

Notice related to traders' phone recordings

Updated November, 7th 2018

Important note : this document is a free translation of the document titled « Avis relatif aux enregistrements téléphoniques des négociateurs ». In case of discrepancies between the two versions, only the French version will be considered valid and binding.

Subject

Counterparties and market intermediaries as well any person in relationship with Moneta Asset Management's traders are notified that they may be recorded for the purpose of compliance with applicable regulation, possibly without warning tone. The legal basis for these recordings are the articles 321-72 and 321-73 of the General Regulations of the French financial markets Authority (AMF).

Source and nature of the archived data

Archived data, captured from telecommunication devices, are audio recordings of the calls, as well as any metadata relating to the communication, including the date and time of the call, the call and called number, as well as the duration of the conversation.

Purpose

Recordings are realized to facilitate the control of the compliance of trading operations and their compliance with the instructions of the orderer.

Recordings retention policy

The recordings are archived for a period of at least six month and no longer than five years.

Access and other rights related to phone recordings

Moneta Asset Management's Head of Compliance and Internal Control, as well as any person authorized by the former has access to the recordings.

Any person that was recorded, or whose employees, legal representatives or tied agent was recorded may solicit, inter alia in virtue of its access rights, the access to the data relative to these recordings by informing in writing the Head of Compliance and Internal Control, whom may reached through the e-mail contact@moneta.fr as well as by regular mail at the registered address of the company. Moneta Asset Management reserves itself the right of invoicing a reasonable cost for accessing the data.

Recorded persons are informed that they have a right of rectification, suppression, treatment limitation, treatment opposition, right to the portability of data. The exercise of these rights may be solicited by notifying the Head of Compliance and Internal Control. Their request will be examined, holding into account Moneta Asset Management regulatory obligations. Recorded persons are informed that they may introduce a complaint to a data protection authority.



Communication of phone recordings

Moneta Asset Management may communicate any phone recording in application of legal or regulatory provisions, including to any judiciary or regulatory authority, as well as to persons subject to binding professional secrecy legal provisions. These transfers will be in principle limited to the European Union member countries. Should there be a change in this Policy, Moneta Asset Management would be taking any appropriate measures and amend the present notice as needed.