



**PERSONAL DATA
PROTECTION POLICY**



OUR PERSONAL DATA PROTECTION COMMITMENTS

As part of the privileged relationship shared with each of its customers, C2A wishes to inform you of its commitments in respect of the protection of your personal data.

In order for you to have total peace of mind when using our payment solutions, this charter sets forth clear, simple and sincere information about the data processing conducted by C2A in a single document. This charter will enable you to understand what information and personal data (hereinafter referred to as "personal data") we collect and how we use it to provide you with new services on a day-to-day basis while respecting all your rights over your personal data.

Whatever the method of contact used, C2A is committed to protecting your privacy in accordance with the legislation in effect, by ensuring the protection, confidentiality and security of the personal data that you entrust to us.

KEY PRINCIPLES

C2A is committed to the principles that are essential for respecting fundamental rights and for complying with all applicable laws and regulations:

- Transparency: we provide you with useful information on the purposes and recipients of your collected data;
- Legitimacy and relevance: we only collect and process the data necessary for the stated purposes;
- Confidentiality and integrity: we implement all reasonable technical and organisational measures to protect your personal data against disclosure, loss, modification or access by unauthorised third parties;
- Retention: we retain your personal data solely for the time necessary for the defined processing purposes or service;
- Right of access: we provide you with an option to access, modify and correct your personal data. We remain at your disposal for you to exercise your right to erasure.



OUR USES OF YOUR PERSONAL DATA

2.1 On what occasions do we collect your personal data?

Your personal data may be collected as part of:

- your request to open a payment account and/or the provision of a MasterCard card with systematic authorisation, as part of our payment solutions offering;
- accessing our online services;
- our sales relationship;
- the use of our services or those of our partners;
- your interactions with our Customer Relationship Management department.

2.2 WHAT IS THE NATURE OF THE DATA COLLECTED?

Declarative personal data are those that you provide within the context of a sales relationship with us or with our partners, for example:

- the creation of your customer account and the creation of your C2A cards;
- any exchange with C2A, for example, with the Customer Relationship Management department.
- participation in competitions

This data is collected through forms that are in digital format on our websites or mobile apps, on paper or in response to questions asked by our Customer Relationship Management department, for example.

The mandatory declarative data are specified by an asterisk on the collection medium. To benefit from our services and services, it is necessary, except in special cases, to collect:

- one or more proofs of identity detailing the following data, which we use: surname, first name, date and place of birth.

In principle, the postal address, e-mail address, landline or mobile phone number that we request are only business data.

Exclusion of particular categories of personal data

In accordance with the law, under no circumstances do we collect certain categories of personal data comprising data that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, union membership, personal genetic data, biometric data for the purpose of uniquely identifying a natural person, personal data in relation to health or in relation to the sexual life or sexual orientation of a natural person.

These particular categories of personal data are never collected or processed by C2A.



2.3 HOW DO WE USE YOUR DATA?

We use your data in accordance with the terms of this Charter, the general terms and conditions of sale or use of our products or services, with transparency and the security of your data continuously front of mind in this respect.

Use case:

- when, following clear, apparent and precise information concerning the processing performed, you have consented to one or more specific purposes by means of a written declaration, including by electronic means;
- when necessary for the execution of a sales contract, of the general terms and conditions of sale or use, or for the performance of pre-contractual measures undertaken at your request;
- for compliance with C2A's legal or regulatory obligations (such as combatting money laundering and terrorist financing);
- when the legitimate interests of C2A or the recipients may be such as to justify the processing of your personal data by C2A (e.g., insurance, etc.).

This processing is performed while taking into account your interests and your fundamental rights as customers. As such, it is combined with measures and safeguards to ensure the protection of your interests and rights, while striking the right balance with the legitimate interests we pursue.

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2.4 WHY DO WE COLLECT YOUR DATA?

- to manage our business relationship;
- to maintain and update our customer files;
- for technical purposes (e.g., caller identification procedure to avoid identity theft)

2.5 WHAT ANALYSES DO WE PERFORM ON YOUR DATA?

C2A does not perform any analysis on your personal data.



2.6 WHO ARE THE RECIPIENTS OF YOUR PERSONAL DATA?

We make sure that only authorised persons within C2A and its call centre can access your personal data when it is necessary for the execution of our business relationship.

Our service providers may also be recipients of personal data that is strictly necessary for the performance of the services we entrust to them (e.g., surname and first name displayed on the C2A card, etc.).

Certain personal data may also be sent to third parties to meet legal, regulatory or contractual obligations or to legally authorised public bodies.

2.7 WHERE ARE YOUR PERSONAL DATA STORED?

The data are stored by C2A, which collects them, in compliance with French legislation and European regulations.

We may share personal data with other companies, as necessary, for the performance of services you are contracted or subscribed to (e.g., authentication of digital financial transactions via the 3D-Secure protocol, etc.).

Transactions with third-party recipients of your data are subject to a contract to ensure the protection of your data and the respect of your rights.

C2A does not transfer any data to countries outside of the European Union.

2.8 HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

The data retention periods comply with CNIL (French data protection agency) recommendations and/or legal obligations (ACPR (French bank/insurance supervisory authority) and TRACFIN (French money laundering/terrorist financing authority)):

Categories of personal data	Active retention rules
Your customer account data	5 years following the closure of your account
Personal login data for websites	1 year
Cookies	Maximum expiry period of 13 months
Prospect data	Data retained as long as the customer remains active and does not request the deletion of its data.
Identification data	Data retained as long as the customer remains active and does not request the deletion of its data.



HOW DO YOU EXERCISE YOUR ACCESS RIGHTS?

You can exercise your rights by mail together with a copy of any identification document by contacting the Personal Data Protection Officer in the Risk and Internal Control Department, at the following address: C2A ZA AGORETTA – 63, Avenue de Bayonne – 64210 BIDART – France

OUR DATA SECURITY MEASURES

4.1 OUR SECURITY AND CONFIDENTIALITY COMMITMENTS

Respecting your right to the protection, security and confidentiality of your data is our priority.

C2A is committed to implementing security measures that are tailored to the degree of sensitivity of the personal data, in order to protect against malicious intrusion, loss, modification or disclosure to unauthorised third parties.

When developing, designing, selecting and using those of our services that rely on the processing of personal data, C2A takes into account the right to personal data protection beginning with the design phase itself. As all personal data is confidential, access to such is restricted to C2A employees and service providers acting on behalf of C2A, which require such for the performance of their remits. All persons having access to your data are bound by an obligation of confidentiality, and are subject to disciplinary measures and/or other sanctions should they do not fulfil this obligation.

Transactions with third-party recipients are subject to a contract in order to ensure the protection of your personal data and the respect of your rights.

In C2A, we are fully committed to protecting the personal data that you entrust to us. Paying continuous close attention to security and protection, we recommend that you exercise caution in order to prevent unauthorised access to your personal data and to protect your devices (computer, smartphone, tablet) against any unwanted or even malicious access by using a strong password, which should be regularly changed. If you share a device, we recommend that you log out after each use.

4.2 OUR PERSONAL DATA PROTECTION OFFICER

We have appointed a Data Protection Officer (DPO), whose contact details are as follows: dpo@c2a-card.com.

"Anonymisation" is defined as the result of "processing personal data in order to irreversibly prevent identification" ⁽¹⁾;

"Collect" refers to the act of collecting personal data. This collection can in particular be done through the use of questionnaires or online forms;

"Consent" refers to any expression of free, specific, informed and unambiguous willingness by which you agree, via a declaration or a clear positive action, that personal data in relation to you can be subject to processing;

"Personal data" refers to any information in relation to a natural person that is identified or identifiable, which can be identified, either directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier, or to one or more specific elements that are specific to its physical, physiological, genetic, psychic, economic, cultural or social identity;

"Right of access" refers to all the fundamental rights as described in the European regulation⁽²⁾ on:

- the right to information;
- the right of access;
- the right of rectification;
- the right to erasure or the right to be forgotten;
- the right to data portability;
- the rights of opposition;
- the right to restriction of processing;
- the right to give instructions in relation to the storage, erasure and communication of personal data after death.

"Restriction of processing" refers to the marking of stored personal data with the aim of limiting their processing in the future⁽³⁾;

"Minimisation" in reference to "data" refers to a limitation placed on the collection or use of information;

"Data sharing" refers to the result of the pooling of customer or prospect databases belonging to several different partners;

"Profiling"⁽⁴⁾ refers to "Any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements";



"Products or Services" refers to all the products and services including technological (websites, applications and associated services) that are offered or to be offered by C2A;

"Sales prospecting" refers to the search for customers, with the fact that it is commercial in nature meaning that it is related to business, that it involves it⁽⁵⁾;

"Business relationship" includes all relations between C2A and its customers such as, for example, when using our products or services, the relationship that ensues with our Customer Relationship Management department or our call centre, or that ensues from your participation in competitions, your complaints or your participation in satisfaction surveys.

"Data controller" is the person or the body that, alone or jointly, determines the processing objectives and methods for your personal data;

"Online services" refers to the digital services offered by C2A such as the website, applications, related services or mobile services;

"Subcontractor" means the person that processes personal data on behalf of the person, organisation or body that is the data controller;

"Behavioural monitoring of persons", sometimes referred to as "profile deduction", refers to techniques that enable the assessment of a natural person's behavioural aspects in relation to their use of the Internet.

"Third party" refers to anyone other than C2A and yourself;

"Personal data processing" means any operation or group of operations applied to your data, regardless of the online service media in question or the process used.

(1) G29 opinion 05/2014 of 10 April 2014 on Anonymisation Techniques (WP216)

(2) Regulation (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016, Art. 15 to 21 and Art. 23

(3) Regulation (EU) 2016-679 of 27/04/2016, Art. 4

(4) Regulation (EU) 2016/679 of 27/04/2016: OJEU 2016 L 119 p.1 s., Art. 4 §4.

(5) Larousse Dictionary, 2017.