



Personal Data Protection Policy

Updated on 05.02.2021

EXECUTIVE SUMMARY

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The website www.start2coin.com is produced and published by SweePay Ltd.

The collection of your personal data is managed by SweePay SA.

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 is registered in Switzerland under the number CHE-219.599.959. SweePay's head office is located at : Kolinplatz 8, 6300 Zug, Switzerland.

SweePay, with its Start2Coin brand, acts as a service provider mandated to market the virtual currency exchange service and enables the provision of these virtual currencies on the Start2Coin card.

SweePay, as manager of the Start2Coin service, attaches great importance to the protection of your personal data and those of your children.

You are protected against the disproportionate collection and use of these data, in particular with regard to the right to respect for your private and family life, home and correspondence.

Therefore, we comply with the applicable data protection laws in Switzerland (DPA) and the European Union (in particular the General Data Protection Regulations, GDPR).

In this privacy policy you will find out how SweePay (hereinafter referred to as "**we**" or "**us**") protects, collects, and uses your personal information in connection with the Start2Coin service. Unless otherwise defined in this Privacy Policy, the terms used have the same meaning as in our Terms and Conditions of Start2Coin Service which are available at www.start2coin.com/en-ch/tos.

1. Definitions

What is personal data?

This is any information relating to an identified or identifiable natural person. This notion includes both classic data such as surname, first name, telephone number and other more atypical data such as IP address, location data, or data related to virtual currency exchange transactions.

What is data processing?

It is any automated or manual operation applied to personal data, regardless of the collection process implemented (recording, adaptation, extraction, use...) and the medium used in order to anticipate technological developments.

The processing of your data is carried out by data controllers who ensure that the processing is carried out in a highly secure manner. When using the Start2coin service, SweePay will act as data controller.

2. Collecting your data

As soon as you voluntarily provide us with personal data, SweePay collects, processes, uses and/or stores your personal data in accordance with this privacy policy.

The collection of your data will be carried out on the website www.start2coin.com. SweePay acts as the responsible party for the Start2Coin service, including the responsibility for the collection and storage of your data for anti-money laundering and anti-terrorist financing purposes. Any request to exercise one of your rights will be made directly to SweePay who is your privileged contact.

2.1. By visiting our website

When you visit our website, our servers temporarily record each access in a log file. The following data is collected and stored:

- the IP address,
- the date and time of access,
- the name and URL of the accessed data,

- the website from which access to our domain is made,
- your computer's operating system and the browser you are using, and
- the status code.

This data is collected and processed for the purpose of enabling the use of our website and to ensure the security and stability of the system in the long term.

The above information is not linked to or stored with personal data. Only in the event of an attack on the website's network infrastructure or suspicion of unauthorised or abusive use of the website will the IP address be evaluated for clarification and defence purposes and, if necessary, used in criminal proceedings for identification and to initiate civil and criminal proceedings against the users concerned.

2.2. By using the contact form

To be able to contact us by using the form, it is essential that you enter the following personal data truthfully:

- Name
- Email address
- Serial number of your Start2Coin card

We use this data in order to be able to process your request, in particular to answer your questions or to provide the required services and, if necessary, to contact you by e-mail.

2.3. When you contact us by e-mail

You can contact us using the e-mail address support@start2coin.com. In this case, we collect the personal data you provide. We need this information to process your request. You are responsible for any communication or content you provide to us. We recommend that you do not provide sensitive information by e-mail. Personal data is only collected if you provide it to us voluntarily. It is therefore up to you to decide what information you provide us with. In order to be able to respond to your requests, we may ask you for additional information, for example your address, telephone number, etc. We will only collect personal data if it is necessary to process and respond to your request or to provide you with the services you request.

3. The use of your data

Your information and data may be used for different purposes. Each processing of your data is based on a legal basis that complies with and is adapted to the legislation in force, whether it is to process your request, to carry out a task in the public interest or in the exercise of official authority, in the case of a vital or legitimate interest or based on your consent given freely and unequivocally to such processing.

Your personal information may be communicated to trusted subcontractors located in a Member State of the European Union or in Switzerland for the distribution and execution of Start2Coin related services. We ensure on an ongoing basis that all such subcontractors respect your rights to the protection of your personal data.

For each data processing, we will ask for your consent in advance in a clear and precise manner when it is necessary.

In addition, this information may be transmitted to Swiss and foreign authorities to comply with our legal obligations.

4. Storage location of your personal data

Your data is stored at OVH in the data centre in Strasbourg (France).

5. The protection of your data

To ensure the protection of your personal data and those of your children, we strive to implement physical and technical security measures appropriate to our business and in accordance with applicable standards. SweePay is committed to ensuring the

greatest possible security with regard to the safeguarding, conservation, integrity and confidentiality of this data. Regular updates will be carried out on our security processes in order to maintain it as optimal as possible. Under no circumstances will this data be resold to third parties. In the interests of transparency and trust, you will be notified as soon as possible of any violation of your data if it is likely to create a high risk for your rights and freedoms.

We are authorised to communicate any operating incident to the public or private institutions in charge of centralising this data.

6. Respecting your rights

In accordance with the applicable rules on the protection of personal data, you have the following rights which we are obliged to respect.

What are your rights as a data subject?

- A right to information on the processing of your data; we undertake to provide you with clear, fair and transparent information on the collection and processing of your data;
- A right of access to your personal data provided; you have the right to obtain confirmation from us as to whether or not your data is being processed, the purposes of the processing, the recipient of the data, the possible transfer of the data and a copy of the said data ;
- A right of rectification of inaccurate or incomplete data; you can obtain from us the rectification of your data if they prove to be erroneous or inaccurate;
- A right to object to certain processing operations;
- A right to cancel your data being processed unlawfully; you have the right to have your data deleted only if the processing of your data does not concern the execution of the contract and you have terminated the contract;
- A portability right to receive in an open format your provided data in order to transmit it to another foreign exchange service provider. In order to do so, two conditions must be met: the processing must be carried out using automated processes and the processing must be based on consent or contract. Data portability is only exercised on the data you have provided us about yourself;
- A right to limit processing if any of the following applies: if you challenge the accuracy of the data, when a processing is unlawful and you require the limitation of the processing, if you wish to retain data but only for the exercise or defence of your legal rights, if you challenge the legitimate interest of a processing operation.

To exercise one of these rights for yourself, without prejudice to your other rights, you simply write online or by mail to Customer Service, indicating your surname, first name and references.

Mailing address

SweePay Ltd

Kolinplatz 8

6300 Zug - Switzerland

support@start2coin.com

A response will then be sent to you within one (1) month following receipt of the request and within three (3) months at the latest if the response is longer and more complex to carry out. You may also send us your instructions regarding the storage, deletion and communication of your personal data after your death at the same addresses.

You also have the right to submit a complaint to the Federal Data Protection and Information Commissioner (<https://www.edoeb.admin.ch/edoeb/en/home.html>).

7. Changes

This policy for the protection of your personal data 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 data protection policy.

8. Contact

SweePay's data protection officer is at your disposal for any questions you may have by writing to our Customer Service, who will forward your request as soon as possible.

SweePay Ltd

To the attention of the DPO,

Kolinplatz 8

6300 Zug - Switzerland