

# Privacy Notice

## 1. About this Privacy Notice

1.1. This is the privacy notice ("Notice") of SwissOnly, UAB, Konstitucijos pr. 7, 09308 Vilnius, Lithuania ("SwissOnly", "we", "us", "our"). SwissOnly is the data controller for the purpose of this Privacy Notice.

1.2. This Notice, together with our Terms of Use, sets out the basis on which we process personal data obtained in connection with your use of and interaction with this website or any other online presence administered by us, including our social media presences and applications (collectively the "Website"). For information about our use of cookies, pixels and social plug-ins, please see our Notice regarding Cookies, Pixels and Social Plug-ins.

1.3. We will post any changes we may make to this Notice on the Website or communicate them to you by email.

1.4. This Notice is effective as of [29.07.2024].

## 2. What personal data do we collect from you?

2.1. We collect personal data that you provide to us, for example when you fill out a contact form, register for an account, use interactive features, subscribe to a service, participate in a promotion, order a product or service, request information or material, or complete surveys. Such personal data may include:

2.1.1. contact information (name, postal address, email address, mobile or other telephone number);

2.1.2. purchase and transaction information;

2.1.3. payment information (payment card number, expiration date, authorization number or security code, delivery address, billing address);

2.1.4. customer service information (customer service inquiries, comments, repair history);

2.1.5. username and password;

2.1.6. information regarding your personal or professional interests, date of birth, marital status, demographics, experiences with our products, and contact preferences;

2.1.7. photographs, comments and other content you provide;

2.1.8. contact information you provide about friends or other persons you wish us to contact;

2.1.9. information we may obtain from third-party service providers.

2.2. We also collect metadata, such as details of your visits to the Website (traffic data, location data, IP address, browser information, session data, preferences, settings, weblogs and other communication data), which we monitor during your interaction with the Website.

### 3. On which basis do we process your personal data?

3.1. We process your personal data for the purposes indicated or that are obvious at the time of collection, and:

3.1.1. to which you have consented (e.g., by checking a box);

3.1.2. for compliance with applicable laws (e.g., data retention obligations relevant for financial reporting);

3.1.3. when necessary for the performance of a contract (e.g., when you order items)

3.1.4. on the basis of our legitimate interests, including:

- gathering market intelligence, promoting products and services, communicating with you and tailoring offers;
- managing customer, client, vendor and other business relationships, sharing intelligence internally, implementing safety procedures, planning and allocating resources and budgets;
- monitoring, detecting and protecting our organization, systems, infrastructure and intellectual property from security incidents, unauthorized access, data breaches, hacking, industrial espionage and cyberattacks;
- developing and protecting industry standards, sharing information on individuals or concerns that may negatively impact us, and following industry best practices;
- complying with industry standards, regulatory requirements and obligations related to fraud prevention and anti-money laundering.

### 4. For which purposes do we process your personal data?

4.1. We process your personal data for the following purposes:

4.1.1. If you fill out a contact form, we use your data to answer your questions, send you information or perform other tasks you request.

4.1.2. If you register an account, we process the data required for that registration and account management (e.g., name, address, email address, password, profile picture, third-party account data).

4.1.3. If you use interactive features, we process the data required for their use (e.g., your name and email address to appear in rankings or receive game-related updates).

4.1.4. If you are an existing customer, we may send you advertising about our products and services using your name and postal address.

4.1.5. If you subscribe to a service such as our newsletter, we use your data to send it to you.

4.1.6. If you participate in a marketing promotion, we use the required data to manage your participation (e.g., event invitations, contest winner notifications).

4.1.7. If you order a product, material or service, we process the data required to fulfill your order (e.g., name, telephone number, delivery address, credit card information, email address).

4.1.8. If you answer a query or survey, we use the data (e.g., age, occupation) to analyze results.

4.1.9. If you consent to receive marketing information, we use your data to send promotional materials, administer your participation in events and research, provide advertisements and tailor your Website and marketing experience.

4.1.10. If you interact with us on third-party social networks, we process your data for these interactions (subject to that network's privacy policies).

4.1.11. We process your personal data to comply with and enforce legal requirements, our Terms of Use, industry standards, contractual obligations and our policies.

4.2. We may process your personal data in a centralized system to enhance your brand experience by tailoring communication and marketing (profiling).

For this purpose, we may match and enrich your personal data with data obtained from your interactions with us or from third parties.

4.3. We process metadata to improve our Website, analyze traffic patterns, conduct targeted marketing, develop statistics and demographics, and optimize our online presence.

## 5. To whom do we disclose and transfer your personal data?

5.1. We may disclose your personal data to recipients who use the data on their own behalf and under their own control (controllers).

5.2. We may disclose your personal data to recipients acting on our behalf and/or as partners (processors), limited to the purpose of executing their contractual obligations and subject to adequate data protection safeguards. Such providers may:

- fulfill orders,
- deliver packages,
- process payments,
- provide customer service,
- send postal and electronic mail,
- host websites,
- remove duplicate data,
- analyze data,
- provide marketing support,
- conduct customer satisfaction surveys,
- provide customized advertising.

These recipients include:

5.2.1. SwissOnly, UAB;

5.2.2. Third-party service providers.

5.3. If SwissOnly, UAB is acquired by a third party, personal data held about its customers may be transferred as one of the assets.

5.4. We may disclose your personal data if required to comply with a legal obligation or enforce our Terms of Use and other agreements, or to protect the rights, property or safety of SwissOnly, UAB, our customers or others. This includes exchanging data with companies and organizations for fraud prevention and credit risk reduction

5.5. We may transfer your personal data internationally, including to countries not considered to provide an adequate level of data protection. In such cases, we ensure adequate safeguards through binding contractual obligations or other approved mechanisms. You may contact us for copies of such safeguards (see section 9).

5.6. This Website may contain links to third-party websites. These websites have their own privacy policies, and we do not accept responsibility for them. Please review such policies before submitting personal data.

## 6. For how long do we process your personal data?

We process your personal data:

- until you withdraw your consent (e.g., unsubscribe from our newsletter or delete your account);
- until we are sure your inquiry is resolved, but not longer than twelve (12) months after the last contact, unless another legal basis applies;
- for the duration of transactions, including the warranty period and an additional grace period, unless otherwise required;
- for as long as you remain our business partner, plus ten years;
- for as long as required by law (e.g., bookkeeping or tax regulations).

## 7. When do we require your personal data?

If you wish to conclude a contract with us (e.g., order products or services), we must obtain certain personal data (e.g., name, delivery address, payment information, contact details). If you choose not to provide the required data, we may be unable to conclude the contract.

## 8. What are your rights?

8.1. You have the right to:

- request access to and rectification or deletion of your personal data;
- request restriction of processing, including objecting to processing for direct marketing purposes;
- request that we provide you or a designated third party with a digital copy of your personal data (data portability).