

PERSONAL DATA PROTECTION POLICY

This Personal Data Protection Policy (hereinafter referred to as the "**Privacy Policy**") sets out to provide users of the Cashback service (hereinafter referred to as "**You**" or "**User**") with information about how Paylead, a simplified joint-stock company (société par actions simplifiée), which has its registered office at 9, rue de Condé 33000 Bordeaux (France) and is listed in the Bordeaux Trade and Companies Register under number B 821 725 579 (hereinafter referred to as "**Paylead**" or "**We**") processes your personal data (hereinafter referred to as the "**Personal Data**" or "**Data**") and on your rights in this area.

As part of the Cashback service, Paylead processes your Personal Data disclosed either by You and/or Keytrade Bank (the "**Programme Manager**" or "**PM**")

Protecting your Personal Data is Paylead's highest priority and Paylead takes utmost care to do so.

Paylead may amend the terms of this Personal Data Protection Policy, in particular, should any further processing of the Personal Data be carried out. Please check this page regularly in order to make sure that you agree with any amendments made. You will be informed of these amendments, either through a special note on the Cashback app or through a notification message sent to your inbox on the Transactional Website.

1. What are Personal Data?

1.1. Personal Data refer to any information or piece of information that relates directly (such as your surname, first name, e-mail address and home address) or indirectly (such as a unique identifier) to a private individual.

1.2. In order to deliver the Cashback service, Paylead will have to process the following Personal Data:

- A code generated using your IBAN (pseudonymisation)
- The bank account name
- Card transaction information (for example, when and where a transaction has been conducted)
- Your unique user identifier (or token)

Please note that Paylead will never directly access your surname, first name, date of birth, nationality, country of residence and e-mail address. This information will remain within the Programme Manager's possession only. Paylead will only identify you through a **unique user identifier (or token) created by the Programme Manager (which takes the form of a series of numbers and letters).**

Paylead may also process some of your Personal Data about your purchase habits or routines, such as your favourite brands, favourite retailers, favourite locations, average sales transactions and specific life events that may be inferred through your purchases at participating merchants (such as weddings and births).

2. How do We collect your Personal Data?

We collect your Personal Data in the following ways:

2.1. Directly from the Programme Manager:

- Your unique user identifier (token)
- The code generated by the PM using your IBAN (pseudonymisation)
- The bank account name
- Card transaction information (for example, when and where a transaction was conducted)

2.2. Directly from you when you use the Cashback app:

- Personal Data relating to your purchase habits or routines, such as your favourite brands, favourite retailers, favourite locations, average sales transactions and specific life events that We may deduce from your purchases (such as weddings and births).
- Personal Data that You have disclosed to Us voluntarily when You complete various forms in the App or when You communicate with Us directly (for example, when You ask Us a question or when You exercise your rights).

2.3. Automatically

When You access or use the Cashback App, We automatically collect information about the device that You are using to log in, as well as about how you use the App (such as your IP address, operating system, the type of browser that You use, whether or not you use a proxy, your device location (deduced from your IP address, which identifies your device), the access time, the pages viewed, how You browsed within the App, the link that You used to access our App, and browsing information).

3. Who can access your Personal Data?

3.1 Accessibility within Paylead

Your Personal Data are processed by Paylead for the purpose set out below and can only be accessed by Paylead staff who need to know them in order to perform their duties.

3.2 Accessibility for other parties

Some parties may be able access your Personal Data, namely:

- The Programme Manager;
- Paylead's data processors and service providers acting on technical and logistical grounds (such as payment service providers, account information service providers, intrusion detection service providers, external security auditors and fraud management service providers);
- Any authority, court or other third party, when Data must be disclosed under legislation, regulations or a court order, or when the Data must be disclosed in order to protect and defend Paylead's rights.

4. On which legal bases and for which purposes do We process the Data that We collect?

We only collect and process Personal Data when We have a legal basis to do so.

Your Personal Data are collected either to fulfil the contract, or for our legitimate interest, or in order to comply with our legal obligations:

- We collect and process your Personal Data on a contractual basis in order to manage your applications and requests, to send You the information that you have requested and to deliver the Cashback servicethat you have signed up to;
- We collect and process your Personal Data for our legitimate interest in order to improve the User experience and our services, to provide you with products that meet your needs, to undertake statistical analyses on an aggregate and anonymised basis, to defend our interests in the event of lawsuits or legal action, to manage cybersecurity, and/or to prevent fraud in order to keep our assets and content secure;
- We may also process and store your Personal Data when We are required to do so by law or in order to defend our legitimate rights and interests.

5. Who are the Data Controllers responsible for protecting your Personal Data?

5.1 Definitions

A "**Data Controller**" is a body that determines the purposes and methods of processing your Personal Data and is liable to You for complying with legislation and regulations on protecting Personal Data.

In some instances and for some specific Personal Data, there may be two or more separate or joint Data Controllers depending on whether these Data Controllers determine the purposes for processing the Data jointly or whether each of them determines, in compliance with the regulations, the purposes for processing the data that they are implementing separately.

A "**Data Processor**" is an entity that processes the Personal Data on the Data Controller's behalf.

5.2 Responsibilities of Paylead and the Programme Manager

- (i) For Personal Data processed in connection with the Cashback service: **your unique user identifier (token), account ID, account name and card-transaction information**, Paylead and the Programme Manager will both act as joint Data Controllers. Under a statutory obligation, Paylead and the Programme Manager have determined their respective obligations as Joint Data Processors under a contract, a summary of which can be obtained by sending an e-mail to Paylead's DPO or to the e-mail address provided by the Programme Manager, as specified in Article 12.
- (ii) For Personal Data processed in connection with the Cashback service: **your surname, first name, date of birth, nationality, country of residence, e-mail address, IBAN and your KYC**, the Programme Manager will act as an independent Data Controller.
- (iii) For your Personal Data relating to your **purchase habits or routines**, Paylead will act as an independent Data Controller. Please note that your unique user identifier (token) will also be used to monitor and analyse your purchase routines.

6. How long does Paylead keep your Personal Data?

Your Personal Data are stored for as long as necessary for the purpose for which they are collected and, in any event, will be deleted at the end of this period.

Please take a look at the table below for further details about these storage periods:

Categories of Personal Data	Processing purposes	Storage period
Code generated using your IBAN (pseudonymisation)	<ul style="list-style-type: none"> - Implementing the Cashback service - Compliance with statutory and regulatory obligations 	5 years (after unsubscribing from the programme)
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The account name	<ul style="list-style-type: none"> - Implementing the Cashback service - Compliance with statutory and regulatory obligations 	5 years (after unsubscribing from the programme)
Card transaction information (for example, when and where a transaction was conducted)	<ul style="list-style-type: none"> - Implementing the Cashback service - Compliance with statutory and regulatory obligations - Undertaking statistical analyses on an aggregate and anonymised basis - Combating fraud and threats against Paylead - Performing compliance and security audits - Developing and improving the Cashback service and Paylead services in general - Showing in the App promotions and products corresponding to your requirements 	5 years (after unsubscribing from the programme)
Your unique user identifier (or token)	<ul style="list-style-type: none"> - Implementing the Cashback service - Compliance with statutory and regulatory obligations - Undertaking statistical analyses on an aggregate and anonymised basis - Combating fraud and threats against Paylead - Performing compliance and security audits - Developing and improving the Cashback service and Paylead services in general 	5 years (after unsubscribing from the programme)
Personal Data relating to your purchase habits or routines, such as your favourite brands, favourite retailers, favourite locations, average sales transactions and specific events in your life that may be deduced from the purchases made using your card (such as weddings and births).	<ul style="list-style-type: none"> - Implementing the Cashback service - Undertaking statistical analyses on an aggregate and anonymised basis - Compliance with statutory and regulatory obligations - Combating fraud and threats against Paylead - Performing compliance and security audits - Developing and improving the Cashback service and Paylead services in general - Showing in the App promotions and 	5 years (after unsubscribing from the programme)

	products corresponding to your requirements	
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7. How are your Personal Data kept secure?

Paylead uses technical and organisational measures that comply with French and European statutory and regulatory requirements for keeping your Personal Data secure and confidential.

Under written agreements, Paylead requires its service providers and data processors to provide safeguards and roll out adequate security measures in order to protect the Personal Data that they are processing on Paylead's behalf, as per the applicable requirements under Personal Data protection laws.

However, please bear in mind the inherent risks with using the internet. Paylead cannot be held liable for any loss or damage incurred through using the internet.

8. Are the Personal Data transferred outside of the European Economic Area?

Your Personal Data are processed by Paylead in France.

However, Paylead may use some service providers who are located abroad or who use data processors located abroad, including outside the European Economic Area (EEA) in countries where Personal Data protection legislation differs from the legislation which applies in the EEA.

Should this occur, Paylead will ensure that your Personal Data will receive the same level of care and legal protection as if they were located in the EEA, and will notify you that they have been transferred and the legal basis for this transfer occurring.

Should your Personal Data be transferred outside of the EEA, this will be undertaken using appropriate safeguards, in accordance with the applicable regulations on personal data protection. On request, Paylead will provide you with a copy of the applicable protective measures.

9. What are your rights in relation to your Personal Data?

9.1. Access, rectification and portability

As required under the regulations in force, You are entitled to access your Personal Data. You may also ask for your Personal Data to be rectified if they are inaccurate. Depending on the processing purpose, You are also entitled to have incomplete Personal Data completed.

In order to respond to your request, We may ask You to provide Us with proof of your identity. We may also ask for additional information or supporting documents from You. We will make every effort to respond to your request as soon as possible.

You may, where the law so specifies, exercise your right to data portability, which enables You to recover your Personal Data in a structured, commonly used and machine readable format.

9.2. Right of erasure and right to restrict processing of your Personal Data

You may ask for your Personal Data to be erased in some instances, for example:

- You consider that your Personal Data no longer need to be processed by Paylead and/or the Programme Manager for the purposes set out in this Privacy Policy;
- You consider that the processing is illegal or you think that the Personal Data are inaccurate;
- You have withdrawn your consent to your Personal Data being processed.

Where the law so specifies, You may ask for processing over your Personal Data to be restricted.

Please note that, even when you exercise your right to erasure or your right to restrict processing, Paylead and/or the Programme Manager may keep some of your Personal Data where required or permitted by law.

9.3 Right to object to the processing of your Personal Data

Where the law so specifies, You are entitled to object, on grounds relating to your situation, to the processing of your Personal Data.

More specifically, at any time, You are entitled to object to your Personal Data being processed for direct marketing purposes, including profiling when it is connected to this direct marketing.

10. How can you exercise your rights relating to protecting your Personal Data?

You can exercise your rights relating to your Personal Data:

- by e-mail at the following address: dpo@keytradebank.com

If You have a complaint about the way that We process your Data, You are also entitled to contact the French Data Protection Authority (CNIL Commission Nationale Informatique et Libertés), located at 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07 (more information at www.cnil.fr/en).

11. How can You obtain more information about your Personal Data?

11.1. Paylead has appointed a Data Protection Officer (DPO), who will be your designated contact person for any questions or complaints about the Personal Data controlled by Paylead (either as a Data Controller or as a Joint Data Controller).

You can contact Paylead's DPO:

- by e-mail at the following address: dpo@paylead.fr

11.2. If you have any questions and requests about your Personal Data, you can contact the Programme Manager's DPO team (acting either as a Controller or a Joint Controller).

You can contact the Programme Manager's DPO:

- by e-mail at the following address: dpo@keytradebank.com.

11.3. If you are unsure whether your question should be handled by Paylead or the Programme Manager, you can contact Paylead's DPO or the Programme Manager's DPO Team and your question will be forwarded to the appropriate person.

12. Data Protection Authority

Should you have any complaints about how your Personal Data are being processed, you may submit a mediation request to the Data Protection Authority at the following address:

Data Protection Authority
Rue de la Presse 35
1000 Brussels
Tel: +32 2 274 48 00
E-mail: contact@apd-gba.be