



DATA PROTECTION POLICY

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1. Introduction

1. RollingFunds (hereinafter "RollingFunds") is committed to a policy of protection of personal data.
2. Personal data is defined in Article 4 of Regulation (EU) 2016/679 of Parliament and of the Council of 27 April 2016 on the protection of individuals concerning 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 the practices and policy of RollingFunds regarding the collection, use and transfer of your personal data.
4. Because we value your trust, we are committed to respecting your privacy by ensuring the protection of your personal data in accordance with the data protection regulations.
5. In the course of its activities, RollingFunds may collect and process your personal data.
6. Therefore, to encourage innovation while building a lasting relationship of trust based on mutual respect and the sharing of responsible social values and 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 data processing carried out in a concise, transparent, understandable and easily accessible format so that you can understand the conditions under which your data is processed by RollingFunds when you use its services and website.
8. We invite you to consult this Policy regularly, 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 the processing of personal data concerning the following persons:
 - any person browsing one of the websites or applications published by RollingFunds;
 - any person having completed the contact or registration form on the website
 - any person directly or indirectly concerned by the relationship established with RollingFunds to benefit from its services (for example, the legal or contractual representative of a company, an employee, a beneficial owner, an agent, etc.)

3. The personal data we process

10. RollingFunds is likely to collect and process all or part of the following data:

- identification data;
- contact data;
- connection data;
- geolocation data, if applicable;
- data relating to the management of the Loan contract (the transaction number, etc.);
- professional data (professional background of the manager, commercial activity of the company, customer assessment of the services, etc.);
- data relating to the follow-up of the commercial relationship.

11. RollingFunds does not process personal data that reveal 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 sexual life or sexual orientation of a natural person.

12. Where data are mandatory, the collection forms will specify this. In the absence of information, your request cannot be examined or its analysis will be delayed.

4. The purposes and legal bases of the processing operations we carry out

13. When RollingFunds processes personal data, it does so for specific purposes: each data processing carried out pursues a legitimate, determined and explicit purpose.

4.1. The purpose of our processing

14. The processing implemented by RollingFunds pursues the purposes indicated below.

- Authentication of persons

RollingFunds collects certain personal data to authenticate the persons concerned prior to subscribing to the products and services and to determine whether they have the capacity to bind the company they represent.

- Fraud risk assessment

RollingFunds collects certain personal data to verify their consistency, detect and prevent attempts (identity theft, etc.).

- Credit risk assessment

RollingFunds collects certain personal data to apply statistical risk models.

- Communication and notifications

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

- Data security

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

- Improving services and products

RollingFunds collects some personal data to be able to contact a data subject by e-mail or telephone, with a view to obtaining his or her opinion on the products and services offered to improve its offer.

- Improving the customer experience

RollingFunds collects some personal data to analyse the use made of its products and services, to better understand the expectations of its customers. For example, RollingFunds analyses the behaviour of Individuals on the Site to improve the user experience, studies data relating to past transactions to anticipate future needs and the results of marketing activities to measure their effectiveness.

- Management of subscribed services and products

RollingFunds collects certain personal data to:

- edit and have contracts signed;
- manage its customers' accounts and the services and products subscribed to by its customers in accordance with the contractual provisions;
- assisting its financial partners in making decisions relating to the granting of loans and other associated services;
- to comply with its legal and regulatory obligations (e.g. to enforce anti-money laundering and other legal requirements relative to the financial and monetary code, etc.) that are imposed on the company and/or its financial partners.

- Performance analysis and reporting

RollingFunds collects some personal data in connection with:

- analysing and improving the performance of its credit risk and fraud assessment algorithms;
- its market research;
- of management reporting editions

- Sales prospecting management

RollingFunds collects some personal data, to inform the persons concerned about the company's news, the products and services provided, and about the offers or benefits they may receive. In doing so, they may receive information of a commercial nature from RollingFunds by way of electronic communication (email, sms, etc.). If the persons concerned

do not wish to receive offers commercial offers and other information from RollingFunds, they can oppose to this sending at any time by clicking on the hypertext link of unsubscription

which can be found at the bottom of each electronic communication received.

- The purpose of cookies is to ensure the proper functioning of the website, to measure

its audience website, to measure its audience and also to personalize the user's experience. For more information on the use of cookies, please refer to the [Policy on the use of cookies](#).

4.2. The legal basis for our treatment

15. We only carry out data processing operations 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 that of a third party, which justifies us carrying out the personal data processing concerned;
- the performance of a contract with you requires us to carry out the relevant processing of personal data;
- we are bound by legal and regulatory obligations which require the processing of personal data concerned.

4.3. Legitimate interests pursued

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

- Protection against the risk of fraud;
- Protection of customer data;

5. The recipients of your data

17. The personal data processed are intended for RollingFunds and its partners and subcontractors and subcontractors.

18. The person in charge of data processing is the Technical Director of RollingFunds.

19. RollingFunds has to transmit certain personal data to third parties to allow its third parties to allow its customers to subscribe to services and products, to optimize the user experience and to manage said products and services. The 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 the user's identity document;
- the financial partners participating directly, indirectly or potentially in the financing of the credits;
- the collection company or companies mandated to collect unpaid debts;

- governmental and supervisory authorities to comply with legal and regulatory and regulatory obligations (e.g. in the context of the fight against terrorism and money laundering);
- Advisors or auditors or other service providers of RollingFunds legally or contractually bound by a confidentiality undertaking;
- Any other partner of RollingFunds after obtaining the prior consent of the Individual.

20. When RollingFunds calls upon service providers, it only transmits to them the personal data necessary to carry out the entrusted missions.

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

6. The flows concerning your data

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

7. How long we keep your data

23. RollingFunds will ensure that data is only kept in a form that allows identification of the data subjects for as long as 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 specifically, we organise our data retention policy as follows:

Purpose	Data Subjects	Retention period
Management of commercial prospecting	Customers	3 years from the end of the commercial relationship
	Prospects	3 years from the collection or the last contact from the prospect
Management of loan contracts	Customer	5 years from the complete reimbursement of the last loan
KYC and Anti-money laundering	Clients and Beneficial Owner	5 years from the full repayment of the last loan

8. The security of your data

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

27. RollingFunds has put in place appropriate physical, logical, administrative or organisational measures, appropriate to the sensitivity of the personal data, to ensure the integrity and the integrity and confidentiality of the data and to protect them against any malicious intrusion loss, alteration or disclosure to unauthorised third parties.

28. Where RollingFunds uses a service provider, it will only disclose personal data to the service provider after it has required the service provider to comply with these security principles.

29. RollingFunds conducts regular audits of its own services to verify the correct operational application of the rules relating to data security.

9. Subcontracting

30. When it uses a service provider, RollingFunds shall only communicate personal data to the latter after having obtained an undertaking and guarantees its ability to meet its security and confidentiality requirements.

31. We conclude contracts with our subcontractors in compliance with our legal and regulatory obligations, which precisely define the terms and conditions for the processing of personal data by the latter.

10. Your rights

10.1. Your rights 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 to ensure fair and transparent processing of your data, you declare that you have received additional information concerning:

- how long your personal data will be kept;
- the existence of the rights that are recognised for 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 the information relating to these new purposes.

10.2. Your rights 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 confirmation as to whether or not your personal data is being processed and, where it is, you can access your data as well as information concerning:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients as well as the international organisations to whom the personal data has been or will be disclosed, in particular recipients who are established in third countries;

- where possible, the intended period of retention of personal data or, where this is not possible, the criteria used to determine that period;
- the existence of the right to ask the controller to rectify or erase your personal data, the right to request a restriction of the processing of your personal data, the right to object to such processing;
- the right to complaint with a supervisory authority;
- information about the source of the data when it is not collected directly from the data subjects;
- the existence of automated decision-making, including profiling, and in the latter case, relevant information about the underlying logic, as well as the significance and expected consequences of such processing for the data subjects.

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 rights to have your data erased

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 the law and regulations.

10.5. Your right to object to data processing

41. You have the right to object to the processing of your personal data where the processing is based on the legitimate interest of the controller.

10.6. Your rights to data portability

42. You have the right to the portability of your personal data..

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

- only your personal data, which excludes anonymised personal data or data which do not concern you;
- 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 right is limited to processing based on consent or on a contract and to personal data that you have personally generated.

45. This 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. consent, you may withdraw it at any time. We will then stop processing your personal data without affecting the previous operations for 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 define post-mortem directives

48. You have the possibility of defining directives relating to the conservation, deletion and communication of your personal data after your death with a trusted third party, certified and charged with enforcing the wishes 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 can be exercised at the following e-mail address rgpd@rolling-funds.com or by post with a copy of an identity document 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 recording 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.