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1. Identification

- LYF is a French limited company (*Société Anonyme*) with share capital of €15,200,000.00, having its registered office at 34 rue du Wacken 67000 Strasbourg, France, listed in the Strasbourg Trade and Companies Register under number 330 623 414, licensed as an e-money institution under number

11628 P by the Autorité de Contrôle Prudentiel (French prudential supervision authority), 61 rue Taitbout 75436 Paris cedex 09, France, and subject to its supervision.

2. Foreword

2. As a data controller, LYF processes personal data concerning you in connection with the use of the emoney and related services offered to you via the mobile application.
3. LYF upholds the privacy and protects the personal data of users of the services that it provides.

LYF has a data protection officer (write to: Monsieur le Délégué à la Protection des Données, 63 chemin Antoine Pardon, 69814 TASSIN CEDEX, France). You also have the right to lodge a complaint with the French data protection and liberties agency: Commission Nationale de l'Informatique et des Libertés, 3 Place de Fontenoy, TSA 80715 75334 PARIS CEDEX 07, France. ”

3. Purpose

4. The purpose of this policy is, in particular, to inform users about the procedures for collection, processing and use of their personal data, and their personal data protection rights with regard to the applicable provisions, in particular the French "Data Protection and Liberties" Act (Loi 78-17 of 6 January 1978 on information technology, files and liberties) and the European Union's General Data Protection Regulation (EU 2016/679 of 27 April 2016).

4. When do we process data?

5. Your data may be collected or processed in the following circumstances:
 - registration for the service and opening an e-money account;
 - use of the services and management of the e-money account;
 - access to and management of your personal area;
 - login to the application;
 - processing of your requests and complaints;
 - when contacting stores and during activity monitoring and customer management by stores;
 - geolocation processing;
 - performance of our anti-money laundering and counter terrorist financing obligations;
 - fraud management;
 - use of promotional offers from merchants during payments;
 - registration and use of the merchant reward program.
6. Data is collected directly from you, at your request and while you use the services.

5. What types of collected data do we process?

7. Several types of personal data may be collected in connection with your use of the services.

8. The data collected generally belongs to one of the following 10 categories:

- **generic data:** first name, age, city, and gender;
- **identity and address data:** includes your title, last name, email address, telephone number, postal address, date of birth and certain forms of proof of identity;
- **payment data:** date, time, amount, store/channel, location, **delivery address** (including the full name and potentially the email address) where applicable, as well as information relating to any promotional offer applied;
- **reward data:** data collected when the user participates in a merchant reward program. This data includes, but is not limited to, validity date, loyalty level, privileges, and where applicable, the number of points;
- **sales promotion data:** data relating to the reading, selection and use of a merchant's promotional offer;
- **e-money account operation data:** this type of data relates to the user profile analysis. It includes data such as the payment method used, the user's e-money account balance and user profile analysis results, in particular information relating to fraud management;
- **behavioural data:** this type of data relates to behavioural analysis of actions and choices made by the user. As such, it includes geolocation data and information relating to past searches for chains and/or stores, searches for products and/or promotions, the voluntary presence indicator, the user's path-to-purchase, user profile analysis results and data relating to use of the services;
- **location data:** if the user has authorised their telephone's operating system to send geolocation data to LYF;
- your **ID** and **information collected from the mobile device:** OS name, MAC address, Wi-Fi, Bluetooth, unique device identifier;
- your browsing history in the application.

9. Required details are indicated in collection forms by an asterisk. If required details are absent, the service or offer associated with their collection may not be provided.

6. For what purposes is data collected?

10. Some or all data, depending on its type, may be processed for the following main reasons, necessary for performance of the contract with the user:

- performance of the contract and routine management of the e-money account;
- management and development of the business relationship;
- risk assessment, detection, management and consolidation;
- management of contacts between users and merchants;
- management of service proposals/provision, promotions and rewards;
- budget management and monitoring;
- activity reporting management;
- statistics ;

- security management;
- management of service user identification and authentication;
- measurement of customer satisfaction and quality of service;

11. Data may also be processed for purposes arising from legitimate interests of LYF, in order to improve the quality and suitability of the services provided to users:

- marketing, sales promotions and advertisement targeting based on information that you either provide to us or derives from the use of our services;
- behavioural segmentation and profiling;
- management of business relationships, marketing and sales promotions conducted by LYF via the LYF PAY application and at the request of merchants;
- management of non-payment and fraud prevention activities.

12. Lastly, certain data must be processed in order to comply with legal obligations to which LYF is subject, such as the fight against money laundering and the financing of terrorism.

13. For certain processes (geolocation for example), LYF will seek your prior consent. In such cases, you will be able to withdraw your consent at any time, as specified in 11 below.

7. Where is it sent?

14. Processed data is intended for the following recipients:

- authorised departments of the data controller;
- service providers of the data controller;
- organisations or departments authorised to know its data due to their role in anti-money laundering activities and internal control.

15. No user data is communicated in “identifying” form to affiliated merchants, except for donations to organisations that issue tax receipts.

16. Furthermore, data may be communicated to any authority legally entitled to consult it, in particular in response to a formal request from judicial, police or administrative authorities.

7.1. Authorised departments of the data controller

17. Access to the user’s personal data is restricted to persons authorised by the data controller who require access to it in order to perform their duties.

18. Furthermore, authorised persons are subject to strict privacy requirements covering all user-related personal data of which they become aware while carrying out their duties.

7.2. Service providers

19. The data controller may entrust certain services to third parties in the context of its activities and provision of the services.

20. For the purpose of such tasks, it may communicate the user's personal data to its service providers. The latter are considered to be subcontractors within the meaning of the regulations on protection of personal data and process data solely on behalf of and on the instructions of LYF.

21. In such cases, service providers are contractually obliged to comply with a data security and confidentiality obligation and undertake to implement appropriate technical and organisational measures to ensure that the processes performed comply with all applicable regulations and safeguard your rights.

7.3. Competent anti-money laundering and internal control organisations or departments

22. The data controller may be required to communicate a user's personal data to authorised organisations or departments competent in anti-money laundering and internal control matters.

23. In such cases, if said organisation is external to LYF, LYF is contractually obliged to comply with an obligation of data security and confidentiality and undertake to implement appropriate measures.

7.4. Merchants affiliated with LYF

24. LYF does not disclose the personal data of LYF PAY users to merchants without the user's express consent.

25. LYF PAY services consist not only of an electronic payment service but also a budget management service. Users can also take advantage of promotions, sales activities and a reward programme for affiliated merchants accepting payment via the LYF PAY electronic payment service and LYF affiliates.

26. In order to provide these services to users, LYF offers its affiliated merchants two services through the application:

- a statistical report on the use of LYF PAY by users. With this service, LYF only provides its affiliated merchants with generic data that cannot be used to directly identify you, namely your first name, your age, your city and your gender, together with behavioural data and merchandising data, in the form of statistical reports such as: "Fifty 25-year old women living in Paris have read your promotional offer";
- a service enabling merchants to ask LYF to send promotional offers to LYF PAY users, based on a query of their choice, such as "send this promotion to all LYF PAY users between the ages of 30 and 40 who are celebrating today".

27. In addition, LYF produces statistical reports on LYF PAY use by its users, and in that context provides merchants to which you make payments with statistical data on LYF PAY usage, including your anonymised payment data.

28. Therefore, unless you give your express prior consent, the data transmitted to the merchants by LYF cannot be used to identify you.

29. In any event, LYF-affiliated merchants have undertaken to uphold the personal data protection policy and best practices, and to comply with the Data Protection Act and the GDPR, as well as all obligations for which they are responsible.
30. It is specified that within the framework of payments made to a merchant cashing via the LYF PRO application, LYF does not transfer any personal data.
However, the LYF PRO application allows the merchant to synchronise the list of his own contacts recorded on his smartphone, i.e. personal data collected directly by him. In this case, the merchant acts as a data controller and under his responsibility, LYF not having access to the contacts thus synchronised in the LYF PRO application.

8. How long is data retained?

31. The data controller retains your data according to a retention period policy that seeks to ensure that data is retained for a period proportional to the purpose for which it was collected. Consequently, your data will be deleted immediately upon cancellation of LYF services, except in the following cases:
- Your identity data will be retained for a period of 5 years from the end of the contractual relationship. Information relating to e-money transactions will also be retained for 5 years following the transaction. These retention periods are made mandatory for anti-money laundering and counter-terrorist financing purposes, under the terms of Article L561-12 of the French Monetary and Financial Code.
 - Any data necessary for the management of disputes will also be retained for a period of 5 years, in accordance with the legal provisions in force (in particular but not exclusively those stipulated in the French Commercial Code, Civil Code and Consumer Code).

9. Data transfers

32. Processed data is stored on servers hosted by a service provider located in France.
33. The data controller contractually obliges its service provider to uphold this personal data protection policy and best practices, and comply with the French Data Protection Act.
34. Only data collected through Google Analytics cookies for analysis purposes and for using the application is transferred to Google servers hosted in the United States. Accordingly, users' IP addresses are sent to Google, which anonymises them before processing them.
35. However, Google entities ensure an adequate level of protection of your data with respect to the requirements of the GDPR.

10. What are your rights?

36. In accordance with the provisions of the French Law of 6 January 1978 and the GDPR, the user has the right to access data concerning them. If you exercise this right, LYF will provide you with a copy of the characteristics of the processes applied to your personal data (such as the categories of data concerned, purposes, recipients, etc.).
37. If you submit an access request electronically, LYF will provide you with the required information in a commonly used electronic format. However, you are entitled to request this information in another format.

38. Note that LYF may charge a fee based on the administrative costs generated by requests for additional copies.
39. You have a right to portability of the personal data that you have submitted. You can obtain this data in a structured, commonly used, machine-readable format. You also have the right to request that this data be sent to another data controller, where technically possible.
40. Users also have a right to object on legitimate grounds to the processing of their personal data, and a right to object to such data being used for marketing purposes, other forms of prospecting or related profiling. If you object to processing, your data will no longer be processed for such purposes.
41. You also have the right, where applicable, to have your data corrected, supplemented and updated in the event that it is inaccurate, incomplete, ambiguous or outdated.
42. You have the right to restrict processing in the following cases:
- if you dispute the accuracy of your personal data;
 - if the processing is unlawful and you want to restrict this processing rather than having your personal data erased;
 - if LYF no longer needs your personal data, but you still require it in order to establish, exercise or defend a right in legal proceedings.
43. Lastly, you have the right to have your personal data erased for the reasons set out below:
- if your personal data is no longer necessary for the purposes for which it was collected or processed;
 - if you withdraw the consent on which processing is based (and there is no other legal basis for processing);
 - if you have objected to the processing of your personal data for marketing purposes;
 - if your personal data has been unlawfully processed;
 - if your personal data must be erased in order to comply with a legal obligation under European Union or French law.
44. However, you may not obtain the erasure of your data if it must be processed in order to exercise the right to freedom of expression and information, to establish, exercise or defend legal rights, or to comply with a legal obligation to which LYF is subject.

11. How do you exercise your rights?

45. You may exercise your rights by contacting us via a dedicated "Contact us" link in the application.
46. In the interests of confidentiality and to protect personal data, the data controller has a duty to verify the identity of the user before responding to their request. Consequently, a copy of a signed identity document must be provided when you make a request to exercise these rights.
47. You may also use the application to select favourite merchants, in order to automatically integrate their offers into your news feed. You remain free at all times to choose to no longer see their offers in your news feed, by removing the merchant from your list of favourite merchants. You will still be able to find their offers in the full catalogue of LYF merchants.

48.If you submit your application electronically, the desired information will also be provided electronically unless you request otherwise.

49.Whenever you submit a request to exercise your rights, we undertake to respond promptly. In any case, you will receive a response within a maximum of one month from receipt of your request. Note, however, that this period may be extended by two months in the event of particularly complex or numerous requests. In such cases, you will be informed of the extension and the reasons for it within no more than one month from receipt of your request.

50.If we are unable to grant your request, we will notify you promptly (within one month from receipt of your request at the latest), stating the reasons. You will then be free to lodge a complaint with the CNIL and institute legal proceedings.

51.Note that in the event of requests that are manifestly unfounded or excessive, in particular due to their repetitive nature, we may decline to process your requests, or charge a fee to take into account the administrative costs incurred in responding to your requests.

12. Cookies and other trackers

52.LYF uses the Google Analytics service, provided by Google Inc. ("Google"), to analyse how you use the application.

53.The main purpose of Google Analytics is to count visitors and identify how they use the application.

54.The generated data concerns:

- your use of the application;
- your IP address, used to determine the city from which you logged in. This data is immediately anonymised after the geolocation step.

55.The LYF PAY application stores the data collected by Google Analytics for 24 hours, then deletes it after sending it to Google, where it is anonymised before being processed.

56.You remain free to reject Google Analytics cookies at any time and/or delete them using the setting provided for this purpose in the application.

57.Lastly, if the application is deleted, all Google Analytics cookies are also deleted.

13. Technical information collected from the user's smartphone

58.When you register for the service that you want to access and use, some technical data will be collected from your Smartphone after you validate the registration form, to secure the use of the service. This data essentially includes:

- version of the fingerprint calculation algorithm;
- OS name;

- OS version;
- Wi-Fi+Bluetooth MAC address;
- unique device identifier.

14. Social module

- 59.Social modules from the leading social networks are included.
60. These modules enable you to share and publish content in your profiles on these networks.
- 61.Members must be logged in to a network in order to use its features.
- 62.Users who are not logged in to the social network will be asked to log in to it in order to interact with such modules.
- 63.LYF will not send any of your personal data to the social media to which you log in via the module.

15. Your LYF contacts

64. LYF allows you, upon request, to synchronize the contacts in your address book with those who subscribe to the Lyf application.
65. To this end, LYF collects, in an encrypted way, the phone numbers and email addresses in your phonebook and stores and uses only non-identifiable fingerprints. Access to your phonebook can be disabled at any time from your phone's settings.

16. Geolocation data

- 66.Your exact geographical location may be used, in order to provide personalised, contextually appropriate LYF services.
- 67.Your geolocation data will be collected only with your consent, based on the geolocation system that you accept.
- 68.The geolocation data collected will allow you to display nearby merchants in your LYF PAY application, provided you have accepted this geolocation.
- 69.In this case, a notification may be sent to you.
- 70.You may disable the geolocation function on your smartphone at any time.

17. What security measures are implemented?

17.1. General application security measure

- 71.We are committed to ensuring the security of users' data, and therefore take all reasonable physical, logical, administrative and organisational precautions - with due consideration for the nature of the data we process and the risks presented by the various processes - to keep data secure and prevent it from being altered, damaged or accessed by unauthorised third parties.
- 72.These measures include:
- management of data access permissions;

- enhanced authentication for access to the LYF PAY application;
- SSL protocol to protect the privacy of exchanges.

73. In the event that a process involving personal data is partly or fully subcontracted, our subcontractors are contractually obliged to guarantee the security and confidentiality of personal data by providing appropriate technical data protection measures and human resources.

17.2. Security measure specific to cardholder data

74. An enhanced security process has been implemented for transactions that can be carried out via the LYF PAY service. Bank data is encrypted, managed and stored in a PCI-DSS-certified environment.

18. Social media and third-party sites and applications

75. Links in the LYF PAY application can direct the user to third-party applications and/or sites, including those of LYF affiliated merchants.

76. We draw your attention to the fact that the personal data protection policies of such applications and/or sites may differ from this policy.

77. We therefore recommend that you always familiarise yourself with the personal data protection policies of each site and/or application.

78. In any case, we may not be held liable in the event that the content of any of the sites and/or applications violates applicable laws and regulations.

19. Data protection policy updates

79. The privacy policy may be updated or amended at any time.

80. In the event of a change, you will be notified of the new privacy policy when you log in to your personal space.

81. Last update: may 2023