

DATA PROTECTION POLICY FOR KLS SERVICES AND PRODUCTS

Version dated 16 April 2025

Courtesy translation - Only the French version is authentic.

The Data protection policy (hereinafter referred to as the "Policy") sets out the manner in which the personal data of users of KLS services and products, in particular of the <https://app.kls-platform.com> platform (hereinafter referred to as "Users" and the « Platform ») are collected and processed by KLS in the context of the provision and promotion of its products and services.

This Policy applies to natural persons from whom KLS collects personal data directly (prospects, clients) but also to natural persons for whom KLS collects data indirectly (because they have a link with you, whether you are a client or a prospect, for example employees, legal representatives and authorised person(s) and beneficial owners and shareholders of companies). This Policy may also apply to legal entities insofar as KLS may process personal data of natural persons mandated by its professional clients and partners (e.g. authorised third parties). Personal data (hereinafter referred to as "Personal Data") means any information relating to an identified or identifiable natural person.

This Personal Data, which may vary depending on the nature of the product or service subscribed to, may be subject to processing, automated or otherwise, in accordance with European Regulation 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (known as the "GDPR") as well as any applicable national regulations. :

Information relating to the protection of Personal Data is also provided to Users when they subscribe to the various products and/or services we offer. These notices, which are specific to the products and services subscribed to, provide an initial level of information on the use of their Personal Data and are supplemented by this Policy.

1. Qualification of KLS and purposes of processing

a. KLS as data controller:

The Personal Data collected through various communication channels, by means of the Platform, by telephone or by e-mail, are collected by KLS, publisher of the Platform and acting as data controller within the meaning of the GDPR, except where it is expressly mentioned on the Personal Data collection medium that the data controller is a third party. In this case, in accordance with the law, the data controller will specify to Users the characteristics of the processing that it implements under its sole responsibility.

KLS undertakes to process Personal Data only for specified, explicit and legitimate purposes, to limit the collection and processing of Personal Data to that which is strictly necessary (data minimisation) and not to process it further in a manner incompatible with those purposes. In the context of their use of its products and services, KLS, acting as Data Controller, processes all or part of the Personal Data concerning Users, for the purposes described below and on the following legal basis:

Legal basis	Purposes and sub-purposes
Legitimate interest :	Prospecting and sales promotion :

<ul style="list-style-type: none"> - to improve products and services; - promote products and services to customers; - responding to a customer request; - to train and assess employees as an employer (human resources management). 	<ul style="list-style-type: none"> - to enable Users to access the Platform and to develop, maintain and improve the Platform; - develop the relationship with the User and respond to requests for information; - managing marketing activities, developing and proposing new products, services or content to customers (sending personalised commercial communications by email to customers for similar products or services). <p>Risk management :</p> <ul style="list-style-type: none"> - management, prevention and detection of internal fraud ; - use of cookies/technical tracers, strictly necessary for the operation of the Platform, in particular to guarantee the security of the network and information. <p>Employee training and appraisal :</p> <ul style="list-style-type: none"> - use of a technology for recording and transcribing oral exchanges into written form (analysis grid) for reporting on meetings held by employees with prospects and customers.
<p>Consent</p>	<p>Prospecting and sales promotion :</p> <ul style="list-style-type: none"> - creation of reliable commercial prospecting databases and carrying out prospecting and sales promotion campaigns aimed at prospective customers (sending personalised commercial communications by email to prospective customers); - personalising the products and services or editorial content offered via the Platform in order to increase User participation in the products and services; - use of cookies/trackers for audience measurement purposes (statistics and volumes of visits to and use of the various elements making up our Platform, sections and content visited, routes taken); - use of technology for recording and transcribing oral exchanges into written form for meetings held as part of competitive tendering procedures. - management of customer satisfaction surveys and other feedback on products, services or applications; - carrying out marketing profiling operations that have no legal effect on Users, such as marketing segmentations and selections, in order to suggest innovative services and products, propose personalised complementary

	<p>or promotional offers and provide a better quality service to Users.</p>
Legal obligation	<p>Managing the security of users and employees, as well as goods, products and services, monitoring and reporting risks, and carrying out ongoing and periodic checks by the compliance and internal control teams:</p> <ul style="list-style-type: none"> - permanent and periodic controls by the compliance and internal control teams and management of the traceability of these controls in accordance with regulatory obligations; - monitoring and reporting of risks (financial, legal, compliance, reputational, etc.) that KLS may face in the course of its business; - Implementation of the "whistleblower" system for reporting and handling alerts under the Sapin 2 Act; - prevention, detection and management of external fraud ; - prevention and detection of criminal offences in order to prepare and/or take legal action. <p>Preventing and combating money laundering and the financing of terrorism:</p> <ul style="list-style-type: none"> - Ensuring that KLS complies with all applicable regulations, particularly those relating to international sanctions and embargoes, as part of the customer identification and identity verification procedure.
Performance of a contract	<p>Execution and management of the business relationship with the customer for the supply of KLS products and services:</p> <ul style="list-style-type: none"> - analyse each customer's applications for the various products; - subscribe to products and services distributed by KLS by electronic signature; - give customers access to the back office so that they can view their different files for each of the products and services they have subscribed to; - management of communications and information provided to customers about products and services ; - management of the contractual relationship with the customer. <p>Handling, follow-up and/or settlement of claims, pre-litigation and litigation and collection operations:</p> <ul style="list-style-type: none"> - claims management ;

	<ul style="list-style-type: none"> - pre-litigation and litigation management ; - management of collection operations.
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b. KLS as Data Processor:

In the context of participating in the management of the client's business relationship with borrowers, benefiting from financing, KLS, acting as the client's Data Processor, processes all or part of the Personal Data concerning Users, for the purposes described below and on the basis of the following grounds:

Legal basis	Purposes and sub-purposes
Performance of a contract	<p>Collection of information from borrowers in order to identify and verify their identity (KYB):</p> <ul style="list-style-type: none"> - enable any banking or financial institution to enter into a relationship with a borrower and/or an invited financial institution. <p>Gathering information from borrowers to find out more about them and meet their financing needs:</p> <ul style="list-style-type: none"> - consolidation and storage of data collected on the Platform; - enable documents to be shared using the Platform and associated services; - enable customers, borrowers and invited institutions to participate in various financing transactions via the Platform and associated services. <p>Creating an account and identifying Users when using the Platform:</p> <ul style="list-style-type: none"> - technical cookies enabling Users to browse the Platform and use the services (collection of session identifiers and identification data).

2. Categories of personal data processed

The Personal Data processed by KLS are :

Data category	Data processed
Civil status, identification, identification data, image (surname, first name, pseudonym, date of birth, identification number, postal or e-mail address, image, etc.)	Surname(s), first name(s), gender, nationality, date and place of birth, postal address, email address, telephone number, proof of identity, identification number (Siren/RCS), KBIS and declaration of beneficial owners.

Professional life (CV, education, professional training, awards, etc.)	Profession, status, employer, business sector.
Economic and financial information (income, financial situation, tax situation, etc.)	No.
Banking and payment information	Financial data: bank details, RIB Transactional data: nature, amount and wording of transactions, credits and financial commitments, lender and beneficiary, identities of issuing institutions, investors or lead managers, financial and non-financial criteria, sources of payment, value date, debts and guarantees, proof of transactions and other banking data and any other information or documents required to trace the origin and destination of transaction funds. Tax situation: invoices.
Connection data (IP address, logs, etc.)	Logs, cookies and other tracers (SDK etc.), IP address.

Under no circumstances does KLS sell Users' Personal Data to third parties.

3. How long Personal Data is kept and stored

Purposes of processing	Retention Period
KLS as data controller	
Management of the business relationship between KLS and the customer for the provision of KLS products and services and related communication	<ul style="list-style-type: none"> - 5 years from the end of the contractual relationship between KLS and the customer for data relating to this customer. - 10 years for accounting and tax documents, and associated supporting documents (account statements, invoices, etc.) from the end of the financial year concerned. - 6 months from the date they are submitted in the case of logs, cookies and technical tracers (SDK, pixel, tags or local storage) and from the date they are collected in the case of IP addresses. - until the withdrawal of consent or 3 years from the end of the commercial relationship for the customer, in the case of the recording and transcription of oral exchanges into writing, for the restitution of appointments as part of the business relationship.
Creation of reliable sales prospecting databases and implementation of prospecting and sales promotion campaigns	<ul style="list-style-type: none"> - 3 years from the completion of opinion and satisfaction surveys and statistics; - until the withdrawal of consent or 3 years from the end of the commercial relationship for the

	<p>customer and the last contact from the prospect, in the case of data relating to commercial prospecting;</p> <ul style="list-style-type: none"> - until the withdrawal of consent or 3 years from the last contact from the prospect, in the case of the recording and transcription of oral exchanges into writing, for the restitution of appointments in the context of competitive tendering procedures; - 6 months maximum for cookies and other tracers subject to consent (SDK, pixel, tags, or local storage).
Handling, follow-up and/or settlement of claims, pre-litigation and litigation and collection operations	<ul style="list-style-type: none"> - 5 years from the event triggering the claim, pre-litigation, litigation or recovery, subject to the application of longer statutory limitation periods.
Risk assessment and management, security and prevention of non-payment and fraud and compliance with legal and regulatory obligations	<ul style="list-style-type: none"> - 5 years from the closure of the proven fraud file or the issue of a relevant alert; - From the date of the offence and for the applicable statutory limitation periods.
Human resources management: recording and transcribing meetings with prospects and customers for training and employee appraisal purposes.	<ul style="list-style-type: none"> - six months from the date of collection, in the case of recordings of meetings held by employees with prospects and customers; - 1 year from the transcription of the exchanges for the analysis documents (analysis grid).
KLS as data processor	
Managing the business relationship between the customer and the borrowers as part of a financing operation.	<ul style="list-style-type: none"> - 5 years from the end of the financing transaction for data relating to the transaction if the business relationship between KLS and the customer continues beyond the end of the financing transaction. - for the duration of the contractual relationship between KLS and the customer if the business relationship between KLS and the customer is terminated before the end of the financing transaction.

The retention periods for Personal Data are necessarily extended for the legal period of foreclosure or prescription as evidence in the event of litigation. In the latter case, the retention period for Personal Data is extended for the duration of the dispute.

At the end of the periods indicated above, Personal Data is either deleted or kept after being anonymised for statistical purposes. It should be noted that deletion or anonymisation are irreversible operations and that KLS is not subsequently able to restore them.

4. Storage and transfer of Personal Data outside the EU

KLS stores Users' Personal Data on the servers of the following service provider:

- Amazon Web Services Emea SARL, 38 avenue John F. Kennedy, L-1855 Luxembourg. French Branch: 31 Place Des Corolles, Tour Carpe Diem, 92400 Courbevoie, France.
Website: <https://aws.amazon.com>.
Contact form: <https://aws.amazon.com/fr/contact-us/compliance-support/>.
Email address: aws-privacy@amazon.com.

KLS takes the utmost care to ensure that Users' Personal Data is processed and stored on the territory of the European Union or in a country whose legislation is recognised as adequate by a decision of the European Commission in accordance with Article 45 of the GDPR. User' Personal Data collected as part of access to the Platform and the provision of services are therefore hosted on servers outsourced to Amazon Web Services on French territory (Paris geographical area).

However, Users' Personal Data, in particular when they visit the Platform, may be transferred outside the European Union by service providers (as data processors of KLS) to third countries (in this case, the United States). If this is the case, KLS implements a precise and demanding framework, in compliance with the applicable European regulations, by signing dedicated contractual clauses (European Commission standard contractual clauses) and security commitments offering the level of guarantee required by European Union regulations (if the service providers do not benefit from the adequacy decision adopted by the European Commission with regard to the United States on 10 July 2023).

Users may obtain a list of KLS's data processors and a copy of the guarantees associated with the transfer of Personal Data to third countries at any time by contacting KLS at the address and in the manner specified in article 11 of this policy.

5. Recipient of Personal Data

The recipients are the natural or legal persons who receive the Personal Data (hereinafter referred to as the "Recipients").

KLS ensures that Personal Data is only accessible to authorised internal and external Recipients, including in particular :

- the staff of the relevant KLS departments authorised to manage the relationship with clients and prospects; in this context, KLS decides which Recipients may have access to which Personal Data in accordance with an appropriate authorisation policy and ensures that they are subject to an obligation of confidentiality;
- KLS's service providers who process Personal Data on behalf of KLS and in accordance with its instructions, without being able to use this data for purposes other than carrying out the sub-contracted operations;
- KLS partners, who process Personal Data on behalf of joint customers and in accordance with the terms of the contracts directly concluded with them;
- the direct and indirect shareholders of KLS, who have a need to know and subject to compliance with confidentiality undertakings;
- the authorities legally entitled to know; in this context, KLS is not responsible for the conditions under which the staff of these authorities have access to and use the Data. These transmissions are carried out in compliance with the "Compendium of procedures - authorised third parties" published by the CNIL.

6. Cookie management

When Users use the Platform, information relating to their browsing may be recorded in "cookies" files installed on their terminals (computer, tablet, smartphone, etc.), subject to their expressed choices regarding cookies, which may be modified at any time. Cookies" are also understood to mean other tracers such as SDKs, pixels, tags or local storage, as tools integrated directly into the Platform's code

As indicated on the Platform's information banner, by clicking on the *Accept* cookies button, Users accept the deposit of cookies on their terminals. They may also choose to continue browsing without accepting the deposit of cookies by clicking on the *Reject cookies* button. However, certain cookies required for the Platform to function properly, for the security of products and services and for audience measurement purposes are not subject to the consent of the person concerned and will therefore remain active. Users may reverse their decision at any time by objecting to the deposit of cookies by clicking on the dedicated button.

- What is a cookie?

A cookie is a small text, image or software file containing information which is recorded on the hard disk of the User's terminal (e.g. computer, tablet, smartphone or any device used for browsing the Internet) when a website is consulted using a browser or a web or mobile application (in particular via an SDK). It is transmitted by a website server to the browser. The cookie file records the pages visited, the type of browser used and the IP address used, and enables its issuer to identify the terminal in which it is stored for the duration of the validity or storage of the cookie concerned. Only the sender of a cookie is likely to read or modify the information contained therein.

- What is a cookie?

A cookie is a small text, image or software file containing information which is recorded on the hard disk of the User's terminal (e.g. computer, tablet, smartphone or any device used for browsing the Internet) when a website or web application is consulted. It is transmitted by a site's server to the browser. The cookie file records the pages visited, the advertisements viewed, the type of browser used and the IP address used, and enables the sender to identify the terminal in which it is stored, for the duration of the validity or storage of the cookie concerned. Only the sender of a cookie is likely to read or modify the information contained therein.

- Why does KLS use cookies?

KLS uses several types of cookies, the purposes of which are described below. Certain technical cookies (session cookies in particular) are essential for the Platform to function properly. Their deletion may lead to navigation difficulties.

6.1. Technical cookies

Technical cookies are cookies that are strictly necessary for the Platform to function. They enable access to reserved and personal areas of our Platform, thanks to personal identifiers (cookie, session identifier), to implement security measures (for example, when a User is asked to connect again to content or a service after a certain period of time), to enable or facilitate communication for the provision of a service by electronic means expressly requested by the User. These cookies are issued and deposited by KLS and Datadog (for technical logs) on the Platform.

6.2. Analytical and audience measurement cookies

These cookies collect information about how visitors use a website or web application.

KLS also uses the Datadog tool (in particular the Heatmap functionality) on the Platform for the purposes of recording browsing patterns and viewing Users' interactions with the Platform. The Personal Data collected by Datadog thanks to the tracers (SDK) relate to the behaviour of Users during their

sessions using the Platform (in particular the date and time of sessions, content consulted, pages visited, mouse events, actions carried out by the User and any specific events on the Platform etc.).

7. Security of Data

KLS reaffirms our commitment to ensuring that the security of Users' Personal Data is at the heart of everything we do.

KLS takes all necessary physical, technical and organisational measures to protect the confidentiality, integrity and availability of Users' Personal Data, in particular against loss, accidental destruction, alteration and unauthorised access.

KLS also takes the utmost care to maintain a high standard of security and confidentiality of Users' Personal Data by raising awareness among its employees and business partners, and by training its employees in data protection, by implementing content controls, by implementing tools and practices aimed at obfuscation, anonymisation, encryption and data encryption in order to ensure the protection of your Personal Data against internal and external risks of leakage of Personal Data.

In the event of a violation of Personal Data concerning Users, presenting a risk to their rights and freedoms, KLS will notify the CNIL of this violation within the regulatory timeframe. In the event that this breach presents a high risk to the rights and freedoms of Users, KLS will inform them as soon as possible of the nature of the breach and the measures implemented to remedy it.

8. Failure to provide Personal Data

Users are not obliged to answer all the questions they are asked in the various collection media and contact forms offered by KLS. However, failure to provide this Personal Data may result in KLS being unable to process the User's request or prevent the User from benefiting from certain KLS products and services.

9. Rights concerning Data

Users have rights to their Personal Data collected and processed by KLS in the context of the provision and promotion of its products and services.

Their rights are as follows:

- a right of access, rectification and deletion of Personal Data (inaccurate, incomplete, equivocal or out of date): KLS guarantees Users access to their Personal Data collected or processed in the context of the commercial relationship;
- a right to object to the processing of Personal Data at any time in the context of commercial prospecting: KLS allows Users to object to the processing of commercial prospecting without justification.
- a right to restrict the processing of Personal Data in accordance with the applicable regulations: if Users no longer wish certain of their Personal Data to be processed, they may restrict its use in accordance with the applicable regulations;
- a right to the portability of Personal Data: KLS will return Users' Personal Data at their request, in a commonly used electronic format, so that they can, if necessary, forward it to the organisation of their choice.
- a right to withdraw consent at any time: Users may accept or refuse at any time to allow KLS to process some of their Personal Data. However, this may result in the termination of the registration process or access to the Platform.

- a right to file a complaint with a supervisory authority: Users have the right to file a complaint at any time with the CNIL as the French supervisory authority for regulations protecting Personal Data.
- a right to communicate to KLS as data controller their instructions concerning their Personal Data in the event of their death: Users may communicate their instructions concerning what should happen to their data after their death.

The User may exercise this right by writing to KLS, publisher of the Platform, or to the banking or financial institution of which he or she is an employee.

The User may contact the KLS Data Protection Officer at the following address: dpo@kls-desk.com or the Data Protection Officer of the banking or financial institution of which he or she is an employee.

In the event of a dispute, the User may file a complaint with the CNIL, whose website can be accessed at <https://www.cnil.fr> and whose head office is located at 3 place de Fontenoy, 75007 Paris.

12. Updating the Policy

The Policy may be modified or amended at any time in the event of changes in legislation, case law, decisions and recommendations of the CNIL or practices. Any new version of the Personal Data Protection Policy will be brought to the attention of Users by any means that KLS deems appropriate and relevant, including electronic means and/or publication on the Platform.