



# Procedure on Processing Personal Information

## Procedure

Owner: Head of Compliance, Korea

November 2025, Version 4.0

<b>Purpose</b>	The purpose of this Procedures is to establishes and implements personal information processing procedure of Seoul Branch in order to protect the personal information and associated rights and interests of an information owner and to facilitate the handling personal information.
<b>Scope</b>	Natixis Asia Limited, Seoul Branch
<b>Version</b>	4.0
<b>Policy Owner</b>	Head of Compliance, Korea
<b>Policy Manager</b>	
<b>Approver(s)</b>	Seoul Management Committee
<b>Approval Date</b>	11/19/2025
<b>Effective Date</b>	04/03/2023
<b>Next Review Date</b>	Annually
<b>Related Documents</b>	APAC Information Security & Data Protection

## Revision History

Version	Date	Description of Revision	Author / Preparer	Reviewer	Approver
1.0	04/03/2023	Establishment	Christina Lee, Head of Risk, Korea		Seoul Management Committee
2.0	04/17/2024	Revision of in-charge staff & Appendix revision (Art 9)	Myung Jin Koo, Head of Compliance, Korea	Heads of IT & HR, Korea	Seoul Management Committee
3.0	04/16/2025	Updated Consent letter for Employee in Appendix 1 with the latest	Myung Jin Koo, Head of Compliance, Korea	Heads of IT & HR, Korea	Seoul Management Committee
4.0	11/19/2025	Addition of Appendix 2 and format changes to comply with Global Governance Management Framework Policy	Myung Jin Koo, Head of Compliance, Korea		Seoul Management Committee

## **<Procedure on Processing Personal Information by Personal Information Processing Manager >**

Natixis Asia Limited, Seoul Branch ("Natixis Seoul") establishes and implements personal information processing procedure as prescribed below in order to protect the personal information and associated rights and interests of an information owner and to facilitate the handling of difficulties experienced by an information owner in connection with his/her personal information in accordance with the Article 30 of the Personal Information Protection Act.

### **Article 1 (Purpose of Processing Personal Information)**

Natixis Seoul processes personal information for following purposes. Processed personal information shall not be used for purposes other than those stated below and prior consent shall be obtained if the purpose of use is changed unless such a change is permitted under relevant legislations.

#### **1. Management of Executives, Officers and/or Employees (in connection with the collection of information on executives, officers and/or employees)**

- Management of Workforce: Hiring, retirement/resignation, promotion, evaluation, rewards, awards and disciplinary measures, department transfer, placement and switch
- Career Management: Issue of certificates evidencing the employment status of an employee such as certificate of employment, certificate of career and certificate of resignation and confirmation of relevant facts.
- Payroll Management: Basic salary, bonus, allowance and severance payment (or retirement annuity)
- Benefits and Welfare: Installment savings, insurance, medical support, loans, holidays, parking and application for use of membership resort
- Tax/Insurance: Payment and deduction of statutory insurance including 4 social insurances and income taxes.
- Compliance with Laws and Regulations Regarding Labor Relationship and Enforcement of Employment Contracts: Enforcement of employment contracts, compliance with relevant internal regulations, equal treatments and provision of opportunities for executives, officers and/or employees, confirmation of war veterans' status and offering relevant treatments and compliance with all legal/administrative obligations imposed on Natixis Seoul Branch in accordance with laws and regulations regarding employment, occupational safety and health and employment of foreign workers.
- Security: Protection of information processed by Seoul Branch, maintenance/improvement/examination of security systems, prevention of crimes and irregularities that may occur within Seoul Branch and collection of evidences and sharing of contact information and establishment of emergency contact network.
- Compliance with Other Local/International Legislations: Compliance with local/international legislations which a financial services company shall comply with and compliance with international legislations by an overseas affiliate and cooperation with local/international governments and financial regulators for compliance with supervisory activities.

#### **2. (Financial) Transactions with Corporate Customer (in connection with the collection of information on executives, officers and/or employees of a corporate customer)**

- Determination of establishment of financial transaction and establishment, maintenance, implementation and management of (financial) relationship.
- Investigations of financial incidents, resolution of disputes and customer complaint handling

### **Article 2 (Personal Information Items Processed)**

① The information items to be collected and the collection methods used by Natixis Seoul to achieve the purposes as defined in the preceding Article 1 are:

#### **1. Executives, Officers and/or Employees**

### Required Information

- Name, photograph, date of birth, address, home phone number, cell phone number, e-mail address, gender, military service completion status, date and location of birth, family relationship (including relationship with family members, names, ages, occupations, cohabitation status and resident ID numbers of family members and car plate number
- Educational background (including schools, locations, major, years of admission and graduation, graduation status and GPAs), work experiences (including place of work, position, roles and responsibilities and years of employments), qualifications, details of awards/disciplinary measures, date of employment, department, positions and roles and responsibilities.
- Account number at a financial institution including a bank use to receive payments.
- E-mail correspondences sent/received via Natixis Seoul's e-mail account, conversations made over Natixis Seoul's telephones and IM messages communicated via Natixis Seoul's communications devices.
- Behavior at work, business performances and evaluations of relationships with customers.
- Video clips collected by using video information processing devices within Natixis Seoul.
- Biometric data including finger print and iris.

### Optional Information

- Wedding anniversary, war veteran status, place of registration and hobby

### 2. Executives, Officers and/or Employees of Corporate Customers

- Name, address, phone number, cell phone number and e-mail address
- Employing company and department, positions and roles and responsibilities

### 3. Video Information

- Natixis Seoul has in place and operates video information processing devices recording the entries and exists of executives, officers and/or employees and guests visiting its workplace.
- ② In principle, Natixis Seoul shall not collect sensitive information with the potential for invading privacy. If necessary, such information shall be collected after separately obtaining the consent from the information owner and shall be used restrictively only for the purpose of collection; provided, however, that sensitive information are checked and confirmed for accuracy and up-to-datedness.
- ③ Information on employees shall be collected frequently via such means as homepage, interviews, written documents, facsimile, telephone, e-mail and information collection programs. To the contrary, information on executives, officers and/or employees of a corporate customer shall be collected at time of a transaction or account opening via such means as business card, written documents including those associated with transactions, telephone and e-mail based on the premise that corporate customer, the provider of the information, provides personal information on the subject executive, officer and/or employee in a legitimate manner.

### Article 3 (Personal Information Processing and Retention Period)

- ① Personal (credit) information on the information owner collected for purposes as defined in the preceding Article 1 shall be kept and used until all the above stated purposes of collection/use are fulfilled and shall be destroyed when it is confirmed that the personal (credit) information is no longer required unless it is obligated to retain the personal (credit) information in accordance with relevant legislations.

### Article 4 (Providing Personal Information to Third Party)

- ① In principle, Natixis Seoul shall process personal information on an information owner within the purposes as defined in the preceding Article 1 and neither process such information outside of the original purposes nor provides such information to a third party without prior consent of the information owner; provided, however, tha

t personal information may be used for purposes other than those specified above or provided to a third party in one of the following cases unless such a use or provision may wrongfully violate the interests of the information owner or a third party:

1. The information owner provides prior consent for the provision of such information to a third party or the disclosure of such information;
  2. Specific provisions are prescribed in other legislations; or
  3. If prior consent cannot be obtained since the information owner or his/her legal proxy is in a position that he/she cannot express his/her intentions or contact information such as address is not available but it is accepted that such a use or provision is evidently required due to urgent causes for the life, body or interests of properties of the information owner.
- ② Natixis Seoul provides following personal information on its executives, officers and/or employees. Refer to attached Consent for Provision of Personal Information for details:
- Receiving Party: Affiliates and business service providers;
  - Purpose of Use of Receiving Party: Employee/labor management and ensure the compliance of employment contracts with banking and other relevant legislations;
  - Personal Information Items Provided: Personal identification information, academic backgrounds, work experiences and family relationship are included.
  - Personal Information Retention Period: Personal information shall be retained until all the above stated purposes of provision are fulfilled and shall be destroyed when it is confirmed that the personal (credit) information is no longer required unless it is obligated to retain the personal (credit) information in accordance with relevant legislations.
- ③ If consent from an information owner is obtained or personal information is provided in accordance with Sub-paragraphs 2, 3 and 5, Paragraph 1, Article 15 of the Personal Information Protection Act, Natixis Seoul will not notify neither the provisions prescribed in Sub-paragraphs of Paragraph 2, Article 17 of the Personal Information Protection Act nor that the access, correction/deletion and/or suspension of processing of personal information can be requested.

#### **Article 5 (Outsourcing Personal Information Processing Business)**

- ① In principle, Natixis Seoul does not use an outsourced service provider to process personal information of an information owner without the consent of the information owner; provided, however, that Natixis Seoul uses a service provider to process personal information in the following cases in accordance with Article 26 of the Personal Information Protection Act. Refer to attached Consent for Provision of Personal Information for details:
1. Service Provider: Accounting firms and business service providers;
  2. Purpose of Using Service Provider: To perform such outsourced services as processing employee payrolls;
  3. Personal (Credit) Information Items Provided: Personal identification information, unique identification information, family relation and wages.
  4. Personal Information Retention Period: Personal information shall be retained until all the above stated purposes of using outsourced service providers are fulfilled and shall be destroyed when it is confirmed that the personal (credit) information is no longer required unless it is obligated to retain the personal (credit) information in accordance with relevant legislations.
- ② When entering into a service level agreement to outsource business services, the requirements for the compliance with relevant laws and regulations regarding the protection of personal information, the prohibitions on the provision of personal information to a third party and associated responsibilities are clearly defined and the service level agreement shall be signed and then retained electronically. Any change to a service provider shall be notified by means of revising this Procedure on Personal Information Processing.

## **Article 6 (Rights/Obligations of Information Owner and Method to Exercise Rights)**

- ① An information owner may request the access to his/her personal information or personal information on a child of age below 14 (legal proxy only) processed by Natixis Seoul.
- ② An information owner who accessed his/her personal information may request Natixis Seoul to correct or delete any personal information which differs from true information or which cannot be confirmed; provided, however, that the information owner cannot request Natixis Seoul to delete a personal information item if it is specified as the information to be collected in other relevant legislations.
- ③ If an information owner may request correction or deletion of any error to personal information, the information items requested for correction or deletion shall not be used or provided until the requested correction or deletion is completed. For the purpose of this Paragraph, wrong personal information used or provided shall be corrected immediately.
- ④ An information owner may request Natixis Seoul to suspend the processing of his/her personal information; provided, however, that Natixis Seoul may refuse the acceptance of the suspension request in one of the following cases after information the information owner of the causes of the refusal:
  1. If information processing is inevitable due to applicable provisions prescribed in relevant legislations or for the compliance with the obligations prescribed in relevant legislations;
  2. If there are concerns for possible damages to the life/body of another person or possible wrongful invasion of property or other interests of other persons; or
  3. If discontinuation of personal information makes it difficult for the enforcement of relevant contracts including the failure to provide services agreed with the information owner but the information owner does not explicitly express his/her intent to terminate relevant contracts.
- ⑤ Natixis Seoul shall handle any personal information terminated or deleted upon the request of an information owner in accordance with the terms and conditions regarding personal information processing and retention period as defined in Article 3 herein.

## **Article 7 (Destruction of Personal Information)**

- ① If the personal information retention period expires, Natixis Seoul shall destroy the personal information within five (5) days from the retention period expiration date or if the personal information becomes no longer required due to such causes as the termination of businesses, Natixis Seoul shall destroy the personal information within five (5) days from the date on which it is acknowledged that personal information processing is no longer required unless:
  1. It is required to retain the personal information in accordance with relevant legislations; or
  2. There are other justifiable and similar causes.
- ② Print-outs and documents containing personal information shall be destroyed by shredding or incinerating them. Personal information in the form of electronic files shall be destroyed by permanently deleting the information in an irrevocable and unrestoreable manner.

## **Article 8 (Measures to Ensure Security of Personal Information)**

In accordance with Article 29 of the Personal Information Protection Act, Natixis Seoul has in place following technological/administrative and physical measures to assure security:

1. Minimizing Employees Handling Personal Information

Personal information management framework is in place to designate and minimize employees to handle personal information and only the designated managers handle personal information on a restricted basis.

2. Encryption of Personal Information

Personal information and password of a user are encrypted and stored and managed in an encrypted manner. Users also apply separate security functions such as the encryption of data which is known only to and material to the users themselves or the use of file locking function.

3. Technological Measures to Ensure Readiness Against Hacking or other Intrusive Attempts

In order to prevent divulgence of and damages to personal information due to such intrusive attempts as hacking or computer virus, Natixis Seoul installs security programs and performs regular updates and examinations, installs systems in restricted areas with controls over accesses from outside and applies technological/physical measures for surveillance and blockage of accesses.

4. Restriction on Access to Personal Information

Measures required for the control of access to personal information are in place and the examples of the measures include assignment, change or deletion of authorities to access database systems used to process personal information. Intrusion block systems are used to control unauthorized access from outside.

5. Use of Locking Devices to Assure Security of Documents

Documents and auxiliary storage devices containing personal information are stored in secure places protected by locking devices.

6. Control of Accesses by Unauthorized Persons

Separate physical storage locations to store personal information are used and procedures to control accesses to the storage locations are established and implemented.

**Article 9 (Personal Information Protection Supervisor)**

- ① In order to protect personal information and handle disputes associated with personal information, Natixis Seoul designates following Personal Information Protection Supervisor pursuant to Paragraph 1, Article 31 of the Personal Information Protection Act:

	Personal Information Protection Supervisor	Personal Information Protection Manager
Department/Position	Compliance Officer	Head of IT
Name	M. J. Koo	Yanghyun Choi
Telephone	+822 6021 7640	822 6021 7632

- ② Refer to the table below for department and manager responsible for acceptance/processing personal information access request:

Department	Position	Name	Telephone	Working Hours
HR	HR/Operations Manager	Inok Nam	+822 6021 7630	9AM-6PM

- ③ If any of the Personal Information Protection Supervisor, the Personal Information Protection Manager or the Personal Information Access Manager is designated or changed, Natixis Seoul shall notify the information of designation and change, the names, departments and contact information including telephone number by means of revising this Procedure on Personal Information Processing (Handling).

**Article 10 (Revision to Procedure on Personal Information Processing)**

This Personal Information Processing Procedure enters into force on its enforcement date. Any addition of revised terms, deletion and/or correction based on relevant legislation and/or this Procedure shall be notified by means of the revision to this Personal Information Processing Procedure from seven (7) days before the enforcement of such a revision.

**Article 11 (Method to Address Invaded Rights and Interests)**

An information owner who needs to file any invasion of personal information or to request consultations associated with the invasion may contact:

1. Personal Information Dispute Mediation Committee ([www.kopico.go.kr/1833-6972](http://www.kopico.go.kr/1833-6972));
2. Personal Information Infringement Report Center, Korea Internet & Security Agency ([privacy.kisa.or.kr/18](http://privacy.kisa.or.kr/18)); and
3. Online Privacy Association ([www.opa.or.kr/02-550-9500](http://www.opa.or.kr/02-550-9500))

Date of Enforcement: April 17, 2024

## Appendix 1.



Consent\_Form\_for  
\_Employee\_2024.doc

## Appendix 2.

### **Policy Exception Process**

It is the responsibility of each employee to adhere to this Procedure. Any exceptions to the Procedure must be escalated to the line manager and Compliance. Upon investigation, all exceptions which are considered as a breach will be reported to the APAC Conduct Committee in accordance with the Global Conduct Framework, as well as to the Seoul Management Committee per the Internal Control Standard. Breaches may result in disciplinary action.

### **Policy Approval and Review Frequency**

The Seoul Management Committee is the approver for the initial Procedure issuance. Thereafter, this Procedure shall be reviewed at least annually and approved by the Seoul Management Committee.