

## INFORMATION STATEMENT RELATING TO THE PROCESSING CARRIED OUT UNDER THE BRIDGE SERVICE

Transparency is a core value for Perspecteev (**Perspecteev** or the **Company**), and it is committed to respecting the privacy of users. In this respect, it complies with the provisions of the French Data Protection Act (loi informatique et liberté) No. 78-17, as amended, and the General Data Protection Regulation (hereinafter the **GDPR**) applicable in France since May 25, 2018.

### 1. DEFINITIONS

**Other Institution** means any company other than an Account Servicing Payment Service Provider which issues Authentication Data that can be used exclusively to access Other Assets online.

**Authentication Data** means an identifier and a password – potentially associated with a strong authentication protocol – issued by a Service Provider and enabling the access to information relating to an Online Banking Space.

**Personal Data** means all personal information concerning an individual User whose identity is or can be established, directly or indirectly, with reference to an identification number or to one or more details specific to that person.

**Online Banking Space** means the entire interface maintained by an Account Servicing Payment Service Provider that You can access online using Authentication Data issued by the concerned service provider.

**“Bridge API” or “Interface”** means the interface hosted by the Company, which You can access in order to sign up for the Service and enter Authentication Data.

**Services** means the aggregation and information services on Payment Accounts and Other Assets and payment initiation service provided by the Company.

**Partner** means the role of user of the Service expressly allocated to one or more Third-party Users by a customer who signs up for the Service (and who therefore becomes a User).

**Mandate** means the agreement given to the Company to carried out the right to data portability on behalf of the user

**Right to data portability** means the right arising from Article 20 of the GDPR by which an individual can obtain their personal data and reuse them for other services.

For more information on the vocabulary used, You can refer directly to the General Contract Terms and Conditions ("GCTC") [here](#).

### 2. GENERAL INFORMATION

Perspecteev, a French société par actions simplifiée (limited liability company) whose legal notice is available [here](#), makes Bridge API available to its Partners enabling them to offer the Bridge service to

their customers. The Bridge service is an online device that can be used to manage bank accounts, budget and assets as well as for payment initiation.

Perspecteev, in its capacity as controller, collects and processes your Personal Data for the purpose of accessing, aggregating and transferring the information available on your Online Banking Area to a Partner of which you are a customer, as well as payment initiation.

### **3. PURPOSES AND BASIS FOR THE PROCESSING OF PERSONAL DATA**

Your Personal Data is collected and processed in an adequate, relevant and limited manner to what is necessary in relation to the main purposes based on the following legal grounds:

- Allow the performance of the contract entered into at your request:
  - access, aggregation and transfer of information from your Online Banking Areas to the Partner;
  - payment initiation;
  - complaints management;
  - litigation management;
- In the context of the achievement of Perspecteev's legitimate interests, for the purposes of:
  - comply with internal rules and policies;
  - ensure the proper functioning of the service;
  - produce trade statistics or statistics on the use of our service;
- Your consent will be requested when it is necessary for the processing of your data;
- Comply with our legal and regulatory obligations, in particular with regard to the fight against money laundering and terrorist financing, fight against fraud, protection of your Personal Data and security of processes for accessing and aggregating information from your Payment Accounts or Other Assets as well as payment initiation

### **4. CATEGORIES OF PERSONAL DATA PROCESSED**

Perspecteev collects and processes the following personal data only when strictly necessary for the purposes described above:

- data relating to your identification, including your surname, first name, date of birth and contact details;
- your Authentication Data relating to access to your payment accounts or other assets;
- your information retrieved from the Online Banking Area and Other Institution strictly necessary for the provision of the Bridge service;
- your payment data allowing the performance of said payment in accordance with our legal obligations.

The data processed by Perspecteev will only be used for the provision of the Bridge service, namely: access, aggregation and transfer of the information available on your Banking Areas to the Partner as well as payment initiation as provided for in the contract concluded between you and Perspecteev (see the General Terms and Conditions [here](#)).

The Personal Data processed by Perspecteev are either provided directly by you, or derived, i.e. coming from the processing of the data, or provided indirectly by our Partner of which you are a customer, in order to comply with its contractual and legal obligations.

## 5. RECIPIENTS OF YOUR PERSONAL DATA

Your Personal Data is only transmitted to natural or legal persons who have a legitimate right to process it, namely:

- authorised employees within the limits of their functions and missions;
- subcontractors of Perspecteev within the limits of their functions and missions;
- the financial institutions expressly designated by you at the time of your requests for payment and limited to the data necessary for the effective performance of the payment in accordance with the regulations in force;
- any entities and persons designated by the regulation as well as any person to whom you expressly authorise disclosure.

## 6. TRANSFER OF PERSONAL DATA

Your Personal Data will be stored within the European Economic Area (hereinafter "**EEA**") for the purposes intended.

If need be, you will be informed of a transfer of your Personal Data to a recipient located in a country outside the EEA and of the transfer modalities in the absence of appropriate protection measures.

## 7. THE MANDATE UNDER THE RIGHT TO DATA PORTABILITY

### a. The subject of the mandate

As part of subscribing to the Bridge service, you authorize the Company (the Agent) so that it can exercise on your behalf your right to data portability with the Financial Establishments that you have designated.

The personal data subject to this mandate are the information contained in your Online Banking Area. They are transmitted to the Partners that you have previously identified.

### b. Request for automated exercise of rights and renewal of mandate by default

Your information is updated automatically through our interface, in order to allow the Agent to regularly detect and extract data concerning you from Financial Establishments.

Exceptionally, and if the Financial Institutions do not respond to successive requests sent on your behalf, the Agent may use web scraping, and to do this will have to connect to your user account in order to have access to the data concerning you.

### c. Duration of this mandate

The mandate will expire simultaneously to the [CGS](#) to which it is attached.

## 8. PERIOD FOR WHICH YOUR PERSONAL DATA ARE STORED

Your Personal Data will be kept throughout the contractual relationship, as required by Perspecteev's internal policies and in compliance with our legal requirements. According to fraud, anti-money laundering and terrorism financing obligations, it may be retained for up to 5 years upon termination of the contractual. Once the retention period elapses, Perspecteev destroys your personal data.

## 9. YOURS RIGHTS

We implement the necessary means to enable 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 the information collected and the way it has been processed;
- The right of rectification, namely the right to obtain rectification by Perspecteev of inaccurate data and to complete incomplete data within the limits of Perspecteev's regulatory obligations;
- The right to erase your data, as long as the legal conditions are met - however, following the data erasure request, Perspecteev reserves the right to make this data anonymous (by depriving them of their personal nature);
- The right to restrict the processing as long as the legal conditions are met;
- The right to data portability, namely (i) the right to receive personal data in a structured, commonly used and machine-readable format, and (ii) the right to request that the data be sent by Perspecteev to another controller, provided that the legal conditions are duly met;
- The right to object, for good reasons and under the conditions provided for by law, to the future processing of data. However, Perspecteev may have to terminate the provision of the Bridge Service (in the event that the Company is unable to provide the Service concerned without the processing in question);
- The right to specify the fate of your data after your death;
- The right not to be subject to an automated individual decision, including profiling, which produces legal effects concerning the data subject or significantly affects him or her, solely on the basis of automated processing activities;
- The right to withdraw your consent at any time for processing activities performed by Perspecteev that require consent. In this case, the processing activity will only be affected for the future; and
- The right to turn to the National Supervisory Authority for the Processing of Personal Data or the competent courts, to the extent that you consider it necessary.

For any question relating to the processing of your Personal Data (including how you can exercise the above rights), please contact customer service at [support@bridgeapi.io](mailto:support@bridgeapi.io), attaching a copy of your valid identity document and indicating your e-mail address provided when you subscribe to the Service.

For security reasons, Perspecteev reserves the right to request other supporting documents in case of doubts on the value and authenticity of the proof you provide.

This information statement may periodically be updated.

Effective 11th of December, 2023