

PRIVACY POLICY

Updated: July 2022

Stancer takes the protection and confidentiality of your private life and, more specifically, your personal data ("personal data") very seriously. As such, this Privacy Policy will enable you to understand what personal data we collect and what we do with it, and how you can exercise your rights in the context of the services we provide.

"You" is understood, depending on the processing of personal data in question, to be the client using the payment services for professional clients (hereinafter the "Client") or the user of our account information services (hereinafter the "User").

Should you have any questions about this policy or our use of your personal data, please send us a e-mail our Personal Data Protection Officer at dpo@iliad78.net.

1. What type of personal data does Stancer collect about you?

When you subscribe to Stancer's services and throughout the provision of such services, Stancer collects, either directly from you including by automated means or indirectly via its partners or service providers, and processes mainly the following categories of personal data. You will find below the purposes for which such data are collected and processed:

Personal data	Clients	Users
i. Identification data: surname, first name, identification number, etc.	Yes	Yes
ii. Identity document	Yes	No
iii. Contact data: postal address, e-mail, telephone number etc.	Yes	No
iv. Invoicing and/or payment data: invoices, means of payment, consumption, purchase amount, etc.	Yes	No
v. Bank details	Yes	Yes
vi. Usage and consumption data: services taken out, products used, consumption, communications, etc.	Yes	No
vii. Client relationship monitoring data: support requests, correspondence with the Client, etc.	Yes	No
viii. Connection data	Yes	No
ix. Data necessary for the provision of information services	No	Yes

For each processing operation carried out, Stancer undertakes to use only personal data that is adequate, relevant and limited to what is necessary for the purposes for which it is processed.

2. How does Stancer use your personal data?

- **Implementation and management of your contract/services**

Where applicable, this includes managing your Client account and the contractual relationship, providing and managing the service taken out, providing support and handling your requests, billing for the service, and handling complaints and disputes and collection procedures, including via third parties.

In this context, the data is kept for the time necessary to manage the contract and/or for the legally permitted period. In the absence of such data, Stancer would not be able to perform the services for which you have subscribed.

For the provision of information services, your data is used to access accounts and, if necessary, to calculate your score and pass it on to our partners.

- **Service improvement and marketing**

If necessary, Stancer may also use your personal data if there is a legitimate interest or, where applicable, with your consent, which you may withdraw at any time. Your personal data will be used by Stancer to assess and improve its services and to develop new ones, as well as to carry out loyalty-building, marketing, surveying and promotional activities.

Unless you object, you may receive, by post and telephone, offers from Stancer or its commercial partners, as well as e-mails for services similar to those offered by Stancer. With your express consent, Stancer may e-mail you commercial information for services that are not similar to those already provided or, except in cases covered by the Universal Directory (Annuaire Universel), transmit your e-mail address to commercial partners for direct marketing purposes.

If you wish, you may change your mind at any time, via your User Area.

Your data will be kept for the time necessary to fulfil these purposes and for a maximum period of three years from the end of the contractual relationship in the case of direct marketing.

- **Statistics and service improvement**

Stancer may also use your personal data to analyse your behaviour and assess and improve the services in order to get to know its clients better and develop new products and services.

- **Security and prevention**

In order to pursue its legitimate interests, Stancer will also use your personal data to guarantee the security of the network and prevent possible fraud; furthermore, in the event of any merger, sale of assets or transfer of all or part of its business, Stancer will transfer your personal data to third party/ies involved in the transaction as part of said transaction.

In this regard, Stancer may collect your personal data via third-party service providers and partners such as financial services or identity verification companies. Please note that we may use monitoring systems to assess the risk associated with certain transaction requests in order to detect possible fraud. This data will be retained for no longer than is necessary to achieve the above purposes or for the period permitted by law.

- **Meeting our legal obligations and defending our interests before a court of law**

Stancer may also use your data to ensure compliance with its legal obligations including, in particular, the laws relating to payment methods, anti-fraud laws, the laws governing money laundering and the financing of terrorism (AML/CFT) and the provisions governing late payment and non-payment and/or to address requests from public and governmental authorities and any requests submitted by data subjects to exercise their rights with respect to personal data processed by Stancer. This data will be retained for no longer than is necessary to achieve the above purposes or for the period permitted by law.

3. How can you manage the collection and use of your personal data?

To the extent and under the conditions permitted by applicable law, you have the following rights regarding the collection and use of your personal data.

You may at any time access your personal data and obtain further information on the characteristics of the processing operations we carry out, or cause your data to be rectified, request that it be deleted for specific reasons or exercise your right to limit data processing or exercise your data portability right in authorised cases.

You also have the right to object at any time to the processing of your personal data for sales marketing purposes or, for reasons relating to your specific situation, to the processing of your personal data which is legally grounded in our legitimate interest.

You may withdraw your consent to any processing operation to which you have consented.

You may also set up instructions on what to do with your personal data after your death

You may exercise these rights by accessing your User Area, as the case may be, or by sending a letter and providing proof of your identity to: **Stancer - Informatique et Libertés - 75371 Paris Cedex 08** or by sending an e-mail to dpo@iliad78.net.

In the event that you are not satisfied with Stancer's response to your complaint, you may contact the French Data Protection Authority (*Commission Nationale de l'Informatique et des Libertés* (CNIL)), which is responsible for compliance with personal data obligations.

4. How does Stancer ensure the security of your personal data?

Stancer considers the security of personal data to be of particular importance, and in this respect we comply in particular with the Payment Card Industry Data Security Standard (PCI DSS) and Stancer has received PCI DSS certification in order to protect your personal data against fraudulent use.

Stancer also takes all necessary steps to protect the personal data it processes. Your data is processed in such a way as to ensure its security, protection and confidentiality in accordance with its level of sensitivity, through administrative, technical and physical measures to prevent loss, theft, unauthorised use, disclosure or modification. Accordingly, Stancer implements measures that comply with the principle of privacy by design and privacy by default of all personal data processed. To this end, Stancer may use anonymisation or encryption techniques whenever possible and/or necessary.

5. Who can access your personal data?

Your personal data is processed solely for the aforementioned purposes by Stancer, the companies of the Iliad Group to which Stancer belongs, its subcontractors and commercial partners and service providers. Only our employees who are authorised and trained in the protection of personal data can access your data in the context of their work.

Your data may also be transferred to third-party service providers who provide services (hosting, etc.) or assistance and advice to Stancer. These service providers may access your personal data only for the purpose of performing the services or resolving a dispute.

When we use a service provider, we only disclose your personal data to said provider after obtaining a commitment and guarantees from the latter regarding its ability to meet our security and privacy requirements, and we enter into agreements in compliance with legal and regulatory obligations specifying the terms and conditions of personal data processing. We ensure that they apply strict policies that allow your personal data to be transferred only to persons authorised to have access to it.

Stancer's subcontractors, partners and service providers may be located outside the European Union. Whenever they are located in a country that has not been recognised as providing an adequate level of data protection, Stancer will do everything necessary to ensure that they provide an adequate level of protection and security for your personal data equivalent to that safeguarded in EU legislation (for example, on the basis of a transfer agreement containing the European Commission's Standard Contractual Clauses) and will require them to meet its requirements for the security and confidentiality of your personal data and to only process your data for the purposes it has determined.

Finally and upon request, your personal data may also be transferred to persons and authorities whose right of access to personal data is recognised by law, regulations or provisions emanating from authorities empowered by law.

6. Changes to the privacy policy

This Privacy Policy may be amended by Stancer from time to time, in particular when new services are added. Stancer encourage you to consult this document regularly in order to familiarise yourself with any changes or updates made to the Privacy Policy.