

CashSentinel France SAS CashSentinel SA (Switzerland)

Confidentiality and data processing policy

Version of 11 May 2018

These confidentiality and data processing conditions are an addendum to CashSentinel's general conditions of use: <https://www.cashsentinel.com/en-WW/content/general-terms-and-conditions>

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1. Collection and use of personal data

In order to respect the privacy of its users, CashSentinel undertakes to ensure that the collection and processing of personal information, on the website and/or mobile applications is carried out in accordance with the French Data Protection Act of 6 January 1978 as amended, as well as the General Data Protection Regulation (GDPR).

CashSentinel guarantees the user a right to object, right of access and right to rectification for the personal data concerning him/her.

The user has the option to exercise this right by contacting CashSentinel directly, via secure internal messaging, or by writing to the following address:

For France and other European countries:

CashSentinel France SAS

Service protection des données
21, place de la République
75003 Paris
France

For Switzerland:

CashSentinel SA

Service protection des données
Avenue de Tivoli 19 bis
1007 Lausanne
Switzerland

1.1 Purpose of collection and use

The personal information we collect from you is used to:

- Ensure the smooth running of the service(s) you request from us;
- Comply with our legal obligations, particularly to combat money laundering and the financing of terrorism;
- To detect and prevent fraudulent or abusive use or use that is contrary to our general conditions of use.

The information we collect from you is not used for:

- Commercial canvassing;
- Advertising purposes;
- Resale, rental or transfer to third parties.

1.2 Information requested when opening a payment account

When opening your CashSentinel account, we ask you to provide the following information:

- Your mobile phone number;

- Your first and last name;
- Your home address;
- A copy of your identity document;
- Bank account details if you receive funds through our service (seller).

Depending on the circumstances, we may ask you for additional documents, such as:

- Proof of residence;
- A bank statement in your name;
- Proof of origin of your funds.

However, this list is not exhaustive, and other documents may be requested depending on the features of your account, how you use it, and our legal obligations.

1.3 Information required when creating a sales contract

When you create a sales contract on our platform, we ask you to provide the following information:

- Information about the vehicle or property being traded;
- Mobile phone number of your counterparty;
- Documents attesting to the ownership of the property being traded.

However, this list is not exhaustive, and other documents may be requested depending on the features of your account, how you use it, and our legal obligations.

1.4 Other information collected

1.4.1 Personal information

During the period in which your account is open, we collect new information about you, or updated information about you, received from you or from third parties.

The nature of this information is similar to that collected when opening an account or creating sales contracts.

For example, we collect information when you use your customer area to update your profile, such as a new home address.

Or when we receive a bank transfer, we collect information received from our banking partners about the transfer.

1.4.2 Technical information

When you visit our website, your browser shares certain information with our servers. These automatically record information about your visit such as your IP address, the website from which you visit us, the type of browser used, and the CashSentinel web pages you visit, including the date and duration of your visit.

1.4.3 Customer communications

When you communicate with CashSentinel via the internal messaging function of the website and the application, we store your messages and attachments that you provide to us.

This information is automatically stored in a separate log file system that preserves the probative value of the communications. It is protected by appropriate technical and organisational measures and is only accessible in justified cases, in accordance with applicable laws and regulations (e.g. court order, suspicion of criminal behaviour, breach of regulatory obligations, serious breach of employment contract), by certain persons performing defined functions (e.g. customer support, legal, compliance, risk).

Communications will be deleted after the expiry of the retention period in force.

1.4.4 Cookies

When you visit our website, cookies are placed on your computer, mobile phone or tablet.

A cookie is information placed on your hard drive by the server of the site or mobile application you are visiting.

It contains several types of data: The name of the server that deposited it, an identifier in the form of a unique number, possibly an expiry date.

When you first connect to our site, a text banner informs you of their use. You can confirm that you have understood and accept their use by clicking on the "I understand" button.

You may also choose not to accept our cookie policy and to delete them. Most web browsers provide a procedure to enable or disable cookies.

We provide links to the procedure for disabling cookies on major browsers, which you will find on our [cookie management policy](#) page.

On your computer, cookies are managed by your web browser. CashSentinel uses several types of cookies for different purposes.

Essential cookies

These cookies are essential to allow you to browse our websites and use their features. Without them, services such as access to your customer area would not work.

Performance cookies

These cookies collect information about the use of our websites, such as the most visited pages. This data allows us to optimise our websites and simplify navigation. These cookies do not collect any information that allows you to be identified. All the information collected is accumulated and therefore anonymous.

Functional cookies

These cookies allow our website to remember the choices you have made while browsing our website. For example, we may store your geographical location in a cookie in order to display the website corresponding to your area. We can also store your preferences, such as text size, font and other customisable site elements. Cookies

can also be used to keep track of products or videos viewed in order to avoid repetition. The information collected by these cookies does not identify you and cannot track your browsing activity on non-CashSentinel sites.

2. Management of your personal data

2.1 Processing

In the course of providing its services, CashSentinel uses personal data within the company, its employees and service providers for the purposes described in paragraph "[Purpose of collection and use](#)".

2.2 Protection

CashSentinel is committed to protecting your personal data against loss, destruction, alteration, unauthorised access and disclosure.

CashSentinel uses physical, technical, organisational and administrative means to achieve this.

As a result of its activity in the provision of payment services, CashSentinel undergoes security and/or organisational audits at least once every two years, conducted by third-party service providers recognised as experts in the field. These audits can be mandated by CashSentinel partners, or by CashSentinel.

2.3 Third-party service providers

CashSentinel may share your information with group companies, as well as with third-party service providers, in your country of residence or elsewhere, for service performance on behalf of CashSentinel and for the purposes stated above.

CashSentinel takes the privacy policy on personal data into account when choosing its third-party service providers, with whom your data may be shared.

The companies in our group and our service providers, to whom we provide access to your personal data, are required to respect the confidentiality of such data.

CashSentinel maintains a register listing:

- The providers with whom the personal data is shared, as well as the place where this provider is based, and processes the information;
- The reason for this sharing;
- The nature of the data actually shared;
- The frequency of sharing.

Whenever personal data is shared with a third party, CashSentinel strives to provide only the information strictly necessary for the third-party service provider to provide its service.

We may also disclose your information to government agencies or entities, regulatory authorities or other authorities in order to comply with any applicable law, regulation, court order or official request; in response to any direction issued by regulatory authorities or other authorities; or in response to any other similar procedure, within the limits set or permitted by applicable law.

For services outsourced to third parties and involving the transfer of personal data, CashSentinel has chosen to work only with service providers that can guarantee data processing in the European Union, Switzerland and/or the United Kingdom.

2.4 Change of ownership

In the event that we are involved in a merger, acquisition, restructuring, sale of assets or bankruptcy, your personal data may be sold or transferred as part of this transaction. This privacy policy will apply to your personal data as transferred to the new entity.

2.5 Data storage duration

Personal data is retained for the duration that your account is open, as well as for a period of time following the closure of your account, which in any case will not be less than 3 years (36 months) after the closure.

The effective duration of personal data storage may be up to 10 years, depending on:

- the law applicable according to your country of residence;
- the nature of the transactions you have conducted on our platform;
- our obligations, in particular to combat money laundering and the financing of terrorism ("LCB-FT").

Data relating to your transactions involving payments on the CashSentinel platform is considered accounting data, and as such, it is stored for a period of 10 years after the closure of your account.

3. Access to personal data; updating; deletion

Some of the information you provide to us can be modified directly from your CashSentinel account.

In addition, where permitted by applicable laws or regulations, you may:

- ask us if we hold any personal data about you,
- ask us to provide you with a copy of your personal data, or
- demand that we correct any personal data about you that is inaccurate;

- ask us to delete the data concerning you.

We draw your attention to the fact that, in terms of personal data storage policy, the regulations to combat money laundering and the financing of terrorism ("LCB-FT") take precedence over data protection legislation, and that, as such, CashSentinel will only be able to comply with a request concerning the updating, storage period or deletion of your personal data if your request does not render CashSentinel non-compliant with the laws and regulations to which it is otherwise subject, including the LCB-FT regulation.

4. Changes to our privacy policy

The purpose of this privacy policy is to ensure that we provide our services in compliance with European data protection legislation, in line with best practices, and in order to ensure the security of your personal data and protect your interests.

As such, we are required to regularly update this policy.

When this is the case, you will be informed when you connect to our site, and will have a period of one month to review and accept the new conditions.