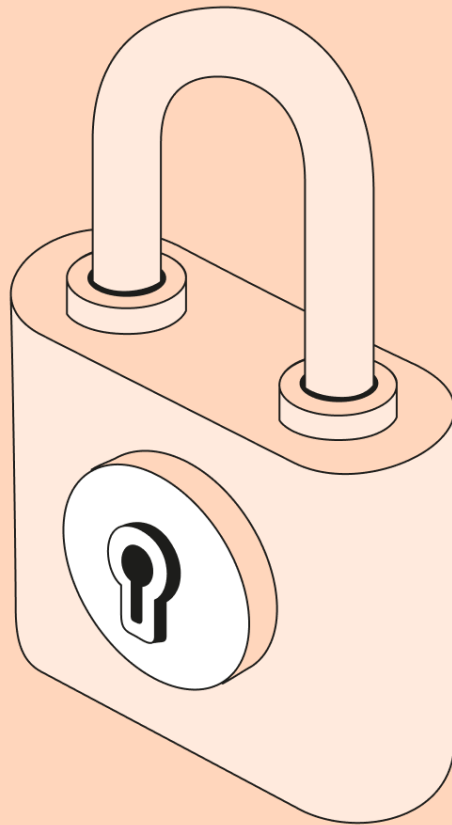


Qonto

Privacy Policy

Updated: 4th of June 2024



Preamble

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.

1. To whom does this policy apply?

This Policy applies to you 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](https://qonto.com)).

NB: Qonto is acting as an independent data controller in the processing of the data of its clients. In fact, we are processing your data for our own purposes (compliance with our AML/CFT obligations in line with national laws) and as such, we do not act as a data processor of our client's data.

2. What is considered personal data?

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

3. Key principles: your data, your property

- We do not, nor do 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.

4. Your data, your rights and choices

Under European 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 (Qonto) to use, 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 specify what type of data set you may want to access to better scope your request.

- Ask us to **rectify** your information if you believe there is an inaccuracy.
- **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 you are looking for, please contact us directly.
- **Withdraw the consent** you gave us for processing your data when we asked for it, especially for sending you marketing emails.
- **Oppose the processing** of your data, in particular for the creation of a user profile in order to send you more personalized offers.
- Ask us to exercise your **right to data portability**, for all or part of the data Qonto holds about you, to another service provider.
- **Lodge a formal complaint** regarding the use of your data. We hope that you will raise this matter with us first, as we will make our best efforts to address your concerns. However, if you feel that we have failed in this matter, you can address your concerns 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 email at dpo@qonto.com.

5. Why and how do we collect your personal data?

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 of the situations described below.

- **You subscribe to our service and create an account with Qonto:** we ask for your email address, name, surname, identification data (passport, ID card), biometrical data, date of birth, place of birth, company data etc. The legal basis for processing this 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 financial laws.

We will keep your data for 5 years after the closing of your account as required by law.

- **You receive information** by email, push notifications or InApp messages: for product updates, industry news, new partnerships and events, or product satisfaction surveys, Qonto relies on its legitimate interest to send you such communications. To contact you, we will ask for your email address, name and surname. You can always unsubscribe from receiving commercial offers by using the unsubscribe link at the bottom of any email we send you.

We will keep this data for 3 years from the date of your last contact.

- **You navigate our website:** we might track your behavior for analytics purposes, to analyze the performance of the website, or to 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 your 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 a transaction using our product:** we may use your aggregated transaction data for internal analysis purposes. The processing of this data is based on our legitimate interest in order to better scope our multimedia marketing strategy.

We may also present you with personalized and non-personalized offers based on your preferences. We use your transaction data to create a unique user profile for personalized offers after ensuring that this does not infringe your rights and interests. You can always object to this processing of your data by contacting us in this regard.

Any communication with you by email, push notification or message via the application regarding the way you interact with our site is in accordance with the terms of the contract you have signed with Qonto and with our legal obligations to inform you of your transactions, withdrawals, balances, etc.

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

- **You submit requests on our online platform:** we may collect certain personal information such as your contact details, identity documents, IP address, chat history, financial information, etc. in order to better respond to your requests regarding our products and services. The way in which we process this data is in accordance with the conditions set out in the contract you have 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 service team:** we may use your telephone number to help you use our products/services, introduce new features, alert you of incidents, etc. We will only contact you if you give us your telephone number.

We will store the calls for 62 days on the platform before deletion.

- **You participate in customer surveys:** once you register and start using Qonto, we ask you to rate your experience and provide us with feedback from time to time as you use our product. We will collect your member ID and store this information internally for as long as you remain a customer with us. Our use of this data is based on our legitimate interest in improving the quality of Qonto's services.

- **You get in touch (email, phone, videoconference) with our sales team:** to speak to a member of our sales team, you need to fill in an online form. We will ask for your first name, last name, e-mail address and telephone number. We will always ask for your consent before recording a conversation. We will process this data on the legal basis of your consent for analysis purposes and to best respond to your requests.

We will keep this data for 3 years from the date of your last contact.

- **You are a Qonto affiliate:** we will collect your email address, name, surname, and phone number to communicate with you on a regular basis and to send you our affiliation program newsletter. The processing of this data is based on our legitimate interest to ensure a smooth communication with you.

Your data will be stored 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 email address to send you the referral link so that you can eventually claim your referral reward.

The processing of this data is based on our legitimate interest, and it will be deleted 30 days after you received the email from us.

- **You take part in contests, lotteries and other promotional operations:** we will collect your personal information (surname, first name, e-mail and postal address) via a contact form or on social networks, in accordance with the terms and conditions you will receive at the time of your participation.

We will process this data on the basis of your consent to participate in the operation. Your data will be kept only for as long as is necessary to complete the operation, unless you have given your consent to be contacted for commercial prospecting purposes.

- **You are a business partner:** we will collect your contact details, physical address, professional email 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 in order to comply with accounting laws.

- **You are a member of Qonto's "Certified Accountant Program":** we will collect your first and last name and telephone number in order to register you and make you eligible for the referral bonus. We process this data on the basis of your consent to join the program and to start your contract when you refer your first client.

If you do not refer any clients, we will retain your data for 3 years. If you refer clients, we will keep your data until the end of the partnership contract you have signed.

- **You are a certified accountant accessing the Qonto API to manage your client's account:** we will not collect personal data if you use our dedicated partner.

If you create an account for a "reporting" access, we will collect your first and last name, e-mail address and telephone number. We process this data on the basis of your consent in order to enable you to manage your customers' accounts, and will retain your data until your customer's contract expires.

If you have a Qonto account, we will collect your login data. We process this data on the basis of the contract signed at the start of the relationship, and we will keep your data until your contract expires.

Indirectly. We also receive your data from other external third-parties:

- From our **third-party partners**: to improve the quality of our services, to offer you (customers and/or non-customer users of the application) new features or services, provided by Qonto (e.g. in order to offer you our "PayLater" services, we may check your eligibility based on your financial profile with partners such as SCHUFA) or by other parties, and to send you marketing communications by e-mail or telephone.

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

- From our other **branches or subsidiaries**.
- From **public databases**. You may have registered your business information and contact details in public databases. We may collect some of this information if it relates to your business account.

6. 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.

- **Public authorities, governmental bodies, or other financial institutions** to comply with our legal obligations.
- Our **technical providers** that help us to provide our services. Please refer to the list below for a list of the main service providers we work with.

Please note that some of our providers may use artificial intelligence and that some of your data may be processed by their algorithms. We will always ensure that your data remains secure and shall not be used directly or indirectly, for the development, training, or any other purpose related to generative artificial intelligence technologies, other than what is required for providing their services.

For the need of providing our services 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 considered by the European Commission as ensuring an adequate level of protection of personal data, and if 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 interaction	FR	https://webhelp.com/en
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/
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

Tableau	Customer analysis	USA	https://www.tableau.com/
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Internal tools

Notion	International communication	USA	https://www.notion.so/fr-fr
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Slack	Internal communication	USA	https://slack.com/intl/fr-fr/
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Google Workspace	Internal collaborative platform	USA	https://workspace.google.fr/intl/fr/
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GitLab	Development collaborative platform	USA	https://gitlab.com/gitlab-org/gitlab
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7. Where do we store your information?

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

8. 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.

Qonto