



USER PERSONAL DATA PROTECTION POLICY

Last update on July 10th 2023

SPAYCIAL (hereinafter referred to as "SPAYCIAL" or "We") is a simplified joint-stock company registered in Paris under the number RCS 822 619 185, with share capital of €43,952.93 and established at 86 rue du Faubourg Saint- Denis 75010 Paris.

SPAYCIAL is registered under no. REGAFI 76254 as a Payment Services Provider with the Prudential Control and Resolution Authority (hereinafter "ACPR") established at 4 Place de Budapest 75436 Paris Cedex 09.

SPAYCIAL undertakes to process your personal data (hereinafter "Personal Data") in a transparent, secure manner, and in compliance with the laws and regulations in force, including the General Data Protection Regulations (hereinafter "GDPR").

Spaycial are the partner Liverpool ONE is working with to run Liverpool ONE Rewards.

1. What is the purpose of this privacy policy?

This privacy policy (the "Policy") defines the terms and conditions for processing the Personal Data of Users (the "Users", "You") and their rights.

In this policy, We describe who is responsible for processing your Personal Data, what Personal Data we process, when We process your Personal Data, why We process your Personal Data and how We process your Personal Data.

In addition, We explain how you can exercise your privacy rights and any other information that may be useful to you.

2. Who is the Data Controller of Your Personal Data?

SPAYCIAL is the Data Controller of your Personal Data (the "Data Controller").

SPAYCIAL independently and autonomously determines the means and purposes of processing your Personal Data.

3. When do we process your Personal Data?

We may process your Personal Data when:

- You register for the Loyalty Program of our customers (hereinafter "Partner Customers").
- You use our software solution and services;

- You contact Us and/or You subscribe to Our newsletter;
- You participate in Our survey(s), marketing event(s) and/or campaign(s);

4. What Personal Data do We process?

“Personal Data” means any information relating to an identified or identifiable natural person.

As part of its activities, SPAYCIAL processes the following Personal Data:

- Identification and contact data:
 - First name
 - Name
 - Phone
 - E-mail address

These Data are collected only if they are strictly necessary for the performance of a service operated directly by SPAYCIAL.

- Contract data:
 - Unique User identifier (known as Customer ID),
 - Date of registration for the services (for example the date of registration for a loyalty program),
 - Transactions (date, amount, store name),
 - Transaction history,
 - Referral code if applicable,
 - Image of receipt if applicable
- Bank data:
 - IBAN,
 - Information on the banks that have been connected: date of connection, date of deletion, date of last synchronization, status (active/inactive)
- Login data:
 - IP address and connection logs
 - Browsing data and tracers (cookies)

5. Are your Personal Data secure?

SPAYCIAL ensures the security of the Personal Data collected and processed and strives with the greatest vigilance to maintain a high standard of security and confidentiality of the Personal Data of its Users.

Only SPAYCIAL, Payment Institution approved by the Prudential Control and Resolution Authority (ACPR/Banque de France), can access connected accounts and related transactions.

SPAYCIAL and its service providers have implemented a set of ongoing organizational and technical procedures and measures to ensure the integrity and confidentiality of the Personal Data processed and to protect it against unauthorized access, use and disclosure.

SPAYCIAL employees are made aware of and trained in the protection of Personal Data and cybersecurity.

Finally SPAYCIAL implements tools aimed at the anonymization, encryption, and encryption of data in order to ensure the protection of the Personal Data of its Users.

6. Why are Your Personal Data processed?

In general, Personal Data relating to a User is collected in order to promote their loyalty to our Partner Clients through the analysis of their banking transactions.

We access, use, and store your Personal Data for the following purposes and on the following legal bases:

Purpose	Purpose
Implementation of all our services and contracts (connection to the bank account of our Users, analysis of receipts, analysis of transactions, personalization of offers, validation of transactions and management user support)	Performance of a Contract
Production of anonymous statistics for the purposes of marketing studies for our Partner Clients	Legitimate Interest
Production of statistics by identifying trends in the use of our software, surveys other surveys in order to assess our performance	Legitimate Interest
Carrying out operations resulting from legal provisions	Legal Obligations
Subscription to payment in installments (BNPL)	Contract

7. Who are the recipients of your Data?

7.1 External recipients

Our service providers and Partner Clients only have access to the Personal Data that is strictly necessary for them to perform the contracts established.

External recipients	Purpose
Partner Clients	Execution of the services of Our Partner Clients (for example calculation of points as part of the execution of a loyalty program)
Mangopay or Checkout (depending on your country of location)	Initiation of the Payment Service (execution of the transfer of cashbacks)
AWS	Hosting

7.2 Internal recipients

Our employees only have access to the Personal Data that is strictly necessary for them to perform the contracts established.

Internal recipients	Purpose
Technical Admin	Service execution
Support Service	User Support and Troubleshooting

7.3 Data transfer

SPAYCIAL stores your Personal Data in Europe.

In the event of transfer of your Personal Data to our subcontractors located outside the European Economic Area (EEA), we ensure that the processing is carried out in accordance with this policy and that it is governed by the latest standard contractual clauses. of the European Commission which make it possible to guarantee a sufficient level of protection of the privacy and fundamental rights of individuals.

7.4 Retention period

Your Personal Data is kept for as long as necessary for the purpose of the processing of Personal Data or as long as the law or regulation authorizes it. Thereafter, your Personal Data will be deleted or made anonymous.

Personal Data relating to Users' bank accounts and related transactions are kept for a period of five (5) years following the termination of the contractual relationship in an intermediate archive database before definitive deletion in accordance with the regulations relating to the fight against money laundering and the financing of terrorism.

8. How to exercise your rights?

8.1 Right of access

You have the right to obtain from SPAYCIAL information on the processing carried out. In order to respond to this request, We may verify Your identity and ask You to provide additional information on this request. SPAYCIAL strives to respond to this type of request within a reasonable time and in accordance with the law in force.

8.2 Right of rectification

You have the option, via Support, of rectifying, erasing or completing incorrect or incomplete information.

8.3 Right to erasure (right to be forgotten)

You have the right to obtain from SPAYCIAL that it deletes, as soon as possible, your Personal Data, in particular when:

- These Personal Data are no longer necessary for the purposes for which they were collected;
- You have withdrawn your consent or object to the processing of their Personal Data;
- When we are not required by the legislator to keep your Data in the context of the fight against money laundering and the financing of terrorism.

8.4 Right to restriction of processing and to object

You have the right to obtain from SPAYCIAL the limitation of the processing of your Personal Data or to object at any time, for reasons relating to your particular situation, to the processing of your Personal Data.

You also have the right to refuse to be the subject of a decision based solely on automated processing, including profiling.

8.5 Right to portability

You have the right to receive a copy of the only Personal Data that you have provided to us in a structured, commonly used and machine-readable format and to transmit it to another data controller.

8.6 Complaint to the supervisory authority

You have the right to lodge a complaint with the competent supervisory authority if you consider that SPAYCIAL has not respected your rights to the protection of Personal Data.

In France, the competent authority is the CNIL. You can visit the CNIL website for more information at the following address: <https://www.cnil.fr/>

8.7 How to contact us ?

If you have any questions or requests regarding the use of your personal data, you can contact our Data Protection Officer (DPO):

- By email to dataprotection@spaycial.com;
- By post to the attention of the Data Protection Officer, at the following address: SPAYCIAL, 86 rue du Boulevard Saint Denis, 75010 Paris.

9. How can I be notified of changes to this Policy?

We are continually developing and improving our products and services, which may lead to changes in the way we process Personal Data.

We may therefore occasionally modify this Policy. If necessary, we will change the date of "last update" in the header of this document.

SPAYCIAL will inform Users of any substantial modification relating to the processing of Personal Data.

