

# DATA PRIVACY POLICY

We take the protection of your personal data very seriously and work hard to make sure our services are safe for you to use. We are committed to complying with statutory data protection requirements. This data privacy policy describes the type of data that we collect from you and use, what we use it for, and how we protect it.

## **Table of Contents**

1. Area of applicability
2. Which data we record
3. Cookies and web tracking
4. Conversion measurement with Facebook's visitor action conversion pixel
5. Sharing
6. Use of data
7. Data security and forwarding
8. Right of withdrawal, information, changes to data and contact details

## **1. Area of Applicability**

This policy applies to the Lyonet Marketer operation and to the websites available at <http://www.lyconet.com> and [www.lyoness.com](http://www.lyoness.com). Please take into consideration that this refers to other Lyoness websites, including those of other countries, for which different data protection rules may apply.

In the course of further website development to improve our services, it may occur that supplements to this Data Privacy Policy are necessary. In this case, we will inform you in advance and obtain your separate consent.

## **2. Which Data We Record**

Personal data about you that we process includes any information about material or personal circumstances that we obtain from you in the course of your operation as a Lyonet Marketer, and that can be attributed to you directly or indirectly (e.g. via your membership number). This includes your membership ID, your full name, title, gender, date of birth, postal address, address coordinates (longitude and latitude), telephone number(s), fax number, email address, bank details and, in the course of the Lyoness membership, data produced about your buying habits (date of purchase, place of purchase, time of purchase, amount of purchase, currency, shopping cart, sector, type of purchase – online/offline, from SME, from Key Account, with voucher, with Cashback card).

## **3. Cookies and Web Tracking**

Our websites use so-called cookies, which are small text files that are stored on your computer, and can be accessed there again. Cookies enable you to register for our services and help us to personalise the website for you.

You can also use part of our website without needing to register or log in. Even if you don't log in to the website, we will still record certain information automatically so that we can collate statistical data on how our website is used and how efficient it is, in a bid to adjust it to our users' needs. We will therefore collect and process information on your IP address, the time and length of your visit, the number of visits you make, which forms you use, your search settings, your display settings and your Favourites settings on our website. Different cookies are stored for different lengths of time. The majority of the cookies we use are automatically deleted when you leave our website (the so-called "session-cookies"). We log every access to our website and every download of files from the website. The cookies on our websites are used exclusively for information purposes and are processed by mWS myWorld Solutions AG (Grazbachgasse 87-93, 8010 Graz, Austria on behalf of Lyoness Suisse GmbH, Bahnhofstrasse 22, 9470 Buchs, Switzerland, for the purpose of analysing the data collected.

We use JavaScript to track your user behaviour on our website to be able to tailor our web services to the needs of our users. We determine your browser type, location, time and duration of your use, URL and page name, as well as the referring website. You can refuse the collection of this data by deactivating JavaScript directly from your web browser.

We also use the following tools:

### **Google Analytics**

This is a web analytics tool from Google Inc., 1600 Amphitheater Parkway Mountain View, CA 94043 USA, herein after referred to as "Google", to log your online activity on our website, to find out how many users visit us online, what page content they view and how often. This process is anonymous. Google Analytics' cookies – including the Google Analytics Tool "Anonymous IP Address" and usage data – are typically sent 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=de>. To stop your data from being logged, please visit Google Analytics at <https://tools.google.com/dlpage/gaoptout?hl=de>.

### **Piwik Open Analytics Platform**

We use this tool to log your online activity on our website and to find out how many users visit us online, what page content they view and how often. This process is anonymous. Cookies are stored on your computer. For more information, please visit <https://piwik.org/faq/>.

## Google AdWords

This is used to record website visits for advertising purposes (re-marketing) on Google and in the Display Network. When you visit the site, your browser saves cookies which make it possible to recognise you as a visitor when you visit other websites belonging to Google's advertising network. On these pages, visitors can then be presented with advertisements referring to the content they have previously viewed on other websites using Google's re-marketing feature. You can reject Google AdWords' tracking at <http://www.google.com/settings/ads>.

## Conversion Tracking by Google AdWords

This is how we create conversion statistics that measure the effectiveness of our online advertising campaigns. The conversion tracking cookie is set when a user clicks on an ad served by Google. According to Google's privacy policy, no personally identifiable information is processed. If you do not want to be tracked, you can disable the Google Conversion tracking cookie through your Internet browser's internet settings.

## 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 enable us to provide you with a better user experience, to identify preferences, to diagnose technical problems, to analyse trends and to improve our website.

The following information may be collected related to your device and browser: 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), keystrokes.

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'.

## Salesforce Marketing Cloud

This is how we record your behaviour on our website in order to optimise our offer. This way, we find out how many users visit us online, what page content they view and how often. This analysis is anonymous and is used in automatic processes to improve our offers using predictive intelligence. The behaviour of registered members on our websites is recorded to improve the user experience and identify relevant content. Salesforce's Cookies are typically sent to a Salesforce server in the USA and stored there.

In addition to the cookies described in the analysis 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	Cook 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 Cashback 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 change the settings in your browser so that all or certain cookies are rejected or so that you are asked if you would like to accept new cookies. You will find instructions on how to do this under the "Help" function in the menu bar on most browsers. 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 on our websites if you do not accept any cookies or not all cookies

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

## 4. Conversion Measurement with the Facebook Pixel

We use the "Facebook-Pixel" by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook") within our website with your consent. This is a cookie, a small text file that is stored on your computer and can be retrieved there. It can be used to track users' actions after they have viewed or clicked on a Facebook ad. This enables us to track the effectiveness of Facebook advertising for statistical and market research purposes. The data collected in this way is anonymous for us, so it does not allow us to conclude the identity of users. However, the Facebook data is stored and processed so that a connection to the respective user profile can be made, and Facebook can use the data for its own advertising purposes, according to the Facebook Data Usage Guideline (<https://www.facebook.com/about/privacy/>). You can enable Facebook and its partners to place advertising on and outside of Facebook. A cookie for these purposes can also be stored on your computer. By using the website, you agree to the use of the visitor action pixel.

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

Lyonesse Suisse GmbH  
Bahnhofstrasse 22  
9470 Buchs  
Switzerland

E-Mail: [international@lyconet.com](mailto:international@lyconet.com)

## **5. Sharing**

Integrated on the website are share buttons of 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 **GooglePlus**, the social network of Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, United States. There is also an integrated share button for e-mails. These share buttons can be recognised by their logos.

All share buttons are set up in compliance with data protection. A direct connection is only established between your browser and the server of the operator of the respective social network once you click on the website's respective share button (and only then). According to the operators of the social networks mentioned, no personal data is collected from the social networks unless you click on the respective share button. This data, including the IP address, is only collected and processed for logged-in members. If you do not wish to have a record of your visit to our website allocated to your social network account, please log out of the user account of the respective social network.

At this point, we would point out that, as a provider of the website, we have no knowledge of the content of the transmitted data or how the social networks use it. For more information on data use by social networks, see the respective social network's privacy policy.

## **6. Use of Data**

We use your personal data exclusively in compliance with legal requirements. The personal data you provide to us during your registration 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 moreover only in cases in which you specifically give us your consent thereto.

We use your data to communicate with you, in order to verify your identity, and to enable us to provide you with your personal login area on the Lyconet website, so that we can handle your enquiries and orders and provide you with our services. Furthermore, we use your data to determine 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, we will also use your data to inform you, for example, of offers and promotions from our Loyalty Merchants.

## **7. Data Security and Forwarding**

In order to protect your data, we use, among other things, encryption for data transmission (SSL encryption), firewalls, hacker defence programmes and other state-of-the-art security devices. When communicating via e-mail, the security of the data can only be guaranteed by us according to the latest state-of-the-art technology.

Your personal data will generally be used by Lyonesse Suisse GmbH as the Lyconet Marketer's contractual partner, which also serves as the service provider for mWS myWorld Solutions AG, (Grazbachgasse 87-93, 8010 Graz, Austria) . Your personal data can, however, be forwarded/transferred to certain service providers, as well as within the Lyonesse Group, as listed below:

To carry out our services, communicate with members and manage our online presence we use certain service providers. We assure you that we carefully select these service providers to ensure legal and secure data processing. In addition, we have obliged the service providers to use your personal data only according to our specific instructions and according to the data protection regulations. Further use of the data by these service providers is prohibited.

In addition, we will transfer your personal data within the Lyonesse Group, insofar as this is necessary to you for the purpose of electronic processing and administration, or for the provision of a specific service, ensuring the necessary data security measures are taken. The Lyonesse Group companies are also obliged by us only to use your personal data for the sole purpose for which it was given, as provided for in the data protection regulations. In particular, the affected services are as follows: contact via electronic messages (e.g. e-mail, SMS or push notifications), by fax, by telephone or by letter for information about Loyalty Merchant products and promotions, identification of promotions corresponding to your interests, conducting satisfaction surveys, operating hotlines, and processing transactions. The Lyonesse Group operates internationally. Our business activities, management structures and technical infrastructure transcend national borders. We therefore send your personal data abroad as well. Transfer of your personal data to the Member States of the European Economic Area, to Switzerland and to other countries with adequate data protection requires no further consent. If, however, your personal data is transferred to any country other than those mentioned above, we will obtain your separate consent in advance.

We will not pass on your personal data to any persons other than the above-mentioned service providers and Lyonesse companies, unless you have given us your consent thereto.

#### **8. Right of Withdrawal, Information, Changes to Data and Contact**

**You have the option to revoke your consent to the use of your personal data used on this website in the future at any time without having to provide any reasons. The withdrawal of your consent means your data may no longer be used. You must inform us in writing (by post or e-mail) of your wish to withdraw consent using the following address:**

Lyonesse Suisse GmbH  
Bahnhofstrasse 22  
9470 Buchs  
Switzerland

E-Mail: [international@lyconet.com](mailto:international@lyconet.com)

Please also use this contact information for any questions regarding the use of your data as well as to update or correct your data.