

DATA PROTECTION POLICY

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1. INTRODUCTION

1. RollingFunds (hereinafter "RollingFunds") is committed to the protection of personal data.
2. The concept of personal data is defined in Article 4 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the "General Data Protection Regulation" or "GDPR").
3. This Data Protection Policy describes RollingFunds' practices and policy regarding the collection, use and transfer of your personal data.
4. We value your trust. Therefore, we commit to respect your privacy by ensuring the protection of your personal data in accordance with data protection regulations.
5. As part of its activity, RollingFunds collects and processes your personal data.
6. Therefore, in order to encourage innovation while building a lasting relationship of trust based on mutual respect, the sharing of responsible social values and the respect for the rights and freedoms of individuals, RollingFunds is committed to the protection of personal data.
7. The main purpose of this Data Protection Policy is to provide you with information about the processing of your data in a concise, transparent, understandable and easily accessible format, so that you can understand under what conditions your data is processed by RollingFunds when you use its services and website.
8. We invite you to consult this Policy on a regular basis as it may change according to the applicable legal and regulatory context.

2. WHO ARE WE?

9. RollingFunds, whose contact details are given below, is responsible for processing personal data concerning the following persons:
 - Any person browsing one of the websites or applications published by RollingFunds;
 - Any person who has completed the contact or registration form of the website;
 - Any person concerned, directly or indirectly, by the relationship established with RollingFunds in order to benefit from its services (e.g. the legal or contractual representative of a company, an employee, a beneficial owner, an agent, etc.);
 - Any person concerned, directly or indirectly, by the processing of public data collected in open data by RollingFunds for the purpose of conducting a credit risk analysis of commercial companies established in France.

3. THE PERSONAL DATA WE PROCESS

10. RollingFunds may collect and process all or part of the following data;
 - Identification data;
 - Contact data;
 - Login data;
 - Geolocation data, if applicable;
 - Data relating to the management of the loan agreement (transaction number, etc.);

- Professional data (background of the manager, commercial activity of the company, customer appreciation of the services, etc.);
 - Data relating to the follow-up of the commercial relationship;
 - Data sourced from the SIRENE registry (legal form, date of establishment, administrative status, etc.)
 - Data obtained from Bodacc-PCL, Bodacc-A, Bodacc-B, INPI sources (judgments, capital alterations, etc.)
 - Statistical data provided by INSEE (demographics, income, etc.);
 - Data related to international sanctions and asset freezes.
11. RollingFunds does not process personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, nor does it process genetic data, biometric data for the purpose of uniquely identifying a natural person, or data concerning the sex life or sexual orientation of a natural person.
12. When data is mandatory, the collection forms will specify it. If this information is not provided, your request will not be examined, or its analysis will be delayed.

4. THE PURPOSE AND LEGAL BASIS OF THE PROCESSING OPERATIONS WE IMPLEMENT

13. When RollingFunds processes personal data, it does so for specific reasons: each data processing carried out follows a legitimate, determined, and explicit objective.

4.1. The purpose of our processing operations

14. The processing implemented by RollingFunds has the following purposes:

- People authentication

RollingFunds collects some personal data to authenticate the people concerned prior to subscribing to products and services and to determine whether they have the capacity to commit the company they represent.

- Fraud risk assessment

RollingFunds collects some personal data in order to verify its consistency, detect and prevent fraud (identity theft, etc.).

- Credit risk assessment

RollingFunds collects some personal data in order to run statistical risk models.

- Communication and notifications

RollingFunds collects some personal data such as the name, address, email and/or telephone number of the people concerned, in order to answer their questions or requests, to send them notifications related to the management of the service provided, or to provide technical or operational assistance.

- Data security

RollingFunds collects some personal data such as name, age, nationality, IP address, geolocation in order to quickly detect/prevent any attempt to hack a user account and thus protect personal data.

- Improvement of services and products

RollingFunds collects some personal data in order to be able to contact a person by e-mail or telephone, with the objective of collecting his/her opinion on the products and services offered.

- Improving the customer path

RollingFunds collects some personal data to analyse the use made of its products and services, in order to better understand the expectations of its customers. For examples, RollingFunds analyses the behaviour of people on the website to improve the user experience, studies past transaction data to anticipate future needs and analyses marketing activities results to assess their effectiveness.

- Management of subscribed services and products

RollingFunds collects some personal data to:

- Issue and sign agreements;
- Manage its clients' account and the products and services subscribed to by the latter in accordance with the contractual provisions;
- Assist its financial partners in decision-making regarding the granting of loans and other related services;
- Comply with legal and regulatory obligations (e.g. anti-money laundering legislation and other legal obligations relating to the Monetary and Financial Code, etc.) that are applicable to the company and/or its financial partners.

- Performance analysis and reporting

RollingFunds collects some personal data for the purpose of:

- Analysing and improving the performance of its credit and fraud risk assessment algorithms;
- Its market studies;
- Editing reporting;

- Management of commercial prospecting

RollingFunds collects some personal data in order to inform the people concerned about company's news, products and services provided, and about offers and advantages they could benefit from. In doing so, they may receive commercial information from RollingFunds through electronic communication (email, sms, etc.). If the people concerned no longer wish to receive commercial offers or other information from RollingFunds, they may oppose these mailings at any time by clicking on the unsubscribe link at the bottom of each electronic communication received.

- About cookies, their purpose is to allow the proper functioning of the website, to measure its audience and also to be able to personalise the user experience. For more information on the use of cookies, please refer to the [Cookie Use Policy](#).

4.2. The legal basis of our processing operations

15. We only process data if at least one of the following conditions is met:

- Your consent to the processing operations has been obtained;
- The existence of our legitimate interest, or the one of a third party, which justifies the processing of personal data;
- The performance of a contract between you and us requires that we carry out the processing of personal data;
- We are bound by legal and regulatory obligations that require the processing of personal data.

4.3. Legitimate interests pursued

16. The legitimate interests of RollingFunds that are pursued through the processing carried out consist in:

- Protecting against the risk of fraud;
- Protecting customer data;
- Analysis of economic trends in France;
- Streamlining the customer journey in the context of credit applications.

5. DATA RECIPIENTS

17. Personal data processed is intended for RollingFunds and its partners, ordering parties and subcontractors.

18. The person in charge of data processing is RollingFunds' Chief Technical Officer.

19. RollingFunds has to transmit some personal data to third parties to enable its clients to subscribe to services and products, to optimise the user experience and to manage these services and products. Third parties with whom RollingFunds may share personal data are:

- The company Universign for the signature of contracts by the user;
- The company Ariadnext for the validation of users' identity documents;
- The company Microsoft Azure Corporation, for data storage, exclusively in France (Paris and Marseille regions);
- The company DataDog, for logging server access;
- The company Mail Partner, for managing and automatically sending emails;
- The company SMS Partner, for managing and dispatching SMS messages;
- Financial partners that participate directly, indirectly or potentially to the financing of loans;
- The collection agency or agencies, or the attorneys and judicial officers appointed for the collection of unpaid debts;
- Governmental and supervisory authorities in order to comply with legal and regulatory obligations (e.g. in the context of the fight against terrorism and money laundering);

- Advisors, auditors or other service providers who are legally or contractually bound by a confidentiality agreement;
- Any other partner of RollingFunds after obtaining the prior consent of the individual.

20. When RollingFunds uses service providers, it only sends them the personal data necessary to carry out the missions entrusted.

21. In all cases, RollingFunds ensures that the recipient of the personal data is bound by a confidentiality agreement.

6. DATA FLOWS

22. RollingFunds informs you that there are no cross-border flows of your personal data outside the European Union.

7. DATA RETENTION DURATION

23. RollingFunds ensures that data is only kept in a form that allows the identification of data subjects for a period that is necessary for the purposes for which it is processed.

24. The retention periods we apply to your personal data are proportionate to the purposes for which they were collected.

25. More specially, we organise our data retention policy as follows:

Purpose	Data subjects	Duration of retention
Commercial prospecting management	Clients	3 years from the end of the business relationship
	Prospects	3 years from the collection date or the last contact from the prospect
Loan agreement management	Clients	5 years from the full repayment of the last loan
KYC and anti-money laundering	Clients and Beneficial Owners	5 years from the full repayment of the last loan
Credit Risk Analysis	Clients and Beneficial Owners	10 years from the date of removal from the SIRENE directory of the relevant legal entity

8. DATA SECURITY

26. RollingFunds attaches particular importance to the security of personal data.

27. RollingFunds has implemented useful, physical, logical, administrative, or organisational measures, commensurate with the sensitivity of the personal data, to ensure the integrity and confidentiality of the data and to protect it against malicious intrusion, loss, alteration, or disclosure to unauthorized third parties.

28. When using a service provider, RollingFunds will only disclose personal data to the service provider after requiring compliance with these security principles.
29. RollingFunds regularly audits its own services in order to verify the correct operational application of data security rules.

9. SUBCONTRACTING

30. When using a service provider, RollingFunds only discloses personal data after obtaining a commitment and guarantees from the service provider on its ability to meet RollingFunds' security and confidentiality requirements.
31. We conclude contracts with our subcontractors in compliance with our legal and regulatory obligations that precisely define the terms and conditions for the processing of personal data by the latter.

10. YOUR RIGHTS

10.1. Your right to information

32. You acknowledge that this Data Protection Policy informs you of the purposes, legal framework, interests, recipients, or categories of recipients with whom your personal data is shared, and the possibility of a data flow to a third country or an international organisation.
33. In addition to this information and in order to ensure fair and transparent processing of your data, you declare that you have received additional information concerning:
 - The retention period of your personal data;
 - The existence of the rights that are recognised to your benefit and the modalities of their exercise.
34. If we decide to process data for purposes other than those indicated, you will be provided with all information relating to these new purposes.

10.2. Your right to access and rectify your data

35. You have the right to access and rectify your personal data, which you can exercise at the following address: rgpd@rolling-funds.com.
36. In this respect, you can obtain a confirmation on whether your personal data is being processed or not and, if so, you can access your data as well as the information about:
 - The purposes of the processing;
 - The categories of personal data concerned;
 - The recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
 - Where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
 - The existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;

- The right to lodge a complaint with a supervisory authority, such as the CNIL in France, which can be addressed online;
- Where the personal data are not collected from the data subject, any available information as to their source;
- The existence of automated decision-making, including profiling, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

37. You may request that your personal data be corrected or completed if it is inaccurate, incomplete, ambiguous or out of date.

10.3. Your right to delete your data

38. You may request the deletion of your personal data where one of the following reasons applies:

- The personal data is no longer necessary for the purposes for which it was collected or processed;
- You withdraw the consent previously given;
- You object to the processing of your personal data where there are no legal grounds for such processing;
- The processing of personal data does not comply with the provisions of the applicable law and regulations applicable legislation and regulations;
- Your personal data has been collected in the context of offering information society services to children aged under the age of 16.

39. However, the exercise of this right will not be possible when the conservation of your personal data is necessary with regard to the legislation or regulations and in particular, for example, for the establishment, exercise or defence of legal rights.

10.4. Your right to limit data processing

40. You may request the restriction of the processing of your personal data in the cases provided for by law and regulation.

10.5. Your right to object data processing

41. You have the right to object the processing of your personal data if the processing is based on the legitimate interest of the controller. In relation to the data collected in open data, we also remind you that you have the right to object to their dissemination by the INPI, under the conditions provided by the French Commercial Code.

10.6. Your right to data portability

42. You have the right to the portability of your personal is:

43. The data on which this right can be exercised are:

- Only your personal data, which excludes anonymized personal data or data that does not concern you;
- The declarative personal data as well as the personal operating data mentioned above;
- Personal data that does not infringe the rights and freedoms of third parties such as those protected by business secrecy.

44. This rights is limited to processing based on consent or on a contract but also to personal data that you have personally generated.

45. That right does not include derived or inferred data.

10.7. Your right to withdraw your consent

46. Where our data processing is based on your consent, you may withdraw it at any time. We will then stop processing your personal data without affecting the previous operations to which you have consented.

10.8. Your right to appeal

47. You have the right to lodge a complaint with the CNIL on French territory without prejudice to any other administrative or judicial remedy.

10.9. Your right to set post-mortem guidelines

48. You have the possibility to define guidelines regarding the storage, deletion, and communication of your personal data after your death with a trusted third party, certified and responsible for enforcing the will of the deceased in accordance with the requirements of the applicable legal framework.

11. HOW TO EXERCISE YOUR RIGHTS

49. All the rights listed above may be exercised at the following e-mail address rgpd@rolling-funds.com or by post with a copy of an identity document by sending it to the data controller at the following address: 3 rue de l'Arrivée 75749 Paris Cedex 15.

50. However, with regard to the exercise of the right to information, we may not be obliged to act on it if:

- You already have this information;
- The storage or communication of your personal data is expressly provided for by law;
- The provision of information is not possible;
- The provision of information would require disproportionate efforts.