

Privacy Notice

Version applicable as of 17.04.2023

At Valorlux, we take your privacy and confidentiality of the data we process as part of our activities very seriously.

That is why we have put in place this Privacy Notice (the “**Notice**”), in accordance with the requirements of the Regulation (UE) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the “**GDPR**”). This Notice applies to you when you use our Spin by Valorlux application (the « **Application** »).

Capitalized terms are defined in our general terms and conditions (the “**GTCs**”); any undefined terms have the meaning given to them in the GDPR.

1. Who is responsible for handling your data?

Data controller means the entity that determines why and how personal data should be processed, transmitted and stored.

When using the Application, the data controller is: Valorlux A.S.B.L.

2. What personal data is collected?

Technical data

When you use our Application, we may process certain technical data:

- IP address
- Technical identifier of the smartphone
- Application traces
- Technical logs

Account creation data

When you create your User Account, we collect the following personal data:

- Full name
- Email address
- Payment method data

This data is necessary to identify you in our system, to secure access to your User Account and to enable you to use our Application.

Application use data

When you use our Application, we process the following personal data:

- Username and password

- Email address
- Individual QR code associated to you
- Unique user key associated with the chosen payment method
- Preferred language
- Location data
- Borrowing and deposit history

This data is necessary for the proper functioning of our Application, for the management of your User Account and for the security of the latter. Location data is only processed if you allow our Application to access your location.

3. Where do we get the data we process?

Data directly provided by you

We collect personal data that you voluntarily provide to us by creating your User Account, as well as data derived from your use of the Application.

If your personal data is not correct or is no longer up to date, we invite you to correct it via the Application settings.

Data provided by third-party applications

When you choose to connect to our Application via Facebook, Google or Apple and/or select Apple Pay or Google Pay as your Payment Method, these third-party applications provide us with personal data about you.

For further information on how these third-party applications collect and process your personal data, please see the links below:

- Facebook (<https://www.facebook.com/privacy/center/>)
- Google (https://safety.google/intl/en_en/privacy/data/)
- Apple (<https://www.apple.com/fr/legal/privacy/>)

Thereafter, you have the possibility to dissociate your User Account from the third-party account used to register you by clicking on "Log out" in the settings of our Application or via the settings of the third-party application used to log in.

4. Why and on what legal basis do we process your data?

We collect your personal data for the following purposes:

- To enable you to create your User Account
- To enable you to use our Application
- To facilitate your borrowing/depositing by displaying nearby Merchant Partners
- To inform you about our activities
- To ensure the proper functioning and security of our Application

For each of the above-mentioned purposes, data processing is based on a legal basis, in accordance with Article 6 of the GDPR, namely:

- The performance of the contract under which you use our Application
- Your consent
- Our legitimate interest in maintaining the operation and security of the Application

5. How long do we retain your data?

We do not retain your personal data longer than is necessary to fulfil the specific purposes for which the information was collected. However, we may retain certain data where required or permitted by applicable law, in which case we will ensure that access to such data is restricted.

Personal data relating to your User Account and data generated by your use of the Application is retained as long as your User Account is active.

When you allow our Application to access your location, your personal location data is not stored in our systems.

Personal data enabling us to inform you about our activities is kept for as long as you agree to receive these communications and until you withdraw your consent.

For further information on our retention periods, please contact us at the address message@valorlux.lu.

6. How is your data secured?

We implement technical and organisational security measures to prevent any breach of your personal data, whether accidental or malicious.

To protect your personal data against the risks of destruction, loss or unauthorised access, we are putting in place appropriate security measures. These measures include technical measures relating to the data and systems used for processing, as well as organisational measures.

7. To whom is your data shared?

We may share your personal data with our processors in order to enable you to use our Application and to ensure its proper functioning.

In this case, we ensure that processing carried out by our processors is governed by a contract, as required by the GDPR. We also ensure that these processors process your data in accordance with data protection law and guarantee an appropriate level of security.

Processor	Service	Location
Microsoft Ireland Operations, Ltd	Hosting	Europe
Stripe Payments Europe, Ltd	Online payment	Europe
Technology Partner S.à.r.l	Application maintenance	Europe
The Rocket Science Group LLC (Mailchimp)	Emailing	United States

8. What are your rights ?

In accordance with the GDPR, you have the right to access, rectify and, if necessary, delete information concerning you. You also have the right to withdraw your consent at any time and, for legitimate reasons, the right to object to the processing of your data.

Please note that some of the rights set out above may be limited where we have a legitimate interest or legal obligation to continue processing your data.

You also have the right to lodge a complaint with a supervisory authority if you consider that the processing of your personal data infringes the applicable legislation on the protection of personal data.

In Luxembourg, the competent authority is the Commission Nationale pour la Protection des Données (the "CNPD").

9. How to exercise your rights?

If you wish to exercise your rights, you can contact us by e-mail at the address message@valorlux.lu.

We ask you to indicate in your request the right you want to exercise. Please note that if there is reasonable doubt about your identity, we may ask you for additional information.

There is normally no cost involved in your request to exercise your rights. We will also do our best to respond within one month.

If you wish to exercise your right to complain to a supervisory authority, you can also contact the CNPD via its website at <https://cnpd.public.lu/en/particuliers/faire-valoir/formulaire-plainte.html> or write to the following address:

Commission Nationale pour la Protection des Données
 15, Boulevard du Jazz
 L-4370 Belvaux

Updating of the Privacy Notice

We regularly review this Notice and, where appropriate, update it to reflect changes in our processing of personal data. If we wish to use your personal data in a way that has not yet been identified by us, we will contact you to provide you with information about this and, if necessary, to ask for your consent.

We will update the date of this Notice each time it is amended.