

**New York State Department of Financial Services  
Agreement on Use of the Symphony Communications Platform**

WHEREAS the New York State Department of Financial Services (“DFS”) has determined that it is critical to the safety and soundness of the financial system for its regulated financial institutions to maintain records in a reliable, safe and secure manner;

WHEREAS banks and other financial institutions have invested in the development of a third-party e-communications platform engineered by Symphony Communication Services LLC (“Symphony”), a platform that utilizes end-to-end encryption;

WHEREAS end-to-end encryption enables the transmission of encrypted messages – including chat and instant messages – where only the sender and recipient institutions can decrypt the message using a private decryption key, and Symphony does not have the ability to decrypt the message;

WHEREAS Société Générale, New York Branch or certain of its affiliates intends to use the e-communications platform developed by Symphony employing among other features, end-to-end encryption;

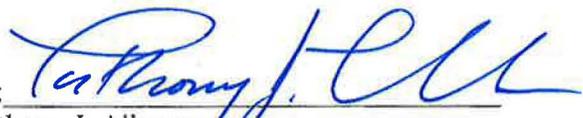
NOW THEREFORE, in addition to its current retention of messages as required by law, Société Générale, New York Branch on behalf of its affiliates that use the e-communications platform developed by Symphony (“SG”) voluntarily agrees to the following:

1. Prior to using or expanding the use of the Symphony platform, SG will require that Symphony maintain copies of all e-communications sent through the platform to or from SG for at least 7 years.
2. For encrypted messages, SG will store a copy of the associated decryption keys with an independent custodian or custodians, i.e. one not controlled by SG (the “Independent Custodian”), and shall identify the Independent Custodian(s) to DFS.
3. Due to the evolving nature of technology and cyber security, after a period of no more than five years from the date of this agreement, the parties agree to discuss in good faith the impact of such developments on this agreement to determine whether any modifications are appropriate.

**Société Générale, New York Branch**

**New York State Department of  
Financial Services**

By:   
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Acting Superintendent of Financial Services

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