

CONFIDENTIALITY POLICY

MOUNTNPAY MOBILE APP

We kindly ask you to read this confidentiality policy carefully to see how your personal data is collected, handled and stored when you use the Services provided by PayinTech (hereinafter referred to as the '**Services**') via the 'MountNPay' mobile app produced by PayinTech or via a partner app integrating the Services provided by PayinTech.

For the purposes of this confidentiality policy, 'personal data' is defined as any kind of information whatsoever relating to an identified or identifiable natural person who would be considered identifiable if they could be identified, directly or indirectly, especially by reference to an identification number or one or more factors specific to their physical being, physiological, genetic, mental, cultural, social or economic characteristics, and their identity under the French Data Protection law of 6 January 1978 relating to people and the handling of their personal data.

Under this confidentiality policy, the company, PayinTech (hereinafter referred to as 'PayinTech', 'we', 'our' and 'us'), a French simplified joint-stock company with share capital of €178,165.60, registered on the Nanterre Trade and Companies Register under number 794 969 634, with their headquarters at 5 Rue Félix Pyat, 92800 Puteaux France, is responsible for collecting the personal data.

PayinTech can be reached at the following email address: mountnpay@payintech.com.

1- What kind of personal data is collected via our Services?

a- User contact information

When you subscribe to the Services, you will be asked to enter a certain amount of personal data, which is required to create your User Account, namely:

- Surname
- First name
- Email address
- Telephone number
- Date of birth

Some of this information may also be obtained from compatible third-party social networks, should you decide to create a User Account via an existing compatible social network account.

b- Bank details

In order to use the Services, you may also be required to provide your credit or debit card details.

However, in this situation, PayinTech will not directly collect your card details; they will be collected, handled and encrypted directly by a specialist, PCI-DSS-certified online payments service provider, with all the necessary accreditation, for whom PayinTech acts simply as an agent.

c- Usage data

The main aim of our Services is to allow you to use our private payment system to pay for products and services from third parties.

In this regard, we collect your usage and purchase history from our retailer partners who use our private payment system.

d- Connection data

When you use the Services, we also collect your connection data, meaning information that is automatically recorded by our servers when you access our Services.

This connection data can be, for example, your IP address, the date and time at which you accessed the app, your operating system type, your connection type and your mobile device type.

e- Location data

The use of certain features of our Services is also based on geographical information, which requires your location data to be shared, particularly the geographical position of your mobile device, which you will need to expressly consent to if you want to be able to use these features.

2- Why do we collect your personal data, and on what legal grounds?

We collect, handle and store your personal data for the following reasons and on the following legal grounds:

- When you use our Services, your personal data will be handled and stored primarily to allow you to create your User Account and to identify you when you use our Services. Within the framework of providing and properly managing our Services, we also collect your personal data to allow you

to see a geographical representation of the retailers who accept our private payment system around you, to allow you to access your purchase history and to manage your usage, and finally to be able to send you emails about your subscription, technical notifications, updates and alerts. Handling your personal data is based on respecting our contractual obligations to provide our Service, in compliance with the provisions of our general terms and conditions of use that you accept when you subscribe to our Services.

- We also collect data relating to your use of our Services, in order to operate, protect, improve and optimise our Services, for example, to improve your user experience on our app. Handling this usage and connection data is therefore based on our legitimate interest in improving our Services.
- Finally, we may use your personal data, particularly your location and usage data, to send you marketing, advertising and promotional material, as well as other information that may be of interest to you. For the most part, these messages will be sent directly from sales partners who are listed on the mobile app used for the purposes of the Services. When you subscribe to the Service, you will be required to either grant or refuse permission for your data to be used for this specific purpose. You also have the right to withdraw your consent for this purpose at any time by emailing us at mountnpay@payintech.com. Handling your personal data is therefore based on your specific consent to using your personal data for these purposes.

3- Who will have access to the personal data we collect?

Being responsible for handling your data, we will be the first recipients of your personal data. More specifically, your data will be handled by employees of PayinTech, including customer services, support services and technical support.

We may also share your personal data with third parties in the following situations:

- Your personal data may be sent to our technical partners, particularly our web host, who help us provide access to the site, in accordance with contractual terms and conditions signed by each of PayinTech's technical partners and cannot violate the terms and conditions of this confidentiality policy.
- Your personal data will also be sent to the following commercial partners: the operator of the ski resort or holiday residence or other partners who are using our Private Payment Services.
- Your personal data may also be sent to the police authorities (when requested along with a search warrant) and to any other person legally authorised to receive this information (by order of a judge).

4- How will your personal data be stored?

We take adequate and appropriate care to keep our Users' personal data safe and have taken the necessary precautions to maintain, and keep maintained via our subcontracted hosts, the security and confidentiality of data, particularly to prevent it from being deformed, damaged or communicated to any unauthorised individuals.

All personal data that we collect is hosted within the European Union.

5- How long do we keep your personal data?

All personal data will be destroyed immediately when your User Account is deleted.

You can also cancel your account and ask that your personal data is destroyed at any time and without charge, simply by contacting the Company at the following email address: mountnpay@payintech.com.

6- Exercising your legal rights

In accordance with European regulations on personal data protection, you have the following rights:

- right of access, allowing you to know, at any time, whether or not your personal data is being handled by our company and when, giving you access to that personal data and to the information required by law concerning how this data is handled;
- right of correction, allowing you to request that any inaccuracies concerning your personal data are corrected as quickly as possible;
- right of removal, allowing you to request that your personal data is deleted as quickly as possible, provided that this request for deletion complies with the terms required by the applicable law;
- right of limitation to how your personal data is handled, provided that this request for limitation complies with the terms required by the applicable law;
- right of transfer, allowing you to receive your personal data in a structured, commonly used and machine-readable format, or request that this personal data is sent to another data handler, provided that this request for transfer complies with the terms required by the applicable law;
- right of objection towards the handling of your personal data for reasons related to your particular situation, provided that this request for objection complies with the terms required by the applicable law;
- right of withdrawing your specific consent, at any time, to the collection of your personal data, particularly when handling your personal data is used for business development purposes;



- right of setting guidelines for the retention, deletion and transfer of your personal data following your death.
These rights can be exercised by contacting us directly at the following email address: mountnpay@payintech.com.

Complaints about the use of your personal data can also be addressed to the French Data Protection Authority, 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX.

