

**Data Protection applicable to the Negotiable European Commercial Paper and Medium-Term Notes (NEU CP/ NEU MTN) information collected by the Banque de France**

The Banque de France provides issuers of negotiable short-term (**NEU CP** -Negotiable European Commercial Paper) and medium-term (**NEU MTN** -Negotiable European Medium Term Note) securities with an internet portal for preparing and publishing the information memorandum for their issuance programme(s).

Within this framework, the Banque de France collects personal data listed in the table below. This data will only be used in the conditions strictly needed for the performance of the Banque de France's duties on the NEU CP and NEU MTN market.

The Banque de France complies with the legal and regulatory provisions: the French Data Protection Act (Law on Information Technology, Data Files and Civil Liberties) was updated to comply with the European Union's General Data Protection Regulation or GDPR (Regulation (EU) 2016/679 of 27 April 2016). The GDPR relates to the use and security of personal data and is designed to ensure the better protection of individual citizens.

**1. Details of persons mentioned in the Information memorandum intended for publication**

Persons concerned	Personal data collected by Banque de France	Recipients	Legal basis	Purposes	Data retention period	
<b>Members of the management</b> of the issuing company and, where applicable, of the guarantor.	Surname, First Name, Position	Public	Legal obligation: - Article D 213-12 of the French Monetary and Financial Code ; - Article 7 of the Order of 30 May 2016 on negotiable debt securities reform	Publication of Information Memorandum for the NEU CP-NEU MTN issuance programmes.  Compliance checks by the Banque de France.	Once the Information Memorandum for year N has been submitted, the Information Memorandum for year N-1 is no longer visible in the portal.	
<b>Signatory (ies) of the Information Memorandum:</b> person who certifies the information provided by the issuer and, where applicable, by the guarantor.	Title, Surname, First name Position, entity of ownership	Public	Legal obligation : 4° of article D 213-9 of the French Monetary and Financial Code.		Compliance checks by the Banque de France.	The Banque de France keeps the data for a period of ten years.
	Handwritten signature	Banque de France				
<b>Contacts</b> N.B. : reporting agents are invited to provide generic rather than nominative contact details	Title, surname, first name Function, belonging entity Business e-mail address Business telephone number	Public	Legal obligation : 4° of article D 213-9 of the French Monetary and Financial Code.			

## 2. Portal user data

Persons concerned	Personal data collected by Banque de France	Recipients	Legal basis	Purposes	Data retention period
Portal users who are employees of the issuer or of a third party acting on behalf of the issuer (as third-party redactor, issuing and paying agent or guarantor).	<p><b>Identification data :</b></p> <ul style="list-style-type: none"> <li>- Title, surname, first name</li> <li>- Function, Directorate</li> <li>- Business telephone number</li> <li>- Business e-mail address</li> <li>- Role of the entity to which the user belongs (issuer, guarantor, issuing and paying agent or third-party redactor)</li> <li>- Profile under which the user is registered on the site (administrator, manager, redactor or reviewer)</li> </ul> <p><b>Administration data :</b></p> <ul style="list-style-type: none"> <li>- Username (in the form of an e-mail address)</li> <li>- Password</li> <li>- Status (active/inactive), set by administrator</li> </ul> <p><b>Connection data :</b></p> <ul style="list-style-type: none"> <li>- Connection logs</li> <li>- Date of last connection</li> </ul>	<p>Banque de France.</p> <p>External user with administrator profile (access to all data of the user group he/she has created, except login, password and connection logs)</p> <p>Other external users (access limited to the identification data of users in the same user group, as well as the user's own last login date)</p>	Mission entrusted to the Banque de France in accordance with Article L213-4 of the French Monetary and Financial Code.	Know the identity of individuals filing the information memorandum on behalf of the issuer, for operational management and control purposes.	<p>The user's identification data and account administration data are retained until the account is deleted by the user or by the administrator of the group to which the user belongs.</p> <p>Connection logs are kept by Banque de France for 7 days.</p> <p>The last login date is retained until the user's account is deleted.</p>

It is the responsibility of the issuer and, where applicable, the guarantor, the third party redactor, the issuing and paying agent, to inform their employees of the transmission of data concerning them to the Banque de France and of how to exercise their rights.

The individuals in questions can exercise their rights of access, rectification, deletion, opposition and limitation regarding their personal data as provided under General Data Protection Regulation, by sending a signed letter and valid proof of identity to the following addresses:

- By email : [NEUCPMTN.ISSUERS@banque-france.fr](mailto:NEUCPMTN.ISSUERS@banque-france.fr)
- By mail : **BANQUE DE FRANCE**  
 Direction de la Mise en Œuvre de la Politique Monétaire  
 Service des Titres de Créances Négociables  
 Mail code : S2B-1134  
 31 Rue Croix des Petits Champs  
 75049 PARIS CEDEX 01

The persons concerned also have the possibility of lodging a complaint with the National Commission for Data Processing and Liberties (CNIL). The contact details of the Data Protection Officer are [1200-DPD-delegue-ut@banque-france.fr](mailto:1200-DPD-delegue-ut@banque-france.fr).