



Privacy Policy

V4 applicable from the 30th March 2020



Disclaimer: The following translation is provided for your convenience only. Only the original French document of the respective Privacy Policy is legally binding. This applies to all of our legal documents.

Purpose and scope of the policy

Purpose of the policy

OLINDA is committed to the protection of users' personal data (hereinafter, "Data") in accordance with French and European regulations, in particular with the French Data Protection Act of 1978, as later amended, and the General Data Protection Regulation of April 27th, 2016 (GDPR).

This policy describes our rules concerning the protection of Data. In particular, it describes how data is collected and processed, and how users can exercise their rights.

We apply a strict policy to ensure the protection of your Data, as follows:

- We do not sell your personal data to third parties
- We make sure your personal data is always safe

Scope of the policy

This policy supplements the Payment Services Framework Agreement. It covers the use of:

- Our web platform Qonto.eu and services accessible from this platform
- Our iOS and Android mobile apps, as soon as you download them

Role of Olinda and of its clients

The Client, legal person, commits to disclose this policy to all natural persons concerned by the Data processing.

OLINDA commits to ensure the respect of the applicable provisions by its partners and processors.



Data we collect

Legal basis

We collect Data on the basis of a legal obligation, a legitimate interest, or your consent.

Data you give us

You give us Data through forms that you complete on our website or our mobile applications to subscribe to our services or those of our partners (in particular Kantox for international transfers). You may also send us Data when you get in touch with us, in particular with our customer service, by mail or telephone. In this case, we keep a copy of this exchange for the duration defined below. You may also send us Data when you interact with us on social media.

The categories of Data that you give us include the following:

- Identification data: name, surname, date and place of birth, photo, identity card numbers, passport or residence, mailing address, email address, telephone number, gender, age, signature.
- Authentication and identification data when using our website or our applications: username, password, PIN code.
- Professional and tax data: professional category, sector of activity, profession, tax data, VAT returns.
- Banking and financial data: income, asset value, bank details, IBAN.
- Transaction data: date, time of transaction, amount, country, counterparty, transaction label, notes, MCC (Merchant Category Code).
- Contact and interaction data with us: messages, emails, calls, interaction on our sites, mobile application, and social networks.
- Biometric data: short video / selfie

We also collect Data when you visit our website or use our mobile applications. The Data we collect is the following:

- Technical connection information, in particular your IP address, the type and version of your browser, your time zone, installed plug-ins, the device you use to connect, the identification number of your device, your operating system.



- Information about your visits: the number of connections, the hours of connection, visited pages, durations of connection, searches, your response time, links on which you clicked.
- Data from subcontractors: to improve our quality of service, we also collect personal data from our subcontractors, including advertising agencies or private databases.
- Data coming from third-party applications: when you give us your consent, we can access your contact list on your facebook or google profile.

Use made of data

We process your Data only for specified, explicit and legitimate purposes. As such, we use your Data to perform the Payment Services Framework Agreement. The purposes of the processing are the following:

- To provide our service, especially to execute the Payment Services Framework Agreement that you sign with us when you open a Qonto payment account. This allows us to enable you, for example, to make withdrawals, transfers, obtain and use your Qonto payment card.
- To manage the payment account and the available payment instruments.
- For anti-money laundering, fraud and terrorist financing prevention purposes especially to verify the identity of the Client and the person opening the account and to secure payments and account accesses.
- To process your claims, according to the implemented procedure.

We also collect and process Data for other purposes:

- To comply with legal and regulatory obligations, in particular in the field of anti-money laundering and counter terrorism financing. According to these obligations, Olinda shall identify you and ensure the accuracy of your identity when you open a Qonto payment account.
- To inform you of changes in the service we offer, including new features or partnerships.
- To facilitate your interactions with our services especially with our customer support and to help you in the best conditions.
- To improve your navigation on our website or the use of our applications and to ensure that the content we display is adapted to your needs.
- To enable you to give us your opinion on the services we offer to improve them permanently.
- To make you aware of similar products or services proposed by us or our partners which could interest you.
- To ensure the security of your Data and your operations.
- With your prior consent, to allow you to use task automation services by connecting your Qonto account to other applications.
- To improve the quality of our services, Phone communications with our advisors are likely to be recorded.



Data recipients

When it is strictly necessary for the purposes of the processing, the collected Data are transferred to our processors and partners which intervene in the provision of our services.

Moreover, your Data can be disclosed to competent authorities, upon demand, for the purposes of judicial proceedings, requests for information from the authorities or to comply with legal obligations.

Cookies and tags internet

OLINDA and its partners use cookies and tags to distinguish you from other users when using our website or apps.

In fact, during the consultation of our platform, information about the navigation of your device (computer, tablet, smartphone, etc.) on our platform/application, are likely to be saved in "Cookies" files installed on your device, according to the choices you have made regarding cookies and which you can change at any time.

What is the purpose of the cookies used on the platform?

Only the issuer of a cookie is liable to read or modify the information contained therein.

Cookies we issue on our platform

When you log on to our platform, according to your choices, we may install various cookies on your device allowing us to recognize the browser of your device during the validity period of the cookie concerned. The cookies that we issue are used for the purposes described below. The installation of cookies depends on the choice that you expressed by changing the settings of your web browser. You can express your choice at any time. The retention period for the cookies information is 13 months.

Cookies that we issue allow us to:

- offer targeted ads tailored to your interests;
- generate statistics and volumes of traffic and use of the various items on our platform (topics and contents visited, route), allowing us to improve the interest and ergonomics of our services;



- adapt the presentation of our platform to the display preferences of your terminal (language used, display resolution, operating system used, etc.) during your visits to our platform, depending on the visualization hardware and software of your device;
- save information related to a form you have filled in on our platform (registration or access to your account) or to products, services or information that you have chosen on our platform (subscribed service, contents of a shopping cart, etc.);
- allow you to access reserved and personal spaces on our platform, such as your account, by means of logins or data that you have potentially previously entrusted to us;
- implement security measures, for example when you are asked to re-connect to a content or a service after a certain period of time.

Third-party cookies

Analytical/performance cookies

- Google Analytics | [Politique Cookie - Politique de Confidentialité](#)
- Segment.io | [Politique Cookie - Politique de Confidentialité](#)
- Google Tag Manager | [Politique Cookie](#)
- Amplitude | [Politique Cookie - Politique de Confidentialité](#)
- Hotjar | [Politique Cookie - Politique de Confidentialité](#)

Targeting cookies

- Facebook Ads | [Politique Cookie - Politique de Confidentialité](#)
- Google Adwords | [Politique Cookie - Politique de Confidentialité](#)
- LinkedIn Insight Tag | [Politique Cookie - Politique de Confidentialité](#)
- Bing Ads | [Politique Cookie - Politique de Confidentialité](#)
- Twitter Ads | [Politique Cookie - Politique de Confidentialité](#)
- Awinq | [Politique Cookie - Politique de Confidentialité](#)

Other tools via third party-cookie

- Visual Website Optimizer (AB Testing) | [Politique Cookie - Politique de Confidentialité](#)
- Zendesk | [Politique Cookie - Politique de Confidentialité](#)
- Branch Metrics | [Politique de Confidentialité](#)

Other analytics or data trackers (SDK or ServerSide)

- Google Firebase (applications mobiles) | [Politique Analytics - Politique de Confidentialité](#)
- Hull.io (ServerSide Data Tracking) | [Politique de Confidentialité](#)
- Fabric.io | [Politique de Confidentialité](#)
- MailChimp | [Politique de Confidentialité](#)

Your choices regarding cookies



There are several ways to manage cookies. Any settings you apply may change your Internet browsing and your conditions of access to certain services that require the use of cookies.

You can make the choice at any time to express and modify your wishes regarding cookies, by the means described below.

The choices offered by your navigation software

You can set your web browser so that cookies are recorded on your device or rejected, either systematically, or depending on their issuer. You can also set up your web browser so that acceptance or rejection of cookies is proposed to you, before a cookie is likely to be recorded on your device.

Cookies agreement

The recording of a cookie in a device is essentially subordinated to the will of the user of the device, which the user can express and modify at any time and without paying for it, through the choices offered to him by his web browser.

If you have agreed in your browser the recording cookies on your device, cookies embedded in the pages and contents that you have consulted can be stored temporarily in a dedicated space of your device. They will be readable only by their issuer.

Cookies refusal

If you refuse to record cookies on your device, or delete those which are recorded, you will no longer benefit from a certain number of features that are necessary to navigate to certain spaces of our platform. This would be the case if you tried to access our content or services that require an identification. This would also be the case if we - or our service providers - could not recognize, for technical compatibility purposes, the type of browser used by your device, its language and display settings or the country from which your device seems to be connected to the Internet.

In that case, we accept no responsibility for any consequences arising from the degraded functioning of our services resulting from the fact that we cannot record or consult the cookies necessary for their operation and which you have refused or deleted.

How to exercise your choices, depending on the browser you are using?



For the management of cookies and your choices, the configuration of each browser is different. It is described in the help menu of your browser, which will allow you to know how to change your settings for cookies:

- Internet Explorer: <http://windows.microsoft.com/fr-FR/windows-vista/Block-or-allow-cookies>
- Safari: <https://support.apple.com/fr-fr/HT201265>
- Chrome: <https://support.google.com/chrome/answer/95647?hl=fr&co=GENIE.Platform=Desktop>
- Firefox: <http://support.mozilla.org/fr/kb/Activer%20et%20d%C3%A9sactiver%20les%20cookies>

Storage security & international transfer

Data storage

Data we collect is stored on Amazon Web Services servers which ensure a high level of security. These servers are located in the European Union, in Germany.

Third parties transfers

For the purposes of the service, we may transfer some of your Data to our subcontractors, some of which are located outside the European Union or the European Economic Area. In that case, we make sure that they are located in a country considered adequate by the European Union for the protection of Data and, if the subcontractors are located in the United States, that they are subject to the agreement on the Privacy Shield. If this is not the case, we ask them to contractually commit to implement equivalent measures to ensure the protection of your personal data (standard clauses of the European Commission).

Security

Transmission of your Data via the Internet is secured via an HTTPS connection protected by an SSL certificate (SHA-256 / RSA Encryption). We are audited on a regular basis by banking security specialists in order to ensure the good protection of our systems. Access to your Qonto account is secured by your username and password which must be strong enough and not shared. For the most sensitive actions, we use a 2-factor authentication system. This is achieved by requiring you to confirm the actions with a 6-digit code received by SMS or generated by a third-party application.



Data retention period

We keep your Data only as long as necessary for the purposes pursued. In particular, in accordance with our anti-money laundering and terrorist financing obligations, your transaction and KYC data will be retained for a maximum of five years after the closure of your payment account and the end of our contractual relationship.

Concerning phone communications, the maximum retention period is two years.

Users' rights

Your rights

In accordance with the applicable regulations, you have rights attached to your Data.

Right of access: You have the right to get from us the confirmation that your Data are processed or not. You can also receive a copy of all Data that we hold about you.

Right to portability: You may receive from us the Data about you in a structured, commonly used and machine readable format, in particular for the purpose of transmission to a third-party. If it is technically possible, you can also request us to transfer your Data directly to the appointed third-party.

Right of rectification: you have the right to request the correction of the Data that we hold about you if the latter is incomplete or erroneous. In this case, we may ask you to verify the new Data provided.

Right of cancellation: You can ask us to delete your Data when we no longer have a legitimate interest in detaining them. Note, however, that this right is not applicable when we have a legal obligation to retain some of your Data, for example to fight money laundering or terrorist financing.

Right to limitation: In certain cases, you may obtain a limitation of the processing of your Data.

Right to object: You can oppose the processing of your Data at any moment for reasons related to your particular situation or if your Data are processed for marketing purposes.



Right to withdraw your consent: you have the right to withdraw your consent at any time. This will not impact the lawfulness of any prior processing of your Data based on your consent.

Exercising your rights

You may exercise one of your rights by submitting a request to our Data Protection Officer or Customer Support (contacts below), by sending a picture of yourself holding your identity card or passport. We will process your requests within one month. For this purpose, we may request additional information or documents.

Contact

For any question concerning the processing of your personal data or for any remark, request or complaint concerning their privacy, please contact our Data Protection Officer by:

- mail at QONTO - Data Protection Officer, 20 bis rue La Fayette, 75009 Paris
- e-mail at dpo@qonto.eu

