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1 PREAMBLE

CMS Monaco is strongly committed to upholding the principles of data security and confidentiality. In this respect, the protection of personal data is of paramount importance.

This Privacy Policy is intended to inform you about how your personal data is used and processed.

It complies with Monegasque legislation on the protection of personal data, namely Act No. 1.565 of 3 December 2024, and with the European General Data Protection Regulation (GDPR) of 27 April 2016.

It applies to all individuals whose data are subject to the processing operations described herein, whether they are clients, prospective clients, business contacts or professional counterparts.

The applicable policy on the management of your personal data and cookies is that of the CMS network, available at the following address: <https://cms.law/fr/mco/footer-configuration/sites-internet-de-cms-avis-de-confidentialite>

2 DEFINITIONS

APDP: Personal Data Protection Authority (Autorité de Protection des Données Personnelles), which is the competent independent authority in Monaco for personal data protection.

GDPR: General Data Protection Regulation (Regulation (EU) 2016/679), the European Union's legal framework on personal data protection.

Personal data: Any information relating to an identified or identifiable natural person. A person is considered identifiable if they can be identified, directly or indirectly, in particular by reference to an identifier.

Examples: name, registration number, phone number, photograph, date of birth, place of residence, fingerprint, IP address, etc.

Processing of personal data: Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means.

Examples: collection, recording, organisation, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

Special categories of data: Information revealing racial or ethnic origin, political, philosophical or religious beliefs, trade union membership, data concerning health, criminal convictions and offences, or data concerning a person's sex life.

Controller: The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Processor: A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

Data subject: The identified or identifiable natural person to whom the personal data relate. For the purposes of this internal policy, this includes members of staff.

Recipient: A natural or legal person, public authority, agency or another body to which the personal data are disclosed.

3 PURPOSE OF DATA PROCESSING

3.1 PURPOSES

The processing of your personal data by CMS Monaco pursues specific and clearly defined purposes, including:

- Recruitment management
- Management of communication tools
- Management of client and prospect databases
- Client satisfaction surveys
- Management of litigation and advisory matters
- Management of communication tools (email, telephone, etc.)
- Email redirection
- Management of IT security measures
- Management of Wi-Fi services
- Management of external communications for promotional purposes (event invitations, publications, etc.)
- Compliance with obligations related to anti-money laundering, counter-terrorist financing, counter-proliferation of weapons of mass destruction, and anti-corruption
- Management of information related to asset-freezing procedures

CMS Monaco undertakes to process your personal data fairly and lawfully, solely for the purposes listed above.

3.2 LEGAL BASES

CMS Monaco processes your personal data on several distinct legal bases.

First, CMS Monaco may collect and process your personal data for the performance of its contractual relationship with its clients, such as for the management of client and prospect databases, or the handling of litigation or advisory matters.

Second, the collection of your personal data may also be based on CMS Monaco's legitimate interests, in particular to invite you to events, send you news updates, gather your feedback through surveys, or communicate with you. In any case, you remain free to unsubscribe from our communications at any time.

In addition, CMS Monaco may collect and process your personal data in order to comply with its general or sector-specific legal or regulatory obligations, such as those related to anti-money laundering, counter-terrorist financing, anti-corruption, or the management of asset-freezing procedures.

Lastly, for processing activities that do not fall under the above categories, your specific consent may be requested on a case-by-case basis.

4 PERSONAL DATA COLLECTED

CMS Monaco may collect various categories of personal data.

The personal data collected may include the following (non-exhaustive list):

- Identity and family status: Surname, given names, marital status, date of birth, nationality, and any relevant document required within the framework of our contractual relationship or legal obligations, such as an identity document.
- Addresses and contact details: Contact information (telephone number, home address, email address).
- Professional information: Professional background, current position, place of work, etc.

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- Financial information: Bank details (such as IBAN) or cheque information, financial transactions where applicable, origin of funds, source of income, etc.
- Connection data: Log data when accessing IT services provided by the firm, such as Wi-Fi.
- Criminal convictions, offences, or security measures: Judgments and any documents necessary for handling our clients' cases.
- Special categories of data: The firm may process clients' special category data in connection with advisory or contentious matters and will ensure the required confidentiality and security. You are advised not to send such data via unsecured channels such as WhatsApp or email.

Please note that certain data is mandatory for CMS Monaco to fulfil its legal obligations. Failure to provide such data may result in the impossibility to initiate or continue any existing contractual relationship.

In any event, whether simply communicating with you or fulfilling our mission, we may collect any personal data you provide to us and will process it in accordance with this Policy and within the scope of a lawful processing operation.

5 PRINCIPLES GOVERNING THE PROTECTION OF YOUR PERSONAL DATA

Lawfulness, fairness and transparency: CMS Monaco undertakes to obtain your consent whenever required and to inform you of any processing of your personal data. The firm ensures transparency by informing you, at the time of data collection, of how the data is used and of any possible sharing with third parties. No data is collected without your knowledge or without informing you in advance.

Purpose limitation: CMS Monaco ensures that your personal data is collected for specific, explicit and legitimate purposes, as set out in Article 3.1 of this Policy.

Storage limitation: Your personal data is retained by the firm for a limited period, determined by the purpose of the processing and the retention periods provided for under applicable legislation.

Accuracy: CMS Monaco ensures that the personal data it processes is accurate and complete. The data is regularly updated and erased if found to be inaccurate.

Data minimisation and proportionality: CMS Monaco processes only personal data that is relevant, adequate, not excessive and strictly necessary for the purposes previously determined.

Security and confidentiality: CMS Monaco implements all necessary organisational and technical measures to ensure the confidentiality of your data and to prevent any intrusion, loss, damage or unauthorised disclosure thereof.

6 RECIPIENTS AND DATA TRANSFERS

Your personal data is primarily processed internally, in compliance with the principles set out above. However, certain categories of data may be shared with external recipients for clearly identified purposes.

For example, personal data processed in connection with advisory or litigation matters may be disclosed to legal counsel, courts, or any authority or entity where such disclosure is necessary for the handling of your case. Your personal data may also be shared within the CMS network.

In all cases, your personal data is only disclosed to authorised and specifically identified recipients, on a strict need-to-know basis.

Where CMS Monaco conducts communications with your consent, certain personal data may be published online. In such cases, your prior authorisation will always be obtained.

CMS Monaco may transfer data to countries whose legislation or regulations ensure an adequate level of protection. The firm may also transfer personal data to countries that do not offer such a level of protection, provided that the transfer is necessary for the performance of a contract between you and the firm or is subject to appropriate safeguards, such as standard contractual clauses.

7 DATA RETENTION PERIOD

All personal data collected is retained for a limited period appropriate to the purpose of the processing and in accordance with the retention periods provided for by applicable legislation (in line with the data storage limitation principle).

Retention periods may also be determined in light of applicable statutory limitation periods and the guidance issued by the Monegasque data protection authority.

8 SECURITY

As data controller, CMS Monaco defines and implements the necessary measures to safeguard its personal data processing systems, in particular to prevent, as far as possible, any malicious intrusion, as well as any loss, alteration or unauthorised disclosure of data.

We apply both technical and organisational measures to ensure the protection and confidentiality of your personal data in accordance with applicable legal and regulatory requirements. Please note that CMS Monaco also imposes strict confidentiality obligations on its processors, service providers and business contacts.

Authorised personnel of CMS Monaco have limited access to personal data, restricted to what is strictly necessary, and an internal information system usage policy is in place and enforced within the firm.

9 RIGHTS OF DATA SUBJECTS

CMS Monaco implements all necessary measures to ensure the effective exercise of your rights in accordance with the applicable personal data protection laws and regulations, namely:

- Right of access: You have the right to obtain confirmation as to whether or not personal data concerning you is being processed, and, where it is, to access such data and receive a copy thereof.
- Right of information: You have the right to receive information about how your personal data is being processed.
- Right to rectification: You have the right to obtain the rectification of inaccurate personal data concerning you.
- Right to erasure: In certain cases, you have the right to obtain the erasure of your personal data. However, this right is not absolute. CMS Monaco may have legal or legitimate grounds for retaining such data.

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- Right to data portability: In certain cases, you have the right to receive the personal data you have provided to us in a structured, commonly used and machine-readable format, and to transmit those data to another controller, where technically feasible. This right applies only where the processing is based on your consent or the performance of a contract and is carried out by automated means.
- Right to object: You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you where such processing is based on the legitimate interests of CMS Monaco.
- Right to restriction of processing: You have the right to obtain restriction of processing from CMS Monaco where the accuracy of the data is contested, where the processing is unlawful, where the firm no longer needs the data for processing purposes, or where you have objected to the processing.
- Right to human supervision: You have the right not to be subject to a decision based solely on automated processing, and to obtain human intervention.
- Right to lodge a complaint with a supervisory authority: You have the right to lodge a complaint with the Personal Data Protection Authority (APDP).

Please note that in certain cases, particularly those relating to legal obligations, you may exercise an indirect right of access through the APDP.

10 EXERCISING YOUR RIGHTS

To exercise any of the rights listed above, you may contact CMS Monaco:

- By email: dataprotection@cms-pcm.com
- In person: 17, rue Louis Aureglia – 98000 Monaco

In the event of any doubt concerning your identity, you may be asked to provide proof of identity.

11 CHANGES TO THIS POLICY

CMS Monaco may update this Data Protection Policy at any time to reflect changes in applicable laws or practices.

In such cases, you will be informed through appropriate communication measures.