



Global Sovereign Advisory – Data Privacy Policy

GSA & Co, a limited liability company (*société par actions simplifiée*) registered with the Trade and Company Registry of Paris, under number 845 212 489 and whose registered office is located at 24, rue de Penthièvre, 75008, Paris – France, undertakes to comply with the legislation in force in the field of Personal Data and in particular with the provisions of European Regulation 2016/679 of 27 April 2016, and Law No 78-17 of 6 January 1978.

Collection of Personal Data and Purposes

We obtain personal data about you when you decide to provide it to us, for example when you contact us by e-mail or register on our Website (<https://www.globalsov.com> – “the Website”) to benefit from certain services. In some cases, it is also possible that you may have previously provided personal data about yourself to GSA & Co (for example, if you are a former employee). When you decide to register or connect to the Website through a unique third-party login service that authenticates your identity and connects your social network identifiers (such as LinkedIn, Google or Twitter) to the Website, we collect from the social network provider the data and content necessary for registration or the connection you have authorized, such as your name and email address. The other data we collect depends on the privacy settings you have made with your social network provider, so we encourage you to review the privacy policy applicable to the service in question.

By registering and/or providing personal data to GSA & Co, you also consent to the use of such personal data in accordance with this Data Privacy Policy.

We do not use your personal data for any other purpose, unless we obtain your consent to do so, or if permitted or required by law or professional standards. For example, if you register on the Website and provide data about your preferences, we will use it to personalize your user experience. If you register or log in using a third-party single sign-on service, we may also identify you as a single user on all the devices you use, in order to customize your user experience on the Website. If you have sent us your curriculum vitae (CV) to apply online for a job offer, we will use the personal data you have provided us to study your application and/or propose job offers at GSA & Co that match your profile.

In some cases, when you register for certain services, we may temporarily retain your email address until we receive confirmation of the information you have provided to us by email (i.e., when we send an email to the address provided at the time of registration to confirm your subscription).

In general, GSA & Co only collects personal data that is necessary to respond to your requests. When we request additional optional data, you will be informed at the time of collection.

Applicable laws in France and in the European Union allow us to process personal data, subject to proof of a legal basis for doing so. We are also required to inform you



of the nature of this information. Therefore, when we process your personal data, we will rely on one of the following legal basis:

- Performance of a contract: when the processing of your personal information is necessary to fulfil our obligations under a contract to which you are a party.
- Obligation imposed by law: when we are required to process your personal data to comply with a legal obligation, including for the purpose of archiving in order to comply with our tax obligations, or to communicate information to a public body or law enforcement authority.
- Legitimate interests: we will process your personal data if it is in our legitimate interest to do so, in order to manage our company's business in accordance with the law, and to the extent that this interest does not exceed your own interests.
- Your consent: in some cases, we will ask you for specific permission to process some of your personal information, and we will process it only for the purposes to which you have consented.

Examples of "legitimate interests" referred to above:

- Provide information and/or services to visitors to our sites or provide information about employment opportunities;
- Prevent fraud or criminal activity and safeguard our computer systems (IT);
- Personalize your online user experience and improve the performance, ergonomics and efficiency of GSA & Co's online presence;
- Carry out and measure the effectiveness of our marketing activities;
- Fulfill our corporate social responsibility obligations.
- To exercise our fundamental rights within the European Union, in accordance with Articles 16 and 17 of the Charter of Fundamental Rights, in particular our freedom to do business and our right to property.

Transfer to third parties

Transfers within the Group GSA & Co

We may exchange information about you with entites controlled by or controlling GSA & Co.

Transfer to third parties

We do not share any personal data with unaffiliated third parties, unless it is necessary for our legitimate professional and business interests, to process your requests and/or if permitted or required by law or professional standards.

In addition, GSA & Co may transfer some of your personal data outside the EEA to outside companies working with or on behalf of us for the purposes set out in this Data Privacy Policy. In this case, your personal data will continue to be protected under contracts that we have concluded with these organisations located outside the EEA, which contain standard data protection clauses whose wording is approved by the European Commission.

GSA & Co will not transfer your personal data to third parties who may use it for commercial prospecting purposes.



Consent

In general, you are not asked to provide personal data when you connect to the Website, however, we may ask you to provide certain personal data in order to provide you with additional information about our services and events. GSA & Co may also ask for your consent to certain uses of your personal data, which you may choose to give or refuse. If you request specific services or communications, such as e-newsletters, you may unsubscribe at any time by following the instructions contained in each communication. If you decide to unsubscribe from a service or communication, we will ensure that we delete your data quickly, but we may need additional information before we can process your request.

Your Rights

If GSA & Co processes your personal data, you have the following rights:

- you have the right to access your data. If we respond positively to your request, we will provide you with your personal data free of charge. Before doing so, we are entitled to ask you for proof of identity and some relevant information about your relationship with us, in order to locate your personal data. If the information we have about you is inaccurate, you have the right to ask us to correct it.
- you have the right to object to us processing your personal data for legitimate reasons,
- in addition, you have the right to delete your personal data, limit its processing in certain circumstances and/or obtain a copy of the personal data we hold in a structured electronic format and the right to give instructions regarding the fate of your personal data in the event of death.

You can exercise your rights by sending an email to the following e-mail address : contact@globalsov.com. We will ensure that we respond to your request, provided it complies with applicable laws and professional standards.

In the event of a dispute, you have the right to file a complaint with the Commission Nationale de l'Informatique et des Libertés.

Security and integrity

GSA & Co has put in place reasonable policies to protect personal data from unauthorized misuse, loss, alteration or destruction. Despite all the efforts made by GSA & Co, absolute protection against all threats cannot be provided. We strive to ensure that access to your personal data is limited to those who need to know it. Persons having access to the data are required to treat them confidentially.

We ensure that we retain personal data only for as long as necessary (i) to process your requests, (ii) to comply with any legal, regulatory or professional obligations imposed on us, or (iii) until such time as these persons request the deletion of their data.

The period for which data are kept depends both on their nature and on the specific circumstances that led us to collect them.



Links to other sites

You should be aware that the Website may contain links to other sites that are not subject to this Data Privacy Policy, but by other policies that may differ significantly. We encourage users to consult the data protection policy of each site visited before disclosing any personal data.

Changes to this Data Privacy Policy

GSA & Co may modify this Data Privacy Policy from time to time to reflect our current privacy practices. When we make changes to the Data Privacy Policy, we will revise the "updated" date at the top of this page. Any changes to the processing of personal data as described in this Data Privacy Policy affecting you will be communicated to you through an appropriate channel, depending on how we normally communicate with you.