

SOCIETE GENERALE DE BANQUE AU LIBAN SAL
"BANKING WITH SGBL"™ MOBILE APPLICATION
PRIVACY POLICY

"Société Générale de Banque au Liban SAL" (hereinafter referred to as the *"Bank"*) places a high priority on (i) preserving banking secrecy under law dated September 03, 1956 and (ii) maintaining utmost confidentiality of its customers' (as well as their authorized agents and representatives') data and personal information (collectively referred to as *"Customers"*).

The Bank is committed to the proper handling of Customer's data and personal information in line with the Lebanese applicable laws, regulations and following principles:

1. Purposes of Acquiring Data and Information

The Bank may acquire data and personal information of Customers to allow for the sound and secure processing of transactions via its mobile banking application *"Banking with SGBL"™* and to ensure that Customers receive the highest level of service in the provision of products and services.

The Bank may collect data and personal information to verify, inter alia, the identity of Customers, to confirm various conditions for conducting business, and to market new products and services to Customers.

2. Types of Data and Information to be Acquired

The required data and personal information may include (but is not limited to) the name, title, address, date of birth, sex, family information, contact particulars, investment objectives and risk tolerance of the Customer.

3. Data and Information Acquisition Method

The Bank may acquire Customers' data and personal information through its mobile banking application *"Banking with SGBL"™*. The Bank shall enforce adequate security measures at all times to protect the confidentiality of all said data and information.

4. Use and Provision of Data and Information

The Bank shall not disclose Customers' data and personal information to third parties except in the following cases:

- (i) The Customer's consent is obtained;

- (ii) Data and personal information is entrusted with a third party for the purpose of outsourcing operations. In this situation, the Bank shall conduct thorough due diligence on such third party, and shall take all appropriate steps to ensure that the third party undertakes strict controls to ensure the confidentiality of the data and personal information;
- (iii) The Bank is compelled to disclose the data and personal information pursuant to a judicial or regulatory order under applicable laws and regulations.

5. Data and Information Management Method

The Bank shall take the appropriate security measures, such as computer access limitations and computer virus countermeasures, to prevent the loss, destruction, falsification, and leakage of Customers' data and personal information.

The Bank shall ensure that any agent or service provider of the Bank which receives or has access to data and personal information of the Bank's Customers shall also maintain strict controls over such personal information to ensure confidentiality.

6. Security Measures

The Bank has implemented the following security measures:

- (i) Encryption: Critical data and personal information stored on the Bank mobile application "*Banking with SGBL*"™ platform are encrypted. All channel between mobile and servers are also encrypted;
- (ii) Sandbox protection: The Bank's mobile application "*Banking with SGBL*"™ runs its own sandbox and will not run on any mobile device that has been rooted or jail broken;
- (iii) Remote Wipe: The Bank and the Customer can remotely wipe the mobile application "*Banking with SGBL*"™ and keychain data if the PIN Code is misused or the mobile phone is lost. Wiping Customers' data and personal information includes wiping the keys used to encrypt said data and information;
- (iv) Time Out: The Bank mobile application "*Banking with SGBL*"™ automatically locks after a period of inactivity. The PIN Code must be reentered to unlock the application;
- (v) Update: Customers are compelled to use the latest version of the Bank mobile application "*Banking with SGBL*"™.

(vi) Authentication Processes: The Bank has implemented a series of authentication processes for full access of its mobile application “*Banking with SGBL*”™ (i.e. first time authentication by insertion of username and password, using security PIN, Transfer PIN, etc.).

7. “*Banking with SGBL*” General Conditions of Use

This Policy is part of the General Conditions of Use of the Bank mobile application “*Banking with SGBL*”™. In case of discrepancy between the provisions of this Policy and the provisions of the General Conditions of Use of the Bank mobile application “*Banking with SGBL*”™ the latter shall prevail.

8. Modifications

The Bank may amend this Policy in accordance with any amendments to (i) the applicable laws, rules, ordinances and prescribed standards in Lebanon, or (ii) the Bank’s internal rules, instructions and guidelines relating to the protection of personal data.

* * *