



Privacy Policy

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1. Purpose and scope of this Policy

1.1 Purpose of this Policy

“CAURI MONEY” is the trading name of the company CAURI SAS.

CAURI’s approach is represented by security, confidentiality and continuous protection of personal data (the “Data”) of the users of its services, in accordance with current French and European regulations, specifically the French Data Protection Law [Loi Informatique et Libertés] of 6 January 1978, as amended (LIL) and the General Data Protection Regulation of 27 April 2016 (GDPR).

The purpose of this policy is to inform you of the rules that we apply with regard to Data protection. More specifically, it describes how we collect and process your personal data and how you can exercise your rights regarding this data.

We apply a strict policy to ensure the protection of your Data; thus:

- We do not sell your Data to third parties
- We ensure that your Data is always safe and secure

1.2 Scope of this Policy

This Policy covers the use of:

- our cauri.money website
- our iOS and Android mobile applications

2. Data collection

Data customers provide us with:

- Information submitted directly on our website or mobile applications to subscribe to our services or those of our partners (specifically, Aza Finance for international money transfers)
- Information collected over conversations with our customer support team over the phone, via email, or through social networks communication channels

The category of data we process are as follows:

- Identification and biometric data: first name, last name, place, date of birth, nationality, photo, ID document number, passport number or residence permit number, postal address, e-mail address, mobile phone number, gender, age, signature.
- Authentication and identification: username, password, PIN code.
- Geolocation, network, and device data (cookies, crash analytics, IP addresses)
- Professional and tax data: employment status, working industry, working country and state, country of tax liability, and corresponding tax ID.
- Banking and financial data: income, source of income, account usage, bank details, IBAN
- Contacts (opt-in): mobile numbers and email addresses in the customer's address book
- Communications: messages, emails, calls, interactions through our website, mobile apps, and social networks communication channels
- Transaction data: date, transaction time, amount, counterparty, transaction wording, country, MCC (Merchant Category Code), notes.

3. Use of collected data

We only process personal data for specific, explicit, and legitimate purposes. The purposes pursued are as follows:

- For the management of bank accounts and payment instruments
- To secure account access and payment instruments
- To prevent, investigate and detect fraud, money laundering, and financing of terrorism schemes
- To deal with customer complaints
- To improve the quality of service and keep customers informed about the changes in the service, including new features or partnerships
- To have a better understanding of customer behavior through analytics
- To improve the user experience (UX) on our website and mobile applications and tailor content
- To manage loyalty programs, referrals, giveaways, or other promotional activities

4. Third parties

All of the Customers' data held are protected and kept confidential. CAURI SAS may share customers' personal data with its subcontractors to provide certain services and process transactions under the condition that these third parties guarantee a sufficient level of protection of the data shared in compliance with GDPR rules.

These partners only have access to the data that is strictly necessary for executing the contracts established with CAURI SAS.

The categories of recipients of the collected Data are as follows:

- Web hosting providers
- Communication Services
- Compliance
- Banking and financial services providers and payment solutions
- Customer service support systems
- Business intelligence solutions
- Auditors, lawyers, external legal advisers
- Anti-fraud and money laundering support systems
- Supervisory authorities, regulators, and public authorities

5. Security of storage and transmission to third parties

5.1 Data storage

We have outsourced data storage activity to a market-leading service provider, Amazon Web Services (AWS). AWS provides data storage with high durability and availability.

AWS offers storage choices for backup, archiving, and disaster recovery, as well as block and object storage.

5.2 Data storage period

Customer Data is stored as long is necessary for the purposes for which it was collected.

In accordance with the laws and regulations that fight against money laundering and the financing of terrorism, transaction data will be stored for a period of five years following the end of contractual relationship.

5.3 Data security

Data transmission is secured over HTTPS (SHA-256/RSA Encryption). Access to accounts is secured with a 2-factor authentication process (username and password and 4-digit passcode)

5.4 International Data Transfer

At CAURI MONEY, we prioritize the security and integrity of your personal data. To that end, we want to assure our users that we do not transfer any personal data outside of the European Union (EU) and European Economic Area (EEA). All data processing activities are confined within Europe, ensuring robust protection in line with the General Data Protection Regulation (GDPR) and other relevant European data protection standards.

Our commitment is to safeguard your data and maintain the highest levels of data protection.

5.5 Data Collection Opt-Out Rights

Pursuant to the principles of transparency and user empowerment, we recognize and respect the right of individuals to control their personal data. As such, we offer users the option to opt-out of certain data collection activities.

1. **Scope of Opt-Out:** Users have the right to opt-out of the collection, processing, or use of their personal data for specific purposes as detailed in this policy. The scope of the opt-out shall be limited to the personal data and purposes specified.
2. **Method of Opt-Out:** To exercise the opt-out right, users must:
 - 2.1 Submit a written request to our designated Data Protection Officer.
 - 2.2 Clearly specify the types of data and purposes for which they wish to opt-out.
 - 2.3 Provide valid identification details to enable us to accurately identify and process the opt-out request.
3. **Processing of Opt-Out Request:** Upon receiving a valid opt-out request, we will:
 - 3.1 Confirm receipt of the request within [e.g., 5] business days.
 - 3.2 Review the validity of the request.
 - 3.3 Cease the collection, processing, or use of the specified personal data within [e.g., 30] business days, unless there are compelling legitimate grounds for continuing said activities that override the individual's opt-out rights.
4. **Limitations and Exceptions:** The opt-out right may not apply in circumstances where:

- 4.1 The processing is necessary for the performance of a contract to which the user is a party.
 - 4.2 The processing is required by law.
 - 4.3 The personal data is necessary for legitimate interests pursued by our company, and these interests are not overridden by the user's data protection interests.
5. **Post Opt-Out Activities:** Should a user exercise their right to opt-out, their personal data will not be used for the specified purposes from that point onward. However, please note that opting out does not equate to the deletion of data. For requests related to data deletion, please refer to the "Legal rights" section of this policy.

It is our solemn commitment to respect and act upon your data preferences.

6. Cookie Policy

Our website utilizes cookies for a more tailored user experience and site improvement. By navigating our site, you consent to our cookie use.

Cookies are small data files stored on your device. We employ:

- **Essential Cookies:** Vital for our website's functionality, such as logging into secure areas or conducting transactions.
- **Analytical Cookies:** Through Google Analytics, we assess visitor behavior to enhance our site. Google Analytics gathers data anonymously, not linking information to individual users. Opt-out from Google Analytics without affecting your site experience.
- **Targeting Cookies:** Tracks pages visited, and links clicked to refine our content and advertising. We may share such data with third parties for advertising purposes.

Be aware, third parties might set their own cookies, which we cannot control.

To block cookies, modify your browser settings. However, blocking all cookies may limit your access to certain site areas.

7. Legal rights

Under GDRP, customers have rights regarding the processing of their data (as detailed in *Table 1: Legal rights*). Under the law, CAURI MONEY commits to responding to any data-related requests within a reasonable timeframe.

Legal rights	Description
Right of access	Customers may request confirmation from CAURI MONEY whether their data are being processed or not and, if so, to obtain information on how these are being processed.
Right to portability	Customers may request a copy of their data in a structured, commonly used, machine-readable format. When technically feasible, customers may ask CAURI MONEY to transfer their data directly to another controller.
Right to rectification	Customers may ask CAURI MONEY to correct, modify, delete, or complete any incomplete or inaccurate data
Right to be forgotten	Under specific circumstances (as detailed in Article 17 of the GDPR), customers may request the deletion of their data, except for data necessary to comply with our legal obligations (e.g., money laundering reporting).
Right to object or request the restriction	Customers may ask CAURI MONEY to restrict the processing of their personal data. Customers can also object to CAURI MONEY using their data for specific automated processing, including direct marketing.
Right to withdraw consent	Customers have the right to withdraw their consent to processing their data at any time, which shall not render unlawful any prior processing based on such consent.
Right to lodge a complaint	Customers have the right to make a complaint at any time to the relevant supervisory authority (e.g., <i>Commission Nationale de l'Informatique et des Libertés</i> in France) or to obtain legal compensation if they consider that CAURI MONEY has not respected their rights.

Table 1: Legal rights

8. Automated Decision Making

At CAURI MONEY, we employ automated processes to assist in certain decision-making activities. Specifically, as part of our identity verification procedures, algorithms and automated tools may evaluate the authenticity of documents and information you provide. This is to streamline the verification process and ensure the rapid processing of applications or services that require identity checks.

While automation aids efficiency, we understand the importance of accuracy and fairness. Therefore, if you believe an incorrect decision has been made based on the automated process, you have the right to challenge this decision and request human intervention.

9. Data Controller & Contact Information

For the purposes of this privacy policy and in line with applicable data protection laws, CAURI MONEY is identified as the Data Controller, meaning we determine the purposes and means of processing your personal data.

Should you have any questions, concerns, or comments about our data handling practices, or if you wish to exercise any of your data rights, please contact our Data Protection Office using the details provided:

- **Entity:** CAURI MONEY SAS
- **Data Protection Office Address:** Délégué à la Protection des Données, 62 avenue de Paris, 92320, Chatillon
- **Email:** dpo@cauri.money

We take your privacy seriously and encourage you to reach out with any concerns. If, however, you believe your concerns haven't been adequately addressed, you retain the right to lodge a complaint with the relevant supervisory authority in your jurisdiction. Nonetheless, we value direct communication and would appreciate the opportunity to address your concerns firsthand.