

Article 1 Definitions

Terms and phrases that start with a capital letter contain the meanings that are given below, regardless of whether they have been used as a singular or plural:

“Account “: pertains to the opening of an account to make the User enable to use ProMotion.

“Request “: pertains to any request dealt with PROMOTION CYCLE through which the User practices his rights of access, communication, opposition, rectification, limitation, portability, or erasure.

“Personal *Data*”: pertains to personal data of the User, according to the meaning of Article 4 of Regulation No. 2016/679 of April 27, 2016.

“ ProMotion “: pertains to the ProMotion mobile application, which is available on iOS and Android, also the browser plug-in, the net Interface, and all other apps, programs, and services that facilitate loyalty to be estimated. Analysis of the User's banking transactions reveals the User's relationship with partner brands.

“Staff “: pertains to the workers, service-providing individuals and subcontractors of PROMOTION CYCLE.

“Policy “: pertains to this document file.

“Smartphone“: assigns the phone that is used by the User to install and use ProMotion.

“User “: pertains to anybody who installs ProMotion and opens an Account.

“PROMOTION *CYCLE* “: assigns PROMOTION CYCLE, which publishes and offers the ProMotion service.

Article 2 Purpose of the Privacy Policy

The Policy describes the situations and modalities of the processing of User's Personal Data within the structure of ProMotion, besides on this Personal Data the privileges of the User.

ProMotion acts in accordance with French and European legislation about the security of Personal Data. PROMOTION CYCLE carries out respect and ensures that it's Staff follows all of these legal obligations. PROMOTION CYCLE promises that it has accomplished the obligations about the security of Personal Data.

Article 3 Evolution of the Privacy Policy

In the event of amendment of the Policy, PROMOTION CYCLE accepts to uphold a correspondent level of confidentiality and security of Personal Data.

In case of any denial of this Policy or any new edition, the User may rule out the use of ProMotion and which directs to the deletion of Personal Data about the User.

Article 4 Purpose and legal basis for the processing of Personal Data

The processing of Personal Data only can be possible for a particular and clear purpose, a purpose that is presented by a law called "legal basis,

In common, the Personal Data about the User is composed with the analysis of his banking transactions to enable him to support his loyalty with associated brands. In this framework, PROMOTION CYCLE processes the Personal Data that coordinates can get in touch with the following:

The following matrix particulars the reason and identifies the related legal basis for each component:

ProMotion's sub-goals	Legal basis
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<p>Implementation of services required for using ProMotion and managing the commercial relationship, including: - Connecting to the bank account and analyzing transactions</p> <p>- Maintain the points counter and have ProMotion and the brands validate transactions.</p> <p>- Personalize deals - Send user updates - Provide customer service</p> <p>Contract execution is the process of putting a contract into action.</p>	Contract execution
ProMotion usage data and customer reviews are used to enhance ProMotion so that the application and service can grow.	Legal interest
Realization of all statistics related to ProMotion use in order to communicate data such as the number of users, the length of ProMotion usage, and so on.	Legal interest
Issuance of a newsletter	Permission
Implementation of the tools required to ensure personal data protection	Legal responsibility
Retailers can benefit from the production of anonymous data for marketing research purposes.	Contract execution
Executing operations requiring customer identification as a result of legal requirements, collective bargaining arrangements, or contractual stipulations	Legal responsibility
Promotional campaigns are excluded in favor of ProMotion in order to protect the User from getting unwanted advertisements.	Legal interest
PROMOTION user sponsorship	Contract execution

The basis of PROMOTION CYCLE's legitimate interests is defined in the sub-purpose when data processing is carried out based on PROMOTION CYCLE's legitimate interests. PROMOTION CYCLE has double-checked that its legitimate interests do not infringe on Users' rights and interests in any of these cases.

Under no conditions will the data be used for reasons that are likely to breach Users' privacy.

Article 5 Personal data processed

5.1. Data processed by ProMotion

To permit the use of ProMotion, several Personal Data can or must be obtained and processed. When the requirement of Personal Data is optional, an asterisk (*) indicates, this comes off next to the Personal Data or any section of Personal Data concerned. The following matrix describes the Personal Data potential to be processed by PROMOTION CYCLE also their retention period:

Data Category	Data compiled	The period of the conversation
Identification data	First name of the User Contact number and email address * The application creates a one-of-a-kind identifier. Password for the application (encrypted) Kind Age date of birth* and Facebook ID (if you're using Facebook Connect).*	12 months from the last time the application was used, 24 months on an intermediate basis
Contract data	Date of registration	12 months from the last use of the application

	Code of referral or invitation, as well as the number of points earned *	24 months on an intermediate basis
	Earning and using points (transactions) (transaction number, timestamp, chosen counterparty)	
Personal data	Favorite brands	12 months from the last use of the application 24 months on an intermediate basis
Bank data	Identifiers for banks * (encrypted) IBAN / BIC * (indirect compilation in principle, and immediate when using a "Cash Machine") Transactions in the bank *	Not saved 12 months after the application's last use (with the user's permission in the case of direct collection) On an intermediate basis, 24 months (only banking transactions providing surge to the valuation of loyalty points)
Login details	Link logs and IP address Events relating to the application's use Data on navigation inside the app (only for offers expecting in-app navigation data)	12 rolling months

In addition, when relating to a banking institution, if various deposit accounts are correlated to the username used, the User can choose the account (s) he wants to relate to ProMotion.

5.2. Data kept beyond the duration of the account

PROMOTION CYCLE abstains from maintaining Personal Data about the User on the far side of the aforesaid periods. They are controlled to irreversible anonymization or are removed when these periods end. But, there is an exception, the given data is held in a form that no longer enables the identity of the user to be tracked (irreversible pseudonymization), includes in the event of a removal request:

Protected data	Purpose for retention	Period of retention
<p>Connection date, deletion date, last synchronization date, status (active/inactive) at the time of deletion, and identifiers with the service provider Budget Insight Storage for two (2) months after the account was removed for evidentiary purposes about Budget Insight Storage</p>	<p>Hold for evidential purposes in relation to Budget Insight</p>	<p>Two (2) months from the removal of the account</p>
<p>Account type, account currency, connection date, deletion date, and Budget Insight credentials are all details about the bank accounts that have been linked.</p>		
<p>Date, summary, amount, number of points credited, technical details for transactions for which points were gained: (date of creation of the transaction, etc.)</p>	<p>Hold for evidential purposes in relation to the statutory auditor and tax services of the company</p>	<p>Period of the legal prescription (i.e. 5 years from the functional event)</p>
<p>Record of bonus points gained: date, total number of points, kind of bonus</p>	<p>Hold for evidential purposes in relation to the statutory auditor and tax services of the company</p>	<p>Period of the tax retrieval (i.e. 3 years from the end of the monetary year coming after the chargeable event)</p>
<p>Record of the usage of points: date, number of points, the objective of usage (gift card, donation, etc.)</p>		
<p>Record of referrals and points attained on each referral</p>		
<p>Code of Referral</p>		

Bank connection date and revocation date	Hold for the purposes of evidential purposes about users and authorities	Twelve (12) months from the removal of the account
Signup date	Hold for the purposes of evidential purposes about users and authorities	

5.3. Plug-in for web browser

PROMOTION CYCLE gives a plug-in for an Internet browser to recognize the presence of a PROMOTION promotional offer when exploring collaborator sites.

The plug-in does not convey any additional data to PROMOTION CYCLE and ProMotion. More particularly, no data about the User's browsing history on the Internet is disseminated.

From ProMotion's server, the plug-in downloads an updated list of partner sites, many times in a day. If the User uses one of these sites, the plug-in shows a button that enables them to get an advantage from the promotional offer. The User is identified by ProMotion when clicks the button and the data pertained to in 5.2 are conveyed.

Article 6 Data recipient

Personal data is intended for PROMOTION CYCLE, its subcontractors and legal service providers, as well as its business partners, with the exception of the identity data.

The Data is intended for PROMOTION CYCLE, it's Staff under the following terms and conditions:

Data Category	Data compiled	Internal recipients	External recipients
Identification data	<p>First name of the User</p> <p>Contact number and email address *</p> <p>The application creates a one-of-a-kind identifier.</p> <p>Password for the application (encrypted)</p> <p>Kind</p> <p>Age</p> <p>date of birth*</p> <p>and Facebook ID (if you're using Facebook Connect).*</p>	<p>Department in charge of publicity and advertisement campaigns: Users' email addresses are no longer used for advertising promotions, and emailing is controlled by ProMotion.</p> <p>The service that is in charge of customer support is: assistance to users, troubleshooting</p> <p>Verification of transactions with suppliers by the sales department</p>	<p>- Sending transaction data (timestamp, number, description) for loyalty point validation to partner brands</p> <p>- When the brand requests it, sending an email (irreversibly encrypted) for verification.</p> <p>Zendesk is a customer service platform.</p> <p>AWS (Amazon Web Services):</p> <p>Emailing with Mailjet</p> <p>Sending indirect identifying data to submit push notifications with OneSignal</p> <p>Providers of social network ads (such as Facebook and Instagram):campaign management (sending the email encrypted irreversibly)</p>
Contract data	<p>Date of registration</p> <p>Code of referral or invitation, as well as the number of points earned *</p> <p>Transactions (the usage of points) (transaction number,</p>	<p>Executives of ProMotion</p>	<p>AWS: Hosting</p> <p>User sponsor: total number of points obtained</p>

	timestamp, selected counterparty)		
Personal data	Favorite brands	Executives of ProMotion	AWS: Hosting
Bank data	Bank identifiers * (encrypted) IBAN / BIC * (indirect collection) Bank transactions *		Budget Tip: Recover credentials for creating an encrypted bank account link. TimeOne: transaction data sent after user agreement in order to determine the status of an offer's activation and assign a value to it.
	- Bank transactions	Executives of ProMotion	AWS: Hosting
Login details	Link logs and IP address Events relating to the application's use	Executives of ProMotion	AWS: Hosting
Technical data	-Correspondence with user assistance, user exchanges - Data relating to the Smartphone, data relating to potential device crashes	Executives of ProMotion	Reporting tools and crash survey (Amplitude, Sentry, firebase, fabric, etc.) AWS: Hosting Adjust: Origin of the app download

The legislation allows the data or upon request so the data can also be made available to the appropriate public authorities.

Identifying data can be passed to the United States by using Facebook Connect and User Support (Zendesk). Similarly, all or part of the connection data and technical data can be transferred to the companies Sentry, Amplitude, and Adjust in the United States.

All the mentioned companies have attempted to acknowledge with the “Data Protection Shield” or “Privacy Shield” treaty to guarantee an equal level of security of Personal Data:

Banking information about the Consumer is never moved outside of the European Union.

Article 7 Rights of the User

The legislation about the safety of Personal Data gives the User numerous rights:

- **Right of access and rectification:** the User has the right to request access to his Personal Data and, if necessary, their correction;
- **Right to revoke consent:** the User has the right to withdraw their consent to the processing of their Personal Data at any time, and this withdrawal is only applicable in the future.
- **Right of opposition:** The User has the right to object to the processing of Personal Data about him, provided that he provides a valid reason (the legitimate reason is not required in the case of opposition to processing for commercial prospecting).
- **Right to be forgotten:** After a certain amount of time, the User has the right to have Personal Data about him erased.
- **Right to data restriction:** under such cases, the User can request that the Personal Data concerning him be subject to a particular marking in order to limit potential processing;
- **Right to data portability:** the User has the right to request a copy of the only Personal Data he has given to PROMOTION CYCLE in an interoperable format, or to have the Personal Data directly transferred to another data controller.

- The right not to be the target of an individual decision made by an algorithm: The User who is subjected to an automatic individual decision must be able to comprehend the reasoning that underlying the decision and discuss it with a human.

In either case, the User has the option of specifying instructions for the conservation, erasure, and communication of data relating to him after his death.

If the User assumes that the PROMOTION CYCLE does not acknowledge its obligations, he should file a complaint or a request with the appropriate authority.

The applicability of these rights is determined by the legal basis retained; the following matrix determines the rights applicable to each PROMOTION CYCLE data processing:

ProMotion's sub-goals	Legal basis	Access	Rectification	Withdrawal of consent	Opposition	Oversight	Portability	Limitation	Automated decision
Implementation of services required for ProMotion usage, as well as management of the commercial relationship	Contract execution	X	X			X	X	X	Not acceptable

Customer reviews and ProMotion consumption data are used to enhance ProMotion.	Legal interest	X	X		X	X		X	Not acceptable
Realization of all statistics relating to ProMotion's use	Legal interest	X	X		X	X		X	Not acceptable
Issuance of a newsletter	Permission	X	X	X		X	X	X	Not acceptable
Implementation of the tools required to assure personal data protection	Legal responsibility	X	X			X		X	Not acceptable
Retailers can benefit from the product	Contract execution	X	X			X	X	X	Not acceptable

on of anonym ous data for marketi ng research purpose s.									
Perform ing operatio ns as a consequ ence of legal require ments, collectiv e arrange ments, or contract ual stipulati ons	Legal respon sibility	X	X			X		X	Not accept able
Prohibit ion of promoti onal campaig ns in support of ProMoti on	Legal interest	X	X		X	X		X	Not accept able

Article 8 Direct and indirect collection

During the contractual relationship, Personal Data may be collected directly from the User when the Account is established, or indirectly from his or her bank(s).

Article 9 Data security

PROMOTION CYCLE protects the personal data it collects and processes. PROMOTION CYCLE and its subcontractors agree to take many steps to ensure the highest level of privacy for Personal Data, including preventing its modification, degradation, or distribution by unauthorized third parties. PROMOTION CYCLE conducts a risk analysis in terms of Personal Data protection and impacts analysis on privacy on a regular basis, at least once every three (3) years, to ensure the importance and sufficiency of the measures in place.

Full encryption of the User's bank login credentials and exchanges between the application and the bank server, as well as partitioning access to this information, ensure the security of the User's bank login credentials. It can only be accessed by service providers who have been authorized by the Prudential Control and Resolution Authority. The bank links are removed after three (3) months of inactivity on the account.

PROMOTION CYCLE has unique access to the information needed to improve the User's brand loyalty.

PROMOTION CYCLE stores all data in an encrypted format.

Personal Data circulating on networks, such as the Internet, is systematically encrypted, and employees are protected by a confidentiality clause.

Access to the Account is protected, and it can be done with any authentication system, such as a username and password, that complies with local legislation that applies to PROMOTION CYCLE. The authentication device is rigorously confidential. The User is responsible for the security measures that must be taken to protect his authentication device's confidentiality.

If the authentication device is lost or stolen, or if the User becomes aware of its use by an unauthorized third party, the User must immediately notify PROMOTION CYCLE at contact@ <https://www.pro-motion.ie/> to have his authentication device revoked and a new one issued.

PROMOTION CYCLE and its subcontractors store data in their computer system that could lead to the identification of everyone who has a connection to the Account, particularly if they are reported to the authorities.

PROMOTION CYCLE agrees to inform the User of any significant event, any intrusion, disclosure, illicit access or alteration to ProMotion, and any attempted intrusion, disclosure, illicit access or alteration to ProMotion, or any malicious actions against Personal Data that have or are likely to have a serious effect on the User, as soon as it becomes aware of it. Notifying PROMOTION CYCLE of a data breach is a legal requirement, and it does not imply that PROMOTION CYCLE is responsible for the breach's occurrence or exploitation.