disclosed in this notice.

#### b) International personal data transfers

It is possible that in some circumstances we may transfer some of your personal data outside the European Economic Area (EEA), **but we shall only do so after having taken appropriate safeguards required by applicable data protection laws.** Such measures may include (without this list being exhaustive) transferring the personal data to a recipient in a country that the European Commission has decided provides adequate protection for personal data, to a recipient that has executed standard contractual clauses adopted or approved by the European Commission or, in exceptional cases, reliance on the derogations under the applicable data protection law.

## 6 What are your rights regarding personal data?

This section summarises the rights you have as a “data subject” under the GDPR.

The exercise of these rights are subject to conditions which are set out in the GDPR and while they are wide-ranging, in limited circumstances it may not be possible to fully exercise them e.g. if you request personal data to be deleted but the law requires that we keep it.

The right to be informed	Euroclear is publishing this privacy notice to keep you informed as to what we do with your personal data.
The right to access	You have the right to access your personal data and check we are lawfully processing it. You may also request a copy of it.
The right to rectification	If you think your personal data is incomplete, inaccurate or out of date, please let us know and we will rectify it as appropriate.
The right to erasure	You have the right to request that Euroclear erases your personal data.
The right to restrict processing	You have the right to ask Euroclear to restrict how we process your personal data, for example, if it is inaccurate. This means we are only permitted to store the data.

The right to data portability	You have the right to request the transfer of your personal data to another party.
The right to object	You have the right to object to specific types of processing of your personal data, such as when processing is based on our legitimate interests. We will then stop the processing, except if the law authorises us to pursue this processing activity
The 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, you have the right to withdraw your consent for that specific processing at any time.
The right to complain to a Supervisory Authority	You have the right to complain to your local data protection authority about our collection and use of your personal data if you feel that Euroclear has not sufficiently addressed any concern or complaint. For more information, please contact your local data protection authority. You can find contact details for many data protection authorities in Europe and beyond <a href="#">here</a> .

If you would like to exercise one of the above rights, please send your request to the relevant Euroclear Data Protection Officer by post using the contact details in section 9.

To facilitate the processing of your request, please provide the following information:

- An explanation of what you are requesting
- Your relationship with Euroclear (e.g. consultant, supplier representative etc.)
- Your full name and address
- A copy of a valid identification document, e.g. passport, ID card<sup>2</sup>, driving licence or extract of population register or register of foreign residents (where applicable). Note, if you are making the request on behalf of someone else, please provide copies of identification documents for yourself AND the person you are representing, and provide proof of your representation power.

## 7 What about data security and quality?

Euroclear uses appropriate technical and organisational measures to protect the personal data that we collect and process about you, such as:

- ensuring that we store your data in a secure operating environment, only accessible to Euroclear employees, contractors and consultants on a need-to-know basis. Euroclear also follows generally accepted industry standards to do this
- requiring third parties we disclose personal data to, to take appropriate security measures to protect it;
- rigorous verification of an individual's identity prior to gaining access to any IT or business premises (e.g. through login ID, password, pin codes and badges)

<sup>2</sup> Please note that it is not necessary to include any personal national ID number.

## 8 How often does Euroclear update this notice?

We may update this notice from time to time in response to any legal, technical or business change /developments. You can see when the notice was last updated by checking the “last updated” date displayed at the top of it. Please consider the version available online as the latest version.

## 9 Questions or concerns?

If you have any questions or concerns regarding this privacy notice, please address them to the Data Protection Officer of the Euroclear Group Company you’re delivering goods or services to:

<b>Euroclear Group Company</b>	<b>Postal address</b>
<b>Euroclear SA/NV</b>	The Data Protection Officer Euroclear SA/NV Koning Albert II-laan 1 / 1 Bld Roi Albert II, B-1210 Brussels, Belgium
<b>Euroclear Belgium</b>	The Data Protection Officer Euroclear Belgium Koning Albert II-laan 1 / 1 Bld Roi Albert II, B-1210 Brussels, Belgium
<b>Euroclear France</b>	The Data Protection Officer Euroclear France SA 66 rue de la Victoire 75009 Paris, France
<b>Euroclear Nederland</b>	The Data Protection Officer Euroclear Nederland Herengracht 459-469 NL-1017 BS Amsterdam The Netherlands
<b>Euroclear UK &amp; Ireland Ltd</b>	The Data Protection Officer Euroclear UK & Ireland Ltd 33 Cannon Street London EC4M 5SB United Kingdom
<b>Euroclear Bank SA/NV</b>	The Data Protection Officer Euroclear Bank SA/NV Koning Albert II-laan 1 / 1 Bld Roi Albert II, B-1210 Brussels, Belgium
<b>Euroclear Holding SA/NV</b>	The Data Protection Officer Euroclear Bank SA/NV Koning Albert II-laan 1 / 1 Bld Roi Albert II, B-1210 Brussels, Belgium

## Appendix 1

Purposes of the Processing	Types of Personal Data
Sourcing	<ol style="list-style-type: none"> <li>1. Business card details</li> <li>2. Professional / Educational background</li> <li>3. Limosa declaration details</li> <li>4. Rates / prices</li> </ol>
Contract management (including daily organisation and team management, emergency calls, provision of trainings, project management, project testing, internal audit etc)	<ol style="list-style-type: none"> <li>1. Business card details</li> <li>2. Professional / Educational background / Skills and training</li> <li>3. Contact persons in case of emergency</li> <li>4. Role / function on project</li> <li>5. Date of entry on/release from a project, hours performed</li> </ol>
Assessment of suppliers' performance (quality assurance, audit)	<ol style="list-style-type: none"> <li>1. Business card details</li> </ol>
Ordering process	<ol style="list-style-type: none"> <li>1. Business card details</li> <li>2. Rates / prices</li> </ol>
Accounting (payment of invoices, data mining, maintenance process, reporting)	<ol style="list-style-type: none"> <li>1. Business card details</li> <li>2. Financial details</li> </ol>
Background checking of suppliers, fraud management, conflict of interest	<ol style="list-style-type: none"> <li>1. Business card details</li> <li>2. Financial details</li> <li>3. Description of identified conflicts of interest (date of reporting, measures to remedy situation)</li> </ol>

Purposes of the Processing	Types of Personal Data
<p><b>Access management and security management for premises</b></p>	<ol style="list-style-type: none"> <li>1. <b>Business card details</b></li> <li>2. <b>Access details to Euroclear premises</b></li> <li>3. <b>Photography</b></li> <li>4. <b>Videos</b></li> </ol>
<p><b>Security and business continuity</b> (Closed circuit television (CCTV) - remote monitoring, business continuity (contact in case of urgency), risk management)</p>	<ol style="list-style-type: none"> <li>1. <b>Business card details</b></li> <li>2. <b>Professional details</b></li> <li>3. <b>Recording of images</b></li> <li>4. <b>Access details to Euroclear premises</b></li> <li>5. <b>Role / function on project</b></li> </ol>
<p><b>Provide IT services for contractors, suppliers, consultants</b> (provide system access, provide office tools, provide communication services, ensure system security)</p>	<ol style="list-style-type: none"> <li>1. <b>Business card details</b></li> <li>3. <b>Device type and model, Operating system</b></li> <li>4. <b>Log data</b> (IP Addresses and connection data; URLs of visited websites etc.)</li> <li>5. <b>Details of calls</b> (caller ID, time and date, recipient, call recording)</li> </ol>
<p><b>Voice recording</b> - when required/permitted by law e.g. for recording financial transactions e.g. MiFiD; or for contact centre training and quality (not applicable to Euroclear Belgium, Euroclear Nederland and Euroclear France)</p>	<ol style="list-style-type: none"> <li>1. <b>Caller ID</b></li> <li>2. <b>Time and date of call</b></li> <li>3. <b>Call recording</b></li> </ol>

Purposes of the Processing	Types of Personal Data
<p>Provide mobile device management (corporate device, private device)</p>	<ol style="list-style-type: none"> <li>1. Business card details</li> <li>2. Device type and model, Operating system</li> <li>3. Last check-in (with MobileIron system) - Private or corporate device</li> <li>4. Operator / Carrier</li> <li>5. Imei</li> <li>6. Serial number (of device)</li> <li>7. Wi-Fi MAC Address</li> <li>8. Device ID</li> <li>9. Apps installed on the device</li> </ol>
<p>Managing directors' participation as a Euroclear board member or board member</p>	<ol style="list-style-type: none"> <li>1. Business card details</li> <li>2. Professional / Educational background</li> <li>3. Judicial data (i.e. personal data related to criminal convictions and offences)</li> <li>4. Details of other mandates/positions (conflicts of interest)</li> <li>5. Agenda</li> <li>6. Copy of ID card</li> <li>7. Private address and phone number</li> </ol>
<p>Respond to requests of regulator and public authorities, perform legal disclosures (with regards to regulatory / legal requirements, or investigations), handle litigation, perform internal audit</p>	<ol style="list-style-type: none"> <li>1. Business card details</li> <li>2. Professional / Educational background</li> <li>3. Judicial data</li> <li>4. National registry/ID number</li> <li>5. Information pertaining to legal claim</li> </ol>
<p>Social events (attendance, advertising events, communications on internal social platforms, media relationship)</p>	<ol style="list-style-type: none"> <li>1. Personal details</li> <li>2. Professional details</li> <li>3. Information from internal social platforms when supplier has access</li> <li>4. Recording of images (picture and videos)</li> </ol>
<p>Mergers and acquisitions (covers contractors of firms where we take an investment stake)</p>	<ol style="list-style-type: none"> <li>1. Business card details</li> <li>2. Financial Data</li> <li>3. Professional / Educational background</li> <li>4. Family related data</li> <li>5. Judicial data</li> </ol>

