PRIVACY POLICY OF THE SWAP PLATFORM

VERSION 1.0 dated 1 October 2026

GENERAL INFORMATION

INPULSE, a single-shareholder simplified joint-stock company (SASU) registered with the Lille Métropole Trade and Companies Register under number 922 516 919, whose registered office is located at 3 rue Saint Joseph, LILLE (59800) (hereinafter "**INPULSE**") provides a marketplace (hereinafter the "**Platform (SWAP)**") enabling professional sellers (hereinafter "**Seller**(s)") and professional buyers (hereinafter "**Buyers**") to be put in contact, allowing the auction sale of construction materials.

INPULSE attaches great importance to respect for privacy and the confidentiality of the personal data it processes in the context of this intermediation service and undertakes to process such data in compliance with the applicable regulations, which include in particular French Law No. 78-17 of 6 January 1978 on Information Technology and Civil Liberties (Loi Informatique et Libertés), the General Data Protection Regulation No. 2016/679 of 27 April 2016, and French and European case law on the subject (hereinafter the "***Applicable Regulations***").

This Privacy Policy (hereinafter the "***Policy***") sets out:

- The processing of personal data **that INPULSE carries out as data controller in connection with making the SWAP Platform available** (Part I),
- The processing of personal data that **the Seller and the Buyer carry out as independent data controllers in connection with their use of the SWAP Platform**, and for which INPULSE acts as processor (Part II).

The Policy may be amended in line with legal and regulatory developments, recommendations of the French data protection authority (Commission Nationale de l'Informatique et des Libertés, CNIL), or changes in INPULSE's practices. INPULSE invites you to review this policy regularly to stay informed of any changes.

DEFINITIONS

Under these terms, each of the terms set out below, in the singular or plural, shall have the meaning given in its definition. Terms used in the singular shall also include the plural and vice versa, depending on the context.

It is specified that the terms defined by the Terms of Use of the Platform have the meaning given by those Terms of Use when used in the Policy.

Personal data: Data is said to be "personal" when it relates to any identified or identifiable person. An identifiable natural person is deemed to be one who can be identified, directly or indirectly, in particular by reference to an identifier, an identification number, location data, an online identifier, or one or more specific elements particular to his or her physical, physiological, genetic, mental, economic, cultural or social identity.

Processing: Processing of personal data is an operation carried out on one or more items of personal data, and may cover various procedures such as collection, recording, organisation, storage, adaptation, modification, retrieval, consultation, use, interconnection, restriction, erasure, destruction, etc. Processing of personal data is not necessarily computerised: paper files are also concerned and must be protected under the same conditions.

Purpose: Data processing must have an objective ("purpose") determined before the data is collected and used.

I. USE OF YOUR PERSONAL DATA BY INPULSE

The SWAP Platform provides a matching service that involves the collection of your Data by INPULSE as Data Controller.

1. **Description of the personal data processing operations carried out by INPULSE**

Purpose	Legal basis	Data concerned	Retention period
PROVISION OF THE INTERMEDIATION SERVICE			
User account management (creation, modification, deletion)	Consent	• Full name and title • Business email address and password • Position held, company	Retained in the active database while the account is open. The Account is deleted at the User's request, or automatically after 2 years of inactivity following an unanswered email reminder.
Invoicing and collection of Commissions	Legitimate interest (performance of the contract with the User)	• Full name and title • Business email address • Position held, company	Retained in the active database for as long as the account is open, then 5 years in the archive database.
Customer support	Consent	• Full name and title • Business email address • Position held, company	Retained in the active database for the duration of the processing of the request, then retained for 5 years in the archive database.
Management of Buyer Reviews	INPULSE's legitimate interest in knowing Buyers' reviews of Sellers	• Content of reviews	Retained in the active database for the duration of the identity verification, then 5 years in the archive database.
COMMUNICATION AND LOYALTY			
Newsletter mailing	INPULSE's legitimate interest in building loyalty among Platform Users	• Full name and title • Business email address • Position held, company	Duration of use of the Account until deletion OR up to 2 years after the last Account activity.
LEGAL AND RELATED OBLIGATIONS			
Fraud prevention	INPULSE's legitimate interest in not allowing Users to carry out unlawful activities via the Platform	• Data relating to Product Listings or to Purchases made • Data relating to the amounts of Purchases/ Sales made • Connection data	Retained in the active database for the duration of the identity verification, then 5 years in the archive database.
Accounting records	Legal obligation: Art. L. 123-22 paragraph 2 of the French Commercial Code	• Full name and title • Company	Invoices retained for 10 years from the close of the financial year
Declaration of turnover generated by the Sellers	Legal obligation: Art. 242 bis of the French General Tax Code	• Full name and title • Company	

Management of reports of unlawful content	Legal obligation: Arts. 16 and 17 of EU Regulation 2022/2065 of 19 October 2022 on a single market for digital services	Connection data, IP address Content reported	Duration of report handling + 6 years (limitation period for criminal offences)
Requests to exercise rights over Your Data	Legal obligation: Arts. 15 to 22 of the GDPR	• Full name and title • Business email address Content of the request	Retained in the active database while the request is handled + 5 years in the archive database.

2. To whom is Your data disclosed?

2.1.Recipients acting as independent Data Controllers

In managing the SWAP Platform, INPULSE uses a Payment Service Provider holding a banking licence and authorised on that basis to provide payment and escrow services on the Platform. In this respect, INPULSE's partner payment provider acts as an independent data controller.

INPULSE may also share Your data if it is required to do so under its legal obligations (e.g. courts, judicial authorities, business tax offices, etc.).

2.2.Recipients acting as INPULSE's Processors

INPULSE uses service providers, acting as sub-processors, so that they can carry out the tasks that INPULSE does not perform itself.
In such cases, INPULSE retains control over Your personal data and obtains from its service providers the guarantees necessary to ensure that Your personal data is processed in accordance with INPULSE's instructions, in compliance with the Applicable Regulations and with appropriate security measures.

Processor	Registration	Activity
IDEINE	Lille Métropole Trade Register No. 793 627 548, 75 bis Bd d'Armentières, 59100 ROUBAIX	Hosting and maintenance of the Platform

3. Countries in which Your data will be processed

INPULSE processes Your personal data within the European Union.
However, INPULSE informs You that some of its processors that receive Your personal data may be located outside the European Economic Area.
INPULSE guarantees the same level of protection for Your data, and sufficient protection of Your data as required by all laws and regulations applicable in Europe.

INPULSE will ensure that its service providers transferring data outside the European Economic Area (i) benefit from an adequacy decision issued by the European Commission or (ii) provide appropriate safeguards as set out in Article 46 of the GDPR, in particular standard contractual clauses adopted by the European Commission, supplemented where applicable by additional safeguards.

Data recipient	Service	Country concerned	Safeguard
IDEINE's sub-processor: MICROSOFT AZURE	Hosting	United States (if Microsoft Corporation is involved)	Adequacy decision & participation in the Data Privacy Framework

4. Your rights

4.1.Definition of Your rights over Your Data

Right of access: This right allows You to obtain a copy of all personal data concerning You, and information on the processing carried out by the Data Controller.

Right to rectification: This right allows You to update Your personal data where it is no longer accurate or is incomplete.

Right to erasure: This right allows You to obtain the erasure of all of Your personal data held by the Data Controller. However, the Data Controller may archive certain data in compliance with its legal obligations, where necessary for the handling of a claim or a dispute.

Right to data portability: This right allows You to obtain a copy of Your data in a structured format and to transmit it to another data controller, only where the data meets the following conditions:

(i) It was provided by You to the Data Controller or results from Your use of its services
(ii) It was collected on the basis of consent or a contract

Right to object to the processing of Data This right allows You to have the Data Controller stop the processing of certain data in the future where You have grounds relating to Your particular situation.

Right to restriction of processing: Exercising this right allows You to object to any modification or further processing of Your data, or of some of Your data, for a limited period in the event of:

- Contesting the accuracy of this data;
- Contesting the lawfulness of the processing of this data by the Data Controller;
- Establishment, exercise or defence of legal claims where the Data is about to be erased

Right to define the fate of Personal Data after death This right allows You to give the Data Controller Your instructions on the fate of Your personal data after Your death (retention, erasure and, where applicable, disclosure

Right to withdraw Your consent: at any time where the Processing is based on that legal basis.

4.2.How to exercise Your rights

Your rights may be exercised with the Data Controller:

- Directly on the Platform via the contact form;
- By post to the following address: INPULSE - 3 rue Saint Joseph - 59800 LILLE, or;

The Data Controller will review all requests and respond within one (1) month of receipt of the request, unless the request is complex, in which case the Data Controller will notify You of an extension of the period by a maximum of two (2) additional months. The Data Controller may ask You for additional information in order to identify You and respond to Your request.

Finally, You have the right to lodge a complaint with the CNIL in the event of a breach in the Processing of Your Data, at the following address: https://www.cnil.fr/plaintes.

II. USE OF YOUR PERSONAL DATA BY A USER OF THE PLATFORM

Every User is intended to use the Personal Data of another User's staff in connection with its use of the Platform for its own purposes, as Data Controller.

1.Description of the personal data processing operations carried out by the User

Purpose	Legal basis	Data concerned	Retention period
TRANSACTION MANAGEMENT			
Management of the auction process	Legitimate interest in running the auction	• Full name and title • Business email address • Position held, company	Retained in the active database during the auction, then 5 years in the archive database
Performance of the Contract: invoicing and verification of the Product's conformity	Legitimate interest in performing the sales contract	• Full name and title • Business email address • Position held, company	Retained in the active database until the conditions precedent are met or the transaction is cancelled, then 5 years in archive
Customer service / handling of requests via SWAP Messaging	Legitimate interest in responding to requests	• Email address • Content of the request	Retained in the active database while the request is handled + 5 years in the archive database.
LEGAL AND RELATED OBLIGATIONS			
Accounting records	Legal obligation: Art. L. 123-22(2) of the Commercial Code	• Full name and title • Company	Invoices retained for 10 years from the close of the financial year
Requests to exercise rights	Legal obligation: Arts. 15 to 22 of the GDPR	• Full name and title • Business email address Content of the request	Retained in the active database while the request is handled + 5 years in the archive database.

For any other use of Your Data by a User outside the Platform, the User must inform You directly. We recommend that You contact the User and check the information provided by the User on the Platform.

2. To whom is Your data disclosed? Where is it stored?

2.1.INPULSE as Processor

The above operations, when carried out via the Platform, involve INPULSE acting as Processor. In this context, INPULSE processes Your personal data within the European Union. However, INPULSE uses processors, some of which may be located outside the European Economic Area (see the table of processors in point I. 2.2)

2.2.Other Processors and Recipients that are not Processors

Any other use of personal data by the User must be the subject of information provided directly by the User.

3. Your rights

You may exercise the rights referred to in point I.4.1 over Your Data with the User acting as Data Controller of Your Data. Your rights may be exercised directly on the Platform via the secure messaging or at the contact details provided by the User and available on the Platform.