

# GALION PERSONAL DATA PROTECTION AND PRIVACY POLICY

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By clicking on this page, you can access information on:

- How and for what purposes we collect your Data and in particular no nominative data;
- The conditions under which we use the Data we process;
- The confidentiality and security measures we implemented;
- Your rights and means of control available to you in respect of Galion's Processing of Data.

Through this policy of Personal Data Protection and Privacy (hereinafter "Policy"), we wish and commit ourselves to build your trust. For this purpose, we wish to draw your attention to two essential principles on which we undertake to guarantee the protection of the Data we process: **transparency and control** by the User on his Personal Data.

In accordance with these two principles, we undertake to guarantee the confidentiality of the Data we process by deploying our activity:

- i. with transparency to enable you to exercise your choices in an informed and clear manner;
- ii. while allowing you to have control over the processing of your Data through a right to object which we enable you to exercise effectively (see Article 8).
- iii. by attaching great importance to the security of the data collected, we deploy, to this end, all our best efforts;
- iv. considering the protection of Personal Data as a fundamental right.

## 1. PURPOSE OF POLICY

This Policy is important for you who want to have a positive and confident experience in the use of our Service. It is also important to us as we strive to be transparent in the way we collect Data and protect their confidentiality. We aim to answer to your questions accurately and appropriately, and meet your expectations by respecting your choices and rights. We invite you to take a moment to understand how we operate and contact us without hesitation if necessary (see article 10).

## 2. DEFINITIONS

The definitions of key terms provided below are intended to explain our activities to you as clearly as possible:

**Cookies:** means a text file that is saved temporarily, subject to your agreement in accordance with the applicable French and European legislation, when you access and consulting our Service. A cookie file allows us to identify the Internet browser of the Device it is saved on and only permit to maintain your connection on your Device. In this Privacy, the term cookie should not be understood in the sense of advertising cookie. We only use technical cookies to allow access to the Service.

**Personal Data or Data:** means, in accordance with the General Data Protection Regulation 2016/679 of 26 April 2017 (GDPR), all information that allows a data subject to be identified either directly or indirectly. Personal data include:

- identification data, in other words, all the data communicated by the User to access his personal account such as an email address and a password;

- access data, in other word, all the identifiers and passwords to connect and synchronize the User's assets with the Service such as the API keys and blockchain addresses. This data will be processing as sensitive data and Galion will make every effort to ensure its confidentiality.

**Service:** means in accordance with the French Act on Confidence in the Digital Economy n°2004/575 of 21 June 2004 (LCEN), the transmission of digital data of any kind, which do not represent private correspondence, by an electronic communications process, of signs, signals, texts, images, sounds or images of any kind, implemented by us in order to offer you the service through our Galion application (hereinafter "Product").

**Galion, we, us, our:** means Group companies and our service providers who may, under certain conditions, be required to collect, use, store or share Personal Data collected during the access to our Service.

**Data Processor(s):** means any company that may be required to process Personal Data on behalf of Galion, who is responsible for the processing Data.

**Device(s):** means the hardware (computer, smartphone, tablet and /or all connected media, etc.) and their software components (operating system, browser, etc.) that allow you to access the Service.

**Processing of Personal Data:** means any operation(s) or set of operations which applied to Personal Data, in particular collection, saving, organization, structuring, adaptation or alteration, retrieval, consultation, viewing, use, storage, transfer or any means of providing access, limiting, erasure, or destruction, comparison or interconnection.

**User(s), you:** means any physical person who accesses, uses, views via a given web browser the Service, whose Personal Data we may process in order to serve the user.

### 3. DATA COLLECTION

Galion is a company that develops a financial application that permit to Users to manage in one place all the personal finances whether it's cryptocurrency assets or traditional assets. With the Galion application, the Users are able to track, transfer or trade any of their assets on any of their accounts.

By reading this Policy, you are informed that the Processing of your Personal Data is necessary for the provision of the Service.

We do not track you, indeed, the Data we collect are declarative Data that you provided us when creating your account on our Service such as your identification Data and/or access Data. Furthermore, we use Matomo, an analytics tool approved by the French Privacy protection agency (CNIL), which automatically anonymize data and serves no purpose other than helping us improve our product.

These collected data are pseudonymized, that is, transformed or manipulated so that it does not identify you directly. We do not, under any circumstances, collect Data such as your name, postal address or phone number, which would identify you directly.

Our activity does not, at any time, involve collecting Data that would directly identify you. We only collect your Data in order to propose you an efficient, functional and secure Service. Indeed, without the communication of all the requested information, you could not create an account on our Service and access the features of the Product.

### 4. USE OF DATA

The needs of our Users are at the center of all our decisions.

By making confidentiality and data privacy a core principle, Galion's ambition is to enable you to a Product of quality in respect of the confidentiality of your Data. We wish to provide ever more efficient Service and stay closed of your expectations, therefore, it is specified that your Data is intended only for us and our Data Processors for the purpose of provision of Galion's Service.

Thus, by collecting your Data, we are essentially seeking to provide you with a satisfactory experience in the use of the Service. In this regard, we draw your attention to the fact that when you register an account on Galion Service, we collect the strict minimum of data for the reasons explain above and do not sell them under any circumstances.

Your Data belongs to you, solely, the Data we collect, allow us to:

- provide you and improve the Service that we offer;
- to send you a newsletter if you choose this option at the creation of your account or once that's done in your account settings;
- have visibility on Service usage flows for statistical purposes used solely internally.

In this way, we can enable access, manage the application and update it to fit your needs.

All the Data collected are retained for a limited time basis for the purpose for which they were processed and in accordance with the regulation in effect.

## **5. TRANSFER OF DATA**

The Data we collect is processed only on servers and Data Processors located in the European Union.

We are aware that the standards for the protection of personal data and privacy of non-European Union countries are different, which is why, in the event of a transfer of data outside the European Union (as a last resort necessity), we are committed to implementing all safeguards in line with European Union law and will enforce and ensure that a high level of data protection is implemented by our Data Processors worldwide. Otherwise, we will not transfer any Data outside the European Union.

## **6. DATA SECURITY**

We undertake to process the Data we collect in strict confidence.

Galion places particular importance on the security of your Data and we implement all the necessary security measures to protect you and Galion from any unauthorized access, damage, disclosure or destruction of Data we have gathered. Therefore, we use:

- Effective technologies to ensure security that complies with the most demanding standards such as encryption, using SSL technology etc.;
- Internal audits on data collection, storage and processing are carried out regularly in order to check access to our databases and prevent any unauthorized system form accessing Galion systems;
- Restricted access to the Data collected, so that only Galion employees whose role requires them to view the Data are authorized to access them, in accordance with strict confidentiality obligations to which they are subject, on penalty of proportionate and appropriate disciplinary sanctions.

## **7. DATA SHARING AND DISCLOSURE**

Galion does not share your Data with businesses, organization or any third party unless we considered that there is a reasonable justification for accessing, or disclosing the Data:

#### 7.1. To our subsidiaries our service providers

It is possible that we may, in the context of our activities, transfer Data to our subsidiaries or our Data Processors that process the Data collected on our behalf, and in accordance with our instructions and this Policy. As such, Galion declares to be in relation with trusted Data Processors, renowned for the seriousness of their services and the high degree of protection they grant to confidentiality.

Under no circumstances, our Data Processors may nominate another Data Processor without our prior authorization in writing or use the Data for any purpose other than those described in this Policy.

#### 7.2. In response to a request from an authorized public authority

- In response to court summons or orders, judicial or administrative proceedings or any other request issued by the competent authorities having jurisdiction over Galion, or to establish or exercise its rights, or to defend itself against legal actions;
- To protect itself from any infringement of Galion's or users' rights, property or security pursuant to any accordance with the law
- To avoid, reveal or deal with fraudulent activities, security breaches or any technical problem that might affect Galion's servers.

If we are required by law to disclose the information that users have submitted, we will attempt to provide them with prior notice (unless prohibited by law) that a request for their information has been made in order to give them an opportunity to object to the disclosure. We will attempt to provide this notice by any means at our disposal. If users do not challenge the disclosure request, we may be legally required to turn over their information.

## 8. FREEDOM OF CHOICE AND CONTROL OF DATA

It is also essential to inform you about how we collect your Data, to allow you to make informed choices and exercise your right in full knowledge of the facts.

In accordance with the applicable law, the collection of Data is subject to your agreement, which can be expressed and modified at any time, using any of the methods offered to you to exercise those choices. We are responsible for obtaining your agreement for the collect and the processing of your Data when you create your account or use our Service, in accordance with the applicable regulations.

We use the opt-in mechanism to collect your Data, in other words, we do not collect any Data unless if you explicitly given your consent and, such as explain above, this consent is valid for the sole purpose of helping us improve our Product.

In accordance with the GDPR, we allow to you the right to access, erase, restrict the Processing and portability your Data. In order to fulfil requests for access and erasure, please send us an email at: [datarequest@galion.io](mailto:datarequest@galion.io). We are in the process of automating this process to make it easier for you.

If you no longer wish any or all of your Data to be gathered and saved by Galion, you may exercise your right to object by **sending us a mail at [datarequest@galion.io](mailto:datarequest@galion.io), and we** will delete your account and all your data. Thus, your data will no longer be gathered and stored in our data base and if you have activated the newsletter option, you will not receive it anymore. The exercise of your right of objection implies destroying all the Data associated with your account and that Galion may therefore no longer be able technically to fulfil subsequent access or erasure request. If you want to exercise a prior right to access Data, it must be expressed in accordance with the terms set out in the previous paragraph.

## **9. MODIFICATION OF THE POLICY**

The Policy may be subject to change. Any Change to the rules of our Policy will be accessible as soon as it comes into effect on this page and will be notified by email.

## **10. CONTACT US**

Do you still have questions about this Policy? are you looking for answers to your queries about confidentiality and the Data we gather? Please contact us at the following address and we will do our best to answer: [gdpr@galion.io](mailto:gdpr@galion.io)