Privacy Policy

PERSONAL DATA PROCESSING POLICY. Last updated: 11/2017

Download Privacy Policy (PDF 1Mo)

Read the General Conditions of use

Consulter la Charte de Confidentialité en Français

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YOU MUST READ THE POLICY IN FULL BEFORE CLICKING ON THE "I HAVE READ AND ACCEPTED THE PERSONAL DATA PROCESSING POLICY" ICON AT THE END OF THIS DOCUMENT.

THIS PERSONAL DATA PROCESSING POLICY FORMS PART OF SNAPP'S TRANSPARENCY PROCESS VIS-A-VIS THE USER IN THE WAY IN WHICH IT HANDLES PERSONAL DATA.

SNAPP' RESERVES THE RIGHT TO AMEND THIS CHARTER, TO REMOVE IT, OR TO MODIFY OR ADD CERTAIN CLAUSES. AMENDMENTS MAY BE MADE AT SNAPP'S DISCRETION (I) EITHER BY WAY OF A NOTIFICATION IN THE APPLICATION AND/OR USER AREA, PROVIDED THAT THE USER HAS BEEN PREVIOUSLY INFORMED THEREOF WITH REASONABLE NOTICE; (II) OR ONCE THE USER HAS SPECIFICALLY ACCEPTED THE AMENDED VERSION OF THE CHARTER BY CHECKING A BOX OR CLICKING A BUTTON IN THE APPLICATION OR USER AREA.

*   *   *

ANY QUESTIONS THAT THE USER MAY HAVE ABOUT THIS PERSONAL DATA PROCESSING POLICY CAN BE SENT BY EMAIL TO CONTACT@FIDME.COM

CONTENTS

FOLLOW FIDME ON FACEBOOK

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Article 3.   What is personal data?

Article 4.   What methods are used to process the personal data collected for the creation of the User Account and the use of the Services?

Article 5.   What methods are used to process the personal data collected to enable the User to manage their Loyalty Schemes with Professionals with a Barcode Card?

Article 6.   What methods are used to process the personal data collected to enable the User to manage their Loyalty Schemes with Professionals with a Stamp Card?

Article 7.   What methods are used to process the personal data collected to enable the User to receive Discounts with Professional Partners?

Article 8.   What methods are used to process the personal details collected to enable the User to receive targeted sales/promotional offers issued by Partner Agencies within Third-Party Applications?

Article 9.   What methods are used to process personal data collected to facilitate the connection between the User Account (FidMe) and certain third-party accounts (e.g. Facebook account)?

Article 10.   What methods are used to process personal data required for the "Dial Once" feature?

Article 11.   What methods are used to process personal data required for technical or security purposes?

Article 12.   What are the User's rights concerning the personal data collected and processed by Snapp' where the latter is the data controller?

III. Canvassing

Article 13.   How can the User manage canvassing from Professional Partners via the Application?

IV. Cookies

Article 14.   What is a Cookie?

Article 15.   Which Cookies does Snapp use via the Application and the Website?

Article 16.   How do I enable/disable Cookies?

I. General Information

Article 1.   Definitions

In the interests of consistency, the definitions set out in the "Definitions" Clause of the GTCU shall also apply to this Personal Data Processing Policy.
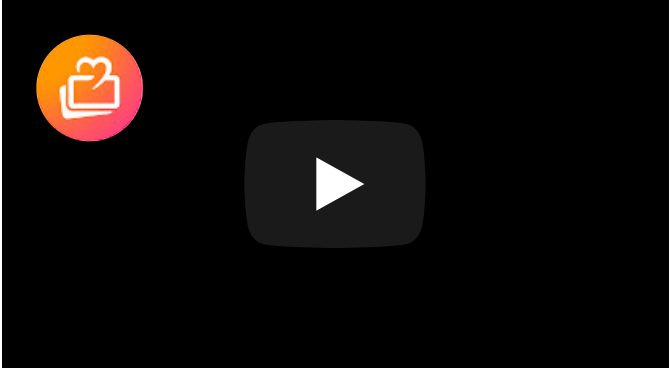
Article 2.   What is the purpose of the Personal Data Processing Policy?

The purpose of this Personal Data Processing Policy is to inform the User on how Snapp' manages their personal data.

II. Personal Details Processed by Snapp'

Article 3.   What is personal data?

According to the French Data Protection Act (loi Informatique, Fichiers et Libertés), it "covers any information on a private individual identified or who may be identified, whether directly or indirectly, by referring to an identification number or to one or several pieces of information specific to this individual".

Article 4.   What methods are used to process the personal data collected for the creation of the User Account and the use of the Services?

The "Account Data" refers to the following data: The User's title, forename, surname, date of birth, postcode, email address, password and telephone number.

Account Data is collected in order to enable the User to create their User Account and to access and use the Services, the Website and the Application. The User can therefore manage the Loyalty Schemes that they hold using the Features of the Application and of their User Area. The User's actions via the Application (e.g. creating a User Account, adding an Electronic Loyalty Card) are stored in order to enable data to be restored (e.g. Electronic Loyalty Cards stored in the Application, accumulated Loyalty Points etc.) in the event of the loss, theft of or change to the User's Mobile Device.

Recipients of the data include: (i) The relevant employees and departments of Snapp' (in particular the IT department and sales and marketing), and (ii) the service providers who assist Snapp' in the operation and/or running of the Website and the Application, in particular the employees and departments of OVH SAS, based in Roubaix, France, the webhost provider for the Website and the Application.

The User may access their Account Data and change it at any time in the Profile section of the Application or User Area. They may delete all of their Account Data via the Profile section of the Website.

Article 5.   What methods are used to process the personal data collected to enable the User to manage their Loyalty Schemes with Professionals with a Barcode Card?

Some Professionals with a Barcode Card offer customers with their Loyalty Card the opportunity to create an online loyalty account on their own website or application. This loyalty account is defined by certain data such as: the User's email address, and/or password, and/or the User's date of birth, and/or their surname, and/or their postcode, and/or the relevant Electronic Barcode Loyalty card number.

Snapp' collects the data listed above in the Application and uses it to "connect" the User's Electronic Barcode Loyalty Card with the information in the online loyalty card account that they hold. This connection can only be made using Electronic Barcode Loyalty Cards where the relevant Professionals have agreed to their cardholders being covered by this feature in the Application.

Given that such data (i) has been provided by the User via a medium belonging to the Professional with a Barcode Card (usually their website or application), and (ii) is linked to the Electronic Barcode Loyalty Card registered with that Professional, any changes to data must be made through the Professional in question, usually via its website.

This data processing method makes it easier for the User to link their Loyalty Schemes for Professionals with a Barcode Card. For example, it means that information on the Loyalty Schemes that the User holds with Professionals with a Barcode will be updated in the Application, primarily by displaying the Loyalty Points balance with the Professional in question. This method also enables the User to receive personalised sales/promotional offers issued by the Professional with a Barcode Card for which they hold a Card, via in-app notifications.

Article 6.   What methods are used to process the personal data collected to enable the User to manage their Loyalty Schemes with Professionals with a Stamp Card?

In order to enable the User to benefit from its Loyalty Schemes with Professionals with a Stamp Card as well as the sales/promotional offers issued by these Professionals via the Application, or by email and/or SMS, Snapp' collects and processes the following data: the User's forename, surname, email address and telephone number.

The User may access their data and change it at any time in the Profile section of the Application or Website. They may delete all of their data via the Profile section of the Website.

Article 7.   What methods are used to process the personal data collected to enable the User to receive Discounts with Professional Partners?

To recap, the term "Professional Partner" refers to a commercial company which provides the User with sales/promotional offers or Discount Coupons for products and services, even if the User does not hold an Electronic Loyalty Card with them.

Snapp' may be required to collect and process certain bank details for the User, in order to enable them to receive (if they so wish) Discounts (subject to conditions) issued by Professional Partners via the Application.

Snapp's accounts department receives these bank details. Snapp' sends the forename, surname, IBAN or Paypal email address to its technical service providers in charge of refunds to the User's Bank Account.

The User's bank details are not sent to any recipient other than the technical service providers listed above, who have undertaken via Snapp' to process such data confidentially and securely.

The User may access, change or delete this banking data at any time in the relevant Banking Information section of the Application.

None of the User's personal details will be sent to the Professional Partner with whom they receive the Discount.

Article 8.   What methods are used to process the personal details collected to enable the User to receive targeted sales/promotional offers issued by Partner Agencies within Third-Party Applications?

The term "Technological Partners" refers to SNAPP's partner companies which act as advertising firms or agencies. These Technological Partners manage and post adverts in advertising spaces (e.g. banners) in Third-Party Applications and in FidMe.

The term "Third-Party Application" refers to any mobile application other than the FidMe Application already installed on the User's Mobile Device. Third-Party Applications include ad space through which sales/promotional offers are disseminated.

With the User's consent, SNAPP' as data controller, may be required to collect and share geolocation data and/or the advertising ID from the User's Mobile Device to its Technological Partners ("IDFA" on iOS, "Advertising ID" or '"Wi-Fi MAC address" on Android), to enable those partners to display sales/promotional offers in ad spaces on certain Third-Party Applications which are actually targeted and linked to the User's geolocation and interests. This data is also used in a anonymous and aggregated form by FidMe and its Technological Partners, to provide marketing studies.

By accepting the collection of geolocation data and advertising ID ("IDFA" on iOS, "Advertising ID" and "Mac Address Wi-Fi" on Android), the User can benefit from more relevant content and optimized services for his shopping and his loyalty:

• discover in FidMe App loyalty programs around him and be informed of exclusive offers and discounts, more relevant and tailored to his interests and geolocation,

• benefit from targeted offers according to his geolocation in Third Party Applications; it being specified that these targeted offers will only be displayed in Third Party Applications whose dedicated advertising spaces are managed by the Technological Partners.

If the User declines, he will not be able to benefit from these targeted offers and further custom nearby deals in FidMe, and the content displayed in Third Party Applications will be less relevant, as it won't take into consideration his interests and geolocation.

The User's geolocation data and advertising identifiers collected for advertising purposes will be stored by SNAPP' and the Technological Partners for a maximum retention period of 13 months, beginning on the date of the User's last activity and/or last contact.

The User can modify his choice at any time and refuse the collection of this data via the dedicated menu "Manage my geolocation parameters", accessible from the section "Data settings" of the "Profile" menu of the application.

The User may exercise his rights of access, rectification, deletion, portability, limitation, opposition, under the conditions provided by the applicable data protection regulations, as follows: by sending an email including a copy of his identity document to: contact@fidme.com. The User also has the right to lodge a complaint with the competent supervisory authority. He has the right to withdraw his consent at any time, without prejudice to the lawfulness of the treatment based on the consent he has given, before withdrawing it.

- How do I opt out of the collection of advertising IDs?

Should the User wish to receive non-targeted ads rather than the targeted ads provided by our Partner Agencies in certain Third-Party Applications, they may suspend the use of their advertising ID for this purpose at any time.

In the Android Google Settings menu, the User can therefore select "Opt out of interest-based ads" or "Reset advertising ID". On iOS, under "Privacy">"Advertising" in the Settings menu, the User can activate the "Limit Ad Tracking" option as well as resetting the advertising identifier. Concerning the Wi-Fi MAC address collected on Android, the User can write to SNAPP' to contact@fidme.com to require such data is no longer collected or processed.

- How do I opt out of the collection of geolocation data?

The User can suspend the collection and processing of its geolocation data by changing the settings on their Mobile Device. On iOS, the User can select "FidMe" under the Settings menu, where they can opt to "Never" share their geolocation data with the Application, or only "While Using the App". On Android 5 and previous versions, geolocation data can be managed globally for the whole Mobile Device, while on Android 6 and later versions it can be managed individually for each application. The User can stop their geolocation data from being collected under "Location" in the Google settings, by selecting "Disable Google Location Reporting" or, if available, using the permissions for each application (Settings/Applications/Application Name/Permissions/Location).

Further details can be found by following the links below:

- Android 5 and earlier: https://support.google.com/googleplay/answer/6014972

- Android 6 and later: https://support.google.com/googleplay/answer/6270602

- iOS: https://support.apple.com/fr-fr/HT207092

Article 9.   What methods are used to process personal data collected to facilitate the connection between the User Account (FidMe) and certain third-party accounts (e.g. Facebook account)?

Snapp may use certain usernames such as the Facebook username in order to facilitate the creation of a (FidMe) User Account via Facebook and access to the (FidMe) User Account via Facebook. Snapp may also use the User's advertising ID in order to enable them to connect to their iGraal account from their (FidMe) User Account, provided that they activate this function when they first open the Application.

As indicated above, the User can stop their advertising ID from being used at any time: on Android, they can select the "Opt out of interest-based ads" or "Reset advertising ID" options from the Google Settings menu. On iOS, under "Privacy">"Advertising" in the Settings menu, the User can activate the "Limit Ad Tracking" option as well as resetting the advertising identifier.

Article 10.   What methods are used to process personal data required for the "Dial Once" feature?

To recap, on Android, Snapp' may be required to collect and process certain calls made by the User to enable them to use the Dial Once feature, provided that they activate this function when they first open the Application, or later under the Application settings. This Feature displays an interface on the User's Mobile Device screen which enables their requests to be handled in an easier and more user-friendly way when they call a company subscribed to Dial Once (usually a call center). In order to enable the User to benefit from this time-saving Feature, which may for example involve routing them to the appropriate page for their request, Snapp' may send the User's phone number, the customer services or call centre phone number dialled, and the connection data (IP address) to Dial Once Holdings Ltd (Ireland), together with any other technical data or data relating to the use of the menu displayed by Dial-Once.

The User may activate or disable Dial Once at any time from the Settings menu.

Article 11.   What methods are used to process personal data required for technical or security purposes?

Snapp collects and processes the Mobile Device IP address and more broadly any Access Method that the User uses to access the Services, the Application or the Website. The purpose of processing such data is to: (i) enable the User to download the Application on their Mobile Device, to create their User Area and to use the Services; (ii) ensure that the Application or Website are displayed according to the browser language; (iii) enable the user session to remain open; (iv) provide the User with a higher level of security when using the Services; and to (v) perform maintenance operations.

Article 12.   What are the User's rights concerning the personal data collected and processed by Snapp' where the latter is the data controller?

Where Snapp' acts as the data controller of data collected and processed by it, the User has the following rights:

- The right to access their personal data collected by the Website and via the Application,

- The right to amend this data,

- The right to delete it,

- The right to contest its use on legitimate grounds.

The above Clauses set out a number of ways in which the User can access, amend or delete specific data or opt out of its collection via the Application, the Website or in their Mobile Device settings.

In all other cases, the User may exercise their rights by -mail, by sending an email with a copy of their ID to: contact@fidme.com.

III. Canvassing

Article 13.   How can the User manage canvassing from Professional Partners via the Application?

- Targeted offers received through in-app or out-of-app notifications

In the "Permissions" section of the Application, the User can opt to receive information on their use of the Application and sales/promotional offers via in-app or out-of-app notifications. These offers are targeted according to the Electronic Loyalty Cards held by the User as well as their geolocation. Snapp' collects and processes the User's Account Data and geolocation data for this purpose. Recipients of this data include: (i) Snapp's IT, sales and marketing departments, and (ii) the service providers who assist Snapp' in sending targeted offers.

The User can opt to no longer receive targeted offers at any time under the "Permissions" section of the

Application.

They can also contest the collection and processing of their geolocation data by changing the settings on their Mobile Device.

As indicated above, the User can suspend the collection and processing of their geolocation data by changing the settings on their Mobile Device. On iOS, the User can select "FidMe" under the Settings menu, where they can opt to "Never" share their geolocation data with the Application, or only "While Using the App". On Android 5 and previous versions, geolocation data can be managed globally for the Mobile Device as a whole, while on Android 6 and later versions it can be managed individually for each application. The User can stop their geolocation data from being collected under "Location" in the Google settings, by selecting "Disable Google Location Reporting" or, if available, using the permissions for each application (Settings/Applications/Application Name/Permissions/Location).

Further details can be found by following the links below:

- Android 5 and earlier: https://support.google.com/googleplay/answer/6014972

- Android 6 and later: https://support.google.com/googleplay/answer/6270602

- iOS: https://support.apple.com/fr-fr/HT207092

- Offers by email

The User can agree to receive sales/promotional offers from Professional Partners by email in the "Permissions" section of the Application. In this case, Snapp' will send the User's email address to the service provider for mailing lists.

The User can change their email address at any time from the Profile section of the Application. The User can also unsubscribe from this mailing list at any time under the "Permissions" section of the Application, or by using the unsubscribe link in the emails.

IV. Cookies

Article 14.   What is a Cookie?

The term "Cookie" refers broadly to any marker which is submitted and/or read during consultation of the Website or Application. A Cookie may contain information such as the name of the server that created it, a unique numerical username or an expiry date. This information is sometimes stored on an Access Method as a simple text file, which a server can access to read and record the information.

Article 15.   Which Cookies does Snapp use via the Application and the Website?

- "Session ID" Cookies

"SessionID" Cookies are used by the Website and Application to: (i) memorise information linked to a form that the User completes on the Website or the Application (e.g. registration forms for the Services or for access to the User Area); (ii) enable the User to access reserved or private areas of the Website such as their User Area, using usernames or data that they have previously sent to Snapp'; (iii) reconnect to content or to a Service after a certain time interval.

- "Technical" Cookies

Technical Cookies are used by the Website to: (i) adapt the Website's editorial content to the technical configuration of the User's computer or tablet, and to (ii) provide a download link for the Application when the internet user is browsing from a Mobile Device.

- "Security" Cookies

"Security" Cookies are used by the Application and the Website in order to improve the security of the services/sections/areas provided to the User (e.g. when logging in to the User Area or accessing the Application after entering the password).

- Visitor statistics Cookies

Visitor statistics Cookies are used by the Website and the Application to prepare statistics and numbers for visits to the Website and Application (e.g. by section, content type etc.), in order to (i) report to Professionals, Users and the general public on FidMe's success, (ii) enable Snapp' to make the Application more engaging and user-friendly, and (iii) analyse how Users use their Electronic Loyalty Cards.

Article 16.   How do I enable/disable Cookies?

The User is informed that they have the right to access their personal Cookie data at any time, and to opt whether or not to accept Cookies.

However, should the User opt not to accept Cookies, the Services cannot be used to optimum effect (in particular, browsing the Website, using the Application, the User Area, connecting to the Application and saving information in the User Area).

The User may manage, disable and enable Cookies at any time through their web browser settings. For example:

- On iOS: Go to Settings > Select the relevant browser > Accept cookies > "Never"/ "Frequently visited sites"/ "Always".

- On Android: After launching the browser, click on the menu button (usually to the bottom left of the Mobile Device screen) > Plus > Settings > "Accept Cookies" or "Do not accept".

- Cookies are managed and disabled in various ways according to which browser is being used. The User can also use the "Help" section of their browser to find out how to disable Cookies.

Should the User experience any problems with accessing or opting out of Cookies, they can contact Snapp' by email at: contact@fidme.com

YOU ARE A CUSTOMER

Your loyalty cards in your mobile

How does FidMe work?

Coupons around you

Deals to share

Beta FidMe V.I.P

RETAILERS & STORES

FidMe stampcards

FidMe Connect!

Manage your loyalty program

Visibility tool

Analytics and customers stats

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