



Personal Data Protection Policy

Last update: 23 March 2021

WeWard SAS

WeWard SAS, the data controller, (hereinafter referred to as “WeWard SAS”) is a simplified joint stock company with a share capital of €1,113.50, having its registered office at 6 Boulevard André Maurois - 75016 - Paris, registered under the SIRET number 85361417000019 with the Paris Trade and Companies Register. This personal data protection policy applies to the use of the WeWard Mobile Application (the “Mobile Application”) and access to the Services we provide, and it is intended to inform you about the collection, use and processing of your personal data. All capitalized terms not defined herein shall have the meaning ascribed to them in the Terms of Use. Please note that you must be 15 years of age or older to use the Services.

Personal data processed, legal basis and purposes

WeWard SAS collects and electronically processes personal information including, but not limited to, your name, mobile phone number, email address, password, IP address, unique device identifiers and other identifying information, photographs and/or payment information. The legal basis for processing is performance of the contract (Terms of Use to which you have agreed) between you and the Company.

More specifically:

Data	Purposes
Email address, encrypted password, username, unique identifiers related to the user's account	Enable you to sign in to the Service
Number of steps and GPS location data	Count the user's steps, assess the distance travelled, verify eligible physical activities and give rewards
Last name, first name, postal address Mobile phone	Provide “physical” gifts (data transmitted to merchants who have to ship gifts) Assist the delivery person in case of problems.
IP address (city level)	Know which time zone you are in to reset your step counter to zero at midnight.

	Provide the service by awarding points for actions at WeWard partners.
Photographs of receipts for purchases made in the recommended locations	Give you rewards for your purchases
Transaction and earnings history	Ensure good account management and transparency

As part of the Services, we may allow you to search for friends using your Facebook and/or Google credentials. If you so choose, you will be asked to allow the WeWard Application to access certain information associated with your Facebook and/or Google account, such as your name, profile picture, gender and friends list. If you consent, this information will be processed by us to identify Facebook friends of yours who use the Application or to enable you to invite Facebook friends to install the WeWard Application. WeWard SAS will never contact your friends directly and will not store their data.

With your consent (legal basis), we will collect information about your location, the history of places visited and your physical activity in order to (i) personalise the reward offers visible on the Application according to your profile and your location, (ii) propose points of interest that match your profile (places to visit). You can enable and disable location services by using your mobile device's operating system settings. However, when you disable this feature, you will only have access to limited application functions and it will be technically impossible for us to collect information about your physical activity and location, which will prevent your movements from being tracked and/or converted into Wards.

With your consent, we also process:

Data	Purposes
Email address	Sending emails about partner offers (personalised advertising)
Ad ID (information from your phone that you can reset)	ID collected by WeWard and transferred to advertising partners for targeted advertising (in-app ads)
Gender and date of birth (optional)	Commercial targeting

WeWard may ask you to upload a photograph. The purpose of this processing is to provide social features allowing a profile to be identified by another user. The point is simply to make the Application "friendlier".

The legal basis for the processing is the legitimate interest of WeWard, it being specified that the sending of the requested photo is not compulsory and that a refusal does not entail any consequences.

Other processing is based on the legitimate interest of WeWard:

Data	Purposes	Legitimate interest of the Company

Photograph of your ID and/or IBAN	Ensure traceability and compliance with legal obligations for bank transfers	Be able to answer questions from banks and to meet our legal obligations
Activity time and calories	Provide statistics on the person's physical activity in order to improve their performance	Provide additional content to people
IP address (city level)	Carry out statistical studies on GPS location of users	Learn the number of users in each city
Email address	Communicate with you, including to inform you of new features and of updates to the Application, the Website, our Terms of Use and/or this Privacy Policy	Provide additional information
GPS location data and history of places visited	Compile statistics	Know how many users are in certain streets or neighbourhoods
Mobile device type and model, browser type, device identification, sign in times and pages viewed	Enable the Application to operate and detect malfunctions to maintain quality, as well as for general anonymous statistical purposes	Maintain Service quality and improve overall knowledge of the customer base
Device identifier	Fraud detection (people with multiple IPs for 1 phone)	Detect fraud
Photographs of receipts for purchases made in the recommended locations	Learn the conversion rates between a visit and a purchase	Evaluate the service and manage the business
Email exchanges and data on banking transactions and reward distributions		Comply with contractual and regulatory obligations Preserve evidence in case of litigation

We work with third parties (convenience stores, brands, advertising networks, analytics providers, affiliate platforms, hereinafter "Partners") who may provide or receive information about you.

Data	Purposes
Postcode, income, answers to questionnaires from survey companies (data for which WeWard is not the controller)	Only when the user responds to a survey: data collected and processed by partner survey companies (data controllers tap research and Theoremreach) for statistical study purposes. Questionnaires allow the user to earn Wards.

Ad ID (information from your phone that you can reset)	ID collected by WeWard and transferred to advertising partners for targeting purposes.
Unique identifier for your account and purchases from partners	Following a visit and/or purchase made through the application, the unique identifier is transferred to partners to track your purchases for rewards.

Recipients

Your personal data are processed by WeWard for the purposes described above and, to this end, WeWard may transfer your data to third parties in the following categories:

Firstly, to our processors: WeWard may use trusted partners as processors:

- in particular, as part of the provision of the Services, to analyse your data to calculate your Wards and to enable us to credit you with the Wards you wish to redeem for a Reward;
- more generally, in connection with the use of the Application, to send you emails, to assist you in using the Service or to help us perform statistical analyses. These third parties are contractually prohibited from using the personal data sent by WeWard except to provide the services for which they have been contracted, and they are required to maintain the security and confidentiality of your information with equal or greater protection than that provided by WeWard.

Secondly, to our Partners: WeWard makes every effort to ensure that the Services are offered transparently by the Partners with which WeWard collaborates. For example, in this regard, Partners may request information from WeWard as confirmation of a visit in order to enable you to benefit from the Services offered (Rewards). If your Wards are converted into Rewards with an online shop, we may pass on your data so that they can see the origin (email address, username) of their customers. WeWard ensures that Partners with access to your personal data only process it for the purposes described at the time of the conversion of Wards into Rewards.

You can obtain further information about these Partners by sending an email to the address below.

In any case: In addition to the above, WeWard will only disclose your personal data, without notice, if required to do so by applicable law or regulation, in response to a legal process and/or administrative or judicial order; to protect and defend the rights or property of the Company and/or to act in urgent circumstances to protect the personal safety of the Users of the Application or third parties. WeWard will never send the list of its Users to third parties without your prior consent. Subject to your express prior consent, WeWard's partners may contact you directly or through us in order to make commercial offers.

Security

WeWard ensures that your data is processed confidentially and securely by putting in place the technical and organisational measures necessary to preserve its security, confidentiality and integrity under optimal conditions.

Only persons strictly authorised by WeWard will have access to your data. No unauthorised third party may have access to it, except where the data controller is legally bound to allow this.

Retention period

WeWard retains your personal data for the period necessary to provide the Services. The data is then kept in the active database for 7 days after the account has been deleted or after 24 months of inactivity (then 5 years in an intermediate archive).

Specifics:

Data	Retention
IP address (city level)	Only the last IP is kept for the duration of the relationship. However, it is deleted after 3 months of inactivity on the Application or 7 days after the deletion of your account.
Information you used to participate in a survey	WeWard only keeps the fact that you earned x Wards for a survey on a certain day and at a certain time for the duration of the relationship, 7 days after the account is deleted and/or after 24 months of inactivity.
Facebook or Google username, Facebook or Google profile picture, gender and Facebook or Google friends list	WeWard does not keep the friends list. You can remove the Facebook/Google to WeWard link from your Facebook/Google account.

Transfer(s) of data outside the European Union

In order to provide the Services, WeWard may use analysis and notification service providers with servers located in countries outside the European Union and which have not been the subject of a European Commission decision on an adequate level of protection. In this case, WeWard ensures that this transfer is carried out under conditions that comply with applicable regulations by taking all appropriate measures and within a legal, technical and operational framework that ensures the confidentiality and security of this data.

You can obtain information on transfers by sending an email to the address below.

Your Rights

In accordance with the regulations in force, you have the right to access, oppose, rectify and delete your personal data, as well as the right to limit the processing carried out, to port your data and to determine the fate of your data in the event of your death. Finally, with regard to

profiling operations, you have the right to object to the use of such a process. Nevertheless, the exercise of some of these rights (opposition to profiling, withdrawal of consent to GPS location) may make it impossible for WeWard to provide you with access to the Application or the use of all or part of the Services.

These rights can be exercised by contacting us at **contact@weward.fr** . In addition, remember that you can exercise some of these rights directly through your account settings. If you are not satisfied, you have the right to lodge a complaint with the Commission Nationale de l'Informatique et des Libertés (CNIL), the supervisory authority in charge of compliance with obligations relating to personal data.