

Safe-Voucher CH AG

Trading as Neosurf

Privacy Notice v1.0

August 2024

“Safe-Voucher”, “the company”, “we”, “us” or “our”, refers to Safe-Voucher CH AG. Neosurf operates in Switzerland under Safe-Voucher CH AG whose office is at Kolinplatz 8, 6300 Zug and is registered under number CHE-291.042.536. Safe-Voucher CH AG provides its products and services based on a license as a financial intermediary connected to the self-regulatory organization (“SRO”) VQF Verein zur Qualitätssicherung von Finanzdienstleistungen (“VQF”). The SRO VQF has a license from the Swiss Financial Market Supervisory Authority (FINMA) to supervise its members in accordance with the Anti-Money Laundering Act.

Introduction

We value your privacy and are committed to protecting your personal data. This Privacy Notice explains how we collect, use, and protect your information in accordance with Swiss data protection laws.

We understand the importance of your personal information and take your privacy seriously. Our aim is to be transparent about the data we collect and how we use it, ensuring that your information is handled responsibly and securely. This notice outlines our practices and your rights regarding your personal data, so you can feel confident when using our services.

The original version of this policy has been created in the English language and provided to you. In cases where we have provided a translation of this policy to you, you agree that such translation is provided for your convenience only and that the English language version of this policy will govern your relationship with us. In the event that a translation of the English language version of this policy is misinterpreted, the English language version takes precedence.

Who We Are

Safe-Voucher CH AG

Address: Kolinplatz 8, 6300 Zug, Switzerland

Contact: support.ch@neosurf.com

Website: www.neosurf.com

Safe-Voucher CH AG

Trading as Neosurf

What Data We Collect

- Personal Identification Information: Name, email address, phone number.
- Financial Information: Payment details, including credit card numbers or bank account information.
- Technical Data: IP address, browser type and version, time zone setting, browser plug-in types and versions, operating system, and platform.
- Usage Data: Information about how you use our website, products, and services.
- Marketing and Communications Data: Your preferences in receiving marketing from us and your communication preferences.

How We Collect Your Data

- Direct Interactions: When you provide data through our website, such as filling in forms or corresponding with us by post, phone, email, or otherwise.
- Automated Technologies: As you interact with our website, we may automatically collect technical data about your equipment, browsing actions, and patterns. We collect this personal data by using cookies, server logs, and other similar technologies.
- Third Parties or Publicly Available Sources: We may receive personal data about you from various third parties and public sources, such as analytics providers, advertising networks, and search information providers.

How We Use Your Data

We use your data in various ways to provide, improve, and protect our services and to comply with legal obligations. Below are the specific purposes for which we process your data:

- To Process Transactions: We use your financial information to process payments for services and products you have purchased from us. This includes handling billing, refunds, and related transactions.
- To Manage Our Relationship with You: We use your personal identification information to communicate with you, provide customer support, and manage our ongoing relationship. This includes notifying you about changes to our services, terms, and policies.
- To Improve Our Services: We analyse your usage data and feedback to understand how our services are used and to make improvements. This helps us enhance user experience, develop new features, and ensure our services meet your needs.
- To Administer and Protect Our Business: We use technical data to maintain and improve the security of our website and services. This includes troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting of data.
- To Deliver Relevant Content and Advertisements: We use your usage data and marketing preferences to provide you with relevant website content, advertisements, and promotional offers. This helps us tailor our marketing efforts to your interests.

Safe-Voucher CH AG

Trading as Neosurf

- To Measure and Understand Advertising Effectiveness: We analyse the performance of our advertising campaigns to understand their effectiveness and to improve future marketing strategies. This involves using cookies and other tracking technologies.
- To Make Recommendations: We use your data to make suggestions and recommendations about goods or services that may be of interest to you. This helps you discover new products and services that match your preferences.
- To Comply with Legal Obligations: We process your data as required by applicable laws and regulations. This includes disclosing your data to regulatory authorities, courts, and law enforcement agencies when necessary.

Data Sharing

We do not share your data with third parties except as necessary to comply with legal obligations, to protect your vital interests or those of another person, or for our legitimate interests. Specifically, we may share your data with:

- Service Providers: We may share your data with third-party service providers who assist us in providing our services, such as payment processors, IT service providers, and customer support.
- Regulatory Authorities: We may disclose your data to government or regulatory authorities as required by law or to comply with legal processes.
- Business Transfers: In the event of a merger, acquisition, or sale of our assets, your personal data may be transferred to the new owners.
- Legal Compliance: We may share your data when necessary to comply with legal obligations, respond to requests from law enforcement agencies, or protect our legal rights.
- Third-Party Data Processors: We may share your data with third-party data processors who act on our behalf to process your data in compliance with our instructions and this Privacy Notice.

Data Security

We implement appropriate technical and organisational measures to protect your data against unauthorised or unlawful processing, accidental loss, destruction, or damage. Our security measures include:

- Encryption: We use encryption to protect your data during transmission and storage.
- Access Controls: We restrict access to your data to authorised personnel only, based on their role and need to know.
- Regular Audits: We conduct regular audits and security assessments to identify and mitigate potential risks.
- Secure Data Storage: We store your data on secure servers with robust physical and digital security measures.
- Incident Response: We have procedures in place to handle any suspected data breach and will notify you and any applicable regulator of a breach where we are legally required to do

Safe-Voucher CH AG

Trading as Neosurf

so.

- Data Minimisation: We ensure that we only collect and process the data necessary for the specific purposes outlined in this notice.

Your Rights

You have the following rights regarding your personal data:

- Access: You have the right to request access to your personal data and obtain information about how we process it.
- Correction: You have the right to request the correction of inaccurate or incomplete personal data.
- Deletion: You have the right to request the deletion of your personal data, subject to certain conditions.
- Restriction: You have the right to request the restriction of processing your personal data under certain circumstances.
- Objection: You have the right to object to the processing of your personal data for direct marketing purposes or on grounds relating to your particular situation.
- Data Portability: You have the right to request the transfer of your personal data to another party in a structured, commonly used, and machine-readable format.
- Withdraw Consent: If we are processing your personal data based on your consent, you have the right to withdraw that consent at any time. The withdrawal of your consent will not affect the lawfulness of any processing carried out before you withdraw your consent.
- Complaint: You have the right to lodge a complaint with a supervisory authority if you believe that the processing of your personal data infringes data protection laws.

To exercise these rights, please contact us at support.ch@neosurf.com.

Retention Period

We retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process the data, and whether we can achieve those purposes through other means.

Changes to This Notice

We may update this notice from time to time. The latest version will be available on our website.

Safe-Voucher CH AG

Trading as Neosurf

Contact Us

For questions about this Privacy Notice or our data protection practices, please contact support.ch@neosurf.com.