

BINKS

PRIVACY POLICY

The purpose of this Privacy Policy is to inform you about the collection, the use and processing of your personal data entered during use from our website <https://binks.eu> (hereinafter, the "Website"), from our Internet application (hereinafter, "the Internet Application") and our application mobile (hereinafter, "the Application"; and collectively, the "Services").

If information relates exclusively to our Website, to our Application Internet or our Application, we will tell you this explicitly. In this context, "personal data" means all information details relating to the personal or factual situation of a natural person specific or identifiable, such as name, telephone number or address.

We process your personal data either as part of our relationship commercial with you if you are a Binks customer, as part of your visit to our website for information.

If necessary for the provision of our services, we will also transfer your personal data to third parties who process your data legally (e.g., for the purpose of executing orders or contracts, or in accordance with your consent).

Finally, we process personal data from public domain sources (e.g. debtors register, business registers, association registers, media, press, Internet).

I. Responsible authority

The authority responsible for the collection, processing and use of your data personal is: Binks SAS, 34 Avenue des Champs-Élysées, 75008 Paris, France, has appointed a data protection officer who can be reached at the email address contact@binks.eu.

II. Purpose of data processing and legal framework.

We process your personal data in compliance with the General Regulations on data protection (GDPR) if one of the following conditions is met:

- the processing is necessary for the performance of a contract to which the person concerned is a party or to the execution of pre-contractual measures taken at the request thereof (art. 6.1 b) of the GDPR. Personal data is processed to perform financial services and banking transactions in order to fulfill our contractual obligations and pre-contractual. These actions are only performed at your request. You find the purpose of data processing in the relevant product category as well as in the general conditions. Data processing can understand needs analysis, consultation, portfolio management, asset support as well as execution of transactions.

- the data subject has consented to the processing of their personal data personnel for one or more specific purposes (art. 6.1 a) of the GDPR). If you have consented to the processing of your personal data to specific purposes, the processing of this data is authorized on the basis of your consent.

Your consent can be revoked at any time. If you revoke your consent, any processing of your personal data carried out after the revocation will be deemed illegal.

Therefore, the previous processing of your personal data remains legal. You can request information about the consents you have given at any time.

- the processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, unless interest prevails or the fundamental rights and freedoms of the data subject which require protection of personal data, in particular when the person

concerned is a child (art. 6.1 f) of the GDPR).

If necessary, we will process your personal data beyond our obligations to protect our legitimate interests or those of a third party.

Examples:

- o exercise of rights of claim and defense in the context of litigation;
- o IT security;
- o prevention of criminal acts;
- o business management and development of services and products;
- o risk management within Binks SAS.

- the processing is necessary to comply with a legal obligation to which the controller is subject (Art. 6.1 c) GDPR) and the processing is necessary for the performance of a task of public interest or relating to the exercise of the public authority vested in the controller (art. 6.1 e) of the GDPR).

Binks is subject to several legal and regulatory obligations.

- Therefore, data processing is justified under French banking, anti money laundering law and laws fiscal. In addition, the FCA (Financial Control Authority), authorize Binks to process personal data in order to comply with their regulatory requirements.

- The purpose of processing your personal data is, for example, verification of your identity and your age, prevention against money laundering and fraud, checking your credit rating, your monitoring and report due to Binks tax law and risk assessment.

- Processing on behalf of Binks (Art. 28 GDPR): When the processing of personal data is made on behalf of Binks, we conclude a separate contract with the subcontractor with regard to this processing. This contract ensures compliance with the GDPR and defines sufficient guarantees for the implementation implementation of appropriate technical and organizational measures, which ensure the protection of your rights.

III. Data processing within the framework of Binks products.

3. Collection and processing of data in the event of opening and using an account current Binks. The following data, among others, will be collected, used and processed by Binks, for the purpose of opening a checking account with Binks and to use the Binks Services:

- First and last name
- Date of Birth
- Place of birth
- E-mail adress
- Nationality
- Legal address
- Phone number
- Identity document including (for details, see "Identification process")
- The type of identity document
- Date of issue
- The number of the identity document

- And the issuing authority.

Be aware that it is impossible to open an account if you do not provide your personal data. To process transactions, Binks receives data personal data and transfers them in accordance with article 4 of the regulations on transfer of funds to paying agencies, recipients and others financial institutions.

You can send money to contacts on your mobile phone via Binks without knowing their bank details. If the recipient is also a Binks customer, the transactions will be carried out in real time. To activate this function, Binks will access the contacts saved on your terminal only if you have previously given your consent.

In addition, as a holder of a current account with Binks, you will be visible by your contacts if they are also Binks customers only if you have there expressly agreed beforehand.

3.1. Data transmission under the Visa Automatic program Billing Updater Program .

In order to be able to use the Automatic Billing Updater (automatic update tool billing information - "VAU"), information about your account current are transmitted to our data processor Visa Europe Limited ("Visa Ltd."), 1 Sheldon Square London, W2 6TT United Kingdom.

VAU provides automatic updates to your Visa information the third-party services that you use and that you have subscribed to with your Visa.

VAU thus contributes to reducing avoidable refusals during a transaction without a card by modifying the information stored on payment accounts.

To this end, Binks transmits information relating to the card holder (PAN of card holder and expiration date) as well as information relating to the payment in accordance with article 6 (1) (b) of the GDPR to Visa Ltd. Visa Ltd. will treat these personal data in order to provide the VAU service, including the fact to host and maintain the VAU database and compare requests authorization with the VAU database.

3.2. Data transmission within the framework of Peer to Peer technology.

In order to be able to offer you our "Peer to Peer" technology, we must process data relating to the sender and the recipient as well as certain transaction data in accordance with Article 6 (1) point b GDPR.

Transaction data is the same as that of a bank transfer ordinary, except that no IBAN is used, but an email address or telephone number and that no data is transmitted to third parties.

To use this technology, users must have made themselves "visible" and have authorized access to their contact list.

This function is based on your consent in accordance with article 6, paragraph 1, point a of the GDPR (see also section II.).

You can revoke this consent at any time in the application.

3.3. Security and access to contacts in the context of Peer to Peer technology.

In accordance with Article 6 (1) (a) of the GDPR, the use of the Peer to Peer Technology requires prior authorization. By agreeing to appear as a Binks client with other users of Binks, you release Binks bank from bank secrecy in this regard.

The second authorization allows the Binks bank to access your contacts in order to tell you which ones are among the users of Binks, provided that they also agreed to be "visible".

You can revoke your permissions at any time via the app. Others users see neither the data nor the contacts of users who are not Binks customers or those of Binks customers who have not made themselves "visible".

IV. Transmission of personal data abroad

Insofar as Binks transmits data to States outside the scope of the GDPR (Regulation 2016/679 of the European Parliament and Council of April 27, 2016 on the protection of individuals with regard to processing of personal data and the free movement of data), Binks ensures that the recipient of the data guarantees a sufficient level of Data protection.

In order to ensure a sufficient level of protection by the recipient of the data, we use the standard contracts of the European Union for the transmission of data outside the EU, as amended.

V. Profiling

If we are to use a fully automated decision-making process as to people to provide prompt and efficient service, and if required by law, we you will be informed beforehand.

You have the right to require someone to review the outcome of this decision automatic. We process your personal data partly automatically in order to assess certain personal aspects (profiling).

This is the case in the following situations:

- To combat money laundering, terrorist financing and other criminal acts that endanger financial assets.

In this regard, personal data (i.e. relating to transactions of payment) are analyzed in order to secure the deposits of our customers.

- With regard to targeted marketing, we strive to offer you only offers likely to interest you and meet your needs.
- Right of revocation relating to a file You have the right to revoke the processing of your personal data, which is carried out in accordance with Articles 6.1 e) and f) of the GDPR at any time, including profiling according to Article 4.4 of the GDPR.

In the event of revocation, your personal data will no longer be processed, unless we have legitimate reasons to continue processing, beyond your interests, rights and freedoms, or if the processing is necessary for the application, the exercise or defense of legal requests. The processing of your personal data remains lawful until the date of your revocation.

- Right of revocation relating to the processing of data for marketing purposes.

The processing of your personal data remains lawful until the date of your revocation.

You can exercise your rights of revocation by simple mail to this effect at the following address (no form to fill in): 34 Avenue Des Champs Elysées 75008 Paris, France; or by e-mail to: contact@binks.eu.

VI. Other rights

You have the following rights with regard to your personal data by virtue of the following articles: right of access according to article 15; right of rectification according to section 16; right to erasure according to article 17; right to restriction of processing according to article 18; right of objection according to article 21; right to portability according section 20.

VII. Destruction and retention periods

We store and process your personal data for as long as necessary to fulfill our obligations under the agreement we have with you or as required by law. In this sense, if they are no longer necessary under of legal or contractual obligations, your data will be destroyed. This rule does not not apply if their limited processing is necessary, in particular for the following purposes:

- Commercial and tax retention periods relating to the following laws: code of French commerce, French tax code, French banking code, law against money laundering and securities trading law. The periods of legal retention and documentation obligation vary between two and ten years.