



Privacy Policy

Introduction

LINKCY regards as of paramount importance the protection and security of Personal Data.

The Privacy Policy for Personal Data collected via the LinkCy Site is detailed below, which sets out:

- How LINKCY collects and processes your Personal Data;
- The security measures that LINKCY implements to guarantee the confidentiality and integrity of your Personal Data;
- The rights you have to control them throughout your use of the Site.

This Privacy Policy applies to all Personal Data.

- provided by you when submitting a contact request;
- collected by us using cookies when you browse our Site (see Cookie Policy available on the LinkCy's Website).

This policy is effective as of 03/03/2021.

This Privacy Policy may be modified or supplemented at any time by LINKCY, in particular with a view to complying with any legislative, regulatory, jurisprudential or technological developments. To check for updates to this Policy, you should regularly consult this page.

If the changes affect the processing activities carried out on the basis of the User's consent, LINKCY must obtain your consent again.

We encourage you to read this policy carefully. If you do not agree with or you are not comfortable with any aspect of this Privacy Policy, please do not use our website or do not provide your personal data through the website.

Who is the Data controller?

We – LINKCY SAS, a simplified joint-stock company registered with the Paris Trade and Companies Register under number 852 295 732, with a capital of 10 000 € whose registered office is located 42 Rue Boursault, 75017 Paris, France – are the controller of your Personal Data collected throughout the Site, as provided by the Applicable Laws (as defined below).

What are the Applicable Laws ?

The processing of your Personal Data is performed in accordance with French Law n°78-17 of 6 January 1978 (the "French Data Protection Act"), with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the "GDPR"), as well as with French and European laws regulating personal data and privacy protection in electronic communications, notably the "ePrivacy" Directive 2002/58/EC (together the "Applicable Laws"), as interpreted by the French Data Protection Authority (the "CNIL") and by the European Court of Justice (the "ECJ").

What personal data is collected? How are they collected?

Personal Data means any information relating to an identified or identifiable natural person.

An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

We collect the following Personal Data through the Site:

- When you browse on the website: your navigation data, as specified within our Cookie Policy;
- When you contact us through the contact form or email:
 - Last name, First Name



- Personal or professional email address
- Personal or professional telephone number
- the content of the question or message you send us : Indeed, so that we can respond to your request as precisely as possible, you have an insert allowing you to specify your request. If, in order to explain your situation, you need to give LINKCY additional personal data, we ask you to provide us with only what is strictly necessary.

Why personal data is collected?

The main purpose of collecting Personal data through the website is to:

- allow us to respond to your request that you submitted by the means of our contact form or your email;
- to analyze the traffic on the website in order to improve its functionalities and services;
- carry out necessary operations for the maintenance and security of the Website : for this purpose, statistic data is used.

Furthermore, LINKCY may collect Personal Data for other purposes, taking care to comply with the legislation on the protection of Personal Data.

What legal ground(s) do we rely on?

The use of our Personal Data collected via contact form or email is necessary to meet your request for information.

For this processing, we rely on your consent regarding the use of your personal data in order to respond to your question.

Indeed, any sending of a contact form or email via this Site is subject to your prior acceptance of the Privacy Policy by ticking the box "I have read and accept the Privacy Policy" in the contact form. By ticking this box, you acknowledge that you have read, understood and fully and completely accepted this Policy.

Fields marked with an asterisk on the contact form are required to process and respond to your request. If you do not provide any data within the marked field, we will not be able to process and respond to your request.

In case certain Personal Data will be collected via cookies, we rely on your consent.

How long do we keep your information?

In accordance with the storage limitation principle set forth under Applicable Laws, we endeavor retaining personal data for as long as is necessary for the specific purpose(s) for which it was collected (for example, until your contact request is processed).

However, we may be required to retain certain Personal Data for a longer period of time, taking into account factors such as:

- legal obligation(s) under applicable law to retain the personal data for a certain period of time (for example, for compliance with tax and accounting requirements) ;
- the establishment, exercise or defense of legal proceedings (for example, for the purposes of potential litigation).

While we continue to process your Personal Data, we will ensure that it is treated in accordance with this Privacy Policy. If not, we will securely delete or anonymize your Personal Data as soon as it is no longer required.

If you wish to know how long we keep your Personal Data for a particular purpose, you can contact us by writing to us at support@linkcy.io

For more information on how long we keep cookies, please refer to our Cookie Policy.

Who may we share your information with?



As your Personal Data are confidential, only persons duly authorized by us due to their functions can access your Personal Data, without prejudice to their possible transmission to the extent required by the applicable regulations. All persons for which we are responsible with access to your Personal Data are bound by a confidentiality agreement.

Our subsidiary company - LinkCy Payment Service Provider, a UAB registered with the Lithuania Trade and Companies Register under number [NUMBER], with a capital of 10 000 € whose registered office is located Mėsinų str. 5, LT01133 Vilnius, Lithuania - may also be required to process your Personal Data strictly necessary for the performance of the services we entrust to them.

In certain circumstances and only where required by Applicable Laws, we may disclose some of your Personal Data to competent administrative or judicial authorities or any other authorized third party.

How do we secure personal data?

We implement the appropriate measures in order to guarantee the protection and confidentiality of your Personal Data, and specifically, to prevent its destruction, loss, alteration, unauthorized disclosure of data, or unauthorized access of this data.

These measures include:

- Training to relevant staff to ensure they are aware of our privacy obligations when handling personal information;
- Careful selection of subcontractors;
- administrative and technical controls to restrict access to Personal Data on a “need to know” basis;
- technological security measures, including fire walls, encryption and anti-virus software, authentication devices;

Although we use appropriate security measures once we have received your Personal Data, the transmission of data over the internet (including by e-mail) is never completely secure. We endeavor to protect Personal Data, but we cannot guarantee the security of data transmitted to us or by us.

We will inform you promptly in the event of a violation of your Personal Data which could expose you to a serious risk.

What are your rights regarding your personal data?

You have rights to the Personal Data that concerns you and that is processed by LINKCY:

- **The right to be informed:** you have the right to receive clear, transparent and easily understandable information about how we use your Personal Data. That is why we provide you with the information contained in this Privacy Policy.
- **The right of access:** you have the right to obtain confirmation from us as to whether or not your Personal Data is processed by us, as well as certain other information about how it is used. You also have the right to access your Personal Data by requesting a copy of your Personal Data. We may refuse to provide information where this would reveal Personal Data about another person or adversely affect the rights of another person.
- **The right of rectification:** you may ask us to take action to correct your Personal Data if it is inaccurate or incomplete (for example, if we have the wrong name or address).
- **The right to forget:** this right allows you, in simple terms, to request the deletion or removal of your Personal Data where, for example, there is no compelling reason for us to continue use them or their use is illegal. However, this is not a general right to deletion and there are some exceptions, for example when we need to use the information to defend a legal claim or to be able to comply with a legal obligation.
- **The right to limit processing:** you have the right to “block” or prevent further use of your Personal Data when we assess a request for rectification or as an alternative to deletion. Where processing is limited, we may still retain your Personal Data, but we may not use it further.
- **The right to data portability:** you have the right to obtain and re-use certain Personal Data for your own purposes in different companies (which are separate data controllers). This only applies to Personal Data that you have provided to us, which we process with your consent. In this case, we will

provide you with a copy of your data in a structured, commonly used, machine-readable format or (where technically possible) we can transmit your data directly to another Data controller.

- **The right to object:** you have the right to object to certain types of processing, for reasons relating to your particular circumstances, at any time. We will be allowed to continue processing Personal Data if we can demonstrate that the processing is justified by compelling and legitimate reasons overriding your interests, rights and freedoms or if we need it for the establishment, exercise or defense of legal claims.
- **The right to withdraw your consent:** where we process your Personal Data on the basis of your consent, you have the right to withdraw your consent at any time. However, such withdrawal does not affect the lawfulness of the processing that took place prior to such withdrawal.
- **The right to provide us with instructions on the use of your Personal Data after your death** - you have the right to provide us with instructions on the management (e.g., retention, deletion and disclosure) of your data after your death. You may change or revoke your instructions at any time.

How to contact us?

If you wish to access, correct, modify or delete the Personal Data we have about you, object to their processing, exercise your right to portability, file a complaint, exercise any of the above-mentioned rights or simply obtain more information about the use of your Personal Data, please contact support@linkcy.io

We will endeavor to find a satisfactory solution to ensure compliance with the Applicable Laws.

In the absence of a response from us or if you are not satisfied by our response or proposal or at any moment, you have the ability to lodge a complaint before the CNIL (the French data protection authority) or with the supervisory authority of the Member State of the European Union of your country of residence.

Cookies Policy

What are cookies?

Cookies are data stored in the terminal equipment of an Internet user and used by the Site to send information to the Internet user's browser, allowing this browser to send information back to the original Site (e.g., a session identifier, choice of language or date).

Cookies enable the storage of status information when a browser accesses the different pages of a website or when the browser subsequently returns to that website.

Only the issuer of a cookie can read or modify the information contained therein.

What are the different types of cookies that can be used by the Site?

LinkCy does not collect cookies at the moment.

How to accept or decline cookies?

When you browse the Site, the placing and reading of cookies makes it possible to analyze your browsing and to measure the website's audience.

From your browser, you can accept or refuse cookies at any time on a case-by-case basis or systematically refuse them once and for all.

The refusal of cookies is likely to modify the conditions of access to the LINKCY site as well as its use.

For the management of cookies and your choices, the configuration of each browser is different.

You can configure your preferences, depending on your browser, by clicking on the links listed.

- For Microsoft Internet Explorer : <http://windows.microsoft.com/fr-FR/windows-vista/Block-or-allow-cookies>
- For Apple Safari : <http://docs.info.apple.com/article.html?path=Safari/3.0/fr/9277.html>
- For Google Chrome : <http://support.google.com/chrome/bin/answer.py?hl=fr&hirm=en&answer=95647>
- For Mozilla Firefox : <http://support.mozilla.org/fr/kb/Activer-et-désactiver-les-cookies>
- For Opera : <http://help.opera.com/Windows/10.20/fr/cookies.html>

Given the objective complexity involved in identifying Cookie-based technologies, Users are invited to contact LINKCY if they wish to receive further information on the use of Cookies by this Site.