

Privacy Policy

WeConnectU AG, a corporation organized and existing under the laws of Switzerland with registered offices at c/o PST Consulting GmbH, Baarerstrasse 10, 6300 Zug, Switzerland (hereinafter "**WeConnectU**" or "**we**" or "**us**") as the operator of this website (hereinafter the "**Website**") takes the protection of your personal data very seriously. The purpose of this privacy policy (hereinafter the "**Privacy Policy**") is to inform you (hereinafter "**you**" or "**User**") about how we collect, process and use your Personal Data.

This Privacy Policy is applicable between you as a User of our Website and WeConnectU, owner and publisher of the Website. This Privacy Policy applies to the use of any personal data we collect or that you provide to us in connection with your use of our Website. In this context, we process the Personal Data of various Users. WeConnectU obtains Personal Data about you from various sources. You may be a visitor to one of our Websites or a User of one or more of our Services (as defined below). This Privacy Policy applies to all users of the Website and any other dealings between WeConnectU and its Users and any services provided by WeConnectU (all of these: use, dealings and services are defined hereinafter as the "**Services**").

In case you provide us with the Personal Data of third persons, you should make sure that these persons are familiar with this Privacy Policy and you should only share their Personal Data if you have permission to do so and have ensured that this Personal Data is correct.

We can assure you that we comply with the Swiss Federal Act on Data Protection, the Swiss Ordinance to the Federal Act on Data Protection, and the European General Data Protection Regulation (hereinafter the "**GDPR**") and that we process your Data lawfully, fairly and transparently.

If you are younger than 18 years old, you are not allowed to use our Website without the permission of your parents or legal guardian.

We take confidentiality and privacy issues very seriously. We, therefore, ensure that your personal information is secure; we communicate our privacy and security guidelines and practices to all our employees and service providers and strictly enforce privacy safeguards within our company.

1. DEFINITIONS AND INTERPRETATION

1.1. In this Privacy Policy, the following definitions are used:

Data: all information that you submit to us via our Website.

Personal Data: all information making you directly or indirectly identifiable (e.g. your name, first name, address, phone number or email address but also the IP address of your computer, for example, or the information relating to your browsing of our Website).

Cookies: A small text file placed on your computer by our Website when you visit certain parts of our Website and/or when you use certain features of the Website. Please refer to the Cookie Policy for more information.

Data Controller: The processing of any Personal Data provided or collected on the Website is carried out under the supervision of WeConnectU AG, Baarerstrasse 10, c/o PST Consulting GmbH 6300 Zug, E-Mail: [privacy@weconnectu.io]

GDPR: The "General Data Protection Regulation" (EU Regulation 2016/679), as well as any national legislation adopted in accordance therewith.

Website: The Website: [www.weconnectu.io] and all subdomains of this Website, unless they are expressly excluded from the scope of this Privacy Policy by their own terms and conditions.

1.2. In this Privacy Policy, unless the context requires a different interpretation:

- The singular includes the plural and vice versa;
- References to sections, clauses, appendices refer to the sections, clauses, appendices of this Privacy Policy;
- A reference to a person includes firms, companies, government entities, trusts, and partnerships;
- "Including" means "including but not limited to";
- A reference to any legislative provision includes all amendments thereto;
- Headings and subheadings are not part of this Privacy Policy.

2. SCOPE OF THIS PRIVACY POLICY

This Privacy Policy applies only to the actions of WeConnectU and of Users with respect to our Website. It does not extend to websites that can be accessed from our Website, including, but not limited to, any links we may provide to social media websites.

3. RESPONSIBLE PERSON / CONTACT DETAILS

Responsible for the Personal Data collected is our data protection officer with a business address at Baarerstrasse 10, 6300 Zug, Switzerland (hereinafter the **"Responsible Person"**). For any matters relating to data protection you may contact [privacy@weconnectu.io] by e-mail or by letter to the following address:

WeConnectU AG
c/o PST Consulting GmbH
Baarestrasse 10
6300 Zug
Switzerland

4. DATA PROCESSING IN CONNECTION WITH OUR WEBSITE

4.1. General data and information resulting from your activity on our Website

We receive and store certain types of information every time you visit our Website. For example, like many websites, we use Cookies and we obtain certain types of information when your Web browser accesses our Website and other content provided by or on behalf of WeConnectU on other websites. We may, therefore, also collect the following technical Data from you:

- IP address (automatically collected);
- Web browser type and version (automatically collected);
- Operating system used by accessing the Website (automatically collected);
- Your browsing history to and from the Website;
- The date and time of access to the Website
- The internet service provider of the accessing system
- Any other similar data and information that may be used in the event of attacks on our information technology systems

The collection and processing of this technical data is for the purpose of

- Enabling the use of our Website;
- Further developing our products, the contents of our Website and services;
- Continuously improving our Website and offering you a more enjoyable and efficient experience.
- For internal statistical purposes

This is our legitimate interest in the processing of Data in the sense of Art. 6 Par. 1 lit. f. GDPR.

4.2. Contact Possibility via the Website

The Website may contain a contact form that enables a quick electronic contact to WeConnectU, as well as direct communication with us, which also includes a general address of the e-mail address. If you contact us by e-mail or via the contact form, the Personal Data transmitted by you is automatically stored.

Such Personal Data, transmitted on a voluntary basis by you to us, is stored for the purpose of processing or contacting you and to handle your request and provide you the service or support you requested. The legal basis for the data processing for these purposes lies in the fulfilment of an agreement in accordance with Art. 6 Par. 1 lit. b GDPR and you have provided consent in accordance with Art. 6 Par. 1 lit. a GDPR.

4.3. Use of Website Cookies:

The Website uses cookies. Cookies are text files that are stored in a computer system via an Internet browser. For further information, visit <https://www.allaboutcookies.org/>.

When you visit our Website, we may collect information from you automatically through cookies. Through the use of cookies, WeConnectU can provide the users of the Website with more user-friendly services that would not be possible without the cookie setting.

You may prevent the setting of cookies through our Website by means of a corresponding setting of the Internet browser used, and may thus permanently deny the setting of cookies. Furthermore, previously set cookies may be deleted at any time via an Internet browser or other software programs. This is possible in all popular Internet browsers. If you deactivate the setting of cookies in the Internet Browser used, it may not be possible to use all the functions of our Website.

If you do not agree to our use of cookies, you should set your browser settings accordingly as described above or not use our Website. By continuing to use our Website without changing your settings, you are agreeing to our use of cookies and the terms with regard to cookies of this Privacy Policy.

Two types of cookies may be used on the Website - "session cookies" and "persistent cookies". Session cookies are temporary cookies that remain on your device until you leave the Website. A persistent cookie remains on your device for much longer or until you manually delete it (how long the cookie remains on your device will depend on the duration or "lifetime" of the specific cookie and your browser settings).

The table below summarizes the different types of cookies we use on the Website, together with their respective purpose and duration (i.e. how long each cookie will remain on your device).

Cookies used on the Website:

Type of Cookie	What do they do?	Do these cookies collect my personal data / identify me?
Necessary Cookies	Cookies that are essential to making the Website work correctly. They enable visitors to move around our Website and use our features. Examples include remembering previous actions (e.g. entered text) when navigating back to a page in the same session.	These cookies do not identify you as an individual. If you do not accept these cookies, it may affect the performance of our Site.
Performance Cookies	Cookies that help us understand how visitors interact with our web properties by providing	These cookies don't identify you as an individual. All data is collected and aggregated

	<p>information about the areas visited, the time spent on the Site and any issues encountered, such as error messages. They help us improve the performance of our Website, alert of any concerns and more.</p>	<p>anonymously.</p>
<p>Functionality Cookies</p>	<p>Cookies that allow our web properties to remember the choices you make (such as your user name, language or the region you are in) to provide a more personalized online experience.</p>	<p>The information these cookies collect may include personally identifiable information that you have disclosed, such as a username, for example. We shall always be transparent with you about what information we collect, what we do with it and with whom we share it.</p> <p>If you do not accept these cookies, it may affect site performance and functionality and may restrict access to web content.</p>
<p>Targeting/Advertising Cookies</p>	<p>Cookies that are used to deliver content, which is more relevant to you and your interests. They may be used to deliver targeted advertising or to limit the number of times you see an advertisement. They also help us measure the effectiveness of advertising campaigns on the Site.</p> <p>Among other others the following services are used:</p> <ul style="list-style-type: none"> - Facebook Pixel; - Facebook SDK; - Google Analytics <p>These services also use cookies. Information about the use of the website generated by cookies (such as web browser and version used, IP address) is transmitted to servers in the United States and stored there. In general, the IP-address is anonymized when transferred to servers in the United States. Exceptionally however the full IP-address may be transferred to servers in the United States.</p>	<p>Most types of these cookies track consumers via their IP address so will collect some personal data.</p> <p>Your dates, sessions and interactions can be allocated across several devices to one pseudonymous user ID and therefore analyse the activities of a user on several devices by the correspondent web analysis services and the companies who provide these services.</p> <p>The information sent to the companies through this analysis service permits the anonymous evaluation of the use of our Website as well as the establishment of reports on the Website activities.</p>

5. RETENTION OF PERSONAL DATA

The retention period of Personal Data processed by WeConnectU may vary depending on common practice, and considered in accordance with the legal obligations and the applicable limitation rules. In any case, WeConnectU will process and store the Personal Data only for the period necessary to achieve the purpose of storage or as far as this is granted by the applicable laws or regulations.

If the storage purpose is not applicable anymore, or if the storage period prescribed by the applicable laws and regulations expires, the Personal Data is routinely erased in accordance with legal hold requirements.

6. PERSONAL DATA SECURITY

Personal Data security is of great importance to WeConnectU. In order to protect your Personal Data, we have implemented appropriate physical, electronic and organizational procedures to safeguard and secure the Personal Data collected via our Website in order to ensure its integrity and confidentiality. Our security measures are continuously being improved in line with technical developments. All Personal Data is securely stored in accordance with industry standards and the Swiss Federal Act on Data Protection, the Swiss Ordinance to the Federal Act on Data Protection and the GDPR.

If a password is required to access certain sections of our Website, you are responsible for keeping this password confidential.

We endeavour to do all we can to protect your Personal Data. However, the transmission of information on the Internet is not fully secure and remains your sole responsibility. We cannot ensure security and accept no liability for the transmission of your Data to our Website.

7. OTHER PARTIES WHO HAVE ACCESS TO INFORMATION WE COLLECT

With the exceptions described in this section, we do not make your Personal Data available to third parties unless you have expressly consented to it, if we are legally obligated to, or if this is necessary to enforce our rights concerning a contractual relationship.

We transmit your Data only to our employees who are authorized to process them as part of their duties.

We may grant access to Personal Data about you:

- to public entities and institutions (e.g. regulatory, quasi-regulatory, tax or other authorities, law enforcement agencies, courts, arbitrational bodies, fraud prevention agencies)
- to other credit and financial service institutions or comparable institutions in order to carry on a business relationship with you depending on the contract with you
- to third parties in connection with transactions that are involved in (e.g. correspondent banks, brokers, exchanges, processing units and third-party custodians, issuers, investors, prospective buyers and other transaction participants and their representatives)
- to prospective buyers as part of a sale, merger or other disposal of any of our business or assets to a natural or legal person, public authority, regulatory agency or body for which you have given us your consent to transfer personal data to
- to professional advisors including law firms, accountants, auditors and tax advisors
- to insurers
- to service providers and agents appointed by us for the purposes given. These are companies in the categories of IT services, logistics, printing services, telecommunications, advice and consulting, and sales and marketing and translation services in relation to the Website on our behalf, and we ensure that they provide the necessary guarantees with respect to the Swiss Federal Act on Data Protection, the Swiss Ordinance to the Federal Act on Data Protection and the GDPR. The transfer of data is for purpose of providing and maintaining the functionality of our Website. This is our legitimate interest in the sense of Art. 6 Par.1 lit. b and lit f GDPR.

In principle, we process your Data in Switzerland. In case it is necessary to transfer your Data to third parties outside Switzerland and the EU, the Data will only be transferred to countries and/or parties that provide an adequate level of protection in accordance with the Swiss and European standards.

If the level of data protection in a country where a service provider is located does not correspond to the Swiss and European data protection level, we contractually ensure that the protection of your Personal Data corresponds to that in Switzerland and the EU at all times, by concluding agreements using the standard contractual clauses complying with the GDPR. You understand that the data protection legislation in such other countries may not give you as much protection as the data protection legislation in the country where you are located.

All Personal Data used by these third parties is solely used for the purposes of the services provided at your request. Any use for other purposes is strictly prohibited. In addition, any Personal Data processed by third parties will be in accordance with the terms of this Privacy Policy and in compliance with the Swiss Federal Act on Data Protection and the GDPR. The third-party providers we use will only collect and use your information to the extent necessary to enable them to perform the services they provide to us.

8. LINKS TO OTHER WEBSITES

Our Website may, from time to time, provide links to other websites. When you activate them (by clicking on them), the operators of the respective website may record that you are on our Website and may use this information. We have no control over such websites and we are not responsible for their content. The processing of your Personal Data then lies in the responsibility of the individuals of these websites and occurs according to their privacy policy. This Privacy Policy does not extend to the use of such websites. We advise you to read the privacy policy applicable to such other websites before using them.

9. YOUR RIGHTS REGARDING YOUR PERSONAL DATA

Please note that some of the rights mentioned below are subject to limitations in some situations and that the exercise of these rights may affect, restrain or render impossible our ability to continue a business relationship with you.

9.1. Right to confirmation

You have the right to obtain confirmation from WeConnectU as to whether or not Personal Data concerning you is being processed. If you wish to avail yourself of this right of confirmation, you may, at any time, contact the Responsible Person as stated in section 3 of this Privacy Policy.

9.2. Right to access

You have the right to obtain free information from WeConnectU about your Personal Data stored at any time, and a copy of this information. Furthermore, you will have access to the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the Personal Data has been or will be disclosed, in particular recipients in third countries;
- where possible, the envisaged period for which the Personal Data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from WeConnectU rectification or erasure of Personal Data, or the restriction of the processing of Personal Data concerning you, or to object to such processing;
- the existence of the right to lodge a complaint with a supervisory authority;
- where the Personal Data is not collected directly from you, any available information as to their source; and
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for you.

If you wish to avail yourself of this right of access, you may at any time contact the Responsible Person as stated in section 3 of this Privacy Policy.

9.3. Right to rectification

You have the right to obtain from WeConnectU, without undue delay, the rectification of inaccurate Personal Data concerning you. Taking into account the purposes of the processing, you shall have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement.

If you wish to exercise this right to rectification, you may, at any time, contact the Responsible Person as stated in section 3 of this Privacy Policy.

9.4. Right to erasure (right to be forgotten)

You have the right to request from WeConnectU the erasure of Personal Data concerning you as soon as possible, and WeConnectU shall have the obligation to erase Personal Data without undue delay where one of the following grounds applies:

- The Personal Data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- You withdraw consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing;
- The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR;
- The Personal Data has been unlawfully processed;
- The Personal Data must be erased for compliance with a legal obligation, in accordance with the applicable law to which WeConnectU is subject; and/or
- The Personal Data has been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If any one of the aforementioned reasons applies, and you wish to request the erasure of Personal Data stored by WeConnectU, you may at any time contact the Responsible Person as stated in section 3 of this Privacy Policy. The Responsible Person at WeConnectU shall promptly ensure that the erasure request is complied with as soon as possible.

9.5. Right to restriction of processing

You have the right to obtain the restriction of processing from WeConnectU where one of the following applies:

- The accuracy of the Personal Data is contested by you, for a period enabling WeConnectU to verify the accuracy of the Personal Data;
- The processing is unlawful and you oppose the erasure of the Personal Data and request instead the restriction of their use;
- WeConnectU no longer needs the Personal Data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims; and/or
- The data subject has objected to processing, pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of WeConnectU override those of the data subject.

If any one of the aforementioned conditions is met, and you wish to request the restriction of the processing of Personal Data stored by WeConnectU, you may at any time contact WeConnectU's Responsible Person. The Responsible Person will arrange the restriction of the processing.

9.6. Right to object

You have the right to object, on grounds relating to your particular situation, at any time, to the processing of Personal Data concerning you, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

WeConnectU shall no longer process the Personal Data in the event of the objection, unless WeConnectU can demonstrate reasonable grounds for the processing, which override the interests, rights and freedoms of you, or for the establishment, exercise or defence of legal claims. In order to exercise the right to object, you may directly contact the Responsible Person.

9.7. Right to data portability

You have the right to receive the Personal Data concerning you, which was provided to WeConnectU, in a structured, commonly used and machine-readable format. You shall have the right to transmit those data to another controller without hindrance from WeConnectU to which the Personal Data has been provided, as long as the processing is based on consent, pursuant to Article 6 (1) GDPR or point (a) of Article 9 (2) GDPR, or on a contract pursuant to point (b) of Article 6 (1) GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest.

Furthermore, in exercising your right to data portability pursuant to Article 20 (1) GDPR, you shall have the right to have Personal Data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, you may at any time contact the Responsible Person according to section 3.

9.8. Automated individual decision-making, including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you, or similarly significantly affects you, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between you and WeConnectU, or (2) is not authorized by the applicable law and which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests, or (3) is not based on your explicit consent.

Due to legal and regulatory requirements, we are required to combat money laundering, terrorism financing, fraud and assess risks and offences that pose a danger to assets. Automated Data assessments (including on payment transactions) are also carried out for this purpose. At the same time, these measures also serve to protect you.

Furthermore, we use assessment tools in order to be able to specifically notify you and advise you about our products. These allow communications and marketing to be tailored as needed, including market and opinion research.

If the decision (1) is necessary for entering into, or the performance of, a contract between you and WeConnectU, or (2) it is based on your explicit consent, WeConnectU shall implement suitable measures to safeguard your rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express their point of view and contest the decision.

If you wish to exercise the rights concerning automated individual decision-making, you may, at any time, contact the Responsible Person.

9.9. Right to withdraw data protection consent

You have the right to withdraw your consent to the processing of your Personal Data at any time.

If you wish to exercise the right to withdraw the consent, you may at any time directly contact the Responsible Person as stated in section 3.

9.10 Manifestly unfounded or excessive use of rights

While the exercise of any individual rights mentioned above will be free of charge, a reasonable fee may be exceptionally charged if such requests are manifestly unfounded or excessive. WeConnectU may refuse to comply with the request under such circumstances.

10. MISCELLANEOUS

If a court or competent authority considers that any provision of this Privacy Policy (or any part thereof) is invalid, illegal or unenforceable, that provision or relevant part of the provision will, to the extent required, be deemed to be deleted. The validity and enforceability of the other provisions of this Privacy Policy will

not be affected.

Unless otherwise agreed, no delay, act or omission by a party in exercising a right or remedy will be deemed a waiver of such right, or of another right or remedy.

This Privacy Policy will be governed by and interpreted according to Swiss law. Any dispute arising out of this Privacy Policy will be subject to the exclusive jurisdiction of the ordinary courts in Zug, Switzerland.

11. CHANGES TO THIS PRIVACY POLICY

We reserve the right to make changes to this Privacy Policy as we deem necessary from time to time or as may be required by law. All changes will be posted immediately on our Website and you are deemed to have accepted the new terms of the Privacy Policy when you first use the Website after such changes. Always the current version of the Privacy Policy, as published on our Website, is applicable.

If our company is the subject of a corporate transaction such as an acquisition or merger with another company, your information may be transferred to the new owners so that we can continue to sell our products to you.

MORE INFORMATION ABOUT PRIVACY REGULATIONS

- EU General Data Protection Regulation
https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2016.119.01.0001.01.ENG
- Swiss Federal Act on Data Protection
<https://www.admin.ch/opc/en/classified-compilation/19920153/index.html>
- Swiss Ordinance to the Federal Act on Data Protection
<https://www.admin.ch/opc/en/classified-compilation/19930159/index.html>

Please do not hesitate to contact us if you have any questions regarding this Privacy Policy by contacting us at [privacy@weconnectu.io].

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