

PRIVACY POLICY

My Sis ID

Table of contents

1. Preamble	3
2. Guiding Principles: SIS as Data Processor	3
3. Guiding Principles: SIS as Data Controller	3
4. Data collected when using our services	4
5. From whom SIS collects Personal Data	4
6. Reasons for collection of Personal Data	4
7. With whom this data is shared	5
8. Personal Data transfers	5
9. Contact & exercise of rights	5
10. Data retention	5

1. Preamble

SIS has adopted this Privacy Policy to provide details on the processing of Personal Data carried out when using our solutions.

Capitalised terms have the meaning attributed to them in our Terms and Conditions of Use and Sale ("T&C") or by the Personal Data Protection Laws (Refers to the Regulation (EU) 2016/679 called "General Data Protection Regulation" or GDPR and any other provision of the European Union law or of the law of the Member States relating to the protection of Personal Data).

2. Guiding Principles: SIS as Data Processor

SIS acts as Data Processor when it processes Personal Data on behalf of the Data Controller who has given instructions regarding the Personal Data sent to SIS. When SIS acts as Data Processor on behalf of the Client, SIS does so in accordance with the Client's instructions.

SIS may act as Data Processor in accordance with the commitments made to the Client, where the Client provides specific instructions concerning (i) the type of Personal Data provided to SIS in the context of the services, (ii) the operations or set of operations to be carried out by SIS on the Personal Data, (iii) the period of time for which the Personal Data is to be processed by SIS, (iv) the technical means employed by SIS to process the Personal Data, (v) the additional security measures to be taken by SIS.

When SIS ceases to act on behalf of a Client, it shall (at the request of the Client) return, destroy or continue to appropriately protect all Personal Data received from the Client, unless provided otherwise.

Unless otherwise provided, SIS is authorised to (i) employ any technical means it deems appropriate to provide the Services and process the Personal Data, (ii) engage subsequent subcontractors to carry out parts of the Services.

SIS is also obliged to assist the Client in complying with the law (provided that the Client covers SIS's costs of doing so), for example by (i) informing the Client of the processing activities carried out by SIS so that the Client can inform the Data Subjects; (ii) providing, at the Client's request, reasonable arrangements for such Personal Data to be updated, corrected, anonymised or erased; and (iii) providing the Client with any requests from Data Subjects for access to their Personal Data held by SIS, so that the Client can respond.

As Data Processor, SIS shall in all cases treat such Data in accordance with the above paragraphs and in accordance with its Data Protection Policy.

3. Guiding Principles: SIS as Data Controller

SIS acts as Data Controller when determining the purposes and means of processing Personal Data. Thus, SIS acts as a Data Controller with regard to (i) the data of payment beneficiaries invited by our Clients; and (ii) the information shown on the platform during a check of bank information relating to natural persons (EURL, liberal profession, etc.).

In the context of the execution of the Services, SIS may have access to Client documents that may contain Personal Data and/or process Personal Data that have been previously collected by the Client, directly or indirectly, from the Data Subjects (such as the Client's employees, clients and suppliers).

In general, SIS acts as a Data Controller in the context of its commitments to Clients when its Services are provided in an independent manner.

4. Data collected when using our services

The following information is required when creating an account:

- e-mail address
- last name
- first name
- job title
- postal address
- telephone / mobile
- typing dynamics
- Preferred language
- Date of account creation
- Date of last use of account
- User Agent:
 - o web browser
 - o web browser version
 - o operating system
 - o operating system version
- IP address
- Country and city (depending on the IP address)

The following information is processed when using the Services:

- Traces of user actions (invitations, IBAN changes, checks, login attempts, etc.)

Cookies:

For the sake of the services, some cookies are set and used. These are:

Name: Accept Cookie

Purpose: Stores consent of the cookie policy

Retention period: 1 year

Name: Access Token

Purpose: Authentication on the platform

Retention period: Session duration

Stored data: User log in, profile completeness, user role, public IP address, token expiration date

Name: XSRF-TOKEN

Purpose: Secures the platform using the CSRF (anti-cross site request forgery) token

Retention period: Session duration

Stored data: UID

5. From whom SIS collects Personal Data

The data processed is directly collected from you, as a customer and user of our products and services, but also indirectly from the people you may invite to the platform. For example, we collect information about people who have no direct connection with us but who have a connection with you.

6. Reasons for collection of Personal Data

We use the data we collect from our Clients, Partners and invitees on the Platform to manage the contracts and services we have entered into and to fulfil our contractual obligations to our Clients and Partners. The Personal Data collected is therefore used to:

- Carry out pre-contractual measures
- Fulfil any contract to which you are a party
- Manage the subscription of the Services

- Ensure the security of our services and information system
- Improve the quality of our products and Services
- Infer your preferences and needs in order to provide you with a personalised commercial offer
- Provide any other current or future service related to the Services and included in the T&C.

7. With whom this data is shared

We only share the Personal Data we collect with staff and departments that have a right to know. This information is confidential and is not shared with irrelevant third parties.

8. Personal Data transfers

The data is stored on IBM CLOUD in data centers located in Paris - France, and Frankfurt - Germany.

In the case of international transfers from the European Economic Area (EEA) to a non-EEA country, the transfer of personal data will take place based on the Processing Agreement signed with the Client.

In all cases, any international transfer of data will be made based on a decision by the European Commission, where the Commission has recognised that the country to which your data will be transferred provides an adequate level of protection. If we ever transfer your data to a country where the level of protection of your data has not been recognised as adequate by the European Commission, SIS will base this transfer on an appropriate safeguard.

9. Contact & exercise of rights

In accordance with the legislation applicable to the Client's situation, the Client's Users may exercise, where applicable, the following rights: access, rectification, deletion, limitation of processing, opposition, withdrawal of consent, portability of data and define directives relating to the retention, deletion or communication of Personal Data, after death.

In accordance with the applicable legislation, in addition to the rights mentioned above, Client's Users may file a complaint with a competent supervisory authority such as the CNIL (Commission Nationale de l'Informatique et de Libertés) in France.

If Client's Users wish to exercise the rights listed above or have any questions regarding this Privacy Policy, Client's Users can contact SIS online by sending an e-mail to the following address: dpo@sis-id.com

10. Data retention

Unless otherwise specified, SIS will retain Personal Data for the duration of the contractual relationship (exception made for bank information related to natural persons). The deletion of data is effective immediately upon termination of the contract. At the request of the Client or a Payment Beneficiary, SIS will carry out any deletion of personal data.

Certain data may also be retained in accordance with legal statutes or in the event of ongoing litigation.

In the event of subscription to the " My Sis ID " pecuniary loss guarantee contract of the insurer CMA Assurances, the data must be kept for an additional six (6) months on the Platform in order to meet the control obligations described in the insurance contract.