

## **Personal data protection policy**

Euronext is committed to protecting personal data and respecting the right to privacy as set out in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (GDPR) and all national laws and regulations implementing the GDPR and other data privacy laws applicable to Euronext companies. In this context, Euronext has adopted a set of internal policies and procedures and has published or disseminated a number of information notices to data subjects.

Internal documentation, part of which is under the direct responsibility of the Data Protection Officer (DPO) and other parts of which under the direction of other departments, but which may have an impact on the processing of personal data within the company, covers:

- Data Privacy Policy (DPO)
- Data retention policy (Data Management Office)
- Data Classification Standard (InfoSec)
- Corporate Standard and Procedure for the management of personal data breach
- Corporate Standard and Procedure for consent and data subject rights
- Privacy by design and data protection impact assessment procedure.

Information notices for data subjects include:

- Information notice for employees
- Information notice for corporate officers
- Notification of data subjects in a timely manner in the case of policy changes or personal data breaches where applicable and in compliance with art. 34 of the GDPR
- Privacy Statement
- Information procedure relating to the exercise of the rights of the persons concerned.

All of this documentation is distributed to employees through general training designed specifically by and for Euronext, as well as through in-depth training for specific functions that are more exposed to risk. Staff training and awareness sessions are regularly organised within the company to promote compliance with our data privacy laws and internal processes. Each new employee is trained shortly after joining the company. All newly acquired companies are also integrated into these processes. This global training is carried out through Euronext's online training platform, Euronext Academy, which keeps track of training completion by employees. Other more specific awareness/training campaigns are carried out in parallel, either physically (with the signing of an attendance sheet), or by means of distribution by email or publication on the company intranet on more specific subjects or in greater depth due to a particular risk exposure. Any breach of or failure to comply with the policy may lead to disciplinary or other appropriate actions as provided by social law.

Additionally, Euronext requires third parties with whom the data is shared to comply with the company's data privacy framework.

Finally, Euronext maintains all the organisational and technical measures put in place to ensure the protection of privacy. Amongst all these organisational measures, we can highlight:

- A Data Protection Officer (DPO) that reports KPIs on a quarterly basis to the Managing Board
- The appointment of "Business Data Owners" within each department whose role is to ensure the link between the department concerned and the Data Protection Officer (DPO) on the one hand and InfoSec and the Data Management Office on the other;
- The use of an IT tool dedicated to GDPR, which allows the automation of the processing register;
- The use of an IT tool for monitoring and risk assessment of personal data breaches;
- The completion of Data Protection Impact Assessments (DPIA) (carried out for any new project or supplier);
- The implementation of several tools by the InfoSec department to classify or control access to data.

Since 2020, Euronext has run a monitoring programme to monitor GDPR compliance as well as the respect of measures implemented internally by tools or departments. Following these checks, remedial measures are proposed and their implementation is monitored. Since 2022, a similar monitoring programme has been introduced for companies outside the Group that process personal data on behalf of Euronext. At the end of this monitoring, a report is sent to the Risk and Compliance Department and to the departments using the services of the third-party companies concerned in the event of identified risks.

Euronext conducts regular audits to ensure compliance with GDPR and the GDPR documentation framework. Those assessments include:

- DPIA performed on new projects and new vendors;
- Internal audit on designed tools to ensure GDPR compliance;
- External monitoring of dedicated vendors.

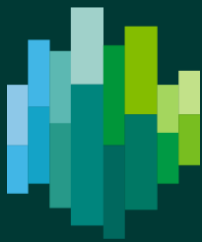
For internal and external monitoring programmes, a plan is defined each year.

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