

# PRIVACY POLICY

Last Updated: June 11, 2018

We take the protection of your personal information very seriously and strive to make the use of our services secure. We are also committed to observing all laws related to the protection of personal information. This Privacy Policy describes which of your data we collect and use, the purposes for which we do this, and how we protect your personal information.

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### 1. Area of Applicability

This Policy applies to your participation in the Lyonet Marketer program and to access to and use of the websites available at <http://www.lyconet.com> and [www.lyoness.com](http://www.lyoness.com). Please note that this Policy also applies to other Cashback World and Lyonet websites, including those operated in other countries or directed to individuals residing in other countries, and in regard to which other privacy and data protection laws may apply.

As we continue to develop our websites to improve our services, we may need to occasionally amend and revise this Privacy Policy. Should this be the case, we will inform you in advance and direct you to the updated version of this privacy policy. Your continued participation in the Lyonet Marketer program and access and use of the Lyonet and Cashback World websites following delivery of this notice will be deemed acceptance of the amended and revised Privacy Policy. You can also determine whether changes to this Privacy Policy have been made by reviewing its date of last update that appears at the top of this document.

### 2. Which Data is Recorded

Personal information we collect about you includes details of any personal or material circumstances that we obtain from you in, your participation in the Lyonet Marketer program as a Lyonet Marketer, and that can be attributed to you directly or indirectly (e.g. via your membership number). This includes your member ID, your full name, title, gender, date of birth, postal address, geographical coordinates (longitude and latitude), your telephone number(s), fax number, e-mail address, bank details and data regarding your shopping behaviour associated with your existing Cashback World membership, data produced in terms of your buying habits (purchase date, place of purchase, time of purchase, purchase amount, currency, shopping cart, industry, type of purchase – online/offline, from SME, from key account, with voucher, with Cashback card).

### 3. Cookies and Web Tracking

Our websites use cookies, which are small text files saved on your computer that can be accessed again later. Cookies enable you to log in to use our services and help us customise our website for you.

You can use parts of our website without registering or logging in. Even in such cases, certain information will be recorded automatically to enable us to collect statistical data regarding the use and efficiency of our website and to adapt it to suit the needs of our users. We therefore record and process information about your IP address, the time and length of your visit, the number of visits, your use of online forms, your search settings, your view settings, and your favourites setting on our website. Cookies are stored for a varying length of time. The majority of the cookies we use are deleted automatically as soon as you leave the website ("session-cookies"). We make a record of every time our website is accessed and every time a user opens one of the files stored on the website. The cookies set by us are solely for our information and are processed by mWS myWorld Solutions AG, Grazbachgasse 87-93, 8010 Graz, Austria, on behalf of Lyoness Canada Inc. to evaluate the information collected.

We use JavaScript to record your usage behaviour on our website in order to adapt our web services to the needs of our users. In doing so, we determine your browser type, location, time, and duration of your use, URL, page name, and the website that referred you to our page. You can stop us from recording this data by disabling JavaScript directly in your browser.

We also use the following tools:

#### **Google Analytics**

This is a web analytics tool provided by Google Inc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA, hereinafter referred to as "Google", to record your online activities on our site and to determine how many users are visiting us, what contents of our page are viewed, and how many times. The evaluation is done anonymously. Google Analytics cookies, including the Google Analytics Tool "Anonymous IP Address" and usage data, are usually transmitted to a Google server in the United States and stored there. For further information, please refer to <https://support.google.com/analytics/answer/6004245?hl=en>. Google Analytics offers the option to opt out of data collection through access to <https://support.google.com/analytics/answer/6004245?hl=en>.

### Piwik Open Analytics Platform

We use this tool to record your online activities on our website and determine how many users visit us on the Internet, which content of our website is viewed, and how often. The evaluation is done anonymously. The cookies are stored on your computer. For more information, please refer to <https://piwik.org/faq/>.

### Google AdWords

This is used to record website visits for advertising purposes (re-marketing) on in Google and in the Display Network. When you visit a website, your browser saves cookies that allow you to be recognised as a visitor when you visit websites that belong to Google's advertising network. On these pages, ads that relate to content that you previously viewed on other websites that use Google's remarketing function can be presented to you as a visitor. You can opt out of data collection by Google AdWords on the website <http://www.google.com/settings/ads>.

### Conversion Tracking by Google AdWords

We use this to generate conversion statistics that measure the effectiveness of our online advertising campaigns. The conversion tracking cookie is set when a user clicks on an ad placed by Google. According to Google's privacy policy, no personal information is processed in terms of the foregoing. If you do not wish to participate in tracking, you can opt out of this usage by disabling the Google conversion tracking cookie in the usage settings of your Internet browser.

### Salesforce Marketing Cloud

We use this tool to record your behaviour on our website to optimise our product offering. It helps us determine how many users visit us in the Internet, which content of our website is viewed, and how often. The evaluation is done anonymously and is used automatically by predictive intelligence to improve the presentation of our product offering. For registered members, the user-related behaviour on the website is recorded to improve the user experience and is used to display the relevant content. Salesforce cookies are usually delivered to a Salesforce server in the United States and stored there.

### Hotjar

We collect non-personal information, including standard internet log information and details of your behavioural patterns when you visit our website. This is done to allow us to provide you with a better user experience, to identify preferences, to diagnose technical problems, to analyse trends and to improve our website generally.

The following information may be collected with respect to your device and browser: your device's IP address (captured and stored in an anonymized form), device screen resolution, device type (unique device identifiers), operating system, and browser type, geographic location (country only), preferred language used to display our website. The following information is collected related to your user interaction: mouse events (movements, location and clicks), keypresses.

For a sampling of visitors, Hotjar also records information which is collected from our website: referring URL and domain, pages visited, geographic location (country only), preferred language used to display our website, date and time when the website pages were accessed.

You may opt-out from having Hotjar collect your information when visiting our website at any time by visiting the [Opt-out](https://www.hotjar.com/opt-out) page <https://www.hotjar.com/opt-out> and clicking 'Disable Hotjar'.

In addition to the cookies described in the analytics tools used, the following additional cookies are used:

Cookie	Domain	Purpose / Function
language	Lyoness	This cookie stores the user's language settings.
cookiesession1	Lyoness	This cookie is used to distribute the load of HTTP requests in the network infrastructure.
authSession	Lyoness	Cookie that is created for the duration of a session and contains a session ID
authToken	Lyoness	Authentication cookie created for logged-in users so that they can be clearly identified
LyoToolbar_SessionID	Lyoness	This cookie is used for communication with the Cash-back Bar
lyo_AT_cookie_privacystatement	Lyoness	This cookie is used to track whether the website user has agreed to the use of cookies
__RequestVerification_Token	Lyoness	An anti-fraud token cookie used to prevent CSRF attacks

Please note that most internet browsers are set to accept cookies by default. You can also set your browser to refuse all or certain cookies or to ask you before a new cookie is received. The relevant instructions are provided by most browsers under the "Help" menu item in the menu bar. These instructions will normally tell you how to delete existing cookies as well.

Please note that you may not be able to use all the features of our websites if you do not accept any or only some cookies.

By using our website, you agree that the cookies and tools mentioned above may be used.

#### **4. Conversion measurement using the Facebook pixel**

With your consent, we use the "Facebook Pixel" by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook") on our website. This is a cookie, a small text file that is stored on your computer and can be accessed again later. With its help, actions of users can be tracked after they have seen or clicked on a Facebook ad. This allows us to track the effectiveness of Facebook ads for statistical and market research purposes. The data collected in this way is anonymous to us, in other words, it does not provide any information on the identity of the users. However, the data is stored and processed by Facebook, so that a connection to the respective user profile is possible and Facebook can use the data for its own advertising purposes, according to the Facebook Data Policy (<https://www.facebook.com/about/privacy/>). You can allow Facebook and its partners to display ads on and off Facebook. A cookie may also be stored on your computer for these purposes. By using the website, you agree to the use of the visitor action pixel.

**You may withdraw your consent to use the visitor action pixel at any time. You must inform us in writing (by mail, fax or e-mail) of your wish to withdraw consent using the following coordinates:**

Lyconet Canada Inc.  
5000 Yonge Street, Suite 1706  
Toronto, Ontario M2N 7E9  
Canada

Fax: +1 (416) 479-8372  
E-mail: [international@lyconet.com](mailto:international@lyconet.com)

#### **5. Sharing**

The website contains "Share" buttons for the social networks **Twitter Inc.**, 795 Folsom St., Suite 600, San Francisco, CA 94107, USA, **XING**, which is operated by XING AG, Dammtorstrasse 30, 20354 Hamburg, Germany, **LinkedIn** Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA, **Facebook**, 1601 South California Avenue, Palo Alto, CA 94304, United States, and **Google Plus**, the social network of Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, United States. In addition, there is also a "Share" button for e-mail. The "Share" buttons can be recognised by their respective logos.

All "Share" buttons are set up in compliance with privacy requirements. A direct connection between your browser and the server of the operator of the respective social network is established only when you click on the respective "Share" button on this website (and only then). According to the operators of the social networks mentioned, no personal information is collected by the social networks without a click on the respective "Share" button. Only data of logged-in members, including the IP address, is collected and processed. If you do not wish to associate your visit to our website with your user account of the respective social network, please log out of the user account of that social network.

Please note that, as the provider of the website, we do not receive any information regarding the content of the data transmitted and its use by the social networks. For more information about the use of data by the social media networks, please refer to their respective privacy policy.

#### **6. Use of Data**

We use your personal information only in compliance with applicable laws. We collect and process the personal information that you provide to us when you register as a Lyconet Marketer, as well as in the course of your operation as a Lyconet Marketer, is recorded and processed exclusively within the framework of our contractual obligations to you and administration and operation of the Lyconet Marketing program, and furthermore, only in cases where you have given us your consent.

For example, we use your personal information to communicate with you to verify your identity and to provide you with your personal login area on the Lyconet website, to process your inquiries and orders, and provide you with our services. In addition, we also use your personal information to determine and allocate the benefits due to you as a result of your operation as a Lyconet Marketer and allocate them to you.

If you have given us your separate consent to do so, we will also use your personal information for promotion purposes, such as to inform you of offers and promotions by our Loyalty Merchants.

#### **7. Data Security and Transferring Data**

To protect your personal information, we use security measures that include encryption for data transmission (SSL encryption), firewalls, hacker defence programs, and other conventional security measures. For e-mail communications, however, we cannot guarantee the security of any unencrypted data. You consent to the use of this unsecure means of communication and accept the risks associated therewith.

Your personal information will generally be used by Lyoiness Canada Inc. as the Lyonet Marketer's contractual partner, which also serves as the service provider for mWS myWorld Solutions AG. However, your personal information may be shared with or passed on to certain service providers, as well as with our parent and affiliates (collectively, the "**Lyoiness Group**").

We use certain service providers to assist in the delivery of our services, to communicate with Lyonet marketers, and to manage our online presence. We have selected these service providers carefully to ensure that the data is processed lawfully and securely. In addition, we have also obligated the service providers to use your personal information only according to our instructions for specific purposes and in compliance with applicable privacy laws. Any other use of personal information by these service providers is strictly prohibited.

In addition, we will share your personal information within the Lyoiness Group, provided that this is necessary for the purpose of electronic processing and management or for the provision of a specific service for you or to you, or administration or management of the Lyonet Marketer program. The companies of the Lyoiness Group are also obligated to us to use your personal information only for the specific purpose for which it was given, in each case and in compliance with applicable privacy laws. In particular, the services concerned include contacting you by electronic messages (e.g. e-mail, SMS, or push notification), by fax, by telephone, or by letter informing you about Loyalty Merchant products and promotions, identification of promotions corresponding to your interests, conducting satisfaction surveys, operating hotlines, and processing transactions.

The Lyoiness Group operates internationally. Our business activities, management structures, and our technical infrastructure transcend national borders. Therefore, we also transfer your personal information abroad. This includes the transmission of your personal information to the member states of the European Economic Area, to Switzerland, and to other countries with adequate privacy and data protection. However, if your personal information is to be transferred to countries other than those just mentioned, we will first ask for your separate consent.

We will not share your personal information with anyone other than the above-mentioned service providers and Lyoiness Group companies, unless you have given us your consent.

#### **8. Right of withdrawal, right of access, right of correction and contact details**

You have the option, at any time, to withdraw your consent regarding the future use of your personal information on this website without stating a reason. By withdrawing your consent, we will no longer have the right to use your personal information for future endeavours. If you wish to withdraw your consent, please send a written declaration to that effect (by letter, fax, or e-mail) to the following address:

Lyoiness Canada Inc.  
5000 Yonge Street, Suite 1706  
Toronto, Ontario M2N 7E9  
Canada  
Fax: +1 (416) 479-8372  
E-mail: [international@lyonet.com](mailto:international@lyonet.com)

Please also use this contact information if you have any questions regarding the use of your personal information or if you wish to access, update or correct your personal information in our custody or under our control.