

# Privacy Policy

## TRANSACTION CONNECT – Westfield Club

Version dated 21.02.2021

### 1. Generalities

You are hereby informed that, in the context of your use of the Loyalty Points Collection program of the loyalty program « *Westfield Club* » set up by Westfield Europe Limited and Unibail Management, which allows its members to be rewarded on the basis of their purchases made under certain conditions, Transaction Connect (“**We**” “**Us**”), a French company with its registered office located at 86 rue du Faubourg Saint Denis, 75010 Paris (www.transactionconnect.com), and registered with the Registry of Commerce and Companies of Paris under the number 822 619 185, acting as an independent data controller regarding the collection and processing of your personal data necessary to provide the *cashback* functionality of the program “*Westfield Club*”.

Our secured technology allows Us to recognize your purchases in a variety of ways:

- By synchronizing your current accounts or your card accounts (hereinafter, the “**Accounts**”) with your User Account
- By linking your debit or credit card(s) to your User Account ,
- By uploading your receipts to your User Account

This allows Us to recognize your purchases in the shopping centre and to process this data in accordance with your consent (hereinafter, the “**Services**”).

The purpose of this Privacy Policy is to explain to you what personal data We collect, how We process it and your rights with respect to such processing.

We encourage you to read this Privacy Policy and Our Terms of Use carefully.

By using the Services and submitting your personal data to Us, you acknowledge that you have been informed of Our use of your personal data in accordance with this Privacy Policy and our Terms of Use.

If you do not want Us to use your personal data, We encourage you not to provide them to Us. But, in this case, We will not be able to implement the Services and allow you to benefit from the *cashback* functionality allowed by your *Westfield Club* account (your “**User Account**”).

Since transparency is a key value for us, We place the utmost emphasis on the respect of your privacy and we are committed to complying with the provisions of the EU Regulation 2016/679 of 27 April 2016 (the “General Data Protection Regulation”) and the French Data Protection Law No. 78-17 of 6 January 1978 in its current version.

Thus, in order to best observe your privacy, We will never sell your personal data (i.e., any information that can identify you directly or indirectly) to third parties.

## 2. Type of data collected

In connection with the provision of the Services, We collect the following personal data (the "Personal Data"):

### 2.1. In the case of synchronising your banking Accounts

- The Access IDs (and, if applicable, your password) that you use to connect to your establishment's web interface;
- Your payment data as displayed on your establishment's web interface;
- If applicable, your payment data from establishments compatible with the service as displayed on the web interface of such service.

### 2.2. In the case of linking your debit or credit card(s)

- The only data We collect are transactions realized with the card inside (store, amount, date).
- The data related to the purchases you made in the shopping centre.

### 2.3. In the case of uploading your receipts

- A picture of your uploaded receipt
- All the information displayed on the receipt (i.e., amount, store, shopping centre, SIRET Number, date, etc.)

In any case, We collect the information related to the debit or credit card that you use for the *cashback* functionality of the *Westfield Club* program.

Once collected, all this data is encrypted and stored on servers located in the European Union, in an encrypted database with a bank level algorithm (AES-256).

## 3. Processing of the Personal Data

To operate the "*cashback*" feature of the loyalty program, We process your Personal Data in these ways and for the following purposes:

- We access and store, in a pseudonymized form, the purchase data that is detected by means of the Accounts linked to your User Account or by means of the debit or credit card(s) linked to your User Account or by means of uploading your purchase receipts;
- We analyse these data in order to identify the purchases made at the shopping centre where the Loyalty Program is active. If the synchronisation of your Accounts is activated, we also take into account any transaction made before your enrolment in the loyalty program so as to provide a customized experience. For more information about the transaction history We have access to, We encourage you to consult your bank.

- We transfer to Westfield Europe Limited and Unibail Management SAS the data relating to the purchases (namely: date, store and amount) made in the participating stores of this shopping centre;
- We transfer to our partner Westfield Europe Limited the necessary data to implement the “cashback” feature, namely the information related to the bank card on which you want to be rewarded;
- We store all the data, in the form of a digital print, that are necessary to prevent any misuse of the Points Collection of the Loyalty Program;
- Subject to your validation of the corresponding opt-in, by ticking a specific box, We use all your Transaction data for statistical purposes in aggregated and anonymized form;
- Subject to your validation of the corresponding opt-in, by ticking a specific box, We share these aggregated and anonymized statistical data with our partners. Since this data is anonymized, it will be impossible, even for our partners, to make a comparison between the statistics that We carry out and your Personal Data.

In addition, We inform you that our partners are forbidden to ask us for specifications, details or any information allowing to disaggregate the data that are communicated to them.

For our part, We refrain from answering any questions they might ask Us if the answer would involve a violation of your rights, including the right to respect your Personal Data.

We freely and independently determine the means implemented in order to pursue the purposes We have identified above. Thus, you are hereby expressly informed that We act as the independent data controller in the meaning of the GDPR with respect to the purposes referred to above and We are in no event to be considered to be joint controllers with Rodamco Handel AB and Unibail Management or their data processor.

Further information relating to the collection, processing and sharing of your Personal Data and your rights regarding your data and how you can exercise these rights are detailed in the *Privacy Policy* of the *Westfield Club* Program accessible directly by clicking [Here](#).

#### **4. Confidentiality of the Personal Data communicated**

You grant to Us a mandate to access, in your name and on your behalf, each of the Accounts that you have entered in your User Account in order to perform all the actions necessary to provide the Services, in accordance with the provisions of the [Payment Services Directive 2](#).

We protect the confidentiality of the Personal Data collected, to which We attach the greatest importance. We make our best efforts to take the necessary precautions to preserve the confidentiality of the Personal Data and We declare that we maintain relations with trusted hosting and technology providers renowned for the seriousness of their services and the degree of protection they provide for the confidentiality of Personal Data.

#### **5. Use of partners**

We use subcontractors in order to provide the Services to you.

Under these conditions, you expressly consent that in order to provide the Services, We may, if necessary, encrypt and securely transmit Access IDs that allow the Accounts to be

synchronised to our hosting and technology providers based in the European Union which undertake the synchronisation of this data and which comply with the applicable legislation.

These hosting and technology providers are contractually obliged to comply with the provisions of the GDPR concerning the personal data they process. They must also ensure that all collected data that they receive for processing is stored on EU territory.

We are currently working with the following partners to provide the Services:

- Checkout and Mangopay: the partners operating the reimbursement of the *cashback* offers;
- FIDEL and Spreedly: partners responsible for collecting your purchase information from the debit or credit card(s) you linked to your User Account;
- Amazon Web Services: the sub-contractor responsible for storing the Personal Data collected.

## **6. Your rights regarding the management of your Personal Data**

First of all, you are informed that you may at any time and without justification withdraw the consent or consents you have given Us.

You can withdraw your consent by writing to the User Relations Department of TRANSACTION CONNECT by email at: [dataprotection@transactionconnect.com](mailto:dataprotection@transactionconnect.com), provided that you have given proof of your identity by attaching to your application a copy of your valid identity document and indicating your e-mail address. For security reasons and in the case of doubt as to the validity and authenticity of the supporting documents produced, We reserve the right to request any other supporting documents from you.

Once your identity has been established, We will then stop processing your Personal Data corresponding to the consent you have withdrawn. Please note that this withdrawal of consent cannot affect the lawfulness of processing already carried out and for which you had previously given your consent.

You are also informed that you have the right to access, oppose, delete and rectify information concerning you. You can exercise these rights by writing to the User Relations Department of TRANSACTION CONNECT by email at: [dataprotection@transactionconnect.com](mailto:dataprotection@transactionconnect.com), provided that you have given proof of your identity by attaching to your application a copy of your valid identity document and indicating your e-mail address. For security reasons and in case of doubt as to the validity and authenticity of the supporting documents produced, We reserve the right to request any other supporting documents from you.

In the event that you request opposition to the processing of your Personal Data or the closure of your User Account, please do so by sending a request to Us at the address [dataprotection@transactionconnect.com](mailto:dataprotection@transactionconnect.com) and by proving your identity by attaching to your request a copy of your valid identity document and indicating your e-mail address. For security reasons and in case of doubt as to the value and authenticity of the supporting documents produced, We reserve the right to request any other supporting documents from you.

Once your identity has been established, We will terminate the processing of your Personal Data and close the corresponding User Account.

As TRANSACTION CONNECT does not possess information concerning your civil status, We cannot identify you using this information. In order to enable us to respond to your requests, you must authorize Westfield Europe Limited and Unibail Management SAS, the entity responsible for creating a technical identifier (known as the "Customer ID") using your Personal Data concerning your civil status, to provide to US your Customer ID.

Please note that in the event of erasure of your Personal Data or opposition to the processing of your Personal Data, you will no longer be able to benefit from the *cashback* functionality.

We undertake to respond to all of your requests as soon as possible and at most within one month after We have received all of the necessary identification information.

## **7. Right to the portability of the Personal Data collected**

You are informed that you have the right to the portability of your Personal Data. This right offers you the possibility to obtain and reuse the Personal Data collected.

You can exercise this right by sending a request to Us at the address [dataprotection@transactionconnect.com](mailto:dataprotection@transactionconnect.com) and by proving your identity by attaching to your request a copy of your valid identity document and indicating your e-mail address. For security reasons and in case of doubt as to the validity and authenticity of the supporting documents produced, We reserve the right to request any other supporting documents from you.

As TRANSACTION CONNECT does not possess information concerning your civil status, We cannot identify you using this information. In order to enable us to respond to your requests, you must authorize Westfield Europe Limited and Unibail Management SAS, the entity responsible for creating a technical identifier (known as the "Customer ID") using your Personal Data concerning your civil status, to provide to US your Customer ID.

Only the Personal Data that you have provided Us will be transmitted to you in a structured, commonly used and machine-readable format as soon as possible, and no later than one month after the request has been sent to Us.

Personal Data derived, calculated or inferred from the data you have provided Us are excluded from your right to portability.

Under no circumstances may the exercise of this right infringe the rights and freedoms of third parties.

We undertake to respond to all of your requests as soon as possible and at most within one month after We have received all of the necessary identification information.

## **8. Data retention**

We retain all of your Personal Data for the period during which you use the Services.

We will automatically delete or prevent the use of your Personal Data if you do not use our Services for more than 3 years (i.e., if you do not conclude any transactions to collect points for a reward). In this case, we will automatically close your account.

When closing your User Account or if you have asked Us to delete your Personal Data, if you have withdrawn your consent or if you have exercised your right to object to the processing of your Personal Data, We will destroy all data concerning you, with the exception of the data required to prevent fraudulent deletions, namely deletions followed by re-registrations under another identifier in order to benefit from potential offers and rewards. In this case, We and Our subcontractors will only keep the Personal Data strictly necessary to detect such fraudulent behaviour for a period of one year following the request to terminate the Services.

This data is stored in the form of a fingerprint, i.e., in the form of a unique and encrypted character string based on the access information for the establishment web interface. In this form, these data are unusable for any purpose other than for combating fraud.

We will perform the same deletion operations when request to do so by Westfield Europe Limited and Unibail Management SAS.

## **9. Transfer in the event of a change of ownership**

In the event that TRANSACTION CONNECT is the subject of a merger, acquisition, dissolution or sale, We reserve the right to transfer your Personal data to the new entity that may become controller, provided that the assignee maintains for your benefit the rights and obligations provided for herein and in our Terms of Use.

You will be notified if your data are transferred to another entity as a result of such merger, acquisition, dissolution or sale.

## **10. Complaint to a Data Protection Authority**

You have the right to submit a complaint concerning our data processing activities before the French Data Protection Authority (the CNIL):

Commission Nationale de l'Informatique et des Libertés  
3, place de Fontenoy  
75007 Paris  
[www.cnil.fr](http://www.cnil.fr)

## **11. Applicable law and jurisdiction**

This Privacy Policy and all the clauses relating to its performance or interpretation are governed by French law, regardless of the place of performance of the obligations arising therefrom.

If you have any questions or complaints about this Privacy Policy, you can contact us at: [dataprotection@transactionconnect.com](mailto:dataprotection@transactionconnect.com).

If a dispute arises in connection with the Privacy Policy or the use of the Services, each of the two Parties shall endeavour to settle the dispute amicably.

## **12. Updates of the Privacy Policy**

We have the right to revise or update the Privacy Policy from time to time. Any modification will enter into force when the updated Privacy Policy is made available. In the event of changes that are important for Us and which require your consent in accordance with applicable law, We will inform you of this and We will request your consent if necessary.

