



Privacy policy - Information on the processing of your personal data.

This privacy policy applies from the opening of the platform on 20 September 2021 and includes legal and regulatory updates. MURMURATION develops and operates the FlockeoFunding platform dedicated to participatory financing. It brings together "Project Owners" and "Contributors". Within the framework of these activities, the FlockeoFunding platform is required to process personal data concerning you, whether you are a simple "Visitor" or "User" (registered member, Contributor or Project Developer).

Translated with www.DeepL.com/Translator (free version)

Types of data collected

Within the framework of the use of the FlockeoFunding platform, several types of personal data can be collected:

- User data: this is data that is necessary for registration on the platform or for requesting information via the contact form (Last name, First name, email address, date of birth, postal address, nationality) and certain optional data (telephone, illustrations, Facebook page, Twitter account).
- Data related to the user's activity on the platform (IP address of connection).
- Data appearing on the documents necessary for the identification of Project Holders and certain Contributors (identity documents, proof of address)
- Bank details of Project Developers (BIC, IBAN and RIB). Some of the spaces filled in by the Project Sponsor are public (description of the project page, biography, etc.).

Through these spaces, the Project Sponsor could reveal personal and sensitive data (religious, philosophical, political opinions, state of health, etc.). The Platform therefore invites the Project Developer to be careful when describing his/her project and his/her profile, in order to protect his/her privacy.

Purpose of the data collection

The company MURMURATION, which operates the FlockeoFunding platform is responsible for processing in accordance with the regulations relating to the protection of personal data (and in

particular the Regulation (EU) 2016/679 of 27 April 2016 known as the General Data Protection Regulation).

The processing of data by the Platform complies with a specific legal framework, the purposes of which are as follows:

- Management of the Platform's Users
- Management of Contributions and fund transfers
- Fight against fraud, money laundering and terrorist financing
- Statistical monitoring
- Taxation

Some data must be collected, and their mandatory nature is mentioned on the platform. In the event of failure to provide this data, the User will not be able to create an account, contribute or submit a project. The collection of payments is managed by our payment service provider Stripe, approved by the Autorité de Contrôle Prudentiel et de Résolution (ACPR).

Our payment service provider processes personal data for which it is responsible. Data protection policy : <https://stripe.com/fr/privacy>.

Data transmission

The data we collect may be transmitted to :

- Our subcontractors: emailing tools, hosting companies, audience measurement tools, advertising targeting tools on social networks...

Our subcontractors are themselves subject to the General Data Protection Regulation.

- To project owners: project owners collect certain information about the users who have contributed to their respective campaigns. This data includes email, first and last name, address, payment amount and date, and the chosen counterparty.

- Our payment provider Stripe, which manages the financial flows of the platform

- Our technical service provider Easycrowd, which ensures the maintenance and technical development of the platform

- Our partners in the case of a project that participates in a sponsorship operation, patronage, trophies, etc.

- Public bodies and companies in charge of the financial control of the platform (auditors, accountants)

Retention period

User data is kept for 5 years from the end of the campaign to which the user last contributed. If the user has not contributed to any campaign, their data will be kept for 2 years from the last time they logged in.

- The project owner's data is kept for 5 years from the end of the last campaign carried out on the platform.
- Data related to the user's activity on the platform (IP address of connection) are kept for 5 years.
- Data appearing on the documents necessary for the identification of Project Developers and certain Contributors (identity documents, proof of address) are kept for 5 years from the end of the campaign
- Bank details of Project Developers (BIC, IBAN and RIB) are kept for 5 years from the end of the campaign

Data storage

The data of the Platform is stored on the servers of our hosting company "Amazon Web Services". The data is stored in the European Union.

Case of minors

To be able to make a donation on the Platform, you must be of age.

Users' rights

Within the limits and conditions authorised by the regulations in force, the User may :

- access all their personal data, - have their personal data rectified, updated and deleted, it being specified that deletion can only take place when the data is no longer necessary for the purposes for which it was collected or processed
- oppose and request the restriction of the processing of his or her personal data
- where the processing is based on his consent, withdraw that consent at any time
- lodge a complaint with a supervisory authority.

In France, the supervisory authority is the CNIL - 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07. Les données de la Plateforme sont stockées dans les serveurs de notre hébergeur « Amazon Web Services ». Les données sont stockées dans l'espace Union Européenne.

Exercise your rights.

To exercise his rights, the User may (by specifying his surname, first name, postal address, email address and by providing a copy of his ID on both sides) send an email to contact@flockeo.com or by post to MURMURATION 15 rue Victor HUGO 31150 BRUGUIERES.