

# Flouci Personal Data and Privacy Policy

Kaoun SARL

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## 1. Definitions

- **Application:** refers to the Flouci web or mobile application. The mobile version is available on Android and iOS.
- **Account:** a Flouci account.
- **Geolocation Data:** data that identifies the user's location using latitude and longitude coordinates obtained by GPS, Wi-Fi or mobile.
- **Certificate:** An electronic file that confirms the link between a defined Subscriber Identity and a Public Key connected to a Private Key managed by the ANCE.
- **Personal Data:** refers to information that can be associated with an identified individual. This data includes the name, surname, email address, National Identity Card (CIN) number, postal address, telephone number and banking information of the participant.
- **Device Information:** data that may be collected automatically from any device used to access the Application, or the Site. This information may include the type of device, its name, IP address, the Internet browser used, mobile network information, and geolocation information.
- **Flouci:** refers to the Kaoun product (and the services provided by it) offered in this Agreement.
- **Kaoun:** refers to the regulatory and financial technology limited liability company founded in 2018 in Tunisia.
- **Services:** refers to the products, services, technologies, as well as the Application and the Site (flouci.tn) which you will have access to after the creation of your Account.
- **Sites:** refers to the Kaoun-run websites [www.flouci.com](http://www.flouci.com) and [www.kaoun.com](http://www.kaoun.com), as well as the official social network platforms through which Kaoun proposes and promotes its Services.
- **Transaction:** the use by a person of the Services offered by Kaoun.
- **User:** designates any natural person who uses the Flouci Application, accesses the sites, and who has established a relationship with Kaoun (e.g. by opening a Flouci Account and accepting Kaoun's Terms of Use).



## 2. Background

**Kaoun** ("Kaoun" or "we" or "us") is a limited liability company under Tunisian law, registered in the Tunis Trade and Companies Register under number B0110142018 (tax identification number 1548479 K/A/M/000), having its registered office at A2-7 Cleopâtre Centre, Centre Urbain Nord, Tunis- Tunisia.

**Flouci**, a Kaoun product, is mobile and web application that allows users to receive and use an electronic signature, as well as link their credit card to pay online and top up your phone credit. Core Flouci operations can be accessed entirely remotely.

To create and use a Flouci account, **you** (the end user and the legitimate owner of the Flouci account and corresponding electronic signature) must agree to the terms of use below. Please read them carefully.

Flouci has put in place this Personal Data and Privacy Policy to explain what information we collect, why it is done, and with whom it may be shared. It also informs you how you can update your personal information, what happens if you delete your Flouci account, your legal rights, and how we protect your personal Information.

We hope this Personal Data and Privacy Policy will help you become familiar with our privacy practices and understand your privacy and personal data options when using our services.

## 3. What personal data do we collect?

We mainly collect personal data that you provide to us in order to use our services or your personal data that we obtain from another source (e.g. your bank). This information includes :

### a) Registration Information

When you register by creating an account on our application to use our services, we collect personal information required by our partners (banks and TunTrust). When creating your account, we ask you to provide: a photo of your National Identity Card (CIN), your date of birth, your telephone number, and your address to perform a full eKYC (create your electronic signature). We also collect your selfie video to ensure that the ID card presented belongs to you and to protect you against identity theft.



## **b) Transaction information**

When you use our services to make payments, send money to your friends and family, or receive money, we collect information about your transactions and other information associated with them. This may include the amount sent or received, the person to whom the payment was made or from whom you received funds, the date and time of the transaction, your Location Data, and Information about the device used.

## **c) Transaction Participant Personal Information**

When you use our services or link your contact list to your account, we collect the personal information you provide to us about other participants associated with the transaction. This may include the participant's name, email address, National Identity Card (NIC) number, mailing address, telephone number and banking information.

## **d) Other information collected in connection with your use of our services**

When you communicate with us, contact our customer support teams (whether by mail, email or telephone) or respond to a survey, we may collect additional information from you.

## **4. Why do we keep your information?**

We retain your personal information for the following purposes:

### **a) To give you access to our services**

Our partners (TunTrust, partnering financial institutions) require your personal data to identify you and accept your application. Kaoun is not able to provide you its services if our partners do not accept your request.

### **b) To ensure the proper functioning of our services**

We use your personal data in order to provide our services, including the completion of transactions. We also use your personal information to ensure the smooth operation of our services, to make improvements to them, and to resolve problems that you report to us.

### **c) To evaluate the performance of our services**



We use your personal data for analysis and evaluation purposes to understand how our services are used, and to help us optimize the design of our products.

#### **e) To communicate with you**

We use the information we collect, such as your email address or phone number, to interact with you directly. For example, we may send you a notification if we detect suspicious activity, such as an attempt to log into your Flouci account from an unusual geographic location. We may also notify you of upcoming changes or improvements to our services.

#### **f) To protect Flouci, our users, and the public**

We use the information we collect, such as your email address or phone number, to interact with you directly.

For example, we may send you a notification if we detect suspicious activity, such as an attempt to log into your Flouci account from an unusual geographic location.

### **5. What if your information changes?**

When you are logged into your account, you can always check and update your personal information by accessing the "Settings" menu in the Flouci application or on the [www.flouci.com](http://www.flouci.com) website. We urge you to update your information if necessary.

### **6. What if your account is closed?**

If your account is closed, we will take steps to delete your personal information. Due to the nature of our distributed ledger technology, transactional information, though anonymized, is part of the public domain and will remain as such.

Per TunTrust regulatory requirements, Kaoun must keep your identification data as well as the data related to the electronic certificate you obtain from TunTrust for 20 years.

### **7. With whom do we share your information?**

We may share your personal information with third parties in various ways described in this section of the Privacy Policy.



We may share your information for the following reasons:

**a) With other parties to transactions when you use the services:**

We may share some of your personal information with other parties to your transactions and activities, such as other users to whom you send or from whom you receive money. This will only occur on an as needed basis to ensure the transaction may be carried out smoothly. Such personal information includes, but is not limited to

- Personal data to facilitate the transaction;
- Personal data to detect and prevent fraud;
- Personal data to resolve disputes that may arise.

**b) With third parties with whom we have partnered:**

Kaoun partners with ANCE, banks, microfinance institutions, and other third parties to provide a wide variety of services to its users.

The relationship between Kaoun and ANCE in our role as a delegated registration authority (DRA), and the necessary personal information shared with ANCE in that regard is outlined in our Trust Service Practice Statement, available on the website.

Other third parties with whom we have partnered do not have access to your personal information outside the scope of that which is necessary to fulfill partnership obligations, but may obtain an automatic analysis of your financial behavior for risk assessment purposes if they already have your national identity card number.

**c) With third parties for our business purposes or where permitted or required by law, including but not limited to**

- If we must do so to comply with any law, process or regulation;
- To law enforcement authorities or other government officials in order to meet a legal requirement applicable to Flouci;
- In order to investigate or enforce violations of certain terms of use;
- To prevent fraud against Flouci, our Users, and fraud involving our sites or the use of our services;
- To protect our property, services and legal rights.

**8. What are your privacy rights?**



Kaoun would like to make sure you are fully aware of all of your data protection rights. Subject to the restrictions set forth in the data protection legislation in force (i.e., Organic Law number 63 dated 27 July 2004 on the protection of personal data), you have certain rights with respect to your personal data. You have a right of access, rectification, opposition, data portability, and omission. If you wish to exercise these rights, please contact us.

Every user is entitled to the following:

- **The right to access** – You have the right to request Kaoun for copies of your personal data. We may charge you a small fee for this service.
- **The right to rectification** – You have the right to request that Kaoun correct any information you believe is inaccurate. You also have the right to request Kaoun to complete the information you believe is incomplete.
- **The right to erasure** – You have the right to request that Kaoun erase your personal data, under certain conditions.
- **The right to restrict processing** – You have the right to request that Kaoun restrict the processing of your personal data, under certain conditions.
- **The right to object to processing** – You have the right to object to Kaoun’s processing of your personal data, under certain conditions. Because this processing is key to our ability to provide the Flouci account, your account will be terminated if Kaoun is not permitted to process necessary personal data.
- **The right to data portability** – You have the right to request that Kaoun transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have 60 days to respond to you. If you would like to exercise any of these rights, please contact us at our email: [contact@kaoun.com](mailto:contact@kaoun.com)

## 9. What types of cookies do we use?



Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology

Our company uses cookies in a range of ways to improve your experience on our website, including keeping you signed in and understanding how you use our website.

These cookies include:

- **Cookies which are strictly necessary for the operation of the Flouci.com website.**

These are the cookies that are essential for browsing our sites (such as session identifiers) that allow you to use the main features of the sites and to secure your connection. For example, they allow you to directly access areas of our site that are reserved for you and personal to you, thanks to identifiers or data that you may have previously entrusted to us.

- **Functionality cookies**

These cookies make it possible to optimize the functioning of our sites.

They also enable you to adapt the presentation of the sites to the display preferences of your terminal during your visits. These cookies thus enable you to have a fluid and customized navigation. Placing cookies on your terminal is the simplest and fastest way to personalize and improve your user experience.

These cookies are deposited by Flouci.com. They have a very short lifespan, for the majority, the time of the session, and a maximum of thirteen months.

- **Analytical / performance cookies**

Cookies allow us to know the use and performance of the sites, to establish statistics, volumes of visits and use of various elements (content visited, routes, etc.) in order to improve the interest and ergonomics of our services (the pages or sections most





often consulted, the most read articles, etc.). Cookies also allow us to count the number of visitors to a page.

If you have refused the implementation of cookies, you will have to authenticate yourself during each sharing operation to the concerned network(s).

## **10. How do we protect your personal information?**

Our servers comply with the international PCI-DSS 3.2 standard, which requires, among other things, encryption of card data and protection of encrypted keys, installation and management of a firewall configuration to protect personal data, protection of all systems against malware and regular updating of anti-virus software or programs.

Only authorized personnel have access to your information, and we keep logs of every access transaction that occurs, as well as the identity of the party accessing the information. Unauthorized parties should not be able to read this information due to the design of our system. However, in the event of unauthorized access, we will inform you via the application.

We undertake to inform you via the application of any security issues that may arise as soon as we become aware of them. We will also inform you of the measures we are taking to ensure that the security gap is addressed. Access to your personal information is only granted to those institutions and third parties that you choose to allow. The protection of your personal information that is given to these institutions is not within the scope of this contract, but the details will be described in a legal document between you and that third party. You will always receive a copy of this agreement in the application before agreeing to share your information.

## **11. Changes to our privacy policy**

Kaoun keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on **11 March 2021**.



## **12. User Deletion Instructions**

In the events where the user wants to delete their account and data, they need to send an email to [contact@flouci.com](mailto:contact@flouci.com) highlighting the reasons behind their request under the subject line "Data deletion request". We will process their request and send a confirmation within 30 days of reception.

## **13. Contact Us**

We can be contacted via the chat box on the Flouci website, official Kaoun social media accounts, as well as:

**Email:** [contact@kaoun.com](mailto:contact@kaoun.com)

**Telephone:** 36 362 772

