

# DATA PROTECTION POLICY

The protection of your privacy is of particular importance to Swappable AG, FL-0002.661.089-9, with the business address Dr. Grass-Strasse 12, 9490 Vaduz, Principality of Liechtenstein (hereafter referred to as “**Swappable**” or “**We**”) and this also applies to the use of your data during your visit to the website of Swappable (hereinafter “Swappable website”).

This statement as well as the questions and answers on data protection set out how Swappable handles personal data, what information Swappable gathers and evaluates, and how this information is both used and managed. Swappable ensures compliance with the General Data Protection Regulation (GDPR).

## I. Data processing in general

### 1. Scope of the processing of personal data

The processing of personal data is limited to data that is required to operate a functional website and for the provision of content and services. The processing of personal data of our users is based on the purposes agreed or on a legal basis (GDPR). We only collect personal data that is necessary to implement and process our tasks and services or if you provide data voluntarily.

### 2. Your rights (rights of the persons affected)

You have the right to request information about any of your personal data we process. In particular, you have the right to request information about the purpose of the processing, the categories of personal data, the categories of recipients who will have access or were disclosed with your data, the duration periods for saving the personal data, whether there is a right to adjust/correct, erase, restrict or object, transmission of data (as long as it does not cause a disproportionate effort to transmit these data), the source of your data if not collected through us and if we use automatic decision-making technologies including profiling.

Additionally, you have the right to revoke a previously granted consent to use your personal data at any time.

If you believe that the processing of your personal data is inconsistent or contradicts the applicable data protection laws you have the possibility to lodge a complaint with the data protection office.

## II. Description and scope of data processing

### 1. Provision of the website

The Swappable website may generally be accessed without the provision of personal data. Your visit to the Swappable website is logged, whereby only the following access data is recorded for anonymous statistical purposes:

The IP address used by your current computer, the name of the website accessed, the date and time of access, the volume of data transferred, notification of whether the access was successful, description of the type of web browser used, the operating system used, number of visits, average length of visit, pages accessed.

The data mentioned above are saved for a maximum time period of 30 days. This storing is done due to security reasons to ensure the stability and integrity of our systems.

The access data listed above cannot be used to create a personal user profile, therefore it is generally not possible for us to make direct personal reference to you.

We do analyze the usage of our web presence with the help of Google Analytics (<https://policies.google.com/privacy>) .

This analysis is exclusively for the purpose of optimizing the website with regards to usability and the provision of useful information about our services. A merger of data with other personal data sources or disclosure to third parties is precluded.

No evaluation of personal data takes place. All analyses are based on anonymized datasets.

We use the function 'anonymizeIP' (so-called IP-Masking): Due to the activation of IP-anonymization on this website, your IP-address will be shortened by Google within member states of the European Union or in other signatory states of the Agreement on the European Economic Area. Only in exceptional cases the full IP address will be transferred to a Google server in the USA and shortened there. The IP address transmitted by your browser within the framework of Google Analytics is not merged with other data from Google.

Your consent is the legal basis for this data processing (Article 6 (1) lett. a GDPR). You can revoke your consent at any time with effect for the future by changing your selection in the cookie settings.

You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) to Google and the processing of this data by Google by

- a. not giving your consent to the setting of the cookie or
- b. downloading and installing the browser add-on to disable Google Analytics.

The statistical evaluations will be stored for 26 months.

## 2. Cookies

We use cookies on our website to ensure a user-friendly experience. Cookies are small files that are managed by the user's web browser and are directly stored on the respective device (Laptop, Tablet, Smartphone etc.) whenever you visit our website. Cookies are stored as long as you do not delete them. This process allows us to recognize your browser on your next visit.

If you do not wish to use cookies you can change the settings in your browser accordingly. You will then be notified whenever your browser attempts to create a cookie and you can decide whether you want to allow the cookie. However, please note that a deactivation of cookies may result in a limited user experience and you may not be able to use every function of our website.

Legal basis for the processing of data through cookies is Article 6 (1) lett. f GDPR.

Cookies are valid for the duration of the usage session and will subsequently be deleted by your browser.

## 3. Contact form

If you fill out a contact form, send us an email or another form of electronic message, your data will only be used to process your inquiry and possible further questions you might have.

Legal basis for the processing of your inquiry is Article 6 (1) lett. b GDPR.

We will delete your email address after completing your inquiry.

## 4. Newsletter

If you subscribe to our newsletter you will receive an email containing a hyperlink immediately after signing up. By clicking on said link you confirm your subscription (double opt in method). If you do not click on the link within 7 days we will delete your email address from our temporary list and no subscription will be made.

If you confirm your subscription you give us permission to save your email address including the date and time of signing up, your IP address as well as the selected newsletters. We only use your email address and personal data such as first name and last name to manage and send the selected newsletter in the selected periodicity.

Our newsletters do not contain visible or hidden counters, third party ads or links to external websites that are not directly connected to the content in the newsletter.

Each newsletter contains a reference on how to unsubscribe from the newsletter.

### **III. Data security**

We use a common encryption technology TLSv2 in connection with the highest encryption levels that are supported by your browser. If a page on our website was/is being transmitted encrypted it is shown by the lock symbol in the address bar of your browser.

Additionally, we use appropriate technical and organizational security measures to protect your data from accidental or intentional manipulation, partial or complete loss, destruction, or to prevent unauthorized access by third parties. Our security measures are continuously upgraded according to the latest technological developments according to OWASP.

### **Questions and comments**

If you have any questions or comments on data protection at Swappable, you may direct them to [info@swappable.io](mailto:info@swappable.io) at any time.