



# PRIVACY AND DATA PROTECTION POLICY (PRIVACY POLICY)

Last update: **19/07/2022**

This Privacy Policy governs the processing of your Personal data by Rise Financials SRL (acting under the commercial name and trademark "RISE"; hereinafter referred to as "**RISE**", "**we**", "**us**", "**our**") as part of your visit to our website <http://www.risecard.eu> (hereinafter referred to as our "**Site**"), applications (hereinafter referred to as our "**App**"), the use of (and subscription on) our Site and/or Rise services (hereinafter together referred to as our "**Services**"), your communication with us via email, telephone and social media channels (such as Facebook, LinkedIn, Twitter, Pinterest, Tiktok *etc*).

RISE complies with all Belgian and European regulatory and legal provisions on the protection of Personal data. Respect for privacy and Personal data is our priority and we are committed to the following three key principles:

- (a) you retain control of your Personal data;
- (b) your Personal data is treated in a transparent, confidential and secure manner; and
- (c) we do not sell your Personal data to third parties.

The definitions of "*Data Controller*", "*Processor*", "*Data subject*", "*Personal data*", "*Processing*" *etc.* are the same as in article 4 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 26 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereafter referred to as "**GDPR**").

As the Services are intended both for parents or other legal representatives (hereinafter referred to as "**parents**") and their children, **WE INVITE CHILDREN TO READ AN EXPLANATORY DOCUMENT THAT IS APPROPRIATE FOR THEIR UNDERSTANDING** (available as Annex B to this Privacy Policy). This document is also a tool for parents to explain to their children how we process their Personal data.

By continuing to browse the Site/App or using our Services, you acknowledge that you have read, understood and accepted this Privacy Policy and that it is your responsibility to review this policy regularly for any changes.

For more information or any questions regarding your data protection or the Privacy Policy, you can contact us by email at: [dpo@risecard.eu](mailto:dpo@risecard.eu).

## **1. IN GENERAL**

### **1.1 Your Personal data are processed by:**

#### **Rise Financials SRL**

Registered office: Avenue du roi 107, 1190 Brussels (Belgium)

Company number: 0741.614.389

Representative: Morgan Wirtz, CEO



1.2 By providing our Services to you, RISE shall be considered as responsible regarding the processing of your Personal data (*i.e.* **Data Controller**) except for Payment Services as specified in Article 2 of this Privacy Policy. With respect to the Payment Services, Treezor will act as a Data Controller and we act as **Treezor's Processor**. However, some of your Personal Data is collected both by RISE in its capacity as Treezor's Processor and in its capacity as a Data Controller. For some of this data, RISE and TREEZOR will therefore be considered both as **Controllers**.

1.3 All the data/information collected by us are related to the provision of our Services. Generally, we collect (1) the data it needs to enable you to use our Services and (2) the data we may use to provide you with enhanced and/or additional features. We will also inform you about our new products and services.

1.4 This Privacy Policy may be amended, supplemented or updated, in particular to comply with any legal, regulatory, case law or technical developments that may arise. However, your Personal data will always be processed in accordance with the policy in force at the time of the data collection, unless a compulsory legal prescription determines otherwise and must be enforced retroactively. Amendments to the Privacy Policy will only become applicable after a period of 30 business days from the date of the amendment. We will revise the date of the last update at the top of the Privacy Policy for this purpose. It is your responsibility to inform yourself as to the content of the Privacy Policy, and only the updated version available online is considered current. We encourage you to check this page frequently for changes.

## **2. TREEZOR**

2.1 RISE operates as a (payment service provider) agent of the french company Treezor SAS. Treezor SAS is an electronic money institution, within the meaning of Article L.525-1 of the French Monetary and Financial Code, approved and registered by the Autorité de Contrôle Prudentiel et de Résolution (ACPR). In this capacity, we market the "**Payment Services**" provided by Treezor (as defined in our General Conditions or in the Framework Agreement with Treezor).

2.2 With respect to the "Payment Services", **Treezor will act as a Data Controller**, in accordance with Treezor's privacy policy (available as Annex A to this Privacy Policy). Treezor limits the processing of your personal data to the purposes necessary to provide the Payment Services. In the context of these Payment Services, we collect your Personal data for the sole purpose of performing these Payment Services by Treezor. In this respect, we act as a Treezor's Processor in the sense of article 4 of the GDPR.

2.3 For the processing of your Personal data in the context of the Payment Services, the Data Controller is therefore:

### **TREEZOR SAS**

Registered office: avenue de Wagram 33, 75017 Paris

Company number: 807 465 059

Representative: Eric Lassus, General Director

(hereinafter referred to as "**Treezor**")

2.4 Therefore, **WE URGE YOU TO CAREFULLY READ Treezor's privacy policy** (available as Annex A to this Privacy Policy).



### **3. COLLECTION AND SOURCE OF PERSONAL DATA**

3.1 We process the Personal data of the following persons:

- You, in your capacity as a user/client/visitor of the Site/App/Services; and
- Any other person about whom you provide information to us through a communication channel indicated on the Site/App, including through social networks. The Personal data of such other persons is transmitted to us under your responsibility and you undertake to transmit it to us in accordance with the applicable legal provisions. We will only use this Personal data if it is necessary for the performance of our duties.

3.2 We know how important it is for you to protect your children's data. We will only process data about your children if you have appointed them as the user of our Services.

3.3 We may collect your Personal data directly (in particular via the collection forms available on our Site/App) or indirectly (in particular via our service providers). We will only use this Personal data if it is necessary for the performance of our duties.

3.4 We undertake to obtain your consent and/or to allow you to object to the use of your Personal data for certain purposes whenever necessary/appropriate.

3.5 In all cases, you will be informed of the purposes for which your Personal Data is collected via the various online data collection forms, this Privacy Policy and via the [Cookie Policy](#), which we also recommend that you read.

### **4. TYPES OF PERSONAL DATA COLLECTED AND USED BY US AS DATA CONTROLLER**

We may specifically collect and process the following types of Personal data:

- Your identification and authentication data (surname, first name, type (parent/child), nationality, date/place of birth, gender, postal address, e-mail address, face and/or print ID, identity card/passport/residence permit number, telephone number, family relationship, avatar (photograph), user name, password/PIN);
- Your socio-demographic data (marital status and family situation);
- Information about third parties such as Personal data relating to your family members where you provide this information directly to us;
- Your banking and financial data, data relating to transactions made by using our Services;
- Information you provide when filling in forms on the Site/App (e.g. for subscription purposes, to participate in surveys/contests, for marketing purposes); generally the content of your communication with us or when you actively provide information to us (e.g. when entering a contest, posting videos/photos/comments etc.)
- Data about your online behaviour and preferences; information about your interests;



- Information you provide when using the App such as screens visited, interaction patterns, device details, geographical location;
- Your geolocation data; and
- Your browsing data.

## **5. PERSONAL DATA THAT WE AUTOMATICALLY COLLECT AS DATA CONTROLLER**

We collect some information automatically when you visit the Site/App in order to personalize and enhance your experience. We collect this information using various methods such as:

### **a) Cookies**

A “cookie” is a small information file sent to your browser when you visit our Site/App and stored on your device. This file contains information such as the domain name, the internet access provider and the operating system as well as the date and time of access by the user. Cookies cannot damage your device in any way.

Cookies are not used to determine the identity of an individual who visits our Site/App. Cookies allow us to identify, in particular, your display language in order to improve your online browsing experience. They also enable us to process information about your visit to our Site/App, such as the pages viewed and the research conducted, in order to improve our Site/App content, to follow your areas of interest and offer you more suitable content.

If you do not want to receive cookies from our Site/App, you can adjust your browser settings accordingly. To manage your choices, each browser has a different configuration. These configurations are described in your browser’s help menu, which will explain how to change the settings to your desired cookies configuration. Note that for some cookies you can indicate your choice directly in the Cookie Settings.

We recommend, however, that you do not deactivate our cookies. Keep in mind that some of our cookies are necessary for the proper functioning of our App/Site and if you block, turn off or reject these necessary cookies, some pages of our Site/App may not display properly or you may not be able to use some of the services we offer. In this case, we cannot be held liable for any consequences related to the reduced functionality of our Services arising from our inability to store or consult the cookies required for its functioning and which you have declined or deactivated.

Lastly, by clicking on the dedicated icons of social networks such as Instagram, Facebook, LinkedIn, Tiktok etc., if these are displayed on our Site/App, and if you have agreed that cookies may be downloaded while you are browsing our Site/App, the social networks in question may also download cookies to your devices (computer, tablet or mobile phone). You can, however, at any time revoke your consent to these social networks downloading these types of cookies.

For more information, notably concerning the duration of storage and the type of cookies used, please consult our [Cookie Policy](#).



## **b) IP addresses**

An IP address is a unique identifier that some electronic devices use to identify themselves and communicate with each other over the Internet. When you visit the Site/App, we may use the IP address of the device you are using to connect to it. We use this information to determine the general physical location of the device and to understand what geographic region visitors to the Site/App are from.

## **c) Statistics**

The Site/App uses Google Analytics to generate statistical reports. These reports tell us, for example, how many users have visited the Site/App, which pages have been visited, and from which geographical area the users of the Site/App come. Information collected through the use of statistics may include, for example, your IP address, the website from which you arrived at our Site/App and the type of device you are using. Your IP address is masked on our systems and will only be used as necessary to troubleshoot technical problems, to administer the Site/App and to understand the preferences of its visitors. Information about traffic on the Site/App is available only to authorized personnel. We do not use any of this information to identify visitors and we do not share it with third parties.

## **6. SOCIAL NETWORKS**

6.1 You have the option to click on the dedicated icons of social networks such as Instagram, Facebook, LinkedIn *etc.* that appear on our Site/App.

Social networks create a friendlier atmosphere on the website and assist in promoting the Site/App via sharing. Video sharing services enrich the video content of our Site/App and increase its visibility.

When you click on these buttons, we may have access to the personal information that you have made public and accessible via your profiles on the social networks in question. If you do not want us to have access to your personal information published in the public spaces of your profile or your social accounts, then you should use the procedures provided by the social networks in question to limit access to this information.

6.2 We may also collect your data when you interact with us on social networks.

6.3 When we use social media for marketing purposes, your personal data (limited to only your name, email address and app events) may be shared with the social media platforms so that they can check if you also hold an account with them. If you do, we may ask the advertising partner or social media provider to: - use your personal data to send our adverts to you, because we think that you might be interested in a new RISE product or service - not send you our adverts, because the marketing relates to a service that you already use - send our adverts to people who have a similar profile to you (for example, if one of our services is particularly useful to people with similar interests to the ones on your social media profile, we may ask our advertising partner or social media partner to send our adverts for that service to those people). An example of how we may use social media for marketing purposes is through Facebook's 'Custom Audience' tool. Read more about these terms. We may share your personal data with our advertising partners in the ways described above, but the personal data is hashed before we send it, and the social media platform we share it with is only allowed to use that hashed personal data in the ways described above. Our legal basis is our legitimate interest (to ensure Rise's advertising is as effective as possible). You can contact us at any time, either through the RISE app or by emailing [dpo@risecard.eu](mailto:dpo@risecard.eu), if you don't want us to share your



personal data for advertising purposes. You can opt out at any time from having your personal data shared in this way. Remember you can also manage your marketing preferences directly with any social media provider that you have an account with.

## 7. PURPOSES, LEGAL BASIS AND STORAGE DURATION

7.1 As Data Controller, we use your Personal data specifically for the following purposes:

N°	Purpose of the Processing	Legal Basis	Storage period
1	Managing your file/application and our relationship with you (including getting to know you)	Execution and management of our contractual relationship with you and/or our client  Legal and regulatory obligations (*ii)	Up to ten (10) years after the end of the contract
2	Create and manage your account and access to/use of the Site/App/Services (including managing your account history and information on transactions and payments made, informing you of account balances, issuing your payment cards etc.)	Execution and management of our contractual relationship with you and/or our client	Up to ten (10) years after the end of the contract
3	Communicate with you and inform you of special offers, our products or our Services (*i)	Our legitimate interest in improving the quality and operational excellence of the services we offer you  Your consent if requested	<i>For the existing costumers:</i> up to three (3) years after the last contact or immediately following the unsubscription from this service  <i>For the prospect:</i> up to three (3) years after the last contact
4	Provide and improve our Services	Execution and management of our contractual relationship with you and/or our client	Up to ten (10) years after the end of the contract
5	Personalize and optimize your experience on the Site/App ((including through geolocation)	Our legitimate interest in improving the quality and operational excellence of the services we offer you  Your consent if requested	Up to thirteen (13) months from last activity or immediately after the account is deleted
6	Perform data analysis and statistical analysis	Our legitimate interest in improving the quality and operational excellence of the services we offer you  Your consent if requested	Up to thirteen (13) months from last activity or immediately after the account is deleted



7	Respond to your requests (information, research, newsletter or other content) and claims and provide you with a support service	Execution and management of our contractual relationship with you and/or our client  Our legitimate interest in improving the quality and operational excellence of the services we offer you	Up to ten (10) years after the end of the contract  Jusqu'à trois (3) ans après le dernier contact (en cas d'intérêt légitime)
8	Conducting satisfaction surveys for the purpose of improving our products and services	Our legitimate interest in improving the quality and operational excellence of the services we offer you	For as long as necessary for the proper organisation and performance of our Services
9	In order to organise, offer and manage your participation in a contest	Your consent	For the duration necessary for the implementation of this contest and in accordance with the rules of the contest in question
10	Prevent, investigate and detect fraud, data security (this may include geolocation)	Execution and management of our contractual relationship with you and/or our client  Legal and regulatory obligations (*ii)	Up to ten (10) years after the end of the contract
11	To comply with legal obligations or to comply with any reasonable request from competent law enforcement agents or representatives, judicial authorities, governmental agencies or bodies, including competent data protection authorities (*iii)	Legal and regulatory obligations (*ii)	Up to ten (10) years after the end of the contract
12	For the preservation of our legitimate interests or of our partners, clients or a third party (*iv)	Our legitimate interest in protecting our Site and App, our social media accounts, our products and Services from misuse and illegal activity  Legal and regulatory obligations (*ii)	For as long as necessary for the preservations of those legitimate interests
	Any other purpose that we may specify to you at the time of collection	Determined at the time of collection	Determined at the time of collection

(\*i) **for marketing purposes**, *i.e.* to provide you with our targeted communications, promotions, offerings and other advertisements of RISE. Unless you are an existing customer and who we wish to target with our own marketing material, we will only send you communications, promotions, offerings, newsletters and other advertisements via e-mail or other person-to-person electronic communication channels if you explicitly consented to receiving such communications, promotions, offerings,





newsletters and other advertisements. You understand that an essential aspect of our marketing efforts pertains to making our marketing materials more relevant to you. This means that we may use your Personal data to provide you with communications, promotions, offerings, newsletters and other advertisements about products and services that may interest you. If you are registered to receive communications, promotions, offerings, newsletter and other advertisements via e-mail or other person-to-person electronic communication channels, you can change your preferences for receiving such communications, promotions, offerings, newsletter and other advertisements by following the opt-out link provided in such communications.

(\*ii) particularly in the context of the prevention of money laundering and terrorist financing.

(\*iii) Your Personal data may be transferred upon our own initiative to the police or the judicial authorities as evidence or if there are justified suspicions of an unlawful act or crime committed by you through your use of or registration with our Site, App, our Services, our social media channels or other communication with us.

(\*iv) If your use of registration with our Site/App, social media channels or other communication channels can be considered (a) a violation of any applicable terms of use of our Site/App or the intellectual property rights or any other right of a third party, (b) a danger or threat to the security or integrity of our Site/App, social media channels or other communication channels or our or any of our affiliates' subcontractors' underlying IT systems due to viruses, Trojan horses, spyware, malware or any other form of malicious code, or (c) in any way hateful, obscene, discriminating, racist, slanderous, spiteful, hurtful or in some other way inappropriate or illegal.

**7.2 PLEASE NOTE: If you are under thirteen (13) years of age, you must give your consent together with your parent. Otherwise, we invite the involved parents to inform us so that we can immediately stop processing the involved Personal data.**

## **8. STORAGE PERIOD OF YOUR PERSONAL DATA**

8.1 We will retain your Personal data for no longer than is necessary for the purposes for which it is collected and processed, extended, where appropriate, by the periods of applicable legal or regulatory requirements.

In general, we apply the following principles/ storage periods:

- Up to ten (10) years after the end of the contractual relationship (which is equivalent to the time-limitation period under Belgian law in accordance with Article 2262 bis of the Civil Code);
- Where the processing is based on legal obligations to which we are bound, your Personal data is retained for as long as is necessary to comply with those legal obligations (e.g. the law regarding the prevention of money laundering and terrorist financing provides for a retention period of 10 years after the end of the relationship);
- Where processing is based on our legitimate interest, we process your Personal data for as long as necessary for the proper organisation and performance of our Services;





- With respect to processing carried out on the basis of your consent, you may at any time ask us to stop processing your Personal data for those purposes, without affecting the lawfulness of processing based on your consent prior to its withdrawal; and
- With respect to your participation in a contest, your Personal data will only be processed for the time necessary for the implementation of that contest and in accordance with the rules of the contest in question.

For more details, we also refer you to the indications in the table in article 7.1.

8.2 We undertake to delete or anonymise your Personal data at the end of the storage period described above, plus a period of a few days or weeks, in proportion to the period indicated above, if this is necessary to ensure the deletion or anonymisation of the Personal data concerned in practice, unless there is a compelling reason to do otherwise.

8.3 At the end of this period, strictly relevant Personal data may be stored (i) for evidential purposes (in the event of litigation or in the event of an inspection by authorised bodies) and/or (ii) to comply with a contractual obligation with our customers.

## **9. DISCLOSURE OF PERSONAL DATA**

9.1 We restrict access to your Personal data only to members of our staff who need to have this information in order to process your request or to provide the requested service.

9.2 We do not disclose your Personal data to any unauthorized third parties. We may, however, share your Personal data with entities within the RISE group and with authorized service providers/subcontractors (*i.e.* processors) whom we may call upon for the purpose of providing our services.

These service providers/subcontractors include (this may change):

- IT service providers responsible for hosting and maintaining the Site/App and for providing cloud computing services;
- Service providers responsible for your authentication;
- Service provider responsible for producing the RISE payment card;
- Service providers who process your RISE subscription payments (see article 9.4);
- Service providers who supply our IT tools including our CRM and email tools;
- Marketing and cookie service providers;
- Providers of audience measurement and analysis;
- Service providers who monitor the quality of services (call centres); and
- Our legal, financial and accounting advisors.

9.3 We do not authorize our service providers to use or disclose your Personal data, except to the extent necessary to deliver the services on our behalf or to comply with legal obligations. Furthermore, we may share Personal data concerning you (i) if the law or a legal procedure requires us to do so, (ii) in response to a request by public authorities or other officials or (iii) if we are of the opinion that transferring this Personal data is necessary or appropriate to prevent any physical harm or financial loss or in respect of an investigation concerning a suspected or proven unlawful activity.

9.4 Any payment card information you use to make a purchase regarding the Services is collected and processed directly by our payment processor, Stripe, and we never physically receive or store your full payment card information. Stripe commits to complying with the Payment Card Industry



Data Security Standard (PCI-DSS) and using industry standard security. Stripe may use your Payment Information in accordance with its own Privacy Policy here: <https://stripe.com/privacy>.

9.5 In accordance with article 2 of the Privacy Policy, we share data with Treezor in our capacity as a processor of Treezor.

## **10. TRANSFER OF PERSONAL DATA**

10.1 We process your Personal data within the European Economic Area (EEA). However, in order to process your Personal data for the purposes outlined in article 7 above, we may also transfer your Personal data to other entities of the RISE Group or to third parties which process on our behalf outside the EEA. Each entity outside the EEA that processes your Personal data will be bound to observe adequate safeguards with regard to the processing of your Personal data. Such safeguards will be the consequence of the recipient country having legislation in place which may be considered equivalent to the protection offered within the EEA; or a contractual arrangement between us and that entity.

10.2 We may transfer anonymized and/or aggregated data to organizations outside the EEA. If such transfer takes place, we will ensure that there are safeguards in place to ensure the safety and integrity of your data and all rights with respect to your Personal data that you enjoy under applicable mandatory law.

## **11. SECURITY**

11.1 You are responsible for ensuring that any Personal data you provide us with is secure.

11.2 We implement all possible technical and organizational security measures to ensure security and confidentiality in processing your Personal data. To this end, we take all necessary precautions given the nature of the Personal data and the risks related to its processing, in order to maintain data security and in particular to prevent distortion, damage or unauthorized third-party access (physical protection of the premises, authentication procedures with personal, secured access via identifiers and confidential passwords, a connection log, encryption of certain data *etc.*).

## **12. YOUR RIGHTS**

12.1 RISE is committed to ensure protection of your rights under applicable laws. You will find below a table summarizing your different rights:

<b>Right of access and rectification</b>	<p>You can request a copy of the Personal data we hold about you. You may also request rectification of inaccurate Personal data, or to have incomplete Personal data completed.</p> <p>We reserve the right to charge an administrative fee for multiple subsequent requests for access that are clearly submitted for causing nuisance or harm to us.</p>
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<b>Right to erasure/ Rights to be forgotten</b>	<p>Your right to be forgotten entitles you to request the erasure of your Personal data in cases where:</p> <ul style="list-style-type: none"> <li>i. the Personal data is no longer necessary for the purpose for which it was collected;</li> <li>ii. you choose to withdraw your consent;</li> <li>iii. you object to the processing of your Personal data;</li> <li>iv. your Personal data has been unlawfully processed;</li> <li>v. there is a legal obligation to erase your Personal data; and</li> <li>vi. the Personal Data concern minors.</li> </ul> <p>However, you may not request the deletion of Personal data if their processing is necessary by virtue of a legal obligation, in particular with regard to the obligation to prevent money laundering and the financing of terrorism.</p>
<b>Right to restriction of Processing</b>	<p>You may request that processing of your Personal data be restricted in the cases where:</p> <ul style="list-style-type: none"> <li>i. you contest the accuracy of your Personal data;</li> <li>ii. RISE no longer needs your Personal data for the purposes of the processing;</li> <li>iii. you have objected to processing for legitimate reasons.</li> </ul>
<b>Right to data portability</b>	<p>You can request, where applicable, the portability of your Personal data that you have provided to RISE, in a structured, commonly used, and machine-readable format and you have the right to transmit this data to another Controller without hindrance from RISE where:</p> <ul style="list-style-type: none"> <li>(a) the processing of your Personal data is based on consent or on a contract; and</li> <li>(b) the processing is carried out by automated means.</li> </ul> <p>You can also request that your Personal data be transmitted to a third party of your choice (where technically feasible).</p>
<b>Right to object to Processing</b>	<p>You may object (i.e. exercise your right to “opt-out”) to the processing of your Personal data particularly in relation to profiling or to marketing communications. When we process your Personal data on the basis of your consent, you can withdraw your consent at any time.</p>
<b>Right not to be subject to automated decisions</b>	<p>You have the right not to be subject to a decision based solely on automated processing, including profiling, which has a legal affect upon you or significantly affects you.</p>
<b>Right to lodge a Complaint</b>	<p>You can choose to lodge a complaint with the Belgian Data Protection Supervisory Authority, to know <a href="#">Autorité de protection des données/Gegevensbeschermingsautoriteit</a>.</p> <p>You have also the right to lodge your Complaint before the courts where the RISE entity has an establishment or where you have your habitual residence.</p>

12.2 If your administrative data changes, you must notify us as soon as possible and in any event within one month of the change.

12.3 In order to exercise these rights, you may:

- access your profile by logging in to the Site/App to modify your Personal data;
- make a written request via the online form or by email: [dpo@risecard.eu](mailto:dpo@risecard.eu).



12.4 In order to exercise your rights in relation to the Processing carried out in the context of the provision of the Payment Services, you may also contact Treezor directly by email at [dpo@treezor.com](mailto:dpo@treezor.com) or in writing at Treezor SAS, Avenue de Wagram 33, 75017 Paris.

### **13. UNSUBSCRIBING**

If you have subscribed to certain services via our Site/App and you no longer want to receive emails, please consult the “*unsubscribe*” page corresponding to the service you are subscribed to.

### **14. HOW TO CONTACT US**

If you have any questions or comments with regard to this Privacy Policy, please do not hesitate to contact us at the following address: [dpo@riseCARD.eu](mailto:dpo@riseCARD.eu).



## ADDENDUM A - TREEZOR'S PRIVACY POLICY

### INTRODUCTION

Treezor ("Treezor" or "we") cares about the protection of your personal data and is committed to respecting your privacy. The purpose of this privacy policy is to provide clear and transparent information on how we collect and process any information that may directly or indirectly identify you (hereinafter "**personal data**") in the context of the payment services that Treezor offers you. This policy also sets out your data protection rights as a user or holder ("User" or "Holder" or "you") of the payment services (the "**Services**").

### RESPONSABLE DE TRAITEMENT

Treezor, "société par actions simplifiée" registered in the Paris Trade and Companies Register under number 807 465 059, located at 33 avenue de Wagram, 75017 Paris, is the Data Controller of your personal data, as described in more detail in this Privacy Policy.

#### 1. PERSONAL DATA WE COLLECT AND PROCESS

The Services allow you to create and manage a payment account. As part of this, we collect some of your personal data in order to provide you with the best possible experience with the Services and also for regulatory purposes subject to obtaining your prior consent.

The categories of data that we collect in the course of our Services, the purposes and the legal basis for such data collection are detailed in the table below (**section 2**).

#### 2. USE AND STORAGE OF YOUR PERSONAL DATA

You are herewith informed that the contact data you provide during a subscription request will be used by Treezor to answer your request and may also be used to assist you in subscribing to the requested product.

This data will be deleted if you do not open a payment account.

You are also hereby informed that, when accessing the Site and or the Agent's application, information may be temporarily stored in memory or on the hard drive in accordance with the Agent's cookie policy. You acknowledge that you have been informed of this practice and authorise the Agent to employ it. Acceptance of essential/necessary cookies is a prerequisite for access to the Site.

The Holders are informed that the personal data collected by Treezor, at the beginning of the relationship and afterwards :

- Are used by Treezor to meet its legal and regulatory obligations, in particular its obligations in terms of the fight against fraud, money laundering and the financing of terrorism, tax evasion (FATCA and CRS), accounting monitoring of payment transactions, queries and declarations to central files, detection, management and monitoring of risks, in particular through controls, management of deceased or inactive cardholders, control of documents, banking mobility, authentication of customers;
- are necessary for the execution of the payment service framework agreement, in particular communication with customers, processing of payment account opening requests, management of means of payment, management of limits and services, management of claims and customer incidents, customer notifications;



Treezor uses authorisation tools for payments. On the basis of these tools, Treezor can decide to accept or refuse a payment and/or a request from a Holder. These tools are based, depending on the case, on the information provided by the Holder, the consultation of central files, statistics relating to payments or predefined settings by Treezor. The use of these tools contributes to the global risk management policy of Treezor.

Personal data are kept by Treezor at least during the legal retention and/or prescription periods (statute limitation periods), for example :

- For 5 years from the execution of the transaction;
- For the duration of the contractual relationship plus the statute limitation periods (prescription periods) for contractual elements; and
- For 10 years for accounting information.

After these periods, Treezor has the possibility to erase the archived data of the Holder.

The non-deleted data can be made available to you at your request.



CATEGORY OF DATA	PURPOSE OF THE PROCESSING	APPLICABLE LEGAL BASE	STORAGE PERIOD
Civil status data and contact details of the parent and child: Surname, first name, date of birth, e-mail, telephone number, identity card/passport/ residence permit...	<ul style="list-style-type: none"> <li>Compliance with legal and regulatory obligations (KYC)</li> </ul>	To comply with our legal obligations	During the duration of the business relationship with Treezor and for 5 years after the end of this business relationship.
surname parent First name parent	<ul style="list-style-type: none"> <li>Subscription to the payment account</li> </ul>	Necessary for the execution of the contract between Treezor and the Holder and to comply with our legal obligations	During the duration of the business relationship with Treezor and for 5 years after the end of this business relationship.
Surname child First name child Address	<ul style="list-style-type: none"> <li>Child card subscription</li> </ul>	Necessary for the execution of the contract between Treezor and the Holder and to comply with our legal obligations	During the duration of the business relationship with Treezor and for 5 years after the end of this business relationship.
Bank operations and transactions data (account balance, card blocking, amount of a money request...)	<ul style="list-style-type: none"> <li>Payment account management (visibility of balance, transactions, account information)</li> </ul>	Necessary for the execution of the contract between Treezor and the Holder	During the duration of the business relationship with Treezor and for 5 years after the end of this business relationship.
Civil status and identification data (surname, first name, gender, date of birth...) Contact details (postal address, e-mail, etc.) Economic and financial information (tax status)	<ul style="list-style-type: none"> <li>Account management (tax declaration)</li> </ul>	To comply with our legal obligations	5 years from the end of the business relationship.
Banking transaction data (payment order identifier, card type, payment data...)	<ul style="list-style-type: none"> <li>Payment account provisioning</li> </ul>	Necessary for the execution of the contract between Treezor and the Holder	5 years from the date of the transaction
	<ul style="list-style-type: none"> <li>Payment children Rise card</li> </ul>	Necessary for the execution of the contract between Treezor and the Holder	5 years from the date of the transaction
Surname First name Subject of the request Details of the request PDF of disputed transaction (if necessary)	<ul style="list-style-type: none"> <li>Handling of claims related to the payment account</li> </ul>	Necessary for the execution of the contract between Treezor and the Holder	5 years from the processing of the claim
Banking operations and transactions data (account balance, transaction history, card blocking...)	<ul style="list-style-type: none"> <li>Management of the payment account by the parent</li> </ul>	Necessary for the execution of the contract between Treezor and the Holder	5 years from the date of the transaction





### **3. WHO HAS ACCESS TO YOUR PERSONAL DATA?**

#### **3.1 Processing and transfer of your personal data by our trusted EU/non-EU affiliates**

To provide you with the Services, Treezor occasionally transfers your data to other countries. When we transfer your data outside the European Union or the European Economic Area (EEA) (countries that are members of the EU, but also Norway, Iceland and Liechtenstein) we ensure that all data is treated with the same security measures regardless of the destination, and in accordance with our standards, policies and regulatory and legal obligations..

As part of the provision of our Services - fulfilling your payments - we may transfer the data we collect from and about you to destinations outside the European Economic Area ("EEA"), within the group to which Treezor belongs, to third party processors, or to our partners. This is justified by the fact that the data is also processed at these different locations. However, we ensure that security measures and safeguards are in place to protect your information and to ensure that all transfers of your personal data benefit from an adequate level of protection. We also ensure that processing by our subcontractors and partners is carried out only in accordance with our written instructions and for the purposes described above.

In all cases where we transfer information across borders, we rely on acceptable and defined legal mechanisms to ensure that we protect the data at all times. We may use standard contractual clauses that have been provided by the European Commission, other agreements and "relevant" protections that have been defined and approved by the European Commission or the relevant supervisory authority. For transfers between group companies to which Treezor belongs, we have an intra-group transfer agreement in place that incorporates the standard contractual clauses. We may also use new standards if they are developed by the relevant regulatory authorities.

#### **3.2 Access and processing of your personal data by RISE**

In relation to the creation of the account and the execution of the agent agreement for which RISE acts as Treezor's Subcontractor; RISE communicates to Treezor the following personal data: your Account ID, your name and surname (in the context of the execution of a transfer of funds between two holders), your US citizenship or not.

This Privacy Policy does not apply to the processing carried out by RISE acting as a data controller in relation to (i) the subscription to the RISE account and (ii) the management of the RISE application and (iii) the management of RISE customer personal information. For these purposes, we recommend that you read the RISE privacy policy.

### **4. YOUR RIGHTS**

#### **4.1 Your data protection rights**

- **Your access right** : you have the right to request whether or not Treezor uses or stores your personal data. You can also ask us for a copy of your personal data.
- **Your right of rectification** : you have the right to ask us to rectify information that you consider to be inaccurate. You have the right to complete information that you consider to be incomplete.
- **You right to erasure**: You have the right to ask us to delete your personal data in the following cases: (i) we no longer need your personal data, (ii) you initially consented to the use of your personal data, but have withdrawn your consent; (iii) you objected to the use of your personal data and your interests outweigh those of Treezor, (iv) we have collected or used your personal



data in an unlawful manner; and/or (v) we are under a legal obligation to delete your personal data.

However, you will not be able to request the deletion of your personal data if its processing is required by a legal obligation, in particular in relation to the obligation to combat money laundering and terrorist financing.

- **Your right to restriction of processing** : you have the right to ask us to restrict the processing of your personal data in the following cases: to temporarily restrict processing where (i) you have challenged the accuracy of your personal data; (ii) we have processed your personal data unlawfully but you do not want us to delete it; and (iii) we no longer need your personal data, but you wish to retain it in order to exercise or defend legal claims.
- **Your right to object the processing** : you have the right to object to the processing of your personal data if we use your personal data (i) for a public interest purpose, (ii) for our legitimate interests, (iii) for scientific or historical research or statistical purposes; or (iv) for marketing purposes.

However, you may not exercise your right in respect of processing for which the legal basis is a legal obligation, in particular with regard to the obligation to combat money laundering and terrorist financing.

- **Your right to data portability** : this right applies to personal data that you have provided to us, where the processing is automated and based on your consent or carried out on the basis of a contract. You have the right to ask us, if technically feasible, to transfer your personal data to a third party or to provide it directly to you in an accessible and machine-readable form.
- You also have the **right to withdraw your consent** at any time where the processing is based on your consent without affecting the lawfulness of the processing based on consent prior to withdrawal.
- You have **the right to lodge a complaint** with a supervisory authority - in France, the Commission nationale de l'informatique et des libertés (CNIL).

Where French data protection law is applicable, you also have **the right to give instructions regarding the retention and disclosure of your personal data after your death**.

#### 4.2 **How to exercise your rights?**

Holders may exercise their rights by sending an email to [dpo@treezor.com](mailto:dpo@treezor.com)

### 5. **HOW DO WE PROTECT YOUR PERSONAL DATA ?**

Treezor takes all reasonable steps to ensure that all information collected on its sites is treated securely and in accordance with this Privacy Policy. To this end, Treezor applies appropriate technical and organisational measures that meet all the standards of our regulatory obligations, including regular assessment measures.



**6. PROTECTION OF CHILDREN'S DATA**

We provide our Services directly or proactively to children under the age of 16 and collect their personal data where they have consented.

**7. HOW TO CONTACT US ?**

You can contact us by sending an email to the following address: [dpo@treezor.com](mailto:dpo@treezor.com).

In all cases, you can contact us in writing at the following address: 33 avenue de Wagram, 75017 Paris

**8. UPDATES AND CHANGES TO THIS PRIVACY POLICY**

Treezor regularly reviews this Privacy Policy to ensure that it is up-to-date and complies with applicable data protection regulations.

In case of significant changes, Treezor will inform and transmit a hyperlink to the updated privacy policy with thirty (30) calendar days' notice. This information will be sent to the Registrants by email and will also be available on the RISE platform.



## **ADDENDUM B - PERSONAL DATA PROTECTION - CHILDREN/MINORS**

It is sometimes difficult for a minor to understand a privacy and data protection policy. That is why we have made an effort to explain to you in simple language what we do with your personal data.

However, this document does not replace our [Privacy Policy](#), it is just intended to facilitate your understanding.

We advise you to take a look at the site [La nouvelle loi vie privée de A à Z | Je Decide](#), which was created for young people who want to know more about the protection of their privacy. In order to get a quick overview of what the protection of your personal data is, we recommend you to watch the following video:

[La nouvelle loi vie privée de A à Z](#)

### **1) WHO ARE WE ?**

We are Rise Financials SRL (0471.614.389) and our address is Avenue du Roi 107, 1190 Brussels (Belgium). We are responsible for processing your data.

### **2) WHAT ARE YOUR PERSONAL DATA ?**

It is everything that defines you and constitutes your identity. That is, what you are, what you do, what you like.

As part of our services, we process some of your personal data, namely:

- Your identification data: last name, first name, gender, nationality, date and place of birth, face/print ID, mobile phone number, e-mail address, name of your parent and (if applicable) name of your brother/sister, your 'avatar' (profile picture) and user name of your choice, password/PIN code;
- Your socio-demographic data and information about your interests;
- Your data relating to transactions made with the RISE application or card;
- The data/information you provide us by communicating with us, filling in the contact form, calling us, participating in surveys/contests *etc.*;
- Your data about your online/application behaviour and preferences as well as information about your use of our application; and
- Your navigation and geolocation data.



We may ask your parent (or other legal representative) to provide us with documents to verify your identity such as an identity card or birth certificate.

### **3) WHY DO WE NEED YOUR PERSONAL DATA ?**

Basically, we process your personal data to enable you to use the RISE application, to provide you with the best possible service and to communicate with you. It may also be used to improve our services and products, for example to enable you to take advantage of cool new features.

On a more technical level, your personal data also helps us to detect/avoid fraud and comply with our legal and regulatory obligations (e.g. to prevent our application being used to commit illegal practices).

We also use your data to understand how people use RISE by adding your data to those of other users. When we do this, we are not able to identify you because your data has been mixed with that of many other people.

### **4) ARE WE ALLOWED TO USE YOUR PERSONAL DATA ?**

1. Yes, your mother/father (or other legal representative) has entered into a contract with us and has therefore given us permission to process your data so that you can use our RISE application, we can provide you with our services and we can communicate with you.

However, if you are over THIRTEEN YEARS OLD, the law considers you to be "old and wise enough" to make certain decisions about the processing of your personal data yourself. This allows you, for example, to ask us to keep you informed about our services (if you are not yet a user of our RISE application). You can always change your mind and withdraw your consent.

However, at RISE we have chosen to ask for your approval as well. A dialogue with your parents about what happens to your personal data is important to us.

2. Please note that in addition to consent, we also rely on other grounds for processing your data, namely our legal and regulatory obligations, the fulfilment of our contractual obligations, and in some cases our legitimate interests (e.g. to maintain our application and services).

### **5) DO WE KEEP YOUR PERSONAL DATA FOREVER ?**

No, we only keep your personal data for as long as is necessary for the purposes for which we process it.



We would particularly like to draw your attention to the fact that, as we are dealing with financial services, we keep some of your data for a period of 10 years after the end of the provision of our services. This includes your identification data, transaction data and our communications with you.

## 6) WHO DO WE SHARE YOUR DATA WITH ?

Rest assured, we do not sell your personal data to third parties.

1. At **RISE**, only staff who need access to your data have access.
2. To provide you with our services, we work with **partners (subcontractors)** who may have access to your data. This includes, for example, technical service providers such as hosting or maintenance.
3. As part of our services, the payment services (your accounts, credit card, transactions etc.) are provided by the company **TREEZOR**, for whom we act as an agent (which means that for the payment services, we act in the name and on behalf of Treezor). We therefore transfer some of your personal data to Treezor in order to provide you with the payment services. For more information, you can read their [Privacy policy](#) or contact them with any questions you may have: [dpo@treezor.com](mailto:dpo@treezor.com).
4. We may be obliged by law or by a judge to transfer your personal data to a **public authority** or a **judge**. If this is the case, we will inform you as soon as possible.
5. Please note that because your parent (or other legal representative) has given you access to RISE services, he/she has access to your data. He/she can check how you use the services, what you buy and how much is in your account.

## 7) WHAT ARE COOKIES ?

Cookies are small text files that are stored on your computer each time you visit our website or use our application. For example, we can "remember" that your language preference is French.

You can choose which cookies you accept in the cookie settings tool. For more information, you can read our [Cookie Policy](#).

## 8) WHAT RIGHTS DO YOU HAVE ?

When your personal data is processed you also have rights. Here is an overview:

- **Right of access:** Do you want to know what we keep about you? You can simply ask us.
- **Right to rectify incorrect information:** You can ask us to correct or even delete your data if it is incorrect.



- **Right to be forgotten:** You may not have been aware of all the risks when you were young... so you can ask us to delete inaccurate or old data. However, we are obliged to keep certain data in order to meet our legal and regulatory obligations.
- **Right to data transfer:** you grow up, your preferences change and the applications you use change too. But you don't like the delete key. You can ask us to take your data with you.
- **The right to restrict processing or to object** in specific cases.
- **Right not to be subject to automated decisions:** you can ask us to ensure that a human is responsible for making important decisions about you.
- **Data protection:** we rigorously protect your data so that it is well protected and remains so!
- **The right to complain:** Finally, you have the right to complain to the [Data Protection Authority](#).

Please be aware that if you ask us to do anything that would prevent you from using your account/application, we will inform your parent (or other legal representative).

## 9) **HOW TO EXERCISE YOUR RIGHTS ?**

Do you want to exercise your rights? Or do you have any questions? Nothing could be easier: you can contact us at [dpo@risecard.eu](mailto:dpo@risecard.eu) or at our general support e-mail address [support@risecard.eu](mailto:support@risecard.eu). We are happy to help you :-)