

# Privacy Policy of SD Technologies SA concerning SalesWings

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## 1. General

- 1.1. SD Technologies SA with its place of business in Lausanne, Switzerland (hereinafter "**we**", "**our**" or "**us**"), is the provider of the website and domain owner of saleswingsapp.com and other websites and mobile applications with similar contents (hereinafter together the "**Platform**"). Data protection is important to us.
- 1.2. This privacy policy (hereinafter the "**Privacy Policy**") describes how we handle personal data, namely concerning the collection, storage and usage thereof. Furthermore, it sets forth how collected personal data may be examined, corrected or deleted.

## 2. Acceptance and Amendment of this Privacy Policy

- 2.1. By either visiting our Platform or registering with us, you accept for yourself or on behalf of the company indicated in the course of the registration process (you and such company together hereinafter "**you**" or "**your**") to be bound to this Privacy Policy and expressly consent to this Privacy Policy.
- 2.2. You personally represent and warrant that you are entitled and have the power to accept this Privacy Policy for the company indicated in the course of the registration process.
- 2.3. We reserve the right to modify this Privacy Policy at any time, in our free discretion, without giving reasons. We shall give due notice of any modifications of the Privacy Policy on our Platform.

## 3. Collection of Personal Data

- 3.1. We collect the following personal data of the users of our Platform:
  - Information You Give Us: We receive and store any information you enter on our Platform or give us in any other way. You can choose not to provide certain information, but then you might not be able to take advantage of many of our features or functions.

- **Information Clearly Indicated:** We may collect personal data which is clearly indicated on our Platform.
- **Automatic Information:** We receive and store certain types of information whenever you interact with us. For example, we use "cookies" and potentially other tracking methodologies and we obtain certain types of information when your web browser accesses our Platform. Moreover, we may use Google Analytics and other analytics software such as Hotjar to improve the usability, user experience and product as well as social media plugins. Further information about automatic information can be found under sec. 5 ff. below.
- **Mobile:** When you download or use applications created by us and, where applicable, have requested or consented to use location services, we may receive information about your location and your mobile device, including a unique identifier for your device. We may use this information to provide you with location-based services, such as search results, and other personalized content. Most mobile devices allow you to turn off location services. We may explicitly ask you for access to your contacts, calendar or other data on your mobile device, in order to provide our features or services, but will never access this without your prior consent. Further information about mobile can be found under sec. 8 below.
- **Email Communications:** To help us make emails more useful and interesting, we often receive a confirmation when you open emails from us if your computer supports such capabilities.
- **Information from Other Sources:** We might receive information about you from other sources and add it to our account information, if any. We reserve the right to obtain information on your payment behavior from third parties (e.g. mail-order companies, credit agencies) to offer you certain payment methods (e.g. payment on account) or other financial services.

#### **4. Use of Personal Data**

4.1. We can use personal data in the sense of sec. 3 above as follows (in addition to the use described in sec. 3 above):

- in order to create user accounts;
- in order to improve our services;

- for marketing purposes, i.e. particularly in order to understand better the needs of the users;
- in order to perform the services on our Platform according to our Terms of Services;
- in order to resolve disputes, collect fees and troubleshoot problems;
- to debug potential software problems;
- as anonymous datasets to test and improve our algorithms;
- for other purposes which are clearly indicated on our Platform.

4.2. Only those employees of us shall have access to your personal data who must know this data. Under no circumstances we will sell or market your personal data to third parties unless otherwise provided in this Privacy Statement.

4.3. We will provide your personal data only to third parties as follows:

- **Third Party Service Providers:** Most of the personal data provided to us is stored on servers in Ireland. Moreover we may employ other companies and individuals in the EU to perform functions on our behalf. They have access to personal information needed to perform their functions, but may not use it for other purposes. Further, they must process the personal information in accordance with this Privacy Policy and as permitted by applicable data protection laws.
- **Protection of Us and Others:** We release account information and other personal information when we believe release is appropriate to comply with the law; enforce or apply our Terms of Services and other agreements; or protect the rights, property or safety of us, our users or others.
- **With Your Consent:** Other than as set out in this Privacy Policy, you will receive notice when information about you might go to third parties and you will have an opportunity to choose not to share the information.

## **5. Cookies and other Automatic Information**

5.1. If you visit our Platform, small files may be saved automatically on your computer. This occurs by means of so-called "cookies" or similar files which help us in various aspects, e.g. in order to learn about the preferences of our users and to improve our Platform.

- 5.2. Examples of the information we collect and analyze include: The Internet protocol (IP) address used to connect your computer to the Internet; confirmations of receipt and read confirmations regarding emails; login; email address; password; computer and connection information such as browser type and version; and time zone setting, browser plug-in types and versions; operating system and platform; visiting history; the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); cookie number; products or services you viewed or searched for.
- 5.3. We may also use browser data such as cookies, Flash cookies (also known as Flash Local Shared Objects), Canvas finger print, or similar data on certain parts of our Platform for fraud prevention and other purposes.
- 5.4. During some visits we may use software tools such as JavaScript to measure and collect session information, including page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.
- 5.5. We may also collect technical information to help us identify your device for fraud prevention and diagnostic purposes.
- 5.6. With most browsers, you are able to erase cookies from your computer or block them. Reference is made to your browser instructions to learn more about these functions. However, doing so may impact your use of the Platform.

## **6. Google Analytics**

- 6.1. We may use the web analysis service from Google Inc. ("Google"), referred to as "Google Analytics". Google Analytics requires the placement of cookies, i.e. files saved on your computer that make it possible for them to analyze the use of these websites.
- 6.2. The data generated by the cookies on your use of our Platform is generally transmitted to a Google server in the U.S. and saved there. We use Google activation with an enabled IP anonymization function. The result is that Google receives only an abbreviated form of your IP address.
- 6.3. Under contract of the operator of these websites, Google uses the data gained from the cookies to evaluate your usage of the website, to compile reports on website activity, and to provide additional services associated with website and Internet usage vis-à-vis the website operator.

- 6.4. You can prevent cookies from being saved through a setting in your browser. Furthermore, you can prevent the logging of information generated by the cookie and relating to your usage of the website (including your IP address) to Google as well as the processing of this information by Google, by downloading and installing the browser plugin available at the respective website of Google. Further information can be found under the websites of Google relating Google Analytics.

## **7. Social Media Plugins**

- 7.1. We may use so-called social plugins of third party providers on our Platform (such as Facebook, Twitter and Google+). These social plugins allow the visitors of our Platform to share contents with other users of social networks.
- 7.2. In case a social plugin is visible on a website (e.g. the “like-button” of Facebook) a connection to the server of the provider of this website will be established automatically. Data on the visit of our Platform may be transmitted to the respective third party provider. If the visitor of our Platform is also registered with the third party provider, the visit on our Platform may be related to the account of the visitor concerning its respective social network (e.g. its Facebook-account).
- 7.3. We cannot influence the extent and way of data transfer due to a social media plugin. Information about the purpose and extent of the collection and use of data as well as your rights and possibilities of modification in order to protect your privacy can be found on the website of the respective third party provider.

## **8. Mobile**

- 8.1. Most mobile devices provide users with the ability to disable location services.
- 8.2. If you have questions about how to disable your device's location services, we recommend you contact your mobile service carrier or your device manufacturer.

## **9. Security**

- 9.1. You can be assured that your personal information and account information is reasonably secure on our Platform. We employ encryption technology (SSL) in all parts of our Platform that require you to provide your login credentials, financial or credit card information. The personally identifiable information we collect is stored in secure operating environments that are not available to the public. Credit card information is encrypted and stored only with our payment gateway provider. All

the information we collect and store is protected by our firewall. Also, any information we store at our business is kept physically secure, and only designated employees may obtain access to it. However, “perfect security” does not exist on the Internet.

- 9.2. While we strive to protect your personally identifiable information, we cannot ensure or warrant the security of any information you transmit to us or from our online products or services, and you do so at your own risk. Once we receive your transmission, we make reasonable efforts to ensure its security on our systems.
- 9.3. We cannot fully ensure that your private communications and other personally identifiable information will not be inadvertently disclosed to third parties. We may be forced to disclose information to the government or third parties under certain circumstances, or third parties may unlawfully intercept or access transmissions or private communications. If we need to investigate or resolve possible problems or inquiries, we can (and you authorize us to) disclose any information about you to private entities, law enforcement, or other government officials as we, in our sole discretion, believe necessary or appropriate.

## 10. Your Rights

- 10.1. Upon your request we will provide you with a copy of your personal data or inform you on the use of your personal data. Moreover, upon your request we will correct or delete your personal data at any time. The competent body for your requests is:

**SD Technologies SA,**  
Legal Department,  
Route de la Feuillère 29  
1010 Lausanne  
Europe : +41 79 588 38 33  
Email: [legal@saleswingsapp.com](mailto:legal@saleswingsapp.com)

- 10.2. We can demand an appropriate fee from you for our services rendered to you according to the foregoing provision.

## **11. Accessibility of this Privacy Policy**

This Privacy Policy is accessible on our Platform. You can access, download save and print it out for your convenience but you may not use a copy for your own commercial purposes