

Privacy Policy

Introduction & General Scope.

Welcome, this is the Privacy Policy and Personal Data Notice applicable for our website available at www.polisystems.ch, encompassing its sub-domains and its mobile optimized versions. We also recommend you to read our Terms and our General Conditions of Service, along with any and all of our rules, guidelines and ancillary policies (if any), all included herein by reference.

Unless otherwise stated to the contrary, this Policy applies to this Site, and any website that references this Policy, any of Polisystems' operated websites and platforms, as well as any data we may collect across partnered and unaffiliated websites.

This Policy also applies to PI collected through the mobile version of our Site, independently of the platform or browser you use to access it.

Definitions.

The following defined terms shall have the meaning ascribed to them here and elsewhere in this document, regardless of whether they are referred to in singular or plural, in masculine form or feminine form.

Privacy Policy shall be referred to as the	“Policy”
Polisystems Team shall be referred to as	“Polisystems” and “our”, “us” or “we”.
polisystems.ch, polisystems.cloud, poli.network and all the subdomains shall be referred to as the	“Site”
A visitor or end user of our Site is referred to as	“you”, “your(s)” or “yourself”.
Personally, Identifiable Information shall be referred to as	“PI”
Terms and Conditions of Service shall be referred to as the	“Terms”

In addition, the terms **“collect”**, **“process”**, **“treat”**, **“use”**, **“share”**, **“disclose”**, **“divulge”** and analogous words shall be refer to your PI and other data collected from our visitors and end users.

Services Offered.

Polisystems provides, operates and manages Internet, telecommunications and infrastructure services such as remote server, storage and network infrastructure. We also provide other services, as indicated on our Site from time to time.

This Policy is freely available for your review prior to registration, and if you do not agree to its terms, your remedy shall consist of not registering an account, and exiting the web tab though which you visited our Site.

User Agreement & Registration.

As a user of our Site, you will be asked to create a profile with us, by clicking on the “I Agree” checkbox on the registration form or box or other similar means. Through that action, you thereby acknowledge and agree to the terms of this Policy, which is and constitutes a legal, binding agreement between you and Polisystems.

Our Core Privacy Guidelines.

The Polisystems team does every possible effort to keep your trust; and thus we adhere to these general privacy principles, in order to defend your privacy:

- Polisystems does not rent or sell your PI.
- Polisystems does not divulge your contact information to third parties or other users without your consent.
- Any PI that you give to Polisystems will be protected by industry standard technology and codes of ethics.

For purposes of this Policy, the Site shall be the initial point of contact between you and Polisystems, and will serve as the point of collection of any personal data you may provide us.

Your Basic Rights as Our User.

As our user, you will normally be able to manage and select the quantity and type of PI you may reveal to us when using our Site, usually in your account settings.

We constantly try to develop our user experience, and continuously work in order to:

- notify you concerning the ways in which your personal information may be utilized and shared (overseas included);
- preserve the security and protection of your personal details; and/or
- enforce the accessibility of your personal information in order for you to exercise your right of correction of said information.

Accordingly, by registering with us or otherwise using our products and services, you consent to the collection, transfer, processing, storage, and disclosure of your PI as described in this Policy.

Collection of Personal Information.

Non-Personal Information. Includes information that cannot be used to personally identify an individual person, such as anonymous usage data, general demographic information that we may collect, number of clicks, platform types, preferences you submit and preferences that are generated based on the data you submit.

Personal Information. Includes information that can be used to personally identify an individual person, such as:

- personal information (e.g. phone number, name (first and last), email address, phone number, gender, address, date of birth, password);
- payment information (i.e. sensitive card details are stored only by our payment providers Stripe and PayPal), VAT identification number (for users in the EU), other business information.

Accordingly, you hereby represent and warrant to Polisystems that you have the necessary rights and authorizations required for the disclosure of any and all PI. If you open an account with us representing a legal entity, you also represent and warrant that you have the necessary power and authorization.

Information Collected via Third Party Tools. Such as aggregate user statistics, analytics, demographic information, and web site usage information. As our user, you will generally be able to control and select the amount and type of PI you may disclose to us.

Information Collected via Social Media Integration. We may allow our users to use single sign on authentication services such as those provided by Facebook, Google and others (if available). Henceforth, the Site might provide an option of using your social media credentials and, thus, by such action, we will collect your PI as given by such third party platforms, but never more than the PI these platforms disclose. Collected PI from such third parties will include, but will not be limited to, friend lists, email, image gallery, likes and other information. If

you close your social media account, or if you deauthorize our access, your access to our Site may be suspended. For more information, please read the terms and policies of such third party platforms.

Login Information. Lastly, users will need to disclose their email address in order to open an account and login into the Site, along with a unique password.

Information Technically Collected via the Site. As you navigate through a website, certain information can be passively collected (that is, gathered without you actively providing the information) using various technologies and means, such as Internet Protocol addresses, cookies, Internet tags, and navigational data collection.

- Internet Protocol (IP) addresses. An IP Address is a number assigned to your computer by your Internet service provider so you can access the Internet and is generally considered to be non-personally identifiable information, because in most cases an IP address is dynamic (changing each time you connect to the Internet), rather than static (unique to a particular user's computer). We use your IP address to diagnose problems with our server, report aggregate information, determine the fastest route for your computer to use in connecting to our Website, and administer and improve services to our consumers.
- Cookies. A "cookie" is a bit of information that a website sends to your web browser that helps the site remember information about you and your preferences. "Session cookies" are temporary bits of information that are erased once you exit your web browser window or otherwise turn your computer off. Session cookies are used to improve navigation on websites and to collect aggregate statistical information. This Site uses session cookies.
- Persistent Cookies. Are more permanent bits of information that are placed on the hard drive of your computer and stay there unless you delete the cookie. Persistent cookies store information on your computer for a number of purposes, such as retrieving certain information you have previously provided (e.g., username), helping to determine what areas of the website visitors find most valuable, and customizing the website based on your preferences. This Site uses persistent cookies.
- Internet tags. (also known as single-pixel GIFs, clear GIFs, invisible GIFs, and 1-by-1 GIFs) are smaller than cookies and tell the Site's server information such as the IP address and browser type related to the visitor's computer. This Site uses Internet tags.
- Navigational data. ("log files," "server logs," and "clickstream" data) and "Internet Tags" are used for system management, to improve the content of the site, market research purposes, and to communicate information to visitors. This Site uses navigational data.

Purposes of PI Collection.

We will store your PI for the purposes of managing your collaboration with other users and clients, improve your user experience, send newsletters and contact you about inquiries for our services. Overall, we use the collected PI to provide and improve our services. Accordingly, we will generally collect, use and disclose your PI to:

- Provide, operate, maintain, improve, and promote our platform and our products and services.
- Verify your e-mail address and other account notices.
- Arrange for travel itineraries options.
- Implement anti-fraud measures.
- Develop, research, process, safeguard and improve our services.
- Conduct research, analysis, and surveys.
- Offer promotions, newsletters, send service related announcements and contact you about inquiries for our products and services.

- Investigate and prevent fraudulent transactions, unauthorized access to our services, and other suspicious activities.
- Monitor and analyze trends, usage, and activities in connection with our products and services and for marketing or advertising purposes.

Polisystems will keep any collected PI only as long as it is necessary, with regard to the purpose of its processing. This means that PI collected and processed for marketing and commercial purposes will be stored for as long as you have an active account.

Upon the case of PI which is stored by our sub-processors, the data will be stored on their secure servers as indicated on their respective privacy policies from time to time.

If you do not wish to disclose any or part of your PI to us, you may still be able to use some of the functionalities of our Site, though we will not be able to guarantee that you will be able to enjoy them at their fullest if you elect not to disclose it to us.

Disclosure of Personal Information.

Disclosure to Affiliates and Partners. We may disclose your PI to our affiliates and business partners worldwide that agree to treat it in accordance with this Policy. In addition, we may disclose your PI information to contractors we use to support our business (e.g. cloud services, software as a service, infrastructure as a service, technical support).

Disclosure to Payment Processors. Certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information we are required to provide to them for your purchase-related transactions. For these providers, we recommend that you read their privacy policies so you can understand the manner in which your personal information will be handled by these providers. In particular, remember that certain providers may be located in or have facilities that are located in a different jurisdiction than either you or us, therefore if you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to their terms and policies.

Disclosure to Business Successors. If our business is sold or merges in whole or in part with another business that would become responsible for providing the Site to you, we retain the right to transfer your PI to the new business. The new business would retain the right to use your PI according to the terms of this Policy as well as to any changes to this privacy notice as instituted by the new business. We will also retain the right to transfer your PI if our company files for bankruptcy and some or all of our assets are sold to another individual or business.

Disclosure to Third Party PI Processors. In order to provide our services, we use third-party platforms and tools, such as those provided by PayPal, Stripe, Google and Amazon, among other providers. Please be aware that such platforms are governed by their own terms, policies and personal data collection practices and policies. Accordingly, by acknowledging your consent to this Policy, you are also acknowledging the applicable terms and conditions of such third-party platforms, which provide functionalities that include aggregated statistics. Upon the case of any discrepancy or conflict among this Policy and the terms of them, the terms of the latter entities will govern.

We will keep a list of any sub-processors that will be involved in the processing of your PI due to the provision of our service and will inform you of any intended material changes concerning the addition or replacement of sub-processors before such changes are effective, thereby giving you the opportunity to object to such changes.

Lawful Disclosure. We, or our affiliates, clients, contractors, licensors, officers, agents and/or representatives, reserve the right to allow access to any of your PI when we think it is reasonably important or when you violate the terms mentioned in this policy. Hereafter, we will have the right to disclose any or all gathered PI and/or data,

when the following circumstances arise: (i) if necessary under an applicable law; (ii) in reply to a legal demand or subpoena from an agency of the law ; (iii) to protect ourselves and our affiliates from any legal third party claims and procedures that may be brought to us (inclusive of takedown notices); and/or (iv) to prevent or cause cessation of any undertakings that may be construed by us as having the ability to be or cause a predicament or hazard to us.

Newsletter Subscription.

Occasionally, we will ask you for express permission and approval to receive electronic messages in electronic format which are then sent to an electronic address and that contains a message asking recipients to participate in commercial activities such as newsletters, purchase of products, services and invitations to participate in surveys.

We will send you service-related announcements on occasions when it is necessary to do so. For instance, if our service is temporarily suspended for maintenance, or a new enhancement is released, which will affect the way you use our services, we might send you an email. Generally, you may not opt-out of these communications, which are neither commercial nor promotional in nature.

If you no longer wish to receive email update and other commercial communications and messages, you may opt-out of receiving them by following the instructions included in each update or communication.

Service eligibility.

You must at least be eighteen (18) years of age, or older—to purchase our products and/or to use our services, no questions asked. We reserve the right to request any type of identification proof, such as your national personal identification, passport and analogous.

Polisystems does not knowingly collect any kind of information from persons under the age of thirteen (13). If we learn or have reason to suspect that any user or that any client, project or customer data appertains persons under the age of thirteen (13), we will freeze and/or delete any PI under that user's account, without prior notice and without responsibility.

Cookie Policy.

Periodically, we may place what are known as 'cookies' inside your device for the purpose of tracking and collecting data in regard to your utilization of our Site and our services. These files are small texts that our site transfers to your device, and which allow us to recognize you and obtain data such as the time in which you browse pages within our Site, time of the day, specs of your computer, session length, etc.

We may also collect and use the data contained in log files, which may include your IP address, your ISP, the browser you used to visit our platform, the time you visited our platform and which sections you visited.

We do not currently offer "do-not-track" or similar mechanisms. Unlike cookies, device IDs cannot be deleted, but you can select to reset your Advertising IDs in the "Settings" section of your mobile device, among other.

When you access our platform via a mobile device, we may use your mobile device ID (i.e. the unique identifier assigned to a mobile device by the manufacturer) and/or Advertising ID (for Apple iOS 6 and later) instead of cookies in order to recognize you and track displayed web pages, along with their performance.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. If you wish so, you can easily disable cookies on your web browsing software by following the step-by-step guides located at www.allaboutcookies.org and at www.youronlinechoices.com.

Advertising, Opt-out Choice.

From time to time, we may use Google Analytics, Ad Words, Double Click and/or Ad Sense tracking codes, and other third-party software tools (such as remarketing codes) in order to collect information and marketing analytics about the manner in which you browse our platform and services.

The served ads will be targeted based on your previous browsing history, and may include retargeting codes. For example, third-party vendors may show you Polisystems' ads on certain websites across the Internet, even after you leave our platform. The collected information is anonymized, meaning it cannot be tracked back to individuals. Using such tools, we learn how to optimize, and serve ads based on a user's past visits, providing you with a better user experience.

Our third-party vendors may use cookies and beacons to track your Internet browsing in order to serve you ads based on what they or us believe to be of interest according to your browsing activities and consumer preferences. Henceforth, by using our services, along with our platform and websites, you hereby consent to such disclosure, treatment and storage of PI. In order to enforce and uphold your right to privacy, you will always have the option to elect not to receive this type of advertising from us or third parties.

When you access our platform via a mobile device, we may use your mobile device ID (i.e. the unique identifier assigned to a mobile device by the manufacturer) and/or Advertising ID (for Apple iOS 6 and later) instead of cookies in order to recognize you and track displayed web pages, along with their performance.

Like many site operators, we collect information that your browser sends whenever you visit our Site. This is called Log Data, which may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics.

We do not currently offer "do-not-track" or similar mechanisms. Unlike cookies, device IDs cannot be deleted, but you can select to reset your Advertising IDs in the "Settings" section of your mobile device, among other.

You can learn more about how to opt-out by browsing Google's opting-out and privacy pages located at www.google.com, or the Network Advertising Initiative website located at www.networkadvertising.org.

Security of Collected Information.

The security of your PI is important to us, but please remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your information, we cannot guarantee its absolute security.

You can be assured that personal information collected through the Site is secure and is maintained in a manner consistent with current industry standards. The importance of security for all personal information associated with our subscribers is of utmost concern to us. Your personal information is protected in several ways. Your personal information resides on a secure server that only selected employees and contractors have access to via password. In order to most efficiently serve you, credit card transactions and order fulfillment are handled by established third-party banking, processing agents and distribution institutions. They receive the information needed to verify and authorize your credit card or other payment information and to process and ship your order.

To protect your personal information, we take reasonable precautions and follow industry best practices to make sure it is not inappropriately lost, misused, accessed, disclosed, altered or destroyed. If you provide us with your credit card information, the information is encrypted using secure socket layer technology (SSL) and stored with encryption systems. Although no method of transmission over the Internet or electronic storage is 100% secure, we follow all requirements and implement additional generally accepted industry standards.

Third Party Services.

Our Site may present our commercial partner's hyperlinks as well as those of other third parties. Once you have used these links to leave our Site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information that you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

International Transfer Notice.

We have our headquarters in Switzerland. Henceforth, your PI may be accessed by us or our affiliates, agents, partners, advertisers or third-party service providers in Switzerland, the United States, the European Union and our locations which may or may not be located in your country of residence, and you hereby consent to such access and transfer by simple disclosure. All or Polisystems' related entities are subject to the privacy practices set out in this Policy and any applicable jurisdictional legislation.

GDPR Notice and your Rights as Data Subject.

For the purposes of the GDPR, in the European Union, Polisystems is both a "data controller" and a "data processor" of the PI you provide to us for the primary purposes of providing you with our services.

For our European Union customers and users, by clicking the "I Accept" button or otherwise accepting the terms and conditions of our services through a clickable action or similar action, you hereby acknowledge, agree and unequivocally consent to the collection, process, management, treatment, transfer and authorized of your PI by Polisystems, its affiliates and authorized third parties.

The section below covers the certain situations that you, as data subject, and we as a data controller, are most likely to see, but you should also carefully review the full list of data subject rights here: <https://gdpr-info.eu/chapter-3/>. You retain the right to access, amend, correct or delete your PI where it is inaccurate at any time. To do so, please contact support@polisystems.ch.

- **Right to be Forgotten:** You can request us to be "forgotten"; that is, to have your entire PI removed from our service. If we are asked to do this, we will remove any PI you we collected from you as requester. We will also need to contact any third parties that process your PI on our behalf, such as our cloud service providers. To ensure that any personal data in Polisystems' possession can be removed in a timely manner, you can relay any request to be "forgotten" to us by submitting a request-
- **Right to Data Portability:** Under the GDPR, our users located in the EU may request Polisystems to send them any PI in our possession. In this case, we will provide you with any PI that you have in a commonly used, machine-readable format.
- **Right to Data Access:** As a data subject, you can ask Polisystems to confirm how and where your PI is being stored and processed. You also have the right to know how such that data is shared with third parties by us.
- **Right to Data Rectification:** As data subject, you have the right to obtain from Polisystems, without undue delay, the rectification of inaccurate PI concerning you.
- **Right to be Informed:** You have the right to be informed about the PI we collect from you, and how we process it.
- **Right to Object:** You have the right to object to us processing your PI for the following reasons:
 - Processing was not based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);

- Direct marketing (including profiling);
 - Processing for purposes of scientific/historical research and statistics; and
 - Rights in relation to automated decision-making and profiling.
- Automated Individual Decision-Making and Profiling: You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.
 - Right to Complain: You have the right to file a complaint with supervisory authorities if your information has not been processed in compliance with the GDPR. If the supervisory authorities fail to address your complaint properly, you may have the right to a judicial remedy.

Your privacy request must include, at the least, the following information: (i) your complete name, address and/or e-mail address in order for us to notify you the response to your request; (ii) attached documents establishing your identity; and (iii) a clear and concise description of the PI with regard to which you seek to enforce any of your privacy rights. If you request rectification, please indicate amendments to be made and attach documentation to back up your request.

Upon receipt of your privacy request, and after due review, we may then edit, deactivate and/or delete your PI from our services within thirty (30) days. In case of secure databases under our control where deletion is impossible, we will make such information permanently inaccessible.

Notice to California Residents.

Pursuant to the California Consumer Privacy Act of 2018 (the “CCPA”), Polisystems and its affiliates hereto provide the following notice regarding the categories of PI that we have collected or disclosed within the preceding 12 months about California residents who are not employees, independent contractors, owners, directors, officers, or job applicants of Polisystems, or emergency contacts or benefits beneficiaries of the foregoing.

Henceforth, the CCPA provides Californians with the following rights:

- Requests for Information: you (or your authorized agent) can request a copy of your PI, including how we have collected, used, and shared your PI over the past 12 months (if any), including the categories of PI we collected and our purposes for doing so; the categories of sources for that information; the categories of third parties with whom we shared it for a business purpose and our purposes for doing so.
- Your Right to Opt Out of Sales: We do not sell your PI, thus, we don’t offer opt out notices.
- Your Right to Notification: under the CCPA, we cannot collect new categories of PI or use them for materially different purposes without first notifying you.
- Nondiscrimination for exercising your CCPA Rights: the CCPA prohibits us from discriminating against you for exercising your rights under the law. Such discrimination may include denying services, charging different prices or rates for services, providing a different level or quality of services, or suggesting that you will receive a different level or quality of goods or services as a result of exercising your rights.
- Your Right to Delete PI: you can request that we delete your PI by closing your Polisystems’ account. You also can request that we delete specific information, and we will honor such requests, unless a due exception applies, such as when the information is necessary to complete a transaction, verify a fraud, review a chargeback or contract for which it was collected or when it is being used to detect, prevent, or investigate security incidents, comply with laws, identify and repair bugs or ensure another consumer’s ability to exercise their free speech rights or other rights provided by law.

- Please take into consideration that we may deny your deletion request if retaining the PI is necessary for us, our affiliates or our service providers in order to:
 - Complete the transaction for which we collected the PI information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
 - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
 - Debug our products to identify and repair errors that impair existing intended functionality;
 - Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
 - Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.);
 - Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
 - Comply with a legal obligation that has substantive grounds;
 - Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Overall, we have, may collect or will collect the following categories of PI from our users, customers and individuals, as necessary to fulfill our legal obligations and operational business purposes:

- Personal information, as defined in the California customer records law, such as contact information and financial information;
- Identifiers, such as online identifier, IP address and name;
- Financial information, such as transaction information and history and securities trading information and history;
- Internet or network activity information, such as browsing history and interactions with our and other websites and systems;
- Geo-location data, such as device location and IP location;
- Audio, electronic, visual and similar information, such as video recordings created in connection with our business activities, such as your fitness videos and multimedia content; and
- Inferences drawn from any of the PI listed above to create a profile or summary about, for example, an individual's preferences and characteristics.

Governing Language.

From time to time, this Policy may be translated into other languages for your convenience. The English language version of each of these documents shall be the version that prevails and governs your use of Site and our products and services. Upon the case of any conflict between the English language version and any translated version, the English language version will prevail.

Amendments to this Policy.

Periodically, and at the final discretion of ourselves, we may update, change, suspend and/modify or our Site, our services, this Policy and/or our Terms, in whole or in part. We hereby reserve such right in order to operate our business and protect ourselves. Your use after any changes indicate your acceptance thereof and we will post a notice regarding such changes on our Site, and may also write an email to you or otherwise notify you.

Contact.

If you have any questions or comments about us, our Site, our Terms and/or this Policy, please contact us at:

Polisystems

support@polisystems.ch or admin@polisystems.ch

Our data protection officer is Philippe Raimundo. You can contact him directly via our support or at pr@polisystems.ch.

Date of last effective update is July, 2020.