

# Privacy Statement

## 1. Purpose and Scope of the Statement

The Euronext Group (“Euronext”, “we”, “us”) is strongly committed to protecting your personal data and upholding your right to privacy. This Privacy Statement describes how we collect and process your personal data and provides an overview of your rights in relation to your personal data. It applies to information which you may provide directly to us or via third parties.

Euronext Group consists of Euronext N.V, a Dutch holding company, located at Beursplein 5, 1012 JW, Amsterdam, the Netherlands, and its affiliated companies, acting as controllers. A list of all group companies can be found in annex to this Statement.

## 2. Application of this Statement

This Privacy Statement applies to the way we collect and process your personal data. Personal data will be collected and processed by us when you or a company with which you are connected engage with us and/or avail of our services, e.g.:

- via our websites or other selected domains, including any linked pages owned and operated by Euronext or any successors thereof, or any application made available by Euronext for use on a tablet, mobile phone or other mobile device (individually and collectively, the " Euronext websites"),
- in the framework of the execution of a contract with a company with which you are connected (e.g. when we have a contract with your employer and the latter provides us your contact data in the execution of that agreement)
- by participating to one of our events
- etc.

We will collect personal data:

- from you: for example through Euronext websites, when you avail of our products and services, when you attend one of our events or an event hosted at our premises, when you correspond with us, etc.; and
- from third party sources such as but not limited to Euronext vendors, Euronext providers, Euronext-listed companies or companies applying for listing with which you are connected, Euronext members, Euronext clients for market data services, and/or from publicly available resources
- (e.g. registration offices, newspapers and other publications).

### 3. The personal data we process

The personal data we may process, which we may collect either directly from you or a company with which you are connected or from a third party, may include some or all of the following depending on the nature of the processing activity:

<b>DEVICE INFORMATION</b>	We collect information about your computer/device browser via cookies used on Euronext websites. Please see section 4 of this Privacy Statement for further information.
<b>CONTACT AND COMPANY INFORMATION</b>	This may include general personal data about who you are such as your name, your contact details, identification number, your job title and position in a company.
<b>AML INFORMATION</b>	This may include your position as a director, officer or beneficial owner of a company, copy documentation confirming your identity (such as your passport or identity card) and copy documentation showing proof of your address.
<b>MAR INFORMATION</b>	This may include general personal data about who you are such as your name, your contact details, your job title, identification number, position in a company and reason for being an insider as defined by law.
<b>MIFID II INFORMATION</b>	This includes all personal data this regulation requires Euronext to process.
<b>CRM INFORMATION</b>	This may include your correspondence and communications with us and details of your connections with our staff and of your visits to our premises.
<b>PUBLICLY AVAILABLE INFORMATION</b>	This may include information available: (i) on the websites or promotional material of companies or organisations with which you are connected; (ii) in news articles; or (iii) from registries such as the companies' registration offices.
<b>INFORMATION IN CONNECTION WITH EURONEXT MEETINGS AND/OR EVENTS</b>	We may collect specific information about you so that we may host you at our premises or at any event or seminar which we organise. We may also collect images (such as photographs and video footage) at IPO announcements and other Euronext events and CCTV footage when you visit our premises.
<b>OTHER INFORMATION</b>	We may also process any personal data which you or the company with which you are connected choose to provide us.

## 4. Websites and Cookies

### 4.1 Euronext Websites

Euronext N.V. is responsible (the controller) for the websites of Euronext Group.

By using these websites, you accept the practices described in this policy, we therefore advise you to carefully review all of its provisions.

Please note that the Euronext websites are general audience websites and Euronext does not knowingly collect personally identifiable information from persons under 18 years of age.

### 4.2 Cookies technologies

Cookies are small text files that are sent and stored on the user computer, smartphone or other device for accessing the Internet, whenever you visit a website. They are useful because they allow a website to recognize the user device, log when the user visits a particular page or provide a secure connection to a website, etc. Euronext undertakes to delete Cookies, which it is responsible for, from your computer after a duration of 12 months. At the end of this period, Consent will be obtained from you again.

Euronext websites use cookies for various purposes:

Cookie Type	Purpose	Description
Necessary	Authentication	Euronext websites use a specific type of cookie which is essential for the software to work properly and for ease of use.
	Single Sign On	<p>This is used to create a session ID for the user, so the system can identify the user as a unique individual, distinct from anyone else surfing on the Euronext websites, and grant him access across Euronext websites. It also allows the user to enter his\her credential only once the user.</p> <p>This information is not used or stored outside Euronext systems, and is held only temporarily while the user is accessing account pages and other pages which require unique and secure access. Without this cookie, such access could not remain secure.</p>
Functional	User Preferences	Functional cookies record information about choices that you have made. For example we put a cookie to remember your language choice to ensure you to do not have to reenter the information each time you visit the page.
	User Settings	This cookie is necessary to offer the basic functionality of the Euronext websites, and to remember your personal settings.

		By storing your preferences, this cookie enables to browse easily on the Euronext websites.
Analytic	Audience Analytics	Analytics technologies are used to collect information about how people use Euronext websites. These technologies store information about what pages you visit, how long you are on the site, how you got there and what you click on. The information collected aims at improving the Euronext websites to meeting the users' needs.

You can decide if a cookie from Euronext websites can be stored on your device. Euronext recommends that you leave the cookie active. By blocking, turning off or otherwise rejecting the cookie, some web pages may not display properly or the user will not be able to use any website services that require you to sign in. At any moment, you can delete cookies through the configuration of the consent and privacy options available in your browser.

### 4.3 Non-Cookies technologies

Euronext also enables the use of technologies that perform functions similar to a cookie:

- some are used to determine whether messages have been opened and links clicked on. They do not place information on your device but may work in conjunction with a cookie to monitor website activity.
- others are used for tracking and reporting aggregate usage patterns on the Euronext websites. No personal data is collected by these technologies.

## 5. How and Why we process your personal data

The following table details the legal basis ("Legal Basis") according to which and the reasons why ("Purposes") we obtain, collect and process your personal data.

LEGAL BASIS	PURPOSE
CONTRACT  It is necessary to process your personal data to enter into and perform our contracts with you.	We obtain, collect and process your personal data: <ul style="list-style-type: none"> <li>• to process contract or application between Euronext and you;</li> <li>• to process applications from the company with which you are connected to list financial instruments (including debt, funds and equities);</li> <li>• to process applications for financial products including Legal Entity Identifiers (LEI), International Securities</li> </ul>

<p>If you do not wish to provide us with your personal data for these purposes, we will not be able to enter into or perform our contract(s) with you.</p>	<p>Identification Numbers (ISIN) and Net Asset Valuations (NAVs);</p> <ul style="list-style-type: none"> <li>• to manage, administer and maintain the ISEdirect system;</li> <li>• to review and publish announcements;</li> <li>• to process your application to participate in the IPOready Program;</li> <li>• as part of the programs organized by Euronext related to the activity of the financial markets (notably Techshare, FamilyShare and issuance of attestations to the training courses attached to them);</li> <li>• provide you with access to Euronext websites and to enable you to use them;</li> <li>• test and improve the effectiveness of Euronext websites and to monitor metrics such as numbers of visitors, traffic data and demographic patterns;</li> <li>• to process your application to participate in dedicated programs organized by Euronext; and</li> <li>• for invoicing, billing and commercial purposes.</li> </ul>
<p><b>LEGITIMATE INTERESTS</b></p> <p>We process certain of your personal data on the basis of our legitimate interests, such as in pursuit of our business or security interests or in the framework of the execution of a contract with a company with which you are connected.</p> <p>Where we process your personal data in pursuit of our legitimate interests we determine if such processing is necessary and we carefully consider the</p>	<p>We obtain, collect and process your personal data in order to:</p> <ul style="list-style-type: none"> <li>• to process contract or application between Euronext and the company with which you are connected in order for Euronext to provide with the services subscribed such as but not limited to: <ul style="list-style-type: none"> <li>○ applications from a company with which you are connected to become a Member of Euronext;</li> <li>○ applications from the company with which you are connected to list financial instruments (including debt, funds and equities) on Euronext;</li> </ul> </li> <li>• to process compliance of the company with which you are connected to the provision of the contract signed;</li> <li>• provide you with access to Euronext websites and to enable you to use them;</li> <li>• test and improve the effectiveness of Euronext websites and to monitor metrics such as numbers of visitors, traffic data and demographic patterns;</li> </ul>

<p>impact of our processing activities on your fundamental rights and freedoms. We will not process your personal data where our legitimate interests are outweighed by the impact on your rights and freedoms (unless otherwise required or permitted by law).</p>	<ul style="list-style-type: none"> <li>• provide you with information (e.g. newsletters, reports, statements and other material which you sign up to receive ...);</li> <li>• respond to your enquiries;</li> <li>• conduct market research surveys linked to the services subscribed by the company with which you are connected;</li> <li>• maintain a list of our business contacts;</li> <li>• tailor our services to match your requirements;</li> <li>• create products or services that may meet your needs;</li> <li>• to process your job/candidate application including to contact you in relation to interviews and/or offer you a job after the interview stage or to process any references you provide to us in the context of recruitment;</li> <li>• maintain the security and integrity of our premises, infrastructure and systems, and the safety of our employees, by using security measures including CCTV cameras.</li> </ul>
<p>LEGAL AND REGULATORY OBLIGATIONS</p>	<p>As a regulated company, we obtain, collect and process your personal data to comply with legal and regulatory obligations applicable to Euronext.</p>
<p>CONSENT</p>	<p>Where applicable, we obtain, collect and process your personal data on the basis of consent for some specific marketing purposes (i.e. proposal of products &amp; services, invitation to events...).</p>

## 6. Disclosure of your personal data

We may disclose your personal data to other companies of the [Euronext Group](#).

We may also disclose your personal data to third parties in relation with the purposes for which personal data are processed including:

- regulatory authorities and law enforcement agencies;
- our trusted third party service providers and our IT service providers;
- third parties involved in financial market activities;

- third parties involved in hosting or organizing events or courses;
- professional advisors such as tax or legal advisors, consultants and accountants, and
- any prospective buyers of Euronext or the business of Euronext.

## 7. Transfer of your personal data

We store and process your personal data on servers located within the European Economic Area (the "EEA"). We only transfer your personal data outside the EEA where the European Commission has decided that the third country in question ensures an adequate level of protection in line with EEA data protection standards or where there are appropriate safeguards in place to protect your personal data.

We may transfer the personal information we collect about you to recipients in countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to recipients in other countries (such as the U.S.), we will protect that information as described in this Privacy Policy and will comply with applicable legal requirements providing adequate protection for the transfer of personal information to recipients in countries other than the one in which you provided the information, including by selecting service providers that are located in a country recognized by the European Commission as providing an adequate level of data protection or by implementing appropriate safeguards based on the European Commission's Standard Contractual Clauses, where applicable. Subject to applicable law, you may obtain a copy of these safeguards by contacting us as indicated below.

Euronext U.S., Inc. and its subsidiaries Euronext FX LLC. and Euronext Market Services LLC. are certified under the EU-U.S. and Swiss-U.S. Privacy Shield frameworks developed by the U.S. Department of Commerce, and the European Commission and the Swiss Federal Data Protection and Information Commissioner, respectively, regarding the transfer of personal information from the EEA, UK and Switzerland to the U.S. [Click here](#) to view our EU/Swiss-U.S. Privacy Shield Privacy Policy. As of July 16, 2020, we no longer rely on the EU-U.S. or Swiss-U.S. Privacy Shield to transfer personal data from the EEA, UK or Switzerland to the United States.

## 8. Retention of your personal data

Generally, we shall retain your personal data for a period of seven years after the later of: (i) the conclusion of your relationship with Euronext; or (ii) the conclusion of the relationship between Euronext and the company with which you are connected. However to determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal requirements.

## 9. Security of your personal data

Your personal data are dealt with in confidence and Euronext has taken appropriate technical and organizational security measures to protect your personal data against loss, misuse, alteration and/or destruction. These include, but are not limited to:

- Installing a firewall to prevent unauthorized access to our systems;
- Using secure servers;
- Ensuring the Personal Data are stored in physically secure accommodation.

Please be aware that the security measures mentioned above apply to systems under the control of Euronext, but that Euronext cannot ensure the security nor confidentiality of any information during its transmission when transmitted via means not under its control, notably the Internet, and that you are aware that data transmitted via such means may be intercepted by third parties.

If Euronext becomes aware of any security breach which results in unauthorized access of your personal data, Euronext will endeavor to inform you.

Euronext websites may provide hyperlinks to websites from other companies or persons. This policy does not apply to the use of such websites and we are not responsible or liable for any processing of your personal data via these third party websites.

In addition, if you share content from the Euronext websites via social media, your personal data will be visible to those visiting your personal pages on these social media websites. Euronext is not responsible or liable for any processing of your personal data via such media. This policy does not apply to the use of such social media.

## 10. Your rights and How to exercise them

The table below sets out the rights which you have to address any concerns or queries with us about our processing of your personal data. Please note that these rights are not absolute and are subject to certain exemptions under applicable data protection law.

RIGHT	FURTHER INFORMATION
RIGHT TO BE INFORMED	You have the right to know your personal data is being processed by us, how we use your personal data and your rights in relation to your personal data.
RIGHT OF ACCESS	You have the right to ascertain what type of personal data Euronext holds about you and to a copy of this personal data.
RIGHT TO RECTIFICATION	You have the right to have any inaccurate personal data which we hold about you updated or corrected.
RIGHT TO ERASURE	In certain circumstances you may request that we delete the personal data that we hold on you. You have also the right to give post-mortem instructions regarding your personal data.

RIGHT TO RESTRICTION OF PROCESSING	You have the right to request that we stop using your personal data in certain circumstances including if you believe that the personal data we hold about you is inaccurate or that our use of your personal data is unlawful. If you validly exercise this right, we will store your personal data and will not carry out any other processing until the issue is resolved.
RIGHT TO OBJECT	Where we rely on our legitimate interests to process your personal data, you have a right to object to this use. We will desist from processing your personal information unless we can demonstrate an overriding legitimate interest in the continued processing.
RIGHT TO DATA PORTABILITY	In case the processing is based on your consent or a contract conclude with you, you may request us to provide you with certain personal data which you have given us in a structured, commonly used and machine-readable format and you may request us to transmit your personal data directly to another controller where this is technically feasible.

You can exercise any of these rights in accordance with the [“Data Subject Rights Request Information Procedure](#)

- submitting a request through the following [form](#).
- sending a request to us at [dpo@euronext.com](mailto:dpo@euronext.com) .
- By sending a letter to the following address:

Euronext  
Compliance Department  
Data Protection Officer  
14, place des Reflets – CS30064  
92054 Paris la Défense.

Furthermore, you may also submit a complaint to the competent Data Supervisory Authority.

## 11. Changes to this Statement

We may occasionally update this Privacy Statement to reflect changes in our business or to comply with applicable law and regulations. We therefore advise you to review this statement regularly to ensure that you are updated with any changes.

## 12. Questions and Requests

Should you have any questions or requests about this policy, please contact us via [dpo@euronext.com](mailto:dpo@euronext.com) .

### Annex – List of Euronext Group Companies

Euronext Amsterdam N.V.

Euronext Brussels N.V./S.A.

Euronext Corporate Services B.V.

Euronext Hong Kong Ltd

Euronext IP & IT Holding B.V.

Euronext Lisbon, Sociedade Gestora de Mercados Regulamentados, S.A.

Euronext London Ltd

Euronext N.V.

Euronext Paris S.A.

Euronext Market Services LLC Euronext Technologies Holding, S.A.S.

Euronext Technologies Ltd

Euronext Technologies S.A.S.

Euronext Technologies Unipessoal, Lda

Interbolsa, Sociedade Gestora de Sistemas de Liquidação e de Sistemas Centralizados de Valores Mobiliários, A.S.

IR Soft Ltd

The Irish Stock Exchange plc., t/a Euronext Dublin

Oslo Børs ASA

Oslo Market Solutions ASA

Centevo AB

FishPool ASA