



HSBC Global Asset Management (France) has established and maintains a number of procedures for the Protection and Prevention of the Misuse of Non-Public Information about Clients.

Collection and Gathering of Information:

HSBC Global Asset Management (France) limits the use of the information gathered from clients to the minimum requirements set forth by regulatory obligations, and what is required to service the accounts of clients with the highest standards. Those information might be subject to an automated treatment whose systems might be located abroad, after a declaration has been made to the competent French authority ("CNIL").

Protection of Your Information:

HSBC Global Asset Management (France) employees are committed and required to protect the confidentiality of client information. They may access your information only when necessary to perform their job functions. HSBC Global Asset Management (France) also maintains physical, electronic and procedural safeguards to help protect your information.

Disclosure of Information:

As a general policy, HSBC Global Asset Management (France) will not disclose personal financial information about any client to affiliated and non-affiliated parties, except as necessary to establish and manage the client's account(s), or as required by law. To the extent permissible by applicable law, HSBC and other members of the HSBC Group may collect, use and share client's information (including relevant information about the Client, the Client's transactions, the Client's use of HSBC's products and services, and the Client's relationships with the HSBC Group). Clients' Information may be requested from the Client (or a person acting on the Client's behalf), or may also be collected by or on behalf of HSBC, from other sources (including from publically available information), generated or combined with other information available to HSBC or any member of the HSBC Group. Clients information may be disclosed in such circumstances as regulatory audits, attorneys or judges as part of a litigation, or law enforcement or other government agencies to help prevent, among other things, fraud bribery, and money laundering.