



INFORMATION NOTICE REGARDING THE PROCESSING CARRIED OUT BY PERSPECTEEV

Update: october, 4th of 2023

This Information Notice informs you about the processing of Personal Data carried out by Perspecteev (Perspecteev or the Establishment). The latter places the utmost importance on respecting the user's privacy and the current provisions, among others, the French Data Protection Act No. 78-17 of January 6, 1978, as amended, and the General Data Protection Regulation (hereinafter "GDPR") applicable in France since May 25, 2018.

For any questions concerning your Personal Data, you can contact the Establishment or the Data Protection Officer at the following contact details: dpo@bridgeapi.io

Perspecteev acts as the data controller for the processing of your personal data for the purpose of providing payment initiation and account information services.

The details related to the processing are outlined below.

For account payment management services, Perspecteev acts as a processor on behalf of XPOLLENS, an electronic money institution, which is responsible for the processing of your data in this context. The privacy policy of XPOLLENS can be consulted at the following link: <https://www.xpollens.com/protection-donnees/>

PURPOSES, LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA, AND PROCESSED DATA

The Personal Data collected and processed are done so according to the current legal bases:

- the execution of the contract subscribed at the request of the client;
- the legitimate interest of Perspecteev;
- compliance with legal and regulatory obligations;
- the consent of the individual.

1. Implementation of the Establishment's Services

Purpose of processing	Legal basis for processing	Status of individual	Personal data processed
Ensure the follow-up of the contractual relationship	Necessary for the execution of a contract to which the client is a party, or for the	Client and prospect (third-party user)	Name, first name, business name, contact details

	implementation of pre-contractual measures		
Access, aggregate, and transfer banking information	Necessary for the execution of a contract to which the client is a party, or for the implementation of pre-contractual measures	Client (user of the solution)	Name, first name, date of birth, contact details, access information to accounts, financial information from banking spaces
Carry out the payment initiation request	Necessary for the execution of a contract to which the client is a party, or for the implementation of pre-contractual measures	Client (user of the solution)	Name, first name, IP address, amount and description of the transaction, IBAN, transfer status
Ensure the service functions	Legitimate interest of the data controller	Client and prospect (third-party user and user of the solution)	Name, first name, IP address, usage data, cookies

2. Management of litigation and evidence

Purpose of processing	Legal basis for processing	Status of individual	Personal data processed
Handle complaints	Necessary for the execution of a contract to which the client is a party, or for the implementation of pre-contractual measures	Client and prospect (third-party user and user of the solution)	Name, first name, contact details, additional information
Manage litigation	Necessary for the execution of a contract to which the client is a party, or for the implementation of pre-contractual measures	Client and prospect (third-party user and user of the solution)	Name, first name, contact details, additional information

3. Development and evolution of the Establishment

Purpose of processing	Legal basis for processing	Status of individual	Personal data processed
Establish commercial statistics or statistics on the use of services	Legitimate interest of the data controller	Client and prospect (third-party user and user of the solution)	Usage data
Analyze the use of the website	Legitimate interest of the data controller	Website visitors	IP address, cookies
Respond to information requests about the services	Consent of the client or prospect	Client and prospect (third-party user and user of the solution)	Name, first name, contact details

Conduct recruitments and process job applications	Legitimate interest of the data controller	Applicant	Name, first name, contact details, information from the C.V.
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4. Respect des obligations légales et réglementaires

Purpose of processing	Legal basis for processing	Status of individual	Personal data processed
Comply with legal and regulatory obligations in the fight against money laundering	Compliance with one or more legal or regulatory obligations to which the data controller is subject	Client and prospect (third-party user and user of the solution)	Name, first name, company name, national identity card, transaction information
Comply with the security obligations of the account information access and aggregation processes	Compliance with one or more legal or regulatory obligations to which the data controller is subject	Client (third-party user and user of the solution)	Usage data

The Personal Data processed by Perspecteev are either provided directly by the individual, derived, meaning resulting from data processing, or provided indirectly by a Partner, of whom the individual is a client, in order to fulfill its contractual and legal obligations.

RECIPIENTS OF YOUR PERSONAL DATA

Your Personal Data are transmitted only to individuals or legal entities who have a legitimate purpose to process them, namely:

- Authorized employees within the scope of their roles and duties;
- Perspecteev's subcontractors within the scope of their roles and duties;
- Financial institutions expressly designated by you during your payment requests and only on the data necessary for the proper execution of the payment in accordance with current regulations.
- All entities and individuals designated by regulations as well as any individuals to whom you expressly authorize disclosure.

TRANSFER OF PERSONAL DATA

Your Personal Data are stored within the European Economic Area (hereinafter "EEA") for the purposes envisaged.

You will be informed of a transfer of your Personal Data to a recipient located in a country outside of the EEA in the absence of appropriate protective measures.

DURATION OF RETENTION OF YOUR PERSONAL DATA

Your Personal Data may be retained for up to five (5) years after the end of the contractual relationship, in compliance with the legal requirements incumbent upon us.

Once the retention period has elapsed, Perspecteev will destroy your personal data.

YOUR RIGHTS REGARDING YOUR PERSONAL DATA

We implement the necessary means to allow you to exercise your rights, in particular:

- The right to be informed, namely the right to receive details on the processing activities carried out by Perspecteev, as described here;
- The right of access to your Personal Data, namely the right to obtain information collected and how it has been processed;
- The right to rectification, namely the right to have Perspecteev correct inaccurate data and complete incomplete data within the limits of Perspecteev's regulatory obligations;
- The right to erasure of your data, to the extent that the legal conditions are met - however, following the request for data erasure, Perspecteev reserves the right to anonymize these data (by depriving them of their personal nature);
- The right to restrict processing to the extent that the legal conditions are met;
- The right to data portability;
- The right to object, for legitimate reasons and under the conditions provided by law, to the future processing of data. However, Perspecteev may have to terminate the Service provided (in the case where the establishment cannot provide the concerned Service without the processing in question);
- The right to determine the fate of your data after your death;
- The right not to be subject to a decision based solely on automated processing, including profiling, which has legal effects concerning the individual or similarly significantly affects them;
- The right to withdraw your consent at any time for processing activities carried out by Perspecteev that require consent. In this case, the processing activity will only be affected for the future;
- The right to lodge a complaint with the CNIL; National Commission on Informatics and Liberty, (more information at www.cnil.fr) or the competent courts, to the extent that you deem it necessary.

To exercise your rights, please contact customer service at the following address: support@bridgeapi.io, indicating the email address you provided when subscribing to the Service.

For security reasons, the Establishment reserves the right to request any additional verification information, including a piece of identification.

The Establishment periodically updates this information notice.