#### SWIKLY DATA PROTECTION POLICY

This Privacy Policy aims to define the principles and guidelines implemented by the company SWIKLY, which has the status of controller, in the processing of personal data of its website's users www.swikly.com. The concept of "personal data" corresponds to the definition given in Article 4 of the General Data Protection Regulation (GDPR 2016/679), that is to say any information that may allow the identification of a natural person directly or indirectly: last name, first name, IP address, email address, etc. SWIKLY affirms its commitment to compliance with applicable data protection laws and regulations, and is committed to maintaining their security, confidentiality and integrity. SWIKLY formally agrees not to sell, rent, exchange or give away any personal data free of charge.

### 1. SCOPE AND EXCLUSION

This Policy applies to all processing of personal data made by SWIKLY from its website www.swikly.com. This policy does not apply to treatments performed on sites or applications of third parties for which SWIKLY is not responsible for treatment.

#### 2. DATA COLLECTED

The data collected differs according to the purpose of the associated treatments.

- Provision of services: We collect your civil status information, postal coordinates, telephone and electronic, bank details.
- Chat: We collect your contact details. The connection data (IP address, location from the IP address are collected indirectly.

### 3. USE OF DATA COLLECTED

The collected data are used for different purposes:

- Registration for Swikly services: the data collected is used to provide the services available on the SWIKLY website.
- Use of the Chat: the collected data are used for the treatment of your request and to make prospection.
- Login Data: Login data is not used or retained.

#### 4. RECIPIENTS OF PERSONAL DATA

Access to personal data is limited to the services of SWIKLY and its subcontractors with which SWIKLY is contractually bound in order to carry out the treatment objective. SWIKLY's subcontractors guarantee a sufficient level of protection of your data. Some of your data is transferred outside the European Union, in the United States in particular. Subcontractors in the United States are all Privacy Shields certified, which means that they provide adequate and sufficient safeguards for the security and privacy of your data.

#### 5. DURATION OF CONSERVATION OF YOUR DATA

The retention period of personal data differs depending on the purpose of processing:

- Swikly services: your personal data are kept for 3 years after the end of our contract.
- Chat and marketing: your personal data are kept for 3 years after the last contact we had with you.
- Login data: personal data related to connections are not retained.

# 6. SECURITY OF YOUR DATA

SWIKLY is particularly attached to the personal data it collects and processes. These operations are carried out in a secure manner. We implement the technical, physical and organizational measures necessary to prevent, as far as possible, any alteration, loss or unauthorized access to your personal data.

### 7. STORAGE OF DATA

Personal data are stored outside the European Union in the databases of service providers with whom SWIKLY has a dedicated contractual relationship and which are certified by Privacy Shields and therefore comply with the requirements of the applicable French regulations.

### 8. RIGHTS RELATING TO PERSONAL DATA

In accordance with the General Data Protection Regulation 2016/679, you have the right to access, rectify, delete or port any data concerning you. You also have a right of limitation and opposition to data processing concerning you. Either from your secure area (users of the Swikly service) or by making a request by mail to the person responsible for processing: Swikly Service personal data 12 rue de la Barre 69002 Lyon

## 9. CLAIMS

We inform you, in accordance with the European Regulation that you have the right to induce a complaint to the National Commission of Information Technology and Freedoms.