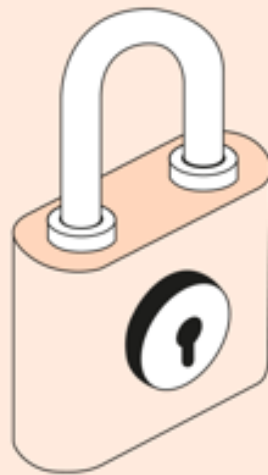


Qonto

Qonto

Privacy Policy

Updated: 31, August 2022



Qonto (OLINDA SAS), as an online payment institution, is committed to the long-term confidentiality and security of your personal data. This Privacy Policy is here to provide you with a clear overview of how and why we collect your personal data, what we use it for, and highlight your rights to data privacy as a Qonto user.

To whom this policy applies ?

If you are a customer of Qonto, subscriber to our online service, on our applications “Apps” (Android or IOS) or a prospect, or, if you are a visitor of our website Qonto.com, this Policy applies to you.

What is personal data ?

💡 A personal data is a data that identifies you directly (e.g: your name, surname, e-mail address) or indirectly (e.g: your IP address, IBAN, user ID).

Key principles: your data, your property

- We do not, nor the third-parties we are working with, sell your personal data.
- We make sure that your data is always secure. For more information, see the last section below related to our security principles.

Your data, your rights and choices

Under Privacy Laws, you benefit from several rights regarding the use of your personal data;

- You can ask us to **erase** the data we hold about you, that you or our third-party partners provided to us, if it is no longer necessary for us to use Qonto and to comply with our legal obligations.


- **Obtain a copy** of the data Qonto holds about you. As a payment institution we might process an important amount of data. Hence, we might ask you to precise what type of data set you may want to access to better scope your request.
- **Rectify** your information if you believe there is an inaccuracy.
- To **obtain any information** about how Qonto uses and handles your data. We have tried to make it easy for you to understand the processing of your data in this Privacy Policy. If you do not find the answer to what you want, please contact us.
- **Withdraw the consent** you gave us for processing your data when we asked for it, especially for sending you marketing e-mails.
- You can make an **objection to the processing** of your data, notably for profiling you to send you personalized offers.
- You have the right to **lodge a complaint** regarding the use of your data. Please tell us first, we will make our best efforts to address your concern. If you think we failed in this, you can address your concern to the Data Protection Authority of your country.


Our privacy team will be happy to answer any of your questions or requests listed above, please send us an e-mail at dpo@qonto.com.


Why do we collect your personal data and how?

We receive information from you directly and indirectly.


Directly : most of the information we process is provided by you in the course of using our service, or, in any situations described below.

 **When you subscribe to our service and create an account at Qonto**, we ask your e-mail address, name, surname, identification data (passport, ID card), biometrical data, date of birth, place of birth, company data etc. The legal basis for processing those data is the execution of the contract you signed with Qonto and the regulatory requirements applicable to Qonto on fraud detection, anti-money laundering, reporting of suspicious transactions and any monitoring activities required by the financial laws. We will keep your data for 5 years after the closing of your account as required by law.

 **To receive our news updates** by e-mails, push notifications or InApp messages, on the update of our products, to send you industry news, new partnerships and events. We will ask for your e-mail address, name and surname. You can always withdraw your consent to receive commercial offers by using the unsubscribe link at the end of every e-mail you will receive from us. We will keep this data 3 years after the last contact you had with us.


 **When you navigate on our website**, we might track your behavior for analytics purposes, analyze the performance of the website, suggest adverts according to the choices you made in the management center of the [cookie banner](#).


To do so, we may collect your IP address, credentials, user IDs, e-mail address, log-in and tracking information. The legal basis of this processing is the legitimate interest for technical cookies - and the consent for non-technical cookies. We will keep your data for 6 months for non-technical cookies and 12 months for technical ones. Note that you are always able to change the settings of your consent choices in our cookie banner.

 **You make transactions using our product:** we might use your aggregated transactional data for internal analytics purposes. This processing is based on our legitimate interest to better scope our marketing efforts in the media landscape Based on your preferences, we may also suggest personalized and non-personalized offers. In the case of personalized offers, we will use your data to create your profile. Before starting such profile creation, we always make an analysis to ensure that we do not overreach your rights and interests. You can always object to this processing by contacting us.


If we want to inform you via e-mail, push notifications or InApp messages on your user behavior, we will do it based on the performance of the contract you signed with Qonto and our legal obligations to inform you on your transactions, withdrawals, balance, etc.


We will keep the data corresponding to your transactions 5 years after the closing of your account as required by financial law.


 **You send requests on our dedicated platforms:** we might collect some personal information such as your contact details, ID documents, IP address, content of the exchanges, financial information, etc. to answer to your requests regarding our product and services. This data processing is based on the execution of the contract you signed with Qonto. We will keep such data for 5 years after the closing of your account.


 **You speak over the phone with our Customer Success team:** we may ask you to provide your phone number to assist you on the use of our product and service, present you our new


features, inform you on incident alerts, etc. The processing is based on your consent to recontact you when asked for it. We will keep the calls for 6 months in a live environment and 5 years in an archived database to comply with our legal obligations.

 **You participate in customer surveys:** after the onboarding, we will ask you to rate our service and give us some feedback at different stages of the usage of our product. We will collect your member ID and store this information internally for as long as you are a Qonto client. The processing of the data is based on Qonto's legitimate interest to improve the quality of our service.

 **You ask to be recontacted by our Sales team:** to answer the requests you submitted by filling one of our online forms, we ask you to provide your name, surname, e-mail address, and phone number. The processing of the data is our legitimate interest to present you with the latest update on our product and answer any of the questions you might have. Your data will be kept for 3 years after the last contact you have with us.

 **You are a Qonto affiliate:** we will collect your e-mail address, name, surname and phone number so as to communicate with you on a regular basis and send our newsletter on our affiliation program. The processing of these data is based on our legitimate interest to ensure a smooth communication with you. Your data will be kept in our systems as long as you participate in our program and will be deleted after a prolonged period of inactivity.

 **You participate in our referral program:** we will collect your e-mail address to send you the referral link to benefit from a discount. The legal basis for the processing of your e-mail address is our legitimate interest and it will be deleted 30 days after you received the e-mail from us.

 **You are a business partner:** we will collect your contact details, physical address, professional e-mail address, for billing purposes. The processing of this data is based on the execution of the contract you signed with Qonto. We will keep your data for 10 years so as to comply with accounting laws.

Indirectly: we also receive your data from other external third-parties;

- From our **third-party partners**, to improve the quality of our service, offer you new features or services provided by other parties, send you marketing communications by e-mail or contact you over the phone.

For instance, some of our partners with whom you have signed a contract will transfer your data to us so as to ease your onboarding process at Qonto.

- From our other **branches or subsidiaries** located in the European Union.
- As professionals, you may have registered your business information and business contact details on **public databases**. We may retrieve those information related to your business account.

Who do we share your personal information with?

- Our **partners and providers** with whom we collaborate to offer you a wide range of connected services on our Apps.

*For instance, if you want to buy crypto currencies through your Qonto app, you will be redirected to our partner's platform and we will send them some personal data for them to comply with their financial and regulatory obligations.

Similarly, if you want to subscribe to our insurance product, you consent to the sharing of your information to our partner to benefit from the service.*

Please note that Qonto is not responsible for the handling of your data by these partners. When you access third-party services from the Qonto App, some of your data is transferred to them and they become fully responsible for the processing of your information.

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- **Public authorities, governmental bodies, or other financial institutions** so as to comply with our legal obligations.
- Our **technical providers** that help us to provide the service. If you want to have a list of the main service providers we are working with, see the list below.

For the need of providing our service we may need to transfer personal data outside of the European Union. In this case, we ensure that this transfer is made in a country consider by the European Commission as ensuring an adequate level of protection of personal data and, if it is not the case, we will put in place the SCC's ([Standard Contractual Clauses](#) adopted by the Commission) to make sure that we reach the expected level of protection. You can obtain a detailed copy of the transfer tool and more information in this regard by sending a request to our Data Protection Officer.

Infrastructure -Tech	Purpose	Location	More information
Amazon Aws	Data Storage	EU	https://aws.amazon.com/fr/
Google Cloud Services	Data Storage	USA	https://cloud.google.com/?hl=fr
Snowflake	Data Storage	USA	https://www.snowflake.com/?lang=fr
Comms			
Intercom	Customer interaction	USA	https://www.intercom.com/
Drift	Customer interaction	USA	https://www.drift.com/
Aircall	Customer interaction	FR	https://aircall.io/fr/
Odity	Customer interaction	USA	https://www.odity.com/en/
Webhelp	Customer	FR	https://webhelp.com/en

Infrastructure -Tech	Purpose	Location	More information
	interaction		
Customer.io	Customer communication	USA	https://customer.io/
Active campaign	Customer communication	USA	https://www.activecampaign.com/fr
Sales Forces	Customer Analytics	USA	https://www.salesforce.com/
Outreach	Customer analytics	USA	https://www.outreach.io/
Data/Analytics			
Chattermill	Customer feedback	UK	https://chattermill.com/
ProductBoard	Business Analytics	USA	https://www.productboard.com/
Mixpanel	Business Analytics	USA	https://mixpanel.com/fr/
Lokalize	Business Analytics	EU	https://lokalise.com/
Amplitude	Business Analytics	USA	https://fr.amplitude.com/
Metabase	Internal analytics	USA	https://www.metabase.com/
Hotjar	Customer analysis	USA	https://www.hotjar.com/

Infrastructure -Tech	Purpose	Location	More information
Segment	Business analytics	USA	https://segment.com/
Content Square	Business Analytics	FR	https://contentsquare.com/fr-fr/
Airflow	Data workflow management	USA	https://airflow.apache.org/
GA4	Customer Analytics	USA	https://support.google.com/analytics/answer/10089681?hl=fr
Internal tools			
Notion	International communication	USA	https://www.notion.so/fr-fr
Slack	Internal communication	USA	https://slack.com/intl/fr-fr/
Google Workspace	Internal collaborative platform	USA	https://workspace.google.fr/intl/fr/
GitLab	Development collaborative platform	USA	https://gitlab.com/gitlab-org/gitlab

Where do we store your information?

The personal data we collect and process in one of our four offices in Europe (Paris, Milan, Berlin, Madrid) are stored on the servers of our data storage provider Amazon AWS in the European Union, Germany.

How secure is the data we collect?

To protect your data we have put in place physical, technical and managerial procedures.

- The transmission of your information is always made via the Internet and secured through HTTPS connection protected by an SSL certificate (SHA-256/RSA Encryption).
- We are regularly audited by independent external security specialists from the financial sector, conduct penetration tests, so as to control that we always apply the highest security measures to our systems.
- The access to your Qonto account is secured by your identifier and your password that must be strong enough and never shared with anyone.
- For the most sensitive actions, we always use a two-factor authentication method through a validation code from a device associated with your “paired device” account.