

BIT2ME CARD REWARDS PROGRAMME PRIVACY POLICY

LAST UPDATE: 05 April 2022

1. OBJECT

This Privacy Policy details all the information that will enable you to understand how your personal data is handled within the Rewards Programme.

The processing of your personal data by PayLead and Bit2Me is the result of your willingness to participate in the Rewards Programme. In the interests of transparency, when you register for the Rewards Programme we will provide you with as much information as possible about how we use your personal data and the extent of your rights (including the right to object to processing that is not strictly necessary for the provision of the Rewards Programme).

2. RESPONSIBLE FOR THE PROCESSING OF YOUR DATA

For the purposes of offering the Rewards Programme, the following two entities act as Data Controllers:

- PAYLEAD, a simplified joint stock company, having its registered office at 9, rue de Condé 33064 Bordeaux (France), registered with the Bordeaux Register of Commerce and Companies (RCS) under number B 821 725 579.
- BITCOINFORME, S.L. (Bit2Me), with registered office at Calle Germán Bernacer, 69, 03203, Elche, Alicante, SPAIN, and with VAT number: B-54835301.

3. PURPOSE OF PROCESSING

RESPONSIBLE	PURPOSE	LEGITIMACY	TREATMENT
Bit2Me	Provision of the services of Programme Rewards Programme	Fulfilment of a contract	Transmission of transactions banking to PayLead
			Payment from the rewards to the user
PayLead	Provision of the services of Programme Rewards Programme	Fulfilment of a contract	Data analysis for the generation and management of the rewards based on transaction history
			Analysis of transaction data for the geographic consistency of offers displayed to the user
			Analysis of the data to build up the user profile and the corresponding catalogue of offers
			Technical assistance to manage the requests of the users
			Establishment of statistics on the follow-up of the offers and the performance of the Programme from Rewards

PayLead also analyses your banking transaction data to provide you with personalised offers based on your transaction history and spending habits. Therefore, the essence of the Rewards Programme is to

allow you to enhance your banking transactions to benefit from personalised and relevant offers from our partner merchants.

PayLead uses your personal data for the further processing described below. You can read more about how PayLead handles your data in its privacy policy: <https://www.paylead.fr/privacy/>

4. PERSONAL DATA PROCESSED

Bit2Me will communicate the following data to Paylead for the provision of this service:

- A customer identifier, consisting of a series of numbers and letters, specific to each user;
- Anonymised IBAN (International Bank Account Number) (i.e. only some digits of the IBAN);
- The nature/type of account;
- Name of the entity;
- Payment account references;
- The location, date, tag and associated anonymised PAN (last 4 numbers) of payment transactions, (including up to 6 months of transaction history);

Through the analysis of your transactions, PayLead also identifies and processes your consumption habits (your preferred brands, your favourite shops, the geographic areas where you shop, your average basket), your average salary, your exceptional income or other life events that can be deducted from your purchases (such as weddings, births, etc.).

As part of the user support process, we may process additional personal data of any kind that you provide to us. In doing so, we will limit the information used to that which is necessary to respond to your request, and we encourage you to provide only the information we request for this purpose.

With respect to six months of transaction history, Paylead needs to obtain this information as a condition of providing the service, as analysis of transaction data is essential to determine eligibility for the various Rewards Programme offers. If you do not wish to share your transaction history, you will not be able to participate in the Rewards Programme.

5. RETENTION TIME OF YOUR DATA

Your personal data is used for a specific period of time, strictly limited to the purposes for which it is collected:

- Your bank transaction details are deleted after two years (from the date of the transaction) if they have not generated a reward payment.
- Your transaction data is deleted after five years (from the date of the transaction) if it has generated a reward payment.

When you decide to unsubscribe from the Rewards Programme, PayLead will delete all your personal data, except for the data relating to the payment of rewards, which will be retained, appropriately blocked, for the aforementioned five-year period.

In addition, Bit2Me may retain certain personal data, appropriately blocked, for a period of ten years, if necessary to comply with money laundering and terrorist financing regulations, as set out in its Privacy Policy.

More information about the retention of your personal data by both companies can be found in their respective Privacy Policies.

6. TRANSFERS OR COMMUNICATIONS OF DATA

There may be communications of data to third parties or competent authorities, for compliance with

legal obligations, as well as for the provision of services by third parties, who will be considered as processors with whom Bit2Me and PayLead have signed the corresponding contracts for access to data on behalf of third parties, having previously verified that they have sufficient guarantees to implement appropriate technical and organisational measures, in such a way that the processing is carried out in accordance with the requirements of the GDPR, guaranteeing the security and protection of the rights of the data subject.

7. EXERCISE OF RIGHTS

You have recognised your rights of access, rectification, deletion, limitation, opposition and portability of your data. You also have the right to withdraw your consent to the processing of your data. You also have the right to lodge a complaint with the supervisory authority.

The Interested Party may at any time exercise their rights by sending a communication, attaching a document proving their identity and expressly indicating the right they wish to exercise, to both PayLead and Bit2Me at the addresses indicated above or by sending an email to dpo@paylead.fr or rgpd@bit2me.com , respectively.

8. TECHNICAL AND ORGANISATIONAL SECURITY MEASURES

Tato PayLead and Bit2Me have adopted the necessary technical and organisational measures to guarantee the security and integrity of the data, as well as to avoid its alteration, loss, processing or unauthorised access.

9. DATA PROVIDED

The data collected through the different channels provided are those strictly necessary to respond to your request, which the Interested Party voluntarily communicates. Refusal to provide data classified as obligatory will mean that the service for which they were requested will not be provided or will be impossible to access. Likewise, data may be provided voluntarily so that the services can be provided in an optimal manner. Likewise, in those cases in which third party data is provided, the interested party undertakes to inform them of the content of this privacy policy. The Interested Party undertakes to communicate as soon as possible any modification and rectification of their personal data so that the information is updated at all times.