PRIVACY POLICY

KEY PRINCIPLES:

Your privacy is precious, and we know it. At Swan, protecting your data is our priority.

We make every effort to ensure that the privacy and security of your personal information follow the highest standards, from the design to the use of our products and services.

In this document, you will find the various data that we may collect and process or that you may provide to us when you access the www.swan.io Website and use our services.

Please read the Policy carefully to understand our practices regarding the processing of your data. Be aware that you must agree with this Policy to use our products and services.

If you disagree, please do not use our Website or any of our services.

DEFINITIONS

Personal Data

Means any information relating to an identified or identifiable individual (Data Subject); an identifiable individual is one who

can be identified, directly or indirectly, in particular by reference

to an identifier.

Data Subject Means the natural person to whom the data being processed

relates.

Data Processing

Means any operation or set of operations which is performed on personal data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction..

File

Means any structured and stable set of Personal Data accessible according to specified criteria.

Data Controller

Means the natural or legal person, public authority, service, or other body collects and processes personal data alone or in conjunction with others.

DPO

Means data protection officer that ensures the processes of the personal data of staff, customers, providers or any other individuals (also referred to as data subjects) in compliance with the applicable data protection rules. We decided to appoint an external DPO in order to answer any of your questions or requests.

Subcontractor

Means the natural or legal person, public authority, service or other body which processes personal data on behalf of the data controller.

Recipient	Means the natural or legal person, public authority, service or another body to which the personal data is disclosed, whether a third party or not.
Authorized third parties	Means in the context of a particular task or the exercise of a right of communication, the authorities are legally authorized to ask the Data Controller to communicate personal data to them.
User	Means a visitor of website swan.io.
Account Holder	Means the owner of one or several accounts at Swan. The Account Holder can give rights to the account to multiple users; each of these users would have an account membership.
Account Member	Means the users authorized by the Account Holder to access a given account. Users can have restricted or full access to an account.

MAIN PURPOSES OF THIS POLICY

The purpose of this Privacy Policy is to inform you of:

- The types of personal data collected about you;
- How your personal data is processed by SWAN and its possible partners and subcontractors; and

• The terms and conditions of use of your data and your rights in this respect, in compliance with European regulation and the applicable French, Spanish, and German national regulations applicable to SWAN.

WHO IS CONCERNED BY THIS POLICY

This policy applies to User, Account Member, Account Holder (referred to herein as "You).

LEGAL AND REGULATORY STANDARDS

All operations on your data are carried out in compliance with the regulations in force and in particular with Regulation No. 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals concerning the processing of personal data and the free movement of such data (hereafter the "GDPR"), and any national legislation applicable to data protection.

IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER

The entity collecting and processing your personal data as Data Controller is Swan, a simplified joint-stock company (SAS) registered with the Bobigny Trade and Companies Register under number 853 827 103, with a capital of 22 840 Euros, whose registered office is located at 95 Avenue du Président Wilson, 93100 Montreuil, France. Our company is represented by Mr Nicolas Benady, in his capacity as Chairman, and by Mr Nicolas Saison, in his capacity as Managing Director (referred to herein as "We").

WHAT KIND OF DATA DO WE PROCESS AND FOR WHAT PURPOSES?

As part of our Website's operations, SWAN collects data about you. This data is processed for the purposes for which it is collected, some information being mandatory and others optional, as indicated in the collection forms.

The data collected and purposes are described here -:



Data categories	Data collected	Purposes
Identity data	Surname, first name, date and place of birth and proof of identity (ID, passport,	The purposes are : • to collect certain information about the user before entering into a

	proof of residence), a photograph (a selfie of the person).	relationship to verify that a business relationship can be established
Personal life data	Personal email address, personal telephone number, personal postal address and proof of address or residence, tax IDs, tax residence outside France (if applicable, the country of residence and the associated national ID), information about your personal income, your personal assets and estate.	to comply with regulatory and legal obligations including notably the fight against fraud, money laundering and terrorist financing;
Professional activity data	Certificate of incorporation.	 to fulfill contractual obligations and manage customer account : provide you with relevant information about our products and services;
Authentication data	Access codes and passwords, connection logs, the number of connections, their duration and their history.	 assist you with requests about a transaction; evaluate your needs and the security of our services.
		to manage applications for our job offers.

Payment and transaction data	Your bank details, IBAN identifier, details of accounts and payment cards opened via Swan solution in particular the dates and times of transactions, data relating to invoices and contracts generated via the Solution, history of your use of our services.	The purpose is to understand the nature of transactions conducted by their clients in order to detect potentially illegal transactions including those that may be related to money laundering, terrorism financing or fraudulent activities.
Browser data	IP address, user IDs, email address, login credentials and tracking information, data related to your navigation on Swan site or the Swan solution, including a unique identifier, navigation statistics and behavioral data related to interactions with our content (pages consulted by the user, date and time of consultation, geographical location and source of connection: social networks, search engine, partner site, directory, etc.).	The purpose is to : - improve and promote our services, - analyze the performance of the website, - suggest personalized adverts.

ORIGIN OF DATA

Personal data is collected either directly from the data subjects or indirectly from the competent supervisory authorities.

WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

We disclose your personal data only to :

- financial, judicial or state agencies, public bodies on request and to the extent permitted by regulation;
- certain regulated professions such as lawyers, notaries and auditors that are covered by confidentiality;

- our technical providers with whom we collaborate to be able to provide you our full services and
- our partners who offer the main services complemented by the services offered by Swan. For some partners, we will send them some Sensitive Personal Data for them to comply with their financial and regulatory obligations, what you agree to.

You can find below our essential providers within the meaning of the European Banking Authority Guidelines of 25 February 2019 on Outsourcing arrangements. For more information do not hesitate to contact our DPO.

Sub-processor	Function	Geographical area in which the service is provided
Amazon Web Services	Web hosting	EU
ComplyAdvantage	Screening of Swan's natural and legal person customers	EU
Ubble	Verification of user identity by video identification, in accordance with our AML-TF policy	EU
Idemia	Production, personalisation and dispatch of physical cards to cardholders	EU

Monext	Cards issuing Authorizations management	EU
BNP Paribas	Holding a segregated account for the funds of users of payment and electronic money services	EU
Lyncas	Periodic audit firm	EU
FourthLine	Verification of user identity by video identification and electronic signature, in accordance with our AML-TF policy	EU
SSP Collect	- Postal reception of cheques - Technical management of checks cashing	EU
SaltEdge	Applications management for an interface enabling secure communication with account information service providers, payment initiation service providers	EU
Wise	Receiving and issuing international transfers via the SWIFT payment system	EU

You can also find below a list of the Main service providers, for more information, you can contact the DPO:

Tool	Purpose	More information		
	Growth			
Hubspot	Cloud-based CRM designed tool	https://www.hubspot.com/		
Google Ads	Gain visibility across Google's properties tool	https://ads.google.com/intl/fr_fr/home/		
Google Analytics	Website behavior Analytics	https://analytics.google.com/analytics/web/provision/#/provision		
Zendesk	cloud-based help desk management solution	https://www.zendesk.com		
Snowflakes	Data cloud	https://www.snowflake.com		
Internal tools				
Notion	organizational tools	https://www.notion.so/		
Slack	messaging app for business	https://slack.com		

GitLab	Technical Teams document Tool	https://www.gitbook.com/
	Conte	nt
Google Search Console	Google Search results. Tool	https://search.google.com/search-console/welcome?
Google My Business	Tool to manage online presence across Google	https://www.google.com/business/
HotJar	Customer analysis	https://www.hotjar.com/

SPECIFIC INDIVIDUALS' RIGHTS

According with the GDPR, you have the right to ask the Data Controller for :

- access to your personal data,
- rectify your personal data,
- erase your personal data,
- limit the processing of your personal data,
- request portability for your personal data if you want; or
- the right to lodge a complaint with a supervisory authority.

However as a regulated entity and in order to be able to share some of your Personal Data with public authorities, governmental bodies, or other financial institutions, SWAN will keep your Personal Data in a secure environment for a maximum period of **five (5) years** from the termination of the business relationship.

This obligation has some impacts on your individual rights provided by the GDPR. Indeed, we cannot rectify, erase or limit the processing of your personal data to comply with our legal and regulatory obligations.

Each demand will be dealt with on a case by case basis, you can ask for more details by sending an email in English, French, German or Spanish to dataprivacy@swan.io or the following address:

Swan - Compliance Department Personal Data

95 avenue du président Wilson 93100 Montreuil

We have one month to respond to any request relating to the exercise of your rights from the date of receipt of the request. This period may be extended by two months due to the complexity or an excessive number of requests.

Following <u>Article 12.6 of the RGPD</u>, to exercise these rights, Swan, as the data controller, reserves the right to ask you to prove your identity.

Finally, you have the right to lodge a complaint with the Commission Nationale de l'Informatique et des Libertés (CNIL), notably on its website www.cnil.fr.

UPDATES

This Personal Data Protection Policy may be amended or supplemented at any time by SWAN, in particular, to comply with any legislative, regulatory, jurisprudential or technological developments.

CONTACT DETAILS

If you have any questions regarding the content of this document, please contact the DPO: dataprivacy@swan.io.

To check for updates to this Policy, you should visit this page regularly.

COOKIES

Definition

Cookies are data stored in a user's terminal equipment and used by the site to send information to the user's browser, allowing the 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 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 it contains.

Several types of cookies are likely to be used by the site:

- Cookies strictly necessary for navigation on the site and to guarantee its proper functioning;
- Cookies that allow to establish traffic statistics:
- Cookies and social networking plug-ins
- Targeted advertising cookies

Google Analytics

SWAN uses the services of the US company Google Inc.

The data collected by the cookies is transmitted and stored by Google Inc. Google Inc. is a member of the Privacy Shield (EU-U.S. Privacy Shield draft adequacy decision of June 12, 2016) and therefore ensures an adequate level of protection for personal data.

The Google Analytics service allows users to count visitors and to identify the way they use the site. These cookies are deposited and read on the user's terminal equipment and as soon as the user accesses a website using the "Google Analytics" service.

More information about the Google Analytics service can be found on the following page: http://www.google.com/analytics/learn/privacy.html.

WHAT TYPES OF COOKIES DOES SWAN USE?

Our cookies have various purposes. They may:

- 1. Enable basic website functionality (Essential cookies);
- 2. (Functional cookies)
- 3. Help us offer you relevant, targeted advertising (Marketing cookies);
- 4. Improve our site performance (Analytics cookies); and
- 5. Other cookies.

Essential cookies

Swan issues cookies that are required to enable basic website functionality.

Cookie	Duration	Description
cookiey es-cons ent	1 year	CookieYes sets this cookie to remember users' consent preferences so that their preferences are respected on their subsequent visits to this site. It does not collect or store any personal information of the site visitors.

hssrc	session	This cookie is set by Hubspot whenever it changes the session cookie. Thehssrc cookie set to 1 indicates that the user has restarted the browser, and if the cookie does not exist, it is assumed to be a new session.
cfrui	session	Cloudflare sets this cookie to identify trusted web traffic.
_GREC APTCH A	5 months 27 days	This cookie is set by the Google recaptcha service to identify bots to protect the website against malicious spam attacks.

Functional cookies

Swan uses functionality cookies to enhance the performance of websites as without them certain functions of the website may not be available.

Cookie	Duration	Description
UserMatchHi story	1 month	LinkedIn sets this cookie for LinkedIn Ads ID syncing.
lang	session	LinkedIn sets this cookie to remember a user's language setting.
bcookie	1 year	LinkedIn sets this cookie from LinkedIn share buttons and ad tags to recognize browser ID.

lidc	1 day	LinkedIn sets the lidc cookie to facilitate data center selection.
bscookie	1 year	LinkedIn sets this cookie to store performed actions on the website.
hssc	30 minutes	HubSpot sets this cookie to keep track of sessions and to determine if HubSpot should increment the session number and timestamps in thehstc cookie.
cf_bm	30 minutes	This cookie, set by Cloudflare, is used to support Cloudflare Bot Management.
_help_center _session	session	No description available.
cp_session	1 month	Codepen sets this cookie for Help systems found in the website.
_uetsid	1 day	Bing Ads sets this cookie to engage with a user that has previously visited the website.
_uetvid	1 year 24 days	Bing Ads sets this cookie to engage with a user that has previously visited the website.

Analytics cookies

Swan may use cookies to help the website operator understand how it performs, how visitors interact with the site, and whether there may be technical issues. However, this storage type usually doesn't collect information identifying a visitor.

Cookie	Duration	Description	
AnalyticsSyncHi story	1 month	No description	
ajs%3Acookies	1 year	No description available.	
li_gc	5 months 27 days	No description	
debug	never	No description available.	
ajs_user_id	1 year	This cookie is set by Segment to help track visitor usage, events, target marketing, and also measure application performance and stability.	
ajs_group_id	1 year	This cookie is set by Segment to track visitor usage and events within the website.	
ajs_anonymous _id	1 year	This cookie is set by Segment to count the number of people who visit a certain site by tracking if they have visited before.	
hstc	5 months 27 days	This is the main cookie set by Hubspot, for tracking visitors. It contains the domain, initial timestamp (first visit), last timestamp (last visit), current timestamp (this visit), and session number (increments for each subsequent session).	

hubspotutk	5 months 27 days	HubSpot sets this cookie to keep track of the visitors to the website. This cookie is passed to HubSpot on form submission and used when deduplicating contacts.
_hjFirstSeen	30 minutes	Hotjar sets this cookie to identify a new user's first session. It stores a true/false value, indicating whether it was the first time Hotjar saw this user.
_hjAbsoluteSes sionInProgress	30 minutes	Hotjar sets this cookie to detect the first pageview session of a user. This is a True/False flag set by the cookie.
_gcl_au	3 months	Provided by Google Tag Manager to experiment advertisement efficiency of websites using their services.
_ga	1 year 1 month 4 days	The _ga cookie, installed by Google Analytics, calculates visitor, session and campaign data and also keeps track of site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors.
_gid	1 day	Installed by Google Analytics, _gid cookie stores information on how visitors use a website, while also creating an analytics report of the website's performance. Some of the data that are collected include the number of visitors, their source, and the pages they visit anonymously.
In_or	1 day	No description
_hjSessionUser _3060972	1 year	No description

_hjSession_306 0972	30 minutes	No description
cuid	1 year 1 month 4 days	No description
session	1 year 1 month 4 days	No description available.
amp_fef1e8	1 year	No description
tld	session	No description
ajs%3Atest	1 year	No description available.
state	15 minutes	No description available.
oauth2_authenti cation_csrf_inse cure	1 month	No description

_zendesk_share d_session	session	No description available.	
_zendesk_sessi	session	No description available.	
_zendesk_authe nticated	past	No description	
gtm_id	1 year	No description available.	
_hjTLDTest	session	To determine the most generic cookie path that has to be used instead of the page hostname. Hotjar sets the _hjTLDTest cookie to store different URL substring alternatives until it fails.	
ga*	1 year 1 month 4 days	Google Analytics sets this cookie to store and count page views.	
_gat_UA-*	1 minute	Google Analytics sets this cookie for user behavior tracking.	
_hjRecordingLa stActivity	never	Hotjar sets this cookie when a user recording starts and when data is sent through the WebSocket.	

_hjRecordingEn abled	never	Hotjar sets this cookie when a Recording starts and is read when the recording module is initialized, to see if the user is already in a recording in a particular session.
CONSENT	2 years	YouTube sets this cookie via embedded YouTube videos and registers anonymous statistical data.
_gh_sess	session	GitHub sets this cookie for temporary application and framework state between pages like what step the user is on in a multiple step form.

Marketing cookies

Swan may use cookies to deliver advertisers more relevant to your interests. They may also limit the number of times you see an advertisement and measure the effectiveness of advertising campaigns.

Cookie	Duration	Description
IDE	1 year 24 days	Google DoubleClick IDE cookies are used to store information about how the user uses the website to present them with relevant ads and according to the user profile.
test_cookie	past	The test_cookie is set by doubleclick.net and is used to determine if the user's browser supports cookies.
guest_id_mar keting	1 year 1 month 4 days	Twitter sets this cookie to identify and track the website visitor.

guest_id_ads	1 year 1 month 4 days	Twitter sets this cookie to identify and track the website visitor.
personalizatio n_id	1 year 1 month 4 days	Twitter sets this cookie to integrate and share features for social media and also store information about how the user uses the website, for tracking and targeting.
guest_id	1 year 1 month 4 days	Twitter sets this cookie to identify and track the website visitor. It registers if a user is signed in to the Twitter platform and collects information about ad preferences.
muc_ads	1 year 1 month 4 days	Twitter sets this cookie to collect user behavior and interaction data to optimize the website.
li_sugr	3 months	LinkedIn sets this cookie to collect user behavior data to optimize the website and make advertisements on the website more relevant.
MUID	1 year 24 days	Bing sets this cookie to recognise unique web browsers visiting Microsoft sites. This cookie is used for advertising, site analytics, and other operations.
YSC	session	Youtube sets this cookie to track the views of embedded videos on Youtube pages.
VISITOR_INF O1_LIVE	5 months 27 days	YouTube sets this cookie to measure bandwidth, determining whether the user gets the new or old player interface.

Other cookies

Cookie	Duration	Description
_hjIncludedInS essionSample _3060972	2 minutes	Description is currently not available.
amplitude_test swan.io	1 year	Description is currently not available.
SNID	1 year 1 month 4 days	This cookie is set by Google. This cookie is used by the map which helps visitors to identify and reach the facility.
_octo	1 year	No description available.
logged_in	1 year	No description available.
amp_cookie_t estoX2WpDfs SNDIwwzrUO0 _rg	session	Description is currently not available.
_tldtest_TtLKL BCw3pyqZncr 7S4EU4	session	Description is currently not available.

amp_cookie_t estmWsRwxP KDs4BVmT7e	session	Description is currently not available.
QsJ5O		

Social network sharing cookies

SWAN offers Users functionalities allowing them to share editorial content and any type of content published on the Site through social networking sites (Twitter, Facebook, LinkedIn). Social network cookies are managed by the publisher of the social network site. The publisher of the social network concerned is able to identify the User thanks to share buttons, even if this button was not used when consulting the website www.swan.io. Indeed, this type of application button may enable the social network concerned to follow a User's browsing on the Site, simply due to the activation of the User's account on this social network (open session) on their terminal during their browsing on the site.

SWAN has no control over the process used by social networks to collect information about the User's browsing on the site and associated with the personal data they have. The User is invited to read the social network Cookies management policy on the sites concerned. These privacy policies must enable the User to exercise their choices with these social networks, in particular by configuring their user accounts for each of these networks.

Targeted advertising cookies

SWAN uses behavioral analysis Cookies to identify which information from the Sites and Applications could be of most interest to the User, to help improve their browsing and make it more interesting. These cookies also make it possible to determine in real time which advertisement to display based on the User's recent browsing of the Site and the Applications in order to limit the number of times the User has seen an advertisement and to help measure the effectiveness of an advertising campaign.

Advertising content is likely to contain cookies issued by third parties: either the advertiser at the origin of the advertising content concerned, or a company that is a third party to the advertiser (communication consulting agency, audience measurement company, targeted advertising service provider, etc.) or advertising network, which has associated a cookie with an advertiser's advertising content.

Consent

When you browse the website <u>www.swan.io</u>, the deposit and reading of cookies enables us to analyze your navigation and to measure the website's audience.

You also have the possibility to manage the cookies used on the site by configuring your browser, as detailed below. The User is informed that, when connecting to the Site, cookies or other technologies are used, subject to the choice expressed by the User, which may be modified at any time.

A Cookie enables its issuer, for a period of thirteen months, to recognise the terminal concerned (computer, tablet, smartphone, etc.) each time this terminal accesses digital content containing Cookies from the same issuer. A Cookie stores information relating to the browsing of your computer on the website (the pages you have visited, the date and time of the visit, etc.) which SWAN may read during your subsequent visits.

You have several options to delete cookies.

Indeed, while most browsers are set by default and accept the installation of cookies, you have the possibility, if you wish, to choose to accept all cookies, or to reject them systematically, or to choose which ones you accept depending on the issuer. To do so, you can install a cookie manager to add, delete, modify, search, protect and block cookies by <u>clicking here.</u>

You can also set your browser to accept or refuse cookies on a case-by-case basis prior to their installation. You can also regularly delete cookies from your terminal via your browser.

To manage cookies and your choices, the configuration of each browser is different. It is described in the help menu of your browser, which will allow you to know how to change your options regarding cookies. For example:

https://support.microsoft.com/fr-fr/microsoft-edge/supprimer-les-cookies-dans-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09

for Safari™	http://docs.info.apple.com/article.html?path=Safari/3.0/fr/9277.ht ml
for Chrome™	http://support.google.com/chrome/bin/answer.py?hl=fr&hlrm=en &answer=95647
for Firefox™	http://support.mozilla.org/fr/kb/Activer et désactiver les cookies
for Opera™	http://help.opera.com/Windows/10.20/fr/cookies.html

However, setting your browser to refuse cookies will make certain features, pages and areas of the site inaccessible.

How do you manage cookie storage and consultation?

Some of our website features are provided to you solely through these cookies.

You can block, delete and deactivate these technologies if your browser or device allows it.

However, doing so may result in certain features becoming unavailable.

For more information on blocking, deleting and deactivating these technologies, refer to your browser or device settings.

Cookies and tracers may be deactivated and deleted using tools available on most browsers. As each browser offers different features and options, you will need to configure your preferences for each different browser you use.

Below is a guide to managing and blocking cookies and tracers:

- If you use Firefox™
- 1 Go to the browser's Tools tab and select the Options menu.
- 2- Select the Privacy tab and configure the Storage Rules menu by selecting Use Custom Settings for History.
- 3- In the menu, you can deselect Accept Cookies or select Never in the Accept Third-Party Cookies drop-down menu.
 - If you use Safari™
- 1- In your browser, select the Safari menu, then Preferences.
- 2- Click on Privacy.
- 3- Click on Display Cookies.
- 4- Select the cookies you wish, click on Delete, or go directly to Delete All.
- 5- After deleting the cookies, click on Finished.
 - If you use Google Chrome™
- 1- Click on the Settings menu, then click on Display Advanced Settings.
- 2- Next, click on Content Settings, select Block Third Party Data and Cookies, and then click OK to confirm your selection.
- 3- You can also click on Display All Website Data and Cookies. Select the cookies you want to delete or click on Delete All.
 - If you use Opera™
- 1- Open the Tools or Settings menu
- 2- Select Delete Private Data.
- 3- Click on the Detailed Options tab, select the options you want, and delete what you seem fit.