

# PRIVACY STATEMENT

This Privacy Statement shall apply to the processing of personal data by:

trustwise.io ag, Krummeneichstrasse 34, 4133 Pratteln, Switzerland

Please read our Privacy statement carefully. Should you have any questions or comments regarding this Privacy Statement, you may address these to our data protection officer under the following addresses

email: [dataprotection@trustwise.io](mailto:dataprotection@trustwise.io)

phone: +41 61 826 60 60

Our privacy policy is designed to comply with the current and drafted revised Swiss Data Protection Law (DSG/revDSG) as well as the European General Data Protection Regulation (GDPR).

## 1 COLLECTION AND STORAGE OF PERSONAL DATA AS WELL AS THE NATURE AND PURPOSE OF THE USE OF SUCH DATA

### 1.1 WHEN VISITING THE WEBSITE

When calling up our website <https://www.trustwise.io/> the browser used on your terminal device automatically sends information to our website server. This information is stored temporarily in a logfile. The following information is collected by us without any action on your part, and automatically deleted after 14 days.

- IP address of the requesting terminal device,
- Date and time of the access,
- Name and URL of the requested file,
- Website from which the access originated (known as "referrer URL")
- Device type and operating system of your terminal device,
- Browser type and version used as well as other information transmitted by the browser (such as the geographical origin, language setting, add-ons used, screen resolution etc.).

We process the aforementioned data for the following purposes:

- To establish a trouble-free connection of the website
- To ensure the best possible use of our website
- To analyse system security and stability as well as
- For other administrative purposes.

The legal basis of the data processing is article 6(1) sentence 1 lit. f of the EU General Data Protection Regulation (GDPR). Our legitimate interest follows from the aforementioned data

processing purposes. On no account will we use the data collected in this way for the purpose of drawing conclusions as to your person.

In addition, we use cookies and analysis services in relation to any visits to our website. For further details, please see sections 2 and 3 of this Privacy Statement.

## 1.2 WHEN SIGNING UP FOR OUR NEWSLETTER

If you have expressly consented in accordance with article 6(1) sentence 1 lit. a GDPR, we will use your email address and your name in order to regularly send you the requested newsletters or to have them sent to you. In order to receive the newsletters, the provision of an email address and your name suffices.

When subscribing our newsletter, Trustwise can identify the content type or page where you carried out the subscription and uses this to provide you with content tailored to your interests.

You may unsubscribe at any time, e.g. via a link at the end of every newsletter. Alternatively, you may send your unsubscribe request by email to [dataprotection@trustwise.io](mailto:dataprotection@trustwise.io) at any time.

## 1.3 WHEN USING OUR CONTACT FORM ("CONTACT US", "REQUEST A DEMO")

Should you have any questions you can get in touch with us via a form provided on our website. This requires the provision of a valid email address, first name and surname, telephone number, company name and country in order for us to know who has sent the request and to be able to answer it. The provision of any other details is voluntary.

Data processing for purposes of getting in touch with us is based on your voluntary consent in accordance with article 6(1) sentence 1 lit. a GDPR.

# 2 COOKIES

We use cookies on our website. These are small files that are automatically produced by your browser and that are stored on your terminal device (laptop, tablet, smartphone or similar) when you visit our website.

The cookie stores certain information that results in connection with the specific terminal device deployed. This does not, however, mean that we will immediately become aware of your identity.

Cookies enable us to make the use of our offers more comfortable for you. To that end, we employ what is known as "session cookies" which allow us to see that you have already visited some pages on our website. They are automatically deleted when you leave our site.

If the aforementioned cookies constitute personal data, they are employed on the basis of legitimate interests in accordance with article 6(1) sentence 1 lit. f GDPR. Our interests in relation to the purposes mentioned, in particular as regards the optimisation of our website, are therefore considered to be legitimate in terms of the aforementioned provision.

Most browsers automatically accept cookies. You may configure your browser to prevent any cookies being stored on your computer or to ensure that a notice appears every time a new cookie is placed. A full deactivation of cookies may, however, mean that you are not able to use all of our website's functions.

## 3 TRACKING TOOLS

The tracking tools listed below and employed by us are used on the basis of article 6(1) sentence 1 lit. f GDPR. We use these tracking tools in order to design our website in line with demand and to continually optimise it. On the other hand, we use tracking tools in order to record the use of our website for statistical purposes and in order to optimise our offers for you. These interests are considered to be legitimate in terms of the aforementioned provision.

### Matomo

Matomo is used to analyse the behaviour of the website visitors to identify potential pitfalls; not found pages, search engine indexing issues, which contents are the most appreciated etc. Once the data is processed (number of visitors reaching a not found pages, viewing only one page ...), Matomo is generating reports for website owners to take action.

Matomo is processing the following personal data:

- Browser type/version
- Size of the browser window
- Browser language
- Installation of Java
- Resolution used
- Operating system used
- Name and URL of the requested file
- Page title
- Referrer URL (i.e. the previously visited page), Anonymized IP address of the accessing terminal device, Approximate location of the access and
- Time of the server request.

The collected information is stored on our server based in Switzerland. This information is used to evaluate the use of the website, to compile reports about the website activities, and to provide additional services related to the use of the website and the internet for purposes of market research and to design these webpages in line with demand. Where appropriate, this information may be transferred to third parties if this is prescribed by law or if third parties are processing this data on behalf of the data controller. Your IP address will never be combined with other data held. IP addresses are anonymised to ensure that such combination is not possible (IP masking).

You can prevent cookies being installed by adjusting your browser software accordingly; however, we make you aware that you may then not be able to make use of the full scope of functions available on this website.

## 4 YOUR RIGHTS

You shall have the right:

Pursuant to article 7(3) GDPR, to revoke the consent given to us at any time. This means that in future we are no longer permitted to carry out the data processing which was based on this consent; Pursuant to article 15 GDPR, to request information regarding the personal data processed by us. In particular, you may request information regarding the purposes of the processing, the category of personal data, the categories of recipient to whom the personal data has been or will be disclosed,

the envisaged storage period, the existence of a right to rectification, erasure, restriction of processing, the existence of a right to lodge a complaint, the origin of your data if it was not collected by us, as well as the existence of automated decision-making including profiling and any meaningful information regarding the details of such automated decision-making;

To request the immediate rectification of inaccurate personal data stored by us and the completion of incomplete personal data;

To have your personal data stored by us erased, unless the processing is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation, for reasons of public interest, or for the establishment, exercise or defence of legal claims;

To restrict the processing of your personal data if you contest the accuracy of the data, the processing is unlawful and you oppose the erasure of the personal data and we no longer need the data but you need it for the establishment, exercise or defence of legal claims or if you have objected to processing;

Pursuant to article 20 GDPR to receive your personal data in a structured, commonly used and machine-readable format or to have it transferred to another controller and

Pursuant to article 77 GDPR to complain to a supervisory authority. This is usually the supervisory authority of your habitual residence, place of work or our registered office.

## 5 RIGHT TO OBJECT

If your personal data is processed on the basis of legitimate interests pursuant to article 6(1) sentence 1 lit. f GDPR, you have the right to object in accordance with article 21 GDPR against the processing of your personal data on grounds relating to your particular situation or if you object to processing for direct marketing purposes. In the latter case you have a general right to object, which we will action without you having to cite a particular situation.

You can exercise your right to object simply by sending an email to [dataprotection@trustwise.io](mailto:dataprotection@trustwise.io).

## 6 DATA SECURITY

On our website we use the common TLS procedure (Transport Layer Security) in conjunction with the highest encryption level supported by your browser. This is usually a 256-bit encryption. If your browser does not support a 256-bit encryption, we instead revert to 128-bit v3 technology. You can see whether individual pages of our website are transmitted in encrypted form by checking the closed key or padlock symbol in the lower status bar of your browser.

Apart from that we use suitable technical and organisational security measures in order to protect your data against random or intentional manipulations, partial or complete loss, destruction or against unauthorised third-party access. Our security measures are being continually improved in accordance with technological developments and are ISO/IEC 27001:2013 certified.

## 7 PRO MEMORIA: TERMS AND CONDITIONS FOR DATA PROTECTION AND PRIVACY WHEN USING THE TRUSTWISE SMARTSHARES SERVICES

If you, as an authorised user of one of our SmartShares Services customers, access and use the SmartShares service through one of the various interfaces (web-browser, iOS or Android App) we process your personal data in connection with your access and use of the Smart Shares services, as a processor (and not as a data controller) for the purposes of fulfilling our contractual obligations under the End-User Service & License Agreement between us and the corresponding SmartShares services customer. The latter is responsible for the processing of your personal data in this context. If you have any questions, requests for information, etc. regarding the processing of your personal data in connection with your access to and use of the Smart Shares Services, you should therefore directly contact the SmartShares Service customer for whom you access and use this SmartShares Service.

## 8 VALIDITY AND AMENDMENTS OF THIS PRIVACY STATEMENT

This Privacy Statement is currently valid and has last been updated in October 2020.

It may become necessary to amend this Privacy Statement due to developments to our website and offerings or due to changes in statutory or official requirements. You can always access and print the current Privacy Statement as amended from time to time at <https://www.trustwise.io/privacy-policy>.