



Securities Issuance Consortium

Privacy Notice

Under this Privacy Notice (hereinafter the “Notice”), **Clearstream Banking S.A. and Euroclear Bank SA/NV** (hereinafter “We” or “Us”) informs you how We process your personal data on Our meetings or Events (hereinafter also “Event”) Your personal data means any information relating to you (hereinafter the “Personal Data”), such as name or contact details.

We pay special attention on the processing of Personal Data in accordance with the General Data Protection Regulation EU 2016/679 (“GDPR”) and applicable national data protection laws.

1. Controller

1.1 Our identity and contact details

Joint controllers (“Clearstream”) according to Article 4 Paragraph 7 and Article 26 GDPR are Clearstream Banking S.A., 42, Avenue JF Kennedy L-1855 Luxembourg, Luxembourg and Euroclear Bank SA/NV “société anonyme” incorporated in Belgium and registered in the RPM Brussels (Company n° 0423 747 369) with registered office at 1 Boulevard du Roi Albert II, 1210 Brussels, Belgium.

1.2 Contact details of Our data protection officer

Data Protection Officer
Clearstream Banking S.A.
42 Avenue JF Kennedy
L-1855 Luxembourg
Luxembourg
Email address: dataprotection@clearstream.com

Euroclear Bank SA/NV
1 Boulevard du Roi Albert II
B-1210 Brussels
Belgium
Email address: EB.Compliance@euroclear.com

We have set up the following contact point for your questions and suggestions:

Euroclear: newissues.dedicated@euroclear.com

Clearstream: PrimaryMarketRelations@clearstream.com

2. Purpose, Categories of Personal Data, Legal Basis and Retention

Your information is used for the preparation and execution of meetings, the circulation of documentation and the general execution of events, and to help Us understand and improve your experience. We collect Personal Data when you voluntarily provide it.

2.1 Categories of your Personal Data, purposes, legal basis and Retention period of Our processing

We process the following categories of your Personal Data for the following purposes with the following legal basis and retention period:

2.1.1 Meeting and Event Registration Data (which may include name; contact details, including email address; telephone number; address billing data; position and company) obtained when you register for the meeting or event. Which data is collected in the various entry masks depends on the individual entry fields. We may share your registration data (name; contact details, including email address; position and company) with bodies involved in the organization of the meeting or event for the purpose of access control to the online conference call and/or the physical event location. In order to help structure the discussion and execution of the meeting or event, we may share your registration data (name; position, company and country) with the moderator, speakers, and panelists prior to the meeting or event. These bodies will use your registration data only for the purposes mentioned above and are obliged to delete the data after the event. The legal basis is Art. 6 para. 1 lit. (b) of the GDPR, permitting the processing of Personal Data for the purposes of the performance of a contract. The period for which your Personal Data will be stored by Us is as long as necessary to carry out Our relationship with you. Insofar as, pursuant to Art. 6 para. 1 lit. (c) GDPR, we are obliged to retain your personal data for a longer period of time due to tax and commercial duties of storage and documentation, these deadlines are decisive.;

2.1.2 Personal Data within communication such as name, address, telephone number or e-mail address for the purpose of you making direct contact with Us, answering to an inquiry. The legal basis is Art. 6 para. 1 lit. (f) of the GDPR, permitting the processing of Personal Data for the purposes of Our legitimate interests in processing and answering your request. The period for which your Personal Data will be stored by Us is as long as necessary to achieve the purpose of your request, so until your request is fully processed and no further communication with you is required or desired. Insofar as, pursuant to Art. 6 para. 1 lit. (c) GDPR, we are obliged to retain your personal data for a longer period of time due to tax and commercial duties of storage and documentation, these deadlines are decisive.;

2.1.3 Speaker Data (Name, position and company, CV summary) obtained when you are a speaker at the event. Speaker Data will be visible for participants of the meeting or event, on the event website and/or in the event documents or brochures. The legal basis is Art. 6 para. 1 lit. (a) of the GDPR, permitting the processing of Personal Data for the purposes that you have consented. The period for which your Personal Data will be stored by Us is as long as necessary to carry out Our relationship with you unless you withdraw your consent earlier. Insofar as, pursuant to Art. 6 para. 1 lit. (c) GDPR, we are obliged to retain your personal data for a longer period of time due to tax and commercial duties of storage and documentation, these deadlines are decisive.

2.2 Do you have to provide your Personal Data to Us?

The provision of your Personal Data is necessary to register as a meeting or event participant. This means that you are obliged to provide your Personal Data to Us as part of the meeting or event registration process.

The consequences if you do not provide your Personal Data to Us are that you will not be able to participate at the meeting or event.

2.3 Do We make automated decisions on you?

We do not make any automated decisions solely on automatic processing, including profiling, which produces legal effects concerning you or similarly significantly affects you to carry out Our relationship with you.

3. Transfer of Personal Data to Third Parties

We will not transfer your Personal Data to third parties except such transfer is permitted by law or you have explicitly consented to the transfer.

We may transfer your Personal Data to public authorities where this is required by the applicable law. A transfer of your Personal Data is also permitted if there is a suspicion of a criminal offence. In this event, We shall be entitled to transfer your Personal Data to the criminal prosecution authority.

In order to make certain services available to you, we may need to share your personal data with some of our service partners.

Otherwise, your personal data will be stored exclusively in Our database and on Our servers, or on those of Our commissioned data processing providers. Our commissioned data processing providers process personal data exclusively within the European Union or an adequate data protection level will be provided by the use of appropriate safeguards in accordance with Article 44 et seq. of the GDPR.

We will only share your Personal Data with other controllers for their own purposes such as cooperation partners under the condition that you explicitly and voluntarily agreed to such transfer of your Personal Data; in this case, we will obtain your consent separately from this Notice.

Under these conditions, recipients of your personal data can be for example:

- public bodies and institutions in the presence of a legal or regulatory obligation (e.g. financial authorities),
- other companies and service providers (processors) in the following areas:
 - Registration Provider
 - Video Conferencing Provider
 - Telecommunications service providers
 - billing service provider
 - financial institutions
 - collection agencies

- Management consultancies as well as business and tax audit companies
- bodies involved in the performance of the Event

4. Your Rights

Under applicable data protection laws, you have rights

- of access to, rectification of, and/or erasure of your Personal Data;
- to restrict or object to its processing;
- to tell Us that you do not wish to receive marketing information; and
- (in some circumstances) to require certain of your Personal Data to be transferred to you or a third party, which you can exercise by contacting Us at the details set out at the beginning of this Notice.
- To the extent Our processing of your Personal Data is based on your consent, you also have the right to withdraw your consent, without affecting the lawfulness of Our processing based on your consent before its withdrawal.

To exercise your rights, you can contact Us as set out in Section 1. above. You can also lodge a complaint about Our processing of your Personal Data with a data protection authority. A list and contact details of local data protection authorities is available [here](#).

5. Joint Controllers responsibilities

The joint controllers are responsible for compliance with the requirements provided for under the GDPR and other applicable data privacy laws and regulations, which includes keeping a record of processing activities and carrying out data protection impact assessments, where required. We are committed to take appropriate technical and organizational security measures for the processed data to ensure a level of protection appropriate to the risk.. The technical and organizational measures will be monitored and updated if necessary to guarantee that the data is processed in accordance with legal and regulatory requirements. The responsible joint controllers inform each other immediately about disruptions in the operational processes that pose a risk to the personal data as well as suspected data protection violations. In the event of a personal data breach we will agree on the content of the report as well as breach containment and risk mitigating measures and we will keep ourselves informed about the communication with the supervisory authority, in case the breach notification is mandated by law. This also applies if there is a legal obligation to inform you as a person impacted by a data protection breach.

If you exercise one of your rights by submitting a request vis-à-vis one of the joint controller, this joint controller will immediately inform the other one of this in writing.

The joint controller in charge contacted by you takes on e.g. communication with you, gathering the necessary information, and coordinating the execution of the request. The joint controllers are obliged to support each other in fulfilling such requests. They keep themselves informed about this on an ongoing basis and intend to reach agreement on all essential steps. You can exercise your rights against each joint controller.

Date: November 2024

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