

Privacy Policy – TRANSACTION CONNECT – Westfield club

Version dated October 2019 2.

1. Generalities

You are informed that, in the context of your use of the Loyalty Points Collection program of the loyalty program “*Westfield club*” set up by Rodamco Handel AB and Unibail Management, which allows rewarding its members according to their purchases made under certain conditions, Transaction Connect (“**We**”), a French company with headquarters at 86 rue du Faubourg Saint Denis, 75010 Paris (www.transactionconnect.com), and registered with the Registry of Commerce and Companies of Paris under number 822 619 185, act as an independent data controller regarding the collecting and the processing of your personal data necessary to provide the *cashback* functionality of the program “*Westfield club*”.

Our secure technology allows to recognize purchases in two ways:

- by synchronizing your current accounts (hereinafter the “**Accounts**”) to your User Account ;
- by linking your bank card(s) to your User Account.

This allows Us to recognize your purchases in the shopping center and process this data in accordance with your consent (hereinafter the “**Services**”).

The purpose of this Privacy Policy is to explain to you what personal data We collect, how We process it and your rights with respect to such processing.

We encourage you to read this Privacy Policy and Our [Terms of Use](#) carefully.

By using the Services and submitting personal data to Us, you acknowledge that you have been informed of Our use of your personal data in accordance with this Privacy Policy and our [Terms of Use](#).

If you do not want Us to use your personal data, We encourage you not to provide them to Us. But, in this case, We will not be able to implement the Services and allow you to benefit from the *cashback* functionality allowed by your « *Westfield club* » account (your “**User Account**”).

Since transparency is a key value for us, We place the utmost emphasis on the respect of your privacy and commit ourselves to respect the provisions of the EU Regulation 2016/679 of April 27 of 2016 (the General Data Protection Regulation) and of the French Law “Informatique et Liberté” No. 78-17 of 6 January 1978 in its current version.

Thus, to best respect your privacy, We will never sell your personal data (i.e. any information that can identify you directly or indirectly) to third parties.

2. Type of data collected

In connection with the provision of the Services, We collect the following personal data (the Personal Data):

a) In the case of synchronization of your Accounts

- The Access IDs (and if applicable your password) that you use to connect to your establishment web interface;
- Your transaction data as displayed on your establishment web interface;
- If applicable, your transactional data of establishments compatible with the service as display on the web interface of said service;

b) In the case of linking your bank card(s)

- The information needed to link your payment card to your User Account, i.e. your bank card number (PAN), your bank card expiry date and the country of use;
- The data related to the purchases you made in the shopping center.

In both cases, We collect the information related to the bank card you use for the *cashback* functionality of the “*Westfield club*” program.

Once collected, all this data is encrypted and stored on servers hosted in the European Union in an encrypted database with a bank level algorithm (AES-256).

3. Processing of the Personal Data

To operate the “*cashback*” feature of the loyalty program, We process your personal data in these ways and for the following purposes:

- We access and store, in a pseudonymized form, to purchase data detected via all the transactional data of the Accounts you linked to your User Account or via the bank card(s) you linked to your User Account;
- We analyse these data to identify the purchases made inside the shopping center where the Loyalty Program is implemented. In the case of synchronization of your Accounts, we also take into account any transaction made before your enrolment in the loyalty program so as to provide a customized experience. For more information about the transaction history We have access to, We encourage you to consult your bank.
- We transfer to Rodamco Handel AB and Unibail Management SAS the data relating to the purchases (namely: date, store and amount) made in the participating stores of this shopping center;

- We transfer to our partner Checkout the necessary data for the implementation of the “*cashback*” feature, namely the information related to the bank card on which you want to be rewarded;
- We store all the data necessary to prevent any misuse of the Points Collection of the loyalty Program in the form of a digital print;
- Subject to your validation of the corresponding opt-in - via a specific box to tick -, We use all your Transactional data for statistical purposes in aggregated and anonymized form;
- Subject to your validation of the corresponding opt-in via a specific box to tick-, We share these aggregated and anonymized statistical data with partners. This data being anonymized, it will be impossible, even for our partners, to make a comparison between the statistics that We realize and your personal data.

In addition, We inform you that our partners are forbidden to ask us for precisions, details or any element allowing to disaggregate the data which are communicated to them.

For our part, We refrain from answering any questions they might ask Us when the answer would involve a violation of your rights, including the right to respect your personal data.

We freely and independently determine the means implemented in order to pursue the purposes We have identified above. Thus, you are hereby expressly informed that We act as independent data controller within the meaning of the GDPR with respect to the purposes referred to above and are in no event to be deemed joint controllers with Rodamco Handel AB and Unibail Management or data processor of the latter.

Further information relating to the collection, processing and sharing of your personal data and your rights regarding your data and how you can exercise them are detailed in the "*Privacy Policy*" of the "*Westfield club*" Program accessible directly by clicking [Here](#).

4. Confidentiality of the Personal Data communicated

You give Us a mandate to access in your name and for your account each of the Accounts that you have entered on your User Account in order to perform all the acts necessary for the provision of the Services, in accordance with the provisions of the Payment Services Directive 2.

We protect the confidentiality of the Personal Data collected, to which We attach the greatest importance. We make our best efforts to take the necessary precautions to preserve the confidentiality of Personal Data and declare to be in relation with trusted hosting providers and technology providers, renowned for the seriousness of their services and the degree of protection they grant to the confidentiality of Personal Data.

5. Use of partners

In order to provide the Services to you, We use subcontractors.

Under these conditions, you give Us your express consent so that, for the purposes of providing the Services, Access IDs allowing Accounts synchronization are encrypted and that personal data is then transmitted securely, if necessary, to our hosts and technology providers, based in the European Union and complying with the legislation in force, who proceed to their synchronization.

The latter are contractually obliged to respect the provisions of the GDPR concerning the personal data they process. They also ensure that all collected data they have to process is stored on EU territory.

We are currently working with the following companies to provide the Services:

- CheckOut : partner operating the reimbursement of the *cashback* offers;
- Fidel : partner in charge of collecting your purchase information from the bank card(s) you linked to your User Account;
- Amazon Web Services: sub-contractor in charge of the storing of the Personal data collected.

6. Your rights regarding the management of your Personal Data

First of all, you are informed that you can at any time and without justification withdraw the consent or consents you have given Us.

You can withdraw your consent by writing to TRANSACTION CONNECT User Relations Department via email at: dataprotection@transactionconnect.com, provided that you have given proof of your identity by attaching to your application a copy of your valid identity document and indicating your e-mail address. For security reasons and in case of doubt as to the value and authenticity of the supporting documents produced, We reserve the right to request any other supporting documents from you.

Once your identity has been established, We will then stop processing your Personal Data corresponding to the consent withdrawn. Please note that this withdrawal of your consent cannot affect the lawfulness of processing already carried out, for which you had previously given your consent.

You are also informed that you have the right to access, oppose, delete and rectify information concerning you. You can exercise these rights by writing to TRANSACTION CONNECT User Relations Department via email at: dataprotection@transactionconnect.com, provided that you have given proof of your identity by attaching to your application a copy of your valid identity document and indicating your e-mail address. For security reasons and in case of doubt as to the value and authenticity of the supporting documents produced, We reserve the right to request any other supporting documents from you.

In the event that you request opposition to the processing of your Personal Data or the closure of your User Account by sending a request to Us at the address dataprotection@transactionconnect.com and by proving your identity by attaching to your request a copy of your valid identity document and indicating your e-mail address. For security reasons and in case of doubt as to the value and authenticity of the supporting documents produced, We reserve the right to request any other supporting documents from you.

Once your identity has been established, We will put an end to the processing of your Personal data and close the corresponding User Account.

TRANSACTION CONNECT, not being in possession of information relating to your civil status, cannot identify you with this information. In order to enable us to respond to your requests, you then authorize Us to ask Rodamco Handel AB and Unibail Management SAS, the entity in charge to create a technical identifier (known as "Customer ID") from your personal data relating to your civil status, to indicate us your Customer ID.

Please note that in case of deletion of your Personal Data or opposition to the processing of your Personal Data, you will no longer be able to benefit from the *cashback* functionality.

We undertake to respond to all your requests as soon as possible and at the most within one month from the time We have all the necessary identification information.

7. Right to the portability of the Personal data collected

You are informed that you have the right to the portability of your Personal data. This right offers you the possibility to obtain and reuse the Personal data collected.

You can exercise this right by sending a request to Us at the address dataprotection@transactionconnect.com and by proving your identity by attaching to your request a copy of your valid identity document and indicating your e-mail address. For security reasons and in case of doubt as to the value and authenticity of the supporting documents produced, We reserve the right to request any other supporting documents from you.

TRANSACTION CONNECT, not being in possession of information relating to your civil status, cannot identify you with this information. In order to enable us to respond to your requests, you then authorize Us to ask Rodamco Handel AB and Unibail Management, the entity in charge to create a technical identifier (known as "Customer ID") from your personal data relating to your civil status, to indicate us your Customer ID.

Only the Personal Data that you have provided Us will be transmitted to you in a structured, commonly used and machine-readable format as soon as possible, and no later than one month after the request has been sent to Us.

Personal data derived, calculated or inferred from the data you have provided Us are excluded from your right to portability.

Under no circumstances may the exercise of this right infringe the rights and freedoms of third parties.

We undertake to respond to all your requests as soon as possible and at the most within one month from the time We have all the necessary identification information.

8. Data retention

We retain all of your Personal Data for the period during which you use the Services.

We will automatically delete or prevent the use of your Personal Data if you do not use our Services for more than 3 years (i.e. if you do not perform any transactions to collect points for a reward). In this case, we will automatically close your account.

When closing your User Account or if you have asked Us to delete your Personal Data, if you have withdrawn your consent or if you have exercised your right to object to the processing of your Personal Data, We will destroy all data that concern you, with the exception of the data required to prevent fraudulent deletions, namely deletions followed by re-registrations under another identifier, to benefit from potential offers and rewards. In this case, We and Our subcontractors will only keep the personal data strictly necessary to detect these fraudulent behaviors for a period of one year from the request to terminate the Services use.

This data is stored in the form of a fingerprint, i.e. in the form of a unique and encrypted character string based on the access information to the establishment web interface. In this form, these data are unusable for any purpose other than the fight against fraud.

We will perform the same deletion operations when request to do so by Rodamco Handel AB and Unibail Management SAS.

9. Transfer in case of change of ownership

In the event that TRANSACTION CONNECT is the subject of a merger, acquisition, dissolution or sale, We reserve the right to transfer your Personal data to the new entity that would become controller, provided that the assignee maintains for your benefit the rights and obligations provided for herein and in our Terms of Use.

You will be notified if your data is transferred to another entity as a result of such merger, acquisition, dissolution or sale.

10. Complaint to a data protection Authority

You have the right to submit a complaint concerning our data processing activities before the CNIL:

Commission Nationale de l'Informatique et des Libertés
3, place de Fontenoy

75007 Paris
www.cnil.fr

11. Applicable law and jurisdiction

This Privacy Policy and all the points relating to its execution or interpretation are governed by French law irrespective of the place of execution of the obligations arising therefrom.

If you have any questions or complaints about this Privacy Policy, you can contact us at: dataprotection@transactionconnect.com.

If a dispute arises in connection with the Privacy Policy or the use of the Services, each of the two Parties shall endeavour to settle the dispute with an amicable agreement.

12. Updates of the Privacy Policy

We have the faculty to revise or update the TOU from time to time. Any modification will enter into force when the updated TOU are made available to. In case of changes important to Us and requesting your consent according to the applicable laws, We will inform you about it and request your agreement if necessary.