

Data protection declaration

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GENERAL ASPECTS AND SCOPE OF VALIDITY	2
WHO IS RESPONSIBLE FOR DATA PROCESSING AND HOW TO CONTACT US?	2
WHAT PERSONAL DATA DO WE PROCESS?	2
FOR WHAT PURPOSES AND ON WHAT LEGAL BASIS DO WE TREAT USERS' PERSONAL DATA?	3
TO WHOM DO WE COMMUNICATE THE PERSONAL DATA OF THE USERS?	3
HOW DO WE USE PROFILING AND AUTOMATED DECISION-MAKING RELATED TO USERS?	4
WHERE ARE PERSONAL DATA PROCESSED?	4
DOES AILIA SA UTILIZE COOKIES OR SIMILAR TECHNOLOGIES?	4
HOW ARE USERS' PERSONAL DATA PROTECTED?	5
HOW LONG ARE USERS' PERSONAL DATA STORED?	5
WHAT RIGHTS DOES THE USER HAVE IN RELATION TO HIS / HER PERSONAL DATA?	5
DECLARATION OF CONSENT	6



GENERAL ASPECTS AND SCOPE OF VALIDITY

This information provides guidance on the processing of personal data of users. For the provision of our service we treat users' personal data in compliance with the European Data Protection Regulation (GDPR) and the Federal Data Protection Act (LPD).

This data protection declaration is valid for the websites, applications, services, contracts and tools developed by AiliA SA, provided that, in the individual case, there are no separate data protection provisions specified and disregarding the way in which the user accesses and uses these services (including access from mobile devices). If necessary we can set up a separate data protection notice for other activities.

WHO IS RESPONSIBLE FOR DATA PROCESSING AND HOW TO CONTACT US?

The data processing manager is: AiliA SA - Weinberghöhe 27, 6300 Zug, CH.
For questions regarding the processing of personal data, please contact the following address: privacy@takamaka.io

WHAT PERSONAL DATA DO WE PROCESS?

We process the personal data made available by the users themselves. If necessary for the provision of our service, we also process the personal data that we have legitimately obtained from publicly accessible sources (eg public databases, Internet, press) or from third parties (eg general agencies, brokers, affiliated partners, companies solvency verification, private databases).

Among others, we may process the following personal data:

- personal data (eg name, address and other contact details, date of birth, language preferences, proposal and usage data, solvency data)
- data on customer activities (eg contract data, customer contacts, session data related to visits to our website, apps for mobile devices, participation in contest or offers)
- other data that we are legally required or authorized to register and process and which we need for authentication and user identification or for verification of the data collected by us (eg the origin of assets)

Where, for the conclusion of the contract or for its execution, we need personal data worthy of particular protection, we require the user's consent. Please note that in the



absence of the users' personal data, we are unable to provide our services nor to conclude or manage a contract.

FOR WHAT PURPOSES AND ON WHAT LEGAL BASIS DO WE TREAT USERS' PERSONAL DATA?

Personal data is used in compliance with the legal provisions for the purposes listed below:

- ❑ **To protect our legitimate interests or those of third parties:** eg. recognition of fraudulent actions, KYC, AML, analysis of customer relationships and customer behavior for the optimization of contracts and the development of products / services / processes, advertising (incl. profiling) for our products and those of our companies affiliates, newsletters, market and opinion polls.
- ❑ **For the conclusion and execution of the contract:** for example consultancy and assistance, verification of solvency, management and adjustment of contracts, collection, customer satisfaction surveys relating to contractual services.
- ❑ **Based on user consent:** in some cases, your consent is required to process user data, e.g. for the processing of particularly sensitive data for the purpose of concluding the contract.
- ❑ **Based on legal obligations:** we are subject to various legal requirements (eg Money Laundering Act, Supervisory Law and FINMA's legal requirements, retention obligations).

TO WHOM DO WE COMMUNICATE THE PERSONAL DATA OF THE USERS?

We do not communicate the personal data of the users to unauthorized third parties. Our employees have access only to the data they need to fulfill legal and contractual obligations. For the supply of our services it is also necessary to forward the data both inside and outside AiliA sagl. Depending on the purpose, the data can be forwarded to partners and other companies in the fields of IT services, logistics, printing, collection and marketing.

All the third parties (recipients) integrated in our business structure process users' personal data on our behalf and exclusively in the way we are authorized to do so. These third parties are carefully controlled by us in relation to the protection and security of data and, taking into account the applicable legal provisions on the subject of data protection, bound by secrecy and compliance with the provisions on privacy. Furthermore, if we have



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a legal obligation, we are required to disclose the personal data of users to government offices (eg authorities, social insurers, courts).

HOW DO WE USE PROFILING AND AUTOMATED DECISION-MAKING RELATED TO USERS?

User data can be partly processed in an automated manner in order to evaluate certain personal aspects, eg. in the following cases:

- ❑ on the legal and regulatory requirements basis we are obliged to take certain measures (eg combating money laundering and terrorist financing). These measures include data analysis (eg at the conclusion of the contract, during the contractual validity and in the case of payments).
- ❑ we analyze the data to be able to provide customers with information and advice on products. This allows us to modulate our communication and publicity activities on their needs (including market research and opinion polls).

WHERE ARE PERSONAL DATA PROCESSED?

If necessary for the provision of our services and taking into account the purpose, the personal data of the users are communicated to the recipients listed in point 5 inside and outside Switzerland and the EU. Data transfer in countries outside the EU occurs only if there is adequate data protection comparable to that of Switzerland and the EU or if the recipient contractually ensures equivalent data protection.

Data transmission to other companies collaborating with AiliA SA outside Switzerland or the EU is based on AiliA SA data protection standards, which guarantee adequate data protection and are binding for all companies. The list of all the companies that collaborate with AiliA SA and that guarantees those standards can be found at www.takamaka.io

DOES AILIA SA UTILIZE COOKIES OR SIMILAR TECHNOLOGIES?

When the user visits a website, he/she can retrieve information from the browser and save it, generally in the form of a cookie. This can be information about the user, the settings used or the device used. Generally cookies are used to guarantee the full functionality of



the website. While not allowing the user to be directly identified, they nevertheless offer a personalized web experience.

The user can decide not to admit certain types of cookies. The chat function, where available in the contact options, allows the user to connect to a customer service person with whom to communicate in real time in a separate browser window. The use of this function does not require any contact data and the chat contents are deleted at the end of the conversation.

HOW ARE USERS' PERSONAL DATA PROTECTED?

When the user transfers information through the Internet, or other electronic means, there is always the risk that these will be lost, damaged or manipulated. The user therefore carries out this transmission at his own risk. The transmission of data through the Internet platforms available is generally in encrypted mode. Through appropriate technical and organizational measures we ensure that personal data received are protected from unauthorized access, loss or destruction.

HOW LONG ARE USERS' PERSONAL DATA STORED?

We treat and save users' personal data for and only for the mandatory period required by legal or contractual provisions.

WHAT RIGHTS DOES THE USER HAVE IN RELATION TO HIS / HER PERSONAL DATA?

The user has the right to access, rectify, oppose, cancel the personal data and - if applicable - has the right to the portability of data as the right to lodge a complaint with the supervisory authority for the competent data protection. The user also has the right to oppose the processing of personal data for direct marketing purposes. The user has the right to object to the processing of personal data for reasons connected to his particular situation even when the processing takes place within the framework of legitimate interests.

To exercise these rights, we invite you to contact the data protection officer.

Please note that, following the exercise of these rights, we may no longer be able to conclude and manage the contract or offer additional services. Finally, we remind you that, under certain circumstances and in compliance with current law, we are authorized



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to refuse or only partially grant access to personal data and to refuse the rectification or deletion of your personal data.

DECLARATION OF CONSENT

I, hereby referred as User, confirm to have read and understood the above information on data protection. I consent to the processing of particularly sensitive personal data.

The last change to this information was in March 2020.