

# PRIVACY POLICY

We take the protection of your personal data 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 data. This Privacy Policy describes which of your data we collect and use, the purposes for which we do this, and how we protect your data.

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## 1. Coverage

This Policy applies to the Lyonet Marketer Program and the websites available at <http://www.lyconet.com> and [www.lyoness.com](http://www.lyoness.com). Please note that this refers to additional Cashback World websites, even to those of other countries, to which other data protection regulations may apply.

As we continue to develop our websites to improve our services, we may need to amend and revise this Privacy Policy. Should this be the case, we will inform you in advance and ask for your separate approval.

## 2. Collected Data

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 any Cashback World 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

We utilize cookies on all our websites, which are small text data stored on your computer that can be later retrieved from it. Cookies enable your registration to our services and personalization of our website.

You can also use part of our website without registering or logging in. In this case, certain information will also 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 setting, and your favourites setting on our website. Cookies are stored for a range of different periods. 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 on behalf of Lyoness America Inc. 450 East Las Olas Boulevard, Suite 700, Fort Lauderdale, FL 33301 to evaluate the information collected.

We use JavaScript to record your usage behavior 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 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=de>. At <https://tools.google.com/dlpage/gaoptout?hl=de>, Google Analytics gives you the option to avoid the collection of data by visiting: <https://tools.google.com/dlpage/gaoptout?hl=de>.

### **Piwik Open Analytics Platform**

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

### Google AdWords

This is used to record website visits for advertising purposes (remarketing) 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 from Google AdWords

By using Conversion Tracking from Google AdWords, we generate conversion statistics that measure the effectiveness of our online advertising campaigns. Cookies for conversion tracking occur when a user clicks on one of the ads placed by Google. According to the data protection regulations from Google no personal data would be processed. If you do not want to be tracked, you could disable this use by deactivating cookies of the Google Conversion Tracking through the settings of your browser.

### Salesforce Marketing Cloud

By using Salesforce Marketing Cloud, we record your behavior on our website for the optimization of our offer. With this information, we determine how many users visit us on the internet and how often specific content is seen. This evaluation occurs anonymously, and it is automatically applied through predictive intelligence to the improved offer representation. With registered members, the users' related behaviors on the website are recorded for the improvement of the users' experience and are used for the display of relevant contents. Cookies of salesforce are usually transmitted and stored to a salesforce server in the United States.

### 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), 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	Originator	Purpose/function
Language	Lyoness	This cookie saves the language settings of the user.
cookiesession1	Lyoness	This cookie is used to distribute the load of the HTTP requests in the network infrastructure.
authSession	Lyoness	Cookie created for the duration of a session and containing the session ID.
authToken	Lyoness	Authentication cookie created for logged-in users to identify them uniquely.
LyoToolbar_SessionID	Lyoness	This cookie is for communicating with the Cashback Bar.
lyo_AT_cookie_privacystatement	Lyoness	This cookie is used to track whether the website user has consented to the use of cookies.
__RequestVerification_Token	Lyoness	This is an anti-counterfeiting token cookie that serves to prevent an CSRF attack.

Please take into consideration that the standard internet browsers accept the use of cookies according to their settings standards. You could set your browser to decline the use of all or specific cookies or even to be asked to agree prior to the use of a new cookie. Most of browsers offer this option under the "Help" bar on your menu. There you may also learn how to delete all cookies that have been already recorded.

Please be aware that there is a chance that you may not use all of our website functions if you don't accept the use of any cookies.

By using our website, you agree to the use of the above-mentioned cookies.

### 4. Conversion Measuring of Users' Actions with 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, i.e. 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. If you wish to withdraw your consent, please send a written declaration (by letter, fax, or e-mail) to the following address:**

Lyoness America Inc.  
450 East Las Olas Boulevard, Suite  
Fort Lauderdale, FL 33301  
Fax: 001 (646) 537 1728  
Email: [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, USA, and **GooglePlus** of the social network Google Inc., 1600 Amphitheatre 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 data protection 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 data 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.

Here we wish to point out 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 the privacy policies of the social networks mentioned.

## **6. Use of Data**

We use your personal data only in compliance with legal regulations. We collect and process the personal data that you provide to us when you register as a Lyonet Marketer and in the course of your operation as a Lyonet Marketer, solely as part of our fulfilment of our contractual obligations to you, and furthermore, only in cases where you expressly give us your consent.

For example, we use your data to communicate with you to verify your identity and provide you with your personal member area on the Lyonet website, to process your inquiries and orders, and provide you with our services. In addition, we also use your data to determine and allocate to you the Shopping Benefits to which you are entitled from participating as a Lyonet Marketer

If you have also given us your separate consent to do so, we will also use your data to inform you of offers and promotions by our Loyalty Merchants, for example.

## **7. Data Security and Disclosure**

To protect your data, we use measures that include encryption for data transmission (SSL encryption), firewalls, hacker defence programs, and other state-of-the-art security measures. For e-mail communication, we can only guarantee the security of the data according to the current state of the art.

Your data is basically used by Lyoness America Inc. as the contractual partner of the members that use mWS myWorld Solutions AG as their service provider. However, your personal data may be shared with / passed on to certain service providers listed below and within the Lyoness Group:

We use certain service providers to handle our services, to communicate with members, and to manage our online presence. We certify that 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 data only according to our instructions for specific purposes and in accordance with the U.S. data protection regulations. Any other use of the data by these service providers is excluded.

In addition, we will share your personal data while ensuring the required data security measures within the Lyoness Group, provided that this is necessary for the purpose of electronic processing and management or for the provision of a specific service for you. The companies of the Lyoness Group are also obligated to us to use your personal data only for the specific purpose in each case and according to the U.S. data protection regulations. In particular, the services concerned include contacting by electronic messages (e.g. e-mail, SMS, or push notification), by fax, by telephone, or by letter informing about products and promotions of the Loyalty Merchant, identifying offers that suit your interests, conducting satisfaction surveys, operating hotlines, and processing transactions.

At the point of registration, by clicking on the submit button, you agree to the Terms of Use and this Privacy Policy and you authorize the Lyoness Group to contact you at the telephone or mobile number that you entered regarding the Lyonet Marketing Program using automated telephone

technology, including auto-dialers, pre-recorded messages, and text messages, even if your telephone or mobile number is currently listed on any state, federal, or corporate "Do Not Call" list, and you are not required to give your consent as a condition of membership.

By submitting your telephone or mobile phone number, you consent to receive text message alerts from Lyoness Group containing product and event information, products tips or promotions that may be sent using automated dialing systems ("Text Messages"). Your consent to receive Text Messages is not otherwise required to purchase any goods or services from us. You may not consent to receive Text Messages on behalf of someone else or provide someone else's phone number. You agree to enter into, sign and receive your consent to receive Text Messages electronically.

Message frequency is based on the number of account orders received by us. We do not charge a fee for you to receive Text Messages from us, however, your mobile service provider may charge you for sending and/or receiving text messages and air-time, as well as any other standard applicable rates charged by your mobile service provider. Text Messages are distributed via third party mobile network providers and, therefore, we cannot control certain factors relating to message delivery or guarantee availability or performance of this service, including liability for transmission delays or message failures. Our participating carriers may include (but are not limited to): AT&T, SprintPCS, Metro PCS, T-Mobile®, U.S. Cellular®, Verizon Wireless. (T-Mobile® is not liable for delayed or undelivered messages.) To receive help with Text Messages or to unsubscribe from Text Messages you may email: [international@lyconet.com](mailto:international@lyconet.com) and specify this as your preference.

We may also obtain the date, time and content of your messages in the course of your use of Text Messages. We will use the information we obtain in connection with our Text Messages in accordance with this Privacy Policy.

From time to time you may be asked to provide your mobile phone number to Lyoness Group in connection with specific text messaging programs, which is in addition to the general Lyoness Group marketing text messaging program. That text messaging program may have additional or different terms and conditions from those set forth above, which will be presented you at the time that you opt-in to receive those text messages. In general, in order to stop receiving text messages from a specific Lyoness Group text messaging program, you can text STOP to the five digit short code for the text messaging program from which you no longer wish to receive message – "Text STOP to 38912 to cancel". You will then receive confirmation of your opt-out of that text messaging program. This will only opt you out of the specific text messaging program associated with that five digit short code. You will remain opted in to any other Lyoness Group text messaging programs that you have signed up for. You may also text HELP to the five digit short code to receive help – "Text HELP to 38912 for Help".

The Lyoness Group operates internationally. Our business activities, management structures, and our technical infrastructure transcend national borders. Therefore, we also transfer your personal data abroad. The transmission 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 additional consent. However, if your personal data is to be transferred to countries other than those just mentioned, we will first ask for your separate consent.

Excluding service providers and companies described above, we shall not pass your personal data on to any other parties. However, we shall always obtain your separate approval should we be required to pass your data on to any other party in order to execute an Agreement.

## **8. Right of withdrawal, Information, Changing Data and Contact Details**

**You have the option, at any time, to withdraw your consent regarding the future use of your personal data used on this website without stating a reason. By withdrawing your consent, we no longer shall have the right to use your data. If you wish to withdraw your consent, please send a written declaration (by letter, fax, or email) to the following address:**

Lyoness America Inc.  
450 East Las Olas Boulevard, Suite 700  
Fort Lauderdale, FL 33301  
Fax: 001 (646) 537 1728  
Email: [international@lyconet.com](mailto:international@lyconet.com)

Please contact us at this address if you have any questions regarding the use of your personal data or if you wish to update or correct your data.

## **9. Children's Privacy Protection**

We take special care to protect the privacy needs of children under the age of 13 and encourage parents to be an active participant in their child's online activities. We abide by the requirements of the Children's Online Privacy Protection Act (COPPA) and other relevant laws. Our Site does not target and is not intended for children under the age of 13, and we will not knowingly collect Personally Identifiable Information from them. If we discover personal data from a child through an adult-oriented site, we will eliminate that data. Right of revocation, information, data changes and contact you have the option of revoking your consent to the use of your data in the future at any time without providing a reason. Such a revocation will make any further use of your data inadmissible. The revocation may be sent in writing (by letter, fax, or Email) to the following address:

Lyoness America, Inc.  
450 East Las Olas Boulevard, Suite 700  
Fort Lauderdale, FL 33301  
Telephone: 001 (888) 565 8089  
Fax: 001 (646) 537 1728  
Email: [international@lyconet.com](mailto:international@lyconet.com)

## **10. Contacting Us**

If there are any questions regarding this privacy policy, you may contact us using the information below:

Lyoness America, Inc.  
450 East Las Olas Boulevard, Suite 700

Fort Lauderdale, FL 33301  
Telephone: 001 (888) 565 8089  
Fax: 001 (646) 537 1728  
Email: [international@lyconet.com](mailto:international@lyconet.com)