



Privacy Policy



Scope

This document describes the ways UTRUST Switzerland AG as its affiliates, agents or branches, (hereinafter, “UTRUST”, “we”, “our”, or “us”) collect, use, disclosure and protect Personal Data when you use our Service. The purpose of this policy is to ensure UTRUST complies with applicable Swiss regulations and data protection laws.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy.

This policy is designed as a way to help you understand privacy policies and practices. This Privacy Policy should be complemented with due regulations and laws addressed to regulation and processing of personal data.



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1 Definitions

Service

UTRUST's Service include processing services, products, features, technologies or functionalities offered by UTRUST.

Personal Data

Personal Data means data about a specific individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

Data collection

UTRUST Switzerland AG is processing personal information submitted by you ("Data Subject") in the context of your use of our Service. For this purpose, compiles, collects, processes and stores the Data in Records.

The following data subjects whose personal data we may process are:

- Merchants signing up for our Services;
- Visitors of our website;
- Users who interface with UTRUST.

Data Processing

"Process" or "Processing" shall mean each (set of) action(s) as regards to the Data, including, but not limited to, the collecting, recording, sorting, keeping, updating, amending, retrieving, consulting, using, provisioning by way of forwarding or other way of dissemination, gathering, linking, protecting, erasing or destroying of Data.

Usage Data

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Cookies

Cookies are small pieces of data stored on your device (computer or mobile device).



Data Controller

Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed. For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.

Data Processors (or Service Providers)

Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your data more effectively.

2 Type of data we collect

Personal Data

While using our Service, we may identify you ("Personal Data"). Personal identifiable information may include:

- Name
- IP address
- Identity documents
- Email address
- Online identifier
- Date of birth
- Phone number
- Cookies and Data Usage

Usage Data

We may also collect information on how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

Tracking & Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information. Cookies are files with small amount of data which may include an anonymous unique identifier.



3 Use of data

UTRUST Switzerland AG uses the collected data for various purposes, but not limited to:

- To comply with applicable laws and regulations;
- To provide and maintain our Service;
- To notify you about changes to our Service;
- To allow you to participate in interactive features of our Service when you choose to do so;
- To provide customer support;
- To gather analysis or valuable information so that we can improve our Service;
- To prevent potentially prohibited or illegal activities, and enforce our terms;
- To monitor the usage of our Service;
- To detect, prevent and address technical issues;
- To customize, measure and improve UTRUST Services including the content and layout;
- To contact you for other purposes as newsletters, marketing or promotional materials and other information that may be of interest to you. If you opt to receive any or all of these communications from us, you should give your explicit consent when asked for it. You may also opt out of receiving them by withdrawing your consent at any time and with no further justification.
- To provide useful information later used for statistical purposes.

4 Retention of data

UTRUST Switzerland AG will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies. UTRUST Switzerland AG will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

5 Data processing

UTRUST Switzerland AG has legal basis for collecting and using the personal information described in this Privacy Policy depending on the Personal Data we collect and the specific context in which we collect it. UTRUST Switzerland AG may process your Personal Data because:

- We need to perform a contract with you; or
- You have given us permission to do so; or



- The processing is in our legitimate interests and it's not overridden by your rights; or
- To comply with the law.

6 Transfer and share data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside Switzerland and choose to provide information to us, please note that we transfer the data, including Personal Data, to Switzerland and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer. UTRUST Switzerland AG will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Additionally, we may share your Personal Data or other information for a variety of motives. We may employ third-parties to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analysing how our Service is used. These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose:

- With other members and entities of UTRUST: we may share your Personal Data to, namely, provide the Services you have requested or authorized; to manage risk; to help detect and prevent potentially illegal and criminal activity and other violations of our policies and agreements; and to guide decisions about our products, services and communications.
- With service providers that monitor and analyse the use of our Service. Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/intl/en/policies/privacy/>
- With other parties involved in the transactions when you use the Services, such as customers, merchants, and their service providers. We will make sure that these parties have appropriate



internal controls in place to protect any Personal Data that might be transferred. The information includes:

- Personal Data necessary to facilitate the transaction;
- Personal Data to help resolve disputes and detect and prevent criminal activity.
- With other third parties for our business purposes or as permitted or required by law. We may share information about you with other parties for UTRUST's business purposes or as permitted or required by law, including:
 - If we need to do so to comply with the law or if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or to protect the rights, property or safety of our site, our users, and others;
 - To law enforcement authorities or other competent authorities;
 - If we believe that the disclosure of Personal Data is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity;
 - To investigate possible violations or enforce a user agreement or other legal terms;
 - To protect our property, Services and legal rights;
 - To facilitate a purchase or sale of all or part of UTRUST's business;
 - To help assess and manage risk and prevent fraud against us, our Users, our business partners, or other individuals, and merchants.
- We may share your data with a limited number of our service providers to help provide customer support to you or keep payments safe and secure. All our third-party service providers are required to take appropriate security measures to protect your data in accordance with our policies. We permit them to process your data only for specified purposes and in accordance with our instructions. We require such service providers to contractually commit to protect the security and confidentiality of Personal Data they process.

In addition, UTRUST may provide aggregated statistical data about how, when, and why Users visit our Sites and use our Services. This data will not personally identify you or provide information about your use of the Sites or Services. We do not share your Personal Data with third parties for their marketing purposes without your consent.

7 Cookies and tracking technologies

We use cookies and similar tracking technologies to track the activity on our Service and to customize our Services and content; measure promotional effectiveness and promote safety. Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser and stored on your device. It enables the website and other services to remember your actions and preferences



(such as login details, language and display preferences) over a period of time, so you won't have to re-enter them every time you access any of the services. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyse our Service. Enabling these cookies is strictly necessary for the Website to work, as it will provide you with a better browsing experience. You can delete or control these cookies; however, this will impair some of the Website's features. We shall not use any cookies other than for the purposes explained herein. Where the cookies used are considered to be personal data (as they could lead to the identification of a natural person), then such cookies are regulated in the manner as described in this Policy.

We use the following cookies:

- Session Cookies. We use Session Cookies to operate our Service. We collect session data because it helps us administer our Website, track correlative information and to collate statistics in relation to visitor traffic. We may use your IP address to help us diagnose problems with our server. Therefore, these cookies are necessary to enhance the performance and functionality of our Website.
- Preference Cookies. We use Preference Cookies to remember your preferences and various settings.
- Security Cookies. We use Security Cookies for security purposes.
- Third party persistent cookies by Google Analytics – Google analytics uses cookies to collect statistical information (e.g. where you are from). These help us to measure how users interact with our Website by collecting information on clicks, time spent on the Website, and pages visited on the Website, the frequency a user visits the Website, what browser a visitor to the Website is using, and so on. We also collect information on how long a user remains on our Website and whether the user visits a third party site. This information is passed on to Google Analytics and the information we get back from Google Analytics is solely used to improve the Website. Statistics and analytical data are very useful tools for us to provide a better and more engaging product for our users and to make our business predictions more accurate. The cookie set by Google Analytics which will identify you as a unique user on the Website can only be used by Google. For further information please visit the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to stop Google Analytics from recognising you when return to our Website by disabling cookies on your browser.
- Other third-party persistent cookies – We use these cookies to understand your behaviour on our Website (for example, where you click). This data is used to further improve the user experience for our users.

We use Hotjar in order to better understand our user's needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't



like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behaviour and their devices (in particular device's IP address – captured and stored only in anonymized form -, device screen size, device type – unique device identifiers, browser information, geographic location – country only -, preferred language used to display our website). Hotjar stores this information in a pseudonymized user profile. Neither Hotjar nor we will ever use this information to identify individual users or to match it with further data on an individual user. For further details, please see Hotjar's privacy policy by clicking on this [link](#).

We also use Fabric to understand our user's needs and improve our services and user experience. For further details, please see Fabric's privacy policy by clicking on this [link](#).

8 Protection of Personal data

The security of your data is very important to us. UTRUST aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data. We use computer safeguards; we enforce physical access controls and we authorize access to Personal Data only for those employees who require it to fulfil their job responsibilities.

If you wish to be informed what Personal Data, we hold about you and if you want it to be removed from our systems, please contact us. In certain circumstances and without prejudice of complying with our legal obligations, you have the following data protection rights:

- The right to access, update or to delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.
- The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.
- The right to object. You have the right to object to our processing of your Personal Data.
- The right of restriction. You have the right to request that we restrict the processing of your personal information.
- The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- The right to withdraw consent. You also have the right to withdraw your consent at any time where UTRUST relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests. You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data.



9 Links to other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

10 Children's Privacy

Our Service does not address anyone under the age of 18 ("Children"). We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

11 Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any relevant changes by posting the new Privacy Policy on this page. We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted.

12 Commitment

We take the responsibility to protect the security and privacy of our users seriously. We have established effective policies that define our commitment to data security and the information technology we manage. We are continually reviewing policies and procedures to assure that they are appropriate and effective in meeting our commitments to our community, our users, customers and ourselves. Any suspicious attempt to breach our terms and policies, or to engage in any type of unauthorized action involving our information systems, is regarded as potential criminal activity. All suspicious computer mischief will be reported to the appropriate authorities.

13 Contact

If Users have any questions relating to these Policy, the User's rights and obligations arising from Terms and Conditions and/or User's use of the site and the services, or any other matter, please contact compliance@ustrust.com