

LIST OF PROCESSINGS FOR WHICH SWIBECO SA ACTS AS DATA CONTROLLER

BANNIERE D'IDENTITE DU DOCUMENT	
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Author	Albina Mehmeti
Validator	Alexis de Font-Réaulx
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1. Personal data relating to the Swibeco Platform

Processing	Categories of people concerned	Personal data used	Basis of treatment	The duration of the conservation
Modification due to End User Account	User account Administrator account	<ul style="list-style-type: none"> • Gender • Recovery email • Phone • Address • Language 	Provision of Services in accordance with the T&Cs	Duration of the contractual relationship + 120 days
Distribution of Swipoints	User account	<ul style="list-style-type: none"> • Date of birth • Amount distributed • Professional anniversary 	Provision of Services in accordance with the T&Cs	Duration of the contractual relationship + 120 days
Management of contractual relationships with customers	Administrator account	<ul style="list-style-type: none"> • Name • First name • E-mail • Phone • Contractual data 	Legitimate interest of Swibeco / Legal Obligation	Contractual documents to be kept for 10 years Contact deleted immediately after relationship ended
Management of contractual relationship with End User	User account	<ul style="list-style-type: none"> • First name • Last name • E-mail address • Recovery e-mail address 	Legal obligation	Contractual documents to be kept for 10 years

		<ul style="list-style-type: none"> • Telephone number • Contractual and billing data 		
Transactional communications management	User account	<ul style="list-style-type: none"> • Name • First name • Gender • E-mail • Phone • Billing address • Delivery address • Content of an order 	Provision of Services in accordance with the T&Cs / Legal obligation	Duration of the contractual relationship + 120 days
Payment management	User account	<ul style="list-style-type: none"> • Number of order (the information banks are not not processed by Swibeco) • Amount of order 	Provision of Services in accordance with the T&Cs	For the legal duration imposed (in principle 10 years)
Order management	User account	<ul style="list-style-type: none"> • Name • First name • Billing address 	Provision of Services in accordance with the T&Cs	Duration of the contractual relationship + 120 days
Managing drop shipping orders	User account	<ul style="list-style-type: none"> • First name • Last name • Phone number • Email address • Delivery address • Invoice address 	Provision of Services in accordance with the T&Cs	Duration of the contractual relationship + 120 days
Monitoring of commercial activity	User account Administrator account	<ul style="list-style-type: none"> • First name • Last name • E-mail address • Connection and usage data 	Swibeco's legitimate interest	Duration of the contractual relationship + 120 days
Providing support to the user and the HR administrator to the User	User account Administrator account	<ul style="list-style-type: none"> • First name • Last name • E-mail address • Telephone number • Address • Language • Content of request • Copy of identity document (where necessary) 	Provision of Services in accordance with the T&Cs	<p>5 years from the date of the request</p> <p>Copy of identity document: kept only for the time needed to verify identity.</p>
Carrying out marketing campaigns	User account Administrator account	<ul style="list-style-type: none"> • First name • Last name • E-mail address 	Legitimate interest of Swibeco + Consent of the user	Until objection or Duration of contractual relationship + 120 days

		<ul style="list-style-type: none"> • Telephone number • Telephone number 		
Satisfaction studies	User account Administrator account Partner	<ul style="list-style-type: none"> • First name • Last name • E-mail address • Telephone number • Address • Language 	Legitimate interest of Swibeco + Consent of the user	Until objection or Duration of contractual relationship + 120 days
Maintenance of the Platform and the quality of the services offered	User account Administrator account	<ul style="list-style-type: none"> • First name • Last name • E-mail pro • Recovery e-mail • Telephone number • Delivery address • Invoice address • Language • Gender • Connection and usage data 	Provision of Services in accordance with the T&C	<p>For connection logs: 6 months prior to the last connection</p> <p>For IP addresses and other information: 1 year from the date it was recorded. Registration</p> <p>For personal or professional data: Duration of the contractual relationship + 120 days</p>
Request for access rights	User account	<ul style="list-style-type: none"> • First name • Last name • Copy of identity document • Date of company leaving 	Legal obligation	Up to 5 years
Prevention actions and securing the Platform (Pen tests, Security Audits, etc.)	User account Administrator account	<ul style="list-style-type: none"> • First name • Last name • E-mail pro • Recovery e-mail • Telephone number • Delivery address • Invoice address • Language • Gender • Connection and usage data 	Provision of Services in accordance with the GCU	<p>For connection logs: 6 months prior to the last connection</p> <p>For IP addresses and other information: 1 year from the date it was recorded. Registration</p> <p>For personal or professional data: Duration of the contractual relationship + 120 days</p>
Prevention and fight against computer fraud, incl. spamming, hacking, etc.	User account Administrator account Swibeco employees Prospects Suppliers Candidates	<ul style="list-style-type: none"> • Connection and usage data 	Legal obligation / Legitimate interest Swibeco	<p>For connection logs: 6 months prior to the last connection</p> <p>For IP addresses and other information: 1 year from the date it was registration</p>
Compliance with our legal obligations or other legitimate interests, incl. our accounting and	User account Administrator account Swibeco employees Candidates	<ul style="list-style-type: none"> • The data described above that are 	Legal obligation / legitimate interest Swibeco	For the statutory period (in principle 10 years)

archiving obligations, the defense of legal claims, the management of disputes	Prospects Suppliers	necessary for our compliance		
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2. Personal data relating to the Lunch Card

Processing	Categories of people concerned	Personal data used	Basis of treatment	The duration of the conservation
Modifying the administrator company user account	Admin account	<ul style="list-style-type: none"> Language 	Legitimate interest of Swibeco	Duration of the contractual relationship + 120 days
User account management	User account	<ul style="list-style-type: none"> Phone number Lunch Card number Connection and usage data 	Provision of Services in accordance with the GCU	Duration of the contractual relationship + 120 days
Managing the contractual relationship with customers	Administrator account	<ul style="list-style-type: none"> First name Last name E-mail address E-mail address Telephone number Contractual information 	Legitimate interest of Swibeco / Legal obligation	<p>Contractual documents to be kept for 10 years</p> <p>Contact deleted immediately after the end of the relationship</p>
Transactional communications management	User account	<ul style="list-style-type: none"> First name Last name Gender E-mail address Telephone number Lunch Card balance 	Provision of Services in accordance with the GCU / Legal obligation	Duration of the contractual relationship + 120 days
Storage of Lunch Card Loads & Unloads	User account	<ul style="list-style-type: none"> First name Last name E-mail address Gender Nationality Date of birth Language Delivery address Amount of incoming and outgoing transactions from or to the employer account 	Legal obligation	As Swibeco is an HR service provider offering a tool for managing a benefit relating to the remuneration of employees, and as HR data relating to remuneration must be kept for 10 years after the end of the employment relationship by the employer, Swibeco must keep and make available to the employer the LOADS and UNLOADS data (incoming and outgoing transactions from or to the employer's account) for a period of 10 years after the end of the employment relationship between the cardholder and his employer..
Provision of user support		<ul style="list-style-type: none"> First name last name 	Provision of Services in accordance with the GCU	5 years from the date of the request

	User account	<ul style="list-style-type: none"> E-mail address Telephone number Address Content of request Copy of identity document (where necessary) Amount of transactions Business/place of transaction 		Copy of identity document: kept only for the time needed to verify identity.
Maintenance of the Lunch Card and the quality of the services offered	User account Administrator account	<ul style="list-style-type: none"> First name Last name E-mail address Gender Nationality Date of birth Language Delivery address 	Provision of Services in accordance with the GCU	<p>For connection logs: 6 months prior to the last connection</p> <p>For IP addresses and other information: 1 year from the date it was recorded. Registration</p> <p>For personal or professional data: Duration of the contractual relationship + 120 days</p>
Marketing campaigns	User account Administrator account	<ul style="list-style-type: none"> First name Last name E-mail address Telephone number Address Language 	Legitimate interest of Swibeco + Consent of the user Legitimate interest of Swibeco / Consent of the user	<p>Until objection or Duration of contractual relationship + 120 days until objection or</p> <p>Duration of contractual relationship + 120 days</p>
Satisfaction surveys	User account Administrator account Partner	<ul style="list-style-type: none"> First name Last name E-mail address Telephone number Address Language 	Legitimate interest of Swibeco + Consent of the user	<p>Until objection or Duration of contractual relationship + 120 days</p> <p>Until objection or Duration of contractual relationship + 120 days</p>
Request for access rights	User account	<ul style="list-style-type: none"> First name Last name Copy of identity document Date of company leaving 	Legal obligation	up to 5 years
Prevention and security measures for the Lunch Card (Pentests, security audits, etc.)	User account Administrator account	<ul style="list-style-type: none"> First name Last name E-mail address Gender Nationality Date of birth Language Delivery address 	Provision of Services in accordance with the GCU	<p>For connection logs: 6 months prior to the last connection</p> <p>For IP addresses and other information: 1 year from the date of the last registration</p>

<p>Preventing and combating computer fraud, including spamming, hacking, etc.</p>	<p>User account Administrator account Swibeco employees Prospects Suppliers Candidates</p>	<ul style="list-style-type: none"> • Connection and usage data 	<p>Legal obligation / legitimate interest Swibeco</p>	<p>For connection logs: 6 months prior to the last connection</p> <p>For IP addresses and other information: 1 year from the date of the last registration</p>
<p>Compliance with our legal obligations or other legitimate interests, including our accounting and archiving obligations, the defence of legal claims and the management of disputes.</p>	<p>User account Administrator account Swibeco employees Candidates Prospects Suppliers</p>	<ul style="list-style-type: none"> • The data described above that are necessary for our compliance 	<p>Legal obligation / legitimate interest Swibeco</p>	<p>For the statutory period (in principle 10 years)</p>