

Open Banking Exchange

Privacy Policy

Introduction

Welcome to Open Banking Exchange's privacy policy.

Open Banking Exchange respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website or use our products and services (regardless of where you visit our platforms from) or communicate with us in other ways, and tell you about your privacy rights and how the law protects you.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how Open Banking Exchange collects and processes your personal data through your use of this website or any Open Banking Exchange products and services and otherwise through your other interactions with us, including any data you may provide through this website when you register an account, fill out a contact form or download content, such as features, white papers, blogs and webinars.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

OBE S.A.S. is the controller and responsible for your personal data (referred to as "**Open Banking Exchange**", "we", "us" or "our" in this privacy policy). OBE S.A.S. is part of the Konsentus group and a wholly owned subsidiary of Konsentus Limited.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact us in the following ways:

Full name of legal entity: OBE S.A.S. (RCS Paris under No. 880 143 896, share capital of € 1,605,000.00)

Email address: info@openbanking.exchange

Registered office: 14 Rue de Dunkerque 75010 Paris

You have the right to make a complaint at any time to:

- the Commission Nationale de l'Informatique et des Libertés (CNIL), the French supervisory authority for data protection issues (www.cnil.fr) or
- the data protection authority in your jurisdiction (you can find this information at <https://www.cnil.fr/en/data-protection-around-the-world>).

We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on July 16th, 2021. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our website and its products and services platforms may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name and last name, email address (where used as an identifier), and geographical location.
- Contact Data includes your business email address and business telephone numbers.
- Transaction Data includes details about payments to and from you on behalf of your business and other details of products and services you or your business have purchased from us, including the price paid.
- Technical Data includes internet protocol (IP) address, your authentication details (i.e. login data), administration page preferences, and other technology on the devices you use to access this website.

- Profile Data includes your email address and password, purchases or orders made by you on behalf of your business, records of your communications with us, feedback and survey responses (where applicable).
- Usage Data includes information about how you use our website, and how you use our products and services as a business.

Marketing and Communications Data includes our records of marketing and other communications we have shared with you, and your preferences where you have informed us that you do not want to receive marketing data from us.

If you fail to provide personal data

We may be required by law, or for the purposes of entering into or servicing a contractual relationship, to collect and process certain personal information. Failure to provide this information may prevent or delay us fulfilling these obligations or performing services.

How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Profile and Financial Data by filling in forms or by corresponding with us by post, phone, email, in person at events, or otherwise. This includes personal data you provide when you:
 - attend an event or webinar that we attend, host or sponsor,
 - make an enquiry in relation to our products or services;
 - create an account on our website or on our products and services platforms;
 - subscribe to or download our marketing materials and publications;
 - request marketing to be sent to you;
 - enter a survey; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies, for example if we release advertising campaigns on other platforms such as LinkedIn. Please see our Cookie Policy for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:
 - analytics providers such as Google;
 - search information providers;

- Identity and Contact Data from third party marketing partners where we have notified you of this at the point you share your information with them, such as co-hosts of our events and webinars or survey response platforms; and
- Identity and Contact Data from publicly available and subscriptions such as social media websites, including LinkedIn and Lead Forensics.
- **Intra-group transfers.** We may receive personal data about you from another company of the Konsentus group with whom you agreed to share your data.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

You may find more information about the types of lawful basis that we will rely on to process your personal data under Section 10 (Glossary) below.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new or prospective customer or interested party or business partner	(a) Identity (b) Contact	(a) Performance of a contract with you, or (where the contract is with your organisation) (b) Necessary for our legitimate interests (to

		correspond with interested parties)
To discuss your organisation’s requirements, enter into a contract between us and your organisation (which may be with you on behalf of your organisation), partner with you to provide services to customers and/or provide our products/services to you on behalf of your organisation, including managing fees and payments.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Profile (f) Usage (g) Marketing and Communications	(a) Performance of a contract with you, or (where the contract is with your organisation) (b) Necessary for our legitimate interests (to correspond with key contacts on behalf of corporate customers and recover payments due to us, or to partner with other organisations to adopt joint marketing strategies)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review, comment on our content, or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services and their views on the same)
To enable you to complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services and/or understand their views on industry and sector trends, to develop our products/services and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation)

		(b) Necessary to comply with a legal obligation
To deliver relevant website content, white papers, event invitations and other communications to you and measure or understand the effectiveness of the content we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services, content and events may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us in the course of your business and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time using the following details:

- OBE S.A.S. (RCS Paris 880 143 896);

- Email address: info@openbanking.exchange;
- Postal address: 14 Rue de Dunkerque 75010 Paris.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table “Purposes for which we will use your personal data” (under Section 4 above):

- External Third Parties as set out in the Section 10 (Glossary) below.
- Other companies of the Konsentus group as necessary for an efficient management of group activities.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

In the case of our use of third party cookie technologies such as Google Analytics and ReCaptcha verifications, these cookies will also be subject to the terms of Google’s Privacy Policy. For further information please see our Cookie Policy.

Where the glossary indicates that the relevant external third party is a joint controller, that third party’s processing of your personal data will be subject to the privacy notice issued by the external third party, or by us on their behalf, at the point of data capture.

International transfers

Whenever we transfer your personal data internationally, we ensure at least one of the following safeguards is implemented:

- We will transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission, which give personal data the same protection it has in Europe.
- Where we use providers or partner with organisations based in the US, we will only transfer your personal data if, after our assessment on the circumstances surrounding each transfer, and subject to the adoption of the specific contracts as mentioned above and any additional measures as deemed necessary, we conclude that a similar level of protection as in the Europe can be offered.

If you would like further information on the specific mechanism used by us when transferring your personal data out internationally, please contact us using the following details:

- OBE S.A.S. (RCS Paris 880 143 896);
- Email address: info@openbanking.exchange;
- Postal address: 14 Rue de Dunkerque 75010 Paris.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements. Details of retention periods for different aspects of your personal data are available by contacting us using the following details:

- OBE S.A.S. (RCS Paris 880 143 896);
- Email address: info@openbanking.exchange;
- Postal address: 14 Rue de Dunkerque 75010 Paris.

In some circumstances you can ask us to delete your data: see your legal rights in Section 10 below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please find out more about these rights in Section 10 (Glossary).

If you wish to exercise any of the rights set out above, please contact us using the following details.

- OBE S.A.S. (RCS Paris 880 143 896);
- Email address: info@openbanking.exchange;
- Postal address: 14 Rue de Dunkerque 75010 Paris.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both

positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

External Third Parties that may be based in the EEA or in another country outside the EEA. Whenever these Third Parties are based outside the EEA, section 6 of this Privacy Policy shall apply.

- Business partners acting as joint or independent controllers who provide complementary technologies to our products and services or who partner with us to undertake marketing activities;
- Service providers acting as processors who provide IT and system administration and hosting services (such as AWS), mail administration (such as MailChimp), website-related services (Google Analytics, ReCaptcha) and survey platform technology (such as MailChimp);
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Local regulators and other authorities acting as processors or joint controllers based in in France who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of

erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.