# PRIVACY POLICY

**(French Law for MTS France SAS)**

The purpose of this privacy policy is to define the conditions under which MTS France SAS (“we”, “us” or “our”), processes data (the “**Data**”) of the users of this website (the “**Users**”). The Users are:

* our clients (the “**Members**”) within the framework of their access to the “*Technology Portal*” and the “*Participants Statistics Area*” (the “**Restricted Areas**”) made available to them on this website [www.mtsmarkets.com](http://www.mtsmarkets.com/) (the “**Website**”);
* anyone interested in the services of MTS France or of the Group we belong to, browsing on the Website (the “**Interested Persons**” or the “**Visitors**”); and
* participants to MTS France trading venue.

# Data

We collect Members’ Data, including the following data, to allow the Members to access and use the Restricted Areas:

* usernames and passwords;
* name and surname; name of the company for which the Users work;
* professional phone number; and
* professional e-mail address.

The Data is collected on the Website, also via forms, that Users can complete, eg to access to the Restricted Areas.

We may also collect Data of the Interested Persons or the Visitors through emails to process the information requests sent in particular to the address: [info@mtsmarkets.com.](mailto:info@mtsmarkets.com)

# Purposes of the processing

The Data is necessary for MTS France to allow Members to access and use the Restricted Areas and to provide them with commercial information related to similar products and services that may interest them.

We also uses the Data to:

* transfer them, when necessary, to the other companies of our Group to allow them to provide the Users with the requested services or information;
* comply with the obligations imposed by our Group ; (the purposes above are jointly defined as the "Mandatory Purposes"); and
* conduct surveys with the Users about the quality of offered services or for promotional or marketing operations (“Marketing Purposes”).

# Retention of personal information

We will retain your Personal Information for as long as is reasonably necessary for the purposes listed in the Section “Purposes of the processing”. In particular:

* Personal Information collected for the Mandatory Purposes are retained for the period necessary to the provision of the required product or service, plus a maximum of 10 years from the termination of the account or the termination of the services;
* Personal Information collected for the Marketing Purposes are retained for the period necessary to the provision of the required product or service and for the following 2 years;

At the end of the retention period your Personal Information will be either deleted or anonymized and aggregated.

However, in some circumstances we may retain Personal Information for longer periods of time, for instance where we are required to do so in accordance with legal, tax or accounting obligations. In specific circumstances also we may also retain your Personal Information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges.

# Use of Cookies

A cookie is a small IT file left on the hard drive of the User’s devices by the server of the Website which records Data. Generally, the cookies can be deactivated or controlled by the Users through the preferences of their Internet browser.

We may use cookies, and collect in this context the IP address of Users, in order to (i) ease the User’s browsing on the Website and in particular to allow the Members to access to the Restricted Areas and (ii) carry out statistical analysis on the Website’s use and traffic (the “**Statistic Cookie**”) by the Users through the Google Analytics service. Please visit our Cookies Policy for more information (<https://www.mtsmarkets.com/mts-home/privacy-and-cookies-policy>).

The Users have the possibility to express their consent to the use of the Statistic Cookie in clicking “Allow” on the specific message bar appearing on the pages of the Website.

# Data Transfer

Data is transferred to the sole companies and personnel of our Group who are carrying out the processing.

We may also disclose the Data to any competent judicial or administrative authority requesting their communication in accordance with the applicable law.

The Data can also be transferred to third-party processors providing IT services, conducting surveys with the Users on the quality of the services offered or realizing promotional or marketing operations on behalf of MTS France or of our Group.

We are part of an international Group with businesses both inside and outside of the European Economic Area ("EEA"). Third party service providers who handle data on our behalf may be based in locations around the world, and we may also be subject to scrutiny from courts or regulators in a number of different jurisdictions. For these reasons, your Data may be transferred to other countries both inside and outside of the EU and the EEA. As privacy laws in other countries may not be equivalent to those in your home country, we only make arrangements to transfer data overseas where we are satisfied that adequate levels of protection are in place to protect any information held in that country or that the service provider acts at all times in compliance with applicable privacy laws. Where required under applicable laws we will take measures to ensure that Data handled in other countries will receive at least the same level of protection as it is given in your home country, for instance by entering into contracts incorporating the European Commission approved model contract clauses.

We may also sell or share some or all of its assets, including the Data, in connection with a merger, acquisition, reorganization, total or partial sale of assets or in the event of insolvency or bankruptcy.

# Security and Confidentiality of the Data

The Data is processed by us to ensure its security and confidentiality within the following limits:

# it is impossible to entirely guarantee the security of the Internet and the data transmitted on the Website ; and

# the Users must take all necessary precautions to ensure the confidentiality of their passwords and must not disclose them to a person who has not been authorized to use them.

# Rights of the Users

While using the Website and communicating the Data, the Users agree that the Data is collected and processed in accordance with this privacy policy.

The Users have the right to access, modify and erase their Data by contacting us at the following address [info@mtsmarkets.com.](mailto:info@mtsmarkets.com.)

The Users also have the right to oppose for legitimate reasons to the processing of their Data by contacting us at the following address [info@mtsmarkets.com.](mailto:info@mtsmarkets.com)