

PRIVACY POLICY

Latest update: 9th of October 2019

Fintecture SAS – 5 avenue de Général de Gaulle, 94160 Saint-Mandé, France.

Our registered office and the address you should use for all correspondence is at 5 avenue de Général de Gaulle, 94160 Saint-Mandé, France.

Fintecture Contact

INTRODUCTION

This Privacy Policy governs Fintecture's collection, processing and use of your personal data. As used in this Privacy Policy, "Fintecture", "we", "us" or "Company" refers to Fintecture SAS, a Payment Institution, registered with the French Financial Regulator ACPR under the number 17248, with its registered address at 5 avenue du general de gaulle 94160 Saint-Mandé, and Fintecture SAS, registered within the French Companies Registrar under the number R.C.S Créteil 834500548.

Fintecture is the data controller under this Privacy Policy and the EU General Data Protection Regulation 2016/679 (GDPR) and national French law "la loi Informatique et Libertés du 6 janvier 1978 modifiée".

DATA CONTROLLER

As your data controller, Fintecture is responsible for the collection, use, disclosure, retention and protection of your personal information in accordance with our global privacy standards, this Privacy Policy, as well as any applicable national laws.

The company uses encryption to protect your information and store decryption keys in separate systems. We process and retain your personal information on our servers in multiple data center locations in the European Union.

Fintecture may employ other firms to perform functions on our behalf.

PERSONAL INFORMATION WE COLLECT

- Contact information, such as name, home address, and email address;

- Account information, such as username, password, account settings and preferences;
- Financial information, such as bank account numbers/IBANs and transactions initiated and collected with Fintecture;
- Identity verification information, such as images of your government issued ID, passport, national ID card, or driving licence;
- Residence verification information, such as utility bill details or similar information;
- Information regarding the way in which you use our services, such as when you used our services and the specific services used; and
- Information relating to communications with us, whether through the Fintecture website, e-mail, over the phone or post.

We also automatically collect certain computer, device and browsing information when you use Fintecture's services. This information is aggregated to provide statistical data about our users' browsing actions and patterns, and does not personally identify individuals. This information may include computer or mobile device information, including IP address, operating system, network system, browser type and settings.

COOKIES

When you use our products and services, we may make use of the standard practice of placing tiny data files called cookies, flash cookies, pixel tags, or other tracking tools on your computer or other devices used when engaging with us. We use cookies to help us recognize you as a customer, collect information about your use of our products and services, to better customize our services and

content for you, and to collect information about your computer or other access devices to ensure our compliance with our anti-money laundering obligations.

If you want to avoid using cookies altogether, you can disable cookies in your browser. However, disabling cookies might make it impossible for you to use certain features or our website or services, such as making transactions. Your use of our website or service with a browser that is configured to accept cookies constitutes an acceptance of our cookies.

SECURITY OF PERSONAL DATA

All personal information is transferred to Fintecture over a secure connection, and thus all reasonable measures are taken to prevent unauthorised parties from viewing the information. Personal information provided to Fintecture that does not classify as personal data is also kept in a safe environment and accessible by authorised personnel only through username and password.

All financial information is transmitted via SSL technology and encrypted in our database.

Only authorised personnel is permitted access to your personal data, and these personnel are required to treat the information as highly confidential.

We have appointed a Data Protection Officer (DPO) to ensure that Fintecture manages and processes your personal information in compliance with the applicable privacy and data protection laws and regulations, and in accordance with this Privacy Policy.

WE NEVER ASK YOUR FINANCIAL INFORMATION, YOUR CARD DETAILS OR SECRET PASSWORDS THAT ENABLE TO ACCESS YOUR BANK ACCOUNT.

Please always check that any website on which you are asked for financial or payment information in relation to services presented as operated by Fintecture. If you do receive a suspicious request, do not provide your information and report it by contacting our client service immediately.

You are responsible for keeping your account passcode safe and secure. Do not share it with anyone. If there is an unauthorised use involving your information, you must notify us as soon as possible.

WHERE WE STORE YOUR PERSONAL DATA

Our operations are supported by a network of computers, servers, and other infrastructure and information technology, including, but not limited

to, third-party service providers. We store and process your personal data in the European Union.

PROCESSING YOUR PERSONAL INFORMATION

- Create and administer your Fintecture account for accounting, maintenance of legal documentation, claim and dispute management. Related processing operations are necessary for the performance of a contract with you and for compliance with our legal obligations.
- Initiate transactions and access account information is necessary for the performance of a contract with you and for compliance with our legal obligations.
- Respond to your client service requests. The processing is necessary for the performance of a contract with you.
- Verify your identity in accordance with applicable know your customer, anti-money laundering, PEPs and sanctions lists and other financial sector legislation or regulations.
- The email address you provide may be used to communicate information and updates related to your use of the Fintecture services and confirmation of transactions.
- If you contact us through the website with the contact form, we are going to collect your email and any other information you are willing to communicate us in this form.

MARKETING

We may use your personal information to send you marketing communications by email or other agreed forms, to ensure you are always kept up-to-date with our latest services. If we send you marketing communications we will do so based on your consent and registered marketing preferences.

Please note that you can opt out or opt in anytime if you change your mind by writing to us at contact@fintecture.com.

If you subscribe to our newsletter we are going to collect the email only, you can unsubscribe any time by clicking on the link at the foot page of any email we send you or by sending us your unsubscribe request at contact@fintecture.com.

RETENTION OF PERSONAL DATA

We have to collect certain information for compliance with legal requirements concerning our anti-fraud, anti-money laundering, counter financing of terrorism and know your customer obligations.

If this information is not provided we may not be able to provide a service for you.

In accordance with our record keeping obligations, we will retain account, operations, documentation, transaction and other personal data for at least five years as required by French and EU law from us as regulated payment institution.

DISCLOSURE OF YOUR PERSONAL INFORMATION

We may share your personal data with law enforcement, data protection authorities, government officials, and other authorities when:

- Compelled by court order, or other legal procedure;
- Disclosure is necessary to report suspected illegal activity.

We will not delete personal data if relevant to an investigation or a dispute. It will continue to be stored until the issues are fully resolved.

TRANSFERS OF PERSONAL INFORMATION OUTSIDE OF THE EUROPEAN ECONOMIC AREA (EEA)

We store and process your personal data in data centers in European Economic Area (EEA).

Therefore, Fintecture may extend its activities outside of EEA and offer services or address clients in countries outside of EEA.

If you are concerned by the services or become a client outside of EEA, the country to which your personal data may be transferred must benefit from an adequacy of EU data protection rules.

YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION

The rights that are available to you in relation to the personal information we hold about you.

1° Information access

You are entitled to ask us if we are processing your information and, if we are, to provide you with a copy of that information within 30 days from the date of your request.

2° Rectification

You are entitled to request that any incomplete or inaccurate personal data we hold about you is corrected.

3° Data portability

You have the right to obtain personal information you have provided us with and to ask us to transfer this to a third party of your choice.

4° Erasure

You are entitled to ask us to delete or remove personal data. There are certain exceptions where we may refuse a request for erasure, for example, where the personal data is required for compliance with law or in connection with claims.

COMPLAINT FILING

If you have a complaint, any questions, complaints, comments and requests regarding this Privacy Policy they should be addressed to contact@fintecture.com.

You also have a right to lodge a complaint with a supervisory authority, in particular in the member state in the European Union where you are habitually resident, where we are based, or where an alleged infringement of Data Protection law has taken place.

CONTACT

Please contact our DPO if you have any question about the collected data or would like to exercise your rights regarding your personal data, you can do so by sending your request on contact@fintecture.com