

Cookie Policy

Updated on 21.08.2023.



EXECUTIVE SUMMARY

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Introduction

The website https://www.start2coin.com is produced and published by SweePay Ltd. SweePay Ltd. is registered in Switzerland under the number CHE-219.599.959. SweePay's head office is located at: Kolinplatz 8, 6300 Zug, Switzerland.

SweePay Ltd as a registered financial intermediary company at Polyreg in Switzerland (Self-Regulatory Organization [SRO]) fulfils its obligations regarding customer Due diligence according to the Swiss legislation on Combating Money Laundering and Terrorist Financing in the Financial Sector (Anti-Money Laundering Act, AMLA) and the implementation of the provisions established by Polyreg.

SweePay Ltd (hereinafter referred to as "SweePay", "we", "us" or "our") use "cookies" and similar technologies when you use our websites or mobile sites (hereinafter referred to as the "Website"). This statement applies in addition to any other terms of use or contractual provisions of the SweePay services.

In this statement we explain how you can control the types of cookies used and find out more about cookies and similar technologies. If you would like to know more about how SweePay handles your data, you can find more information in our <u>personal</u> data protection policy.

1. Granting, modifying and withdrawing consent

When you use our website, you will be asked to consent to the placement of cookies or similar technologies on your device. You may withdraw or modify this consent unless these cookies are strictly necessary for the operation of the site or the provision of services.

We use a cookie banner to ensure that you authorise the collection of your data and a cookie preferences centre to enable you to give your authorisation and change it.

It's easy to give your consent. When the cookie banner appears, click on "Accept all" and continue browsing. If you wish to refuse or further control the cookies we use, click on "Continue without accepting" or "Personalise my choices".

To change or withdraw your consent:

Click on "Cookie preferences" at the bottom of the page. This will open the cookie preferences centre, where you can change your consent.

When you open the preferences centre for the first time, all cookies will be deactivated, with the exception of those that are strictly necessary. If you have already accepted cookies, the preferences centre will display your choices. By choosing "Confirm selection", you will save your choices. You can also select "Authorise all" to authorise all cookies.

Note: if you have deleted your cookies or if you are using a browser or browser settings that prevent cookies from remaining on your device, you will see the cookie banner every time you visit our website, and the preferences centre will be reset. This is because we use a cookie to remember your privacy preferences. You can also configure your browser to restrict the use of cookies or refuse them completely, but your browsing experience may be affected.

2. Monitoring and advertising techniques

We use various techniques on our website that enable us and the third parties we engage to recognise you when you use our website and possibly to track you over several visits.

Basically, we want to distinguish your access (via your system) from that of other users, in order to ensure the functionality of our website and to carry out analyses and customisation. We do not determine your identity. However, even in the absence of registration data, the technologies we use are designed in such a way that you are recognised as an individual visitor each time you access our website, for example by our server (or third-party servers) assigning you or your browser a specific identification number (called a "cookie").

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3. Cookies

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies are widely used by the owners of websites and mobile applications to make them work or to work more efficiently, as well as to communicate information.

We may use cookies for many different tasks, including enabling you to navigate efficiently between pages, remembering your preferences and improving your overall browsing experience.

If you visit our website, we may deploy cookies and similar technologies to provide you with an online service that is better suited to the device with which you are connecting, as well as to prevent and detect fraud and help maintain your security. When you visit our website from any device (e.g. mobile device or PC), we collect information about your use of this site, including information about the device or browser you use to access the site (including device type, operating system, screen resolution, etc.), how you interact with the site, and the IP address of your device. In this way, you are recognisable even if your identity is unknown.

We may, for example, monitor the traffic patterns of users of our website from page to page, send or communicate with cookies, determine whether you have come to our website from an online advertisement on a third-party site, improve site performance and measure the success of marketing campaigns.

We use these technologies on our website and may authorise certain third parties to do so as well. You can also configure your browser to block or deceive certain types of cookies or alternative technologies or to delete existing cookies. You can also add software to your browser that blocks certain third-party tracking. You can find more information on your browser's help pages (usually with the keyword "data protection") or on the websites of the third parties mentioned below.

In many cases, our online services depend on cookies to function properly. As a result, refusing cookies has a detrimental effect on their operation.

4. Pixel tags

We may also use similar technologies such as "pixel tags" and "JavaScript" to perform these tasks. Pixel tags and JavaScript are tiny graphic files that contain a unique identifier, allowing us to know when someone has visited our website or opened an email we have sent them.

JavaScript and some of the similar technologies we use can also be disabled in your device or browser settings, but this may significantly affect the ability of our website to function on your devices.

5. What are cookies used for?

There are different types of cookies which are used for different purposes. In this section we describe six different functions, but please note that not all of them will be used by SweePay or on our website and some cookies may fall into more than one category.

5.1. « Strictly necessary » cookies

These cookies are necessary for a website to function properly and cannot be deactivated.

In general, they are only set in response to actions you perform that amount to a request for services. You can configure your browser to block these cookies or to alert you about them, but some parts of the site will not function. They are activated when you visit a website and remain active for the duration of your visit.

Strictly necessary" cookies record data that may be used to: remember your privacy preferences; enable you to log in or fill in forms; move around the website and use its features, such as accessing secure areas of a website; comply with legal and regulatory requirements, for example, anti-money laundering and fraud prevention.

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5.2. « Performance » cookies

These cookies are used to count visits and sources of traffic in order to measure and improve the performance of a site or service.

They enable us to determine which pages are viewed most and least frequently and to study visitor behaviour on the site. All the information collected by these cookies is aggregated and therefore anonymous. If you do not authorise these cookies, the site will not be able to use your experience to monitor and improve its performance.

Performance cookies may be used to: record where visitors click on each page and track the services they seek; log web page error messages; help improve websites to make access to information and services faster and easier in desktop and mobile browsers.

5.3. « Functionnality » cookies

These cookies enable websites to remember your choices (such as your username, language, or region of residence) and to offer improved and more personal functionalities.

For example, a website can provide you with local weather reports or traffic information by recording your current location in a cookie. They can also be used to provide you with the services you have requested, such as watching a video or commenting on a blog. The information collected by these cookies can be anonymised and they cannot track your browsing activity on other websites. As a result, these cookies essentially remember the choices you make to improve your user experience.

5.4. « Targetting » cookies

These cookies are used to display advertising that is better adapted to your interests. They are also used to limit the frequency with which you see an advertisement and to help evaluate the effectiveness of advertising campaigns.

They are generally left by advertising networks with the authorisation of the site operator. They remember your visit to a website and this information is shared with other organisations such as advertisers. Very often, targeting or advertising cookies will be linked to the site features provided by the other organisation. These cookies therefore essentially collect information about your browsing habits in order to tailor advertising to your interests.

If you deactivate these cookies, you will still see advertising, but it will not be optimised to display the content and offers that interest you most.

5.5. « Social media » cookies

These cookies are set by a range of social media services and may allow you to share content with your friends and networks.

They are able to track your browser on other sites and create a profile of your interests. The content and messages you see on other websites you visit may be affected. If you do not allow these cookies, you may not be able to use or view these sharing tools, and any content or offers provided may be less relevant.

5.6. Cookies in e-mails

These cookies and similar technologies may be used in some e-mails that contain hyperlinks, each with a unique tag. They help us understand how you interact with e-mails and are generally used to improve e-mail communications from the website.

If you click on the links contained in the e-mail, the website will be able to track your use of the website and display the content and offers of most interest to you.

If you do not wish to accept cookies from e-mails, simply close the e-mail before downloading any images or clicking on any links. You can also configure your browser to restrict cookies or refuse them completely. These settings will apply to all cookies, whether they come from websites or e-mails. If you have configured your computer to automatically display images, or if you have added us to your address book (or list of authorised senders), or if you have configured your computer to a low level of security, cookies may be set at the same time as you download, open, or read an e-mail. If you want to avoid this, you should disable the automatic display of images, remove the e-mail from your address book or increase your security settings.

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6. Who does SweePay work with to show you personalised ads?

SweePay uses third party advertisers (or advertising agencies working on their behalf) to deliver content, including advertisements, directly to your browser or device. Occasionally, we may use these third parties' own cookies as part of the delivery of this content. These cookies may also be used to measure the effectiveness of our ads and to show you more relevant advertising content.

Here are the agencies we use and links to their privacy policies:

- Google
- Facebook
- Instagram

We use Google Analytics, a web analysis service provided by Google Ireland Ltd (Google). Google Analytics uses cookies to analyse how you use the website. The information generated by the cookie about your use of the website is generally transmitted to and stored by Google on servers in the United States.

Your full IP address will be sent to a Google server in the USA, where it will be truncated only in exceptional cases. Google will use this information on our behalf for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. The IP address provided by your browser will not be merged with other Google data. You can prevent Google Analytics from collecting this data in the future by installing an add-on (https://tools.google.com/dlpage/gaoptout?hl=en) for your browser.

In this way, you install an "opt-out" cookie that prevents data from being tracked on the website. This function is maintained until the opt-out cookie is deleted.

7. What data do we process on our social networking pages?

We may operate pages and other online presences ("fan pages", "channels", "profiles", etc.) on social networks and other platforms (e.g. Facebook, Instagram, etc.) operated by third parties. We receive this data from you and from the platforms when you interact with us through our online presence (for example when you communicate with us, comment on our content or visit our online presence). These platforms also analyse your use of our online presence and combine this data with other data they have about you (for example, about your behaviour and preferences). They also process this data for their own purposes, including for marketing and market research purposes (e.g. to personalise advertising) and to manage their platforms (e.g. the content they show you) and, for this purpose, they act as independent data controllers.

We receive data about you when you communicate with us via online presences, when you consult our content on the corresponding platforms, when you visit our online presences or when you are active on them (e.g. when you publish content or submit comments).

These platforms also collect technical data, registration data, communication data, behavioural data and preference data from or about you, among other things. They typically perform statistical analysis of how you interact with us, how you use our online presences and content or other parts of the platform (what you view, comment on, "like", share, etc.) and combine this data with other information about you (e.g. information about your age and gender and other demographic information). In this way, they create profiles of you and statistics on the use of our online presence.

They use this data and these profiles to show you our advertisements or other advertisements and other personalised content on the platform and to manage the behaviour of the platform, but also for market and user research and to provide us and other parties with information about you and the use of our online presence.

We may display content posted by you (e.g. comments on an advert), for example as part of our advertising on the Platform or elsewhere. We or the platform operators may also remove or restrict content from or about you in accordance with their terms of use (for example, inappropriate comments).

For more information on the processing by platform operators, you can consult the data protection statements of the platforms concerned. There you will also find information on the countries in which they process your data, your rights of access and erasure of data and other data subject rights, as well as how you can exercise these rights or obtain further information.

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8. Find out more about the specific cookies used by SweePay

To find out more about each cookie used by SweePay, consult the cookie preferences centre.

9. Changes

This cookie policy is subject to change to ensure that your rights are fully protected and to enable us to comply with the regulations in force. We therefore recommend that you regularly consult this cookie policy.

10. Contact

SweePay is responsible for processing personal data in accordance with this Cookie Policy and our <u>personal data protection</u> <u>policy</u>. If you have any questions about this, please contact us at SweePay Ltd, Data Protection, Kolinplatz 8, 6300 Zug or by e-mail at <u>dpo@sweepay.ch</u>.

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