

General Privacy Policy of EveryFin AG

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1. What is this privacy policy about?

EveryFin AG, Switzerland (hereinafter also “**EveryFin**”, “**we**” or “**us**”) processes personal data relating to you or other individuals in different ways and for different purposes.

“**Personal data**” means all information relating to an identified or identifiable natural person, and “**processing**” means any operation with it, such as collecting, using, and disclosing it.

This privacy notice explains our processing of such data (hereinafter referred to as **personal data** or **data**) when

- you visit our website (<https://www.everyfin.fi/>),
- you purchase our services,
- you are otherwise associated with us by contract,
- you contact us via email, letter, on social media, by text message, via a contact form, etc.,

- you register for certain offers (e.g. contests, promotions, etc) and our newsletter,
- you deal with us in the context of all other data processing related to our offers.

Please take the time to read this privacy notice to learn how and why EveryFin processes your personal data, how EveryFin protects your personal data and what rights you have in this context. If you have any questions or would like further information about our data processing, please do not hesitate to contact us (para. 2).

We have aligned this privacy notice with both the Swiss Federal Act on Data Protection (**FADP**) and the European General Data Protection Regulation (**GDPR**). However, whether and to what extent the GDPR is applicable at all depends on the individual case.

2. Who is responsible for processing your data?

For the data processing according to this privacy notice, the following company is the "controller", i.e. the party primarily responsible under data protection law unless otherwise communicated in individual cases:

EveryFin AG
Im Marteli 9
4102 Binningen
Switzerland

If you have any questions regarding data protection, please feel free to contact us at the following address so that we can process your request as quickly as possible:

dataprotection@everyfin.fi

3. What personal data do we process?

We process different categories of personal data depending on the occasion and purpose. You will find the most important categories below, whereby this list cannot be exhaustive.

If you provide us with data that relates to other individuals, we understand that you confirm this data is correct and that you are authorised to provide us with this data. We ask you to

inform these third parties about our processing of their data (for example, by a reference to this privacy policy).

3.1. Master data

Master data is the basic data that we need to process our business relationships or for marketing and advertising purposes and that relates directly to your person and characteristics. For example, we process the following master data:

- surname and first name;
- e-mail address
- wallet address(es)
- Nickname
- Mobile phone number
- User's customized wallet contact list
- Origin country of IP address (for VAT declaration purposes; this is not associated with users)

We usually obtain this master data from you directly.

We never link your name to your wallet in a publicly visible way.

3.2. Contract data

Contract data is information that incurs in connection with the conclusion or execution of a contract, for example information about contracts and cooperative partnerships and the services to be rendered or the services rendered, as well as data from the period prior to the conclusion of a contract, information on the conclusion of the contract itself, as well as the information required or used for the execution. Specifically, we process the following contract data:

- date, information on the type and duration as well as conditions of the respective contract, data concerning the termination of the contract;
- contact details;
- information on the use of services;

- information on payments and payment methods, invoices, mutual claims, contact with customer service, objections, information on customer satisfaction, complaints, feedback, etc.;
- for Web3 services available online, also access data and logins.

3.3. Communication data

Communication data is data in connection with our communication with you, for example, when you contact us via contact form or via other means of communication. Communication data is, for example:

- name and e-mail address;
- content of correspondence;
- information on the type, time and, if applicable, location of the communication and other peripheral data of the communication.

3.4. Technical data

Technical data is generated in connection with the use of our website and app. This includes, for example, the following data:

- The IP address of the end device and device ID;
- information about your device, the operating system of your end device or language settings;
- information about your internet provider;
- password (in encrypted format and not accessible to EveryFin);
- accessed content or protocols in which the use of our systems is recorded;
- date and time of access to the website and your approximate location.
- Web3 protocols approved by user's wallet
- App usage, including user wallet analytics, for anonymized statistics
- Access and log in records

We may also assign an individual code to you or your end device (e.g., by means of a cookie; see section 5.1). This code is stored for a certain duration, often only during your visit. We cannot usually deduce who you are from technical data [unless, for example, you register for the newsletter on our website. In this case, we can link technical data with master data – and thus with your person.

3.5. Behavioural data

To tailor our offers and services to you or your company in the best way possible, we try to get to know you better and try to better tailor our services to you. For this purpose, we collect and use data on your behaviour. Behavioural data is, in particular, information about your use of our website. It may also be collected based on technical data. This includes, for example, information on your use of electronic communications (e.g., whether and when you opened an e-mail or clicked on a link, especially when sending newsletters). We may also use your other interactions with us as behavioural data, and we may link behavioural data with other data (e.g., with anonymous information from statistical offices) and evaluate this data on a personal and non-personal basis.

3.6. Preference data

Preference data tells us which needs you are likely to have, and which services might meet your interest or the interest of your company (e.g. when selecting topics for the newsletter). We therefore also process data regarding your interests and preferences. For this purpose, we can link behavioural data with other data and evaluate this data on a personal and non-personal basis. This allows us to draw conclusions about preferences, and anticipated behaviour.

3.7. Other data

We may also collect data from you in other situations. In connection with official or judicial proceedings, for example, data (such as files, evidence, etc.) incurs that may also relate to you.

4. For what purposes do we process your personal data?

We use the personal data we collect for collaboration with you. If you have subscribed to our newsletter, we use your e-mail address for sending it. In addition, we also process your personal data, to the extent permitted and deemed appropriate, for other purposes in which we (and sometimes third parties) have a legitimate interest corresponding to the purpose:

- For **communication purposes**, i.e., to contact you and to stay in contact with you. This includes answering inquiries and contacting you in case of queries, e.g., by e-mail. For this purpose, we especially process your communication and master data.
- For **customer care and marketing purposes** to offer you targeted information about new offers according to your personal interests and preferences, for example, through the newsletter and personalised advertising. For this purpose, we especially process technical data, master data, communication data and behavioural data.
- We also process data to **improve our services and for product development**.
- **To ensure IT security and for prevention**: we process personal data to monitor the performance of our company, in particular IT, our website, applications, and other platforms, for security purposes, to ensure IT security, to prevent theft, fraud and abuse, and for evidence purposes. This includes, for example, the evaluation of technical records of the use of our systems (log data), the prevention, defence and investigation of cyber-attacks and malware attacks, analyses and tests of our networks and IT infrastructures, system and error checks.
- **To maintain the internal rules and other measures for IT security** and for the protection of our employees and other persons and assets belonging to or entrusted to us.
- **To protect our rights**: we may also process personal data to enforce claims in or out of court and before authorities in Switzerland and abroad, or to defend ourselves against claims. For this purpose, master data and communication data may be processed.
- **To comply with legal requirements**: this includes, for example, the processing of complaints and other notifications, compliance with orders of a court or an

authority, measures to detect and investigate abuses, and generally measures that we are obliged to take by applicable law, self-regulation, or industry standards. For this purpose, we may especially process your master data and communication data.

- **For administration and support:** to shape our internal processes efficiently, we process data as far as necessary for the administration of IT, for accounting or for archiving data. For this purpose, particularly communication and behavioural data as well as technical data may be used.
- We may also process data for **other purposes**. These include company management, including business organization and company development, other internal processes and administrative purposes (e.g. management of master data, accounting and archiving), training as well as educational purposes and the preparation and processing of purchase and sale of business units, companies or parts of companies and other transactions under company law and the associated transfer of personal data, as well as measures for business management and the protection of other legitimate interests.

If we ask for your consent for certain processing activities, we will inform you separately about the corresponding purposes of the processing. You can revoke your consent at any time by digital notice.

5. What online tracking and online advertising techniques do we use?

On our website, we use various techniques to let us and third parties consulted by us recognise you when you use our website and, in some cases, track you across multiple visits. The use of such techniques is regulated separately. The following section provides information on this topic.

5.1. How and for what purpose do we use cookies and similar technologies?

We use third-party services for our website to measure and improve the **user experience of the website and online advertising campaigns**. For this purpose, we may embed third-party components on our website, which may in turn use cookies. When we track you or use similar technologies, the core purpose is to enable us to distinguish access by you (via your system) from access by other users so that we can ensure the

functionality of the website and perform statistical analyses. We do not want to identify you in this process. The technology used is designed to recognise you as an individual visitor each time you access the site, for example, by having our server (or the servers of third parties) assign a specific identification number to you or your browser (so-called "cookie").

Cookies are files that your browser automatically stores on your end device when you visit our website. Cookies contain a unique identification number (an ID) that allows us to distinguish individual visitors from others. Depending on the purpose use, cookies contain further information, for example, on accessed sites and the duration of the visit to a site. On the one hand, we use session cookies, which are deleted again when the browser is closed, and on the other hand, we use permanent cookies, which remain stored for a certain duration after the browser is closed and are used to recognise visitors on a subsequent visit.

We use the following types of cookies and similar technologies:

- Necessary cookies: necessary cookies are required for the functionality of the websites, for example, to allow you to switch between sites without losing information entered in a form.
- Performance cookies: these cookies collect information about the use of a website and enable analyses, for example, which sites are most popular. They can thereby simplify the visit to a website and improve the user experience.
- Functional cookies: functional cookies enable advanced features and can display personalised content.
- Marketing cookies: marketing cookies help us and our advertising partners to target you on our websites and on websites of third parties with advertisements for products or services that may be of interest to you or to display our advertisements during your further internet use after visiting our websites.

We particularly use cookies for the following purposes:

- personalisation of content;
- displaying personalised advertisements and offers;
- displaying ads on third-party websites and measuring their success, i.e. whether you respond to these ads (remarketing);

- save settings between your visits;
- determining whether and how we can improve our website;
- collection of statistical data on the number of users and their usage habits, as well as to improve the speed and performance of the website;
- we may process your contact details to target you with advertisement on third-party platforms.

We may also use similar technologies e.g. LinkedIn Insight Tags, MetaMask Extension, Pixel Tags or Fingerprints, to store data in the browser. Pixel Tags refer to small, usually invisible images or a program code that are loaded from a server and thereby transmit certain information to the operator of the server, e.g. whether and when the website was visited. Fingerprints are information that is collected when you visit our website via the configuration of your end device or your browser, and which make your end device distinguishable from other devices.

5.2. How can cookies and similar technologies be disabled?

When accessing our website, you have the option to activate or deactivate certain categories of cookies. You can configure your browser in the settings to block certain cookies or similar technologies or delete existing cookies and other data stored in the browser. You can also enhance your browser with software (so-called “plug-ins”) that blocks tracking by certain third parties. You can find out more about this in the help pages of your browser (usually under the heading “Privacy”). Please note that our website may no longer fully function if you block cookies and similar technologies.

5.3. Cookies from partners and third parties on our website

We use third-party services to help us measure and improve the user experience of the website and online advertising campaigns. Third-party service providers may be located outside Switzerland and the EU/EEA, provided that the protection of your personal data is adequately ensured. For example, we use analytical services to allow us to optimise and personalise our website. The respective third-party providers may record the use of the website for this purpose and combine their recordings with further information from other websites. This allows them to record user behaviour across multiple websites and end devices in order to provide us with statistical evaluations on this basis. The

providers may also use this information for their own purposes, e.g., for personalised advertising on their own website or other websites. If a user is registered with the provider, the provider can assign the usage data to the relevant person.

Two of the most important third-party providers are Google and Meta/Facebook. You can find more information about them below. Other third-party providers generally process personal and other data in a similar way.

- **Google Analytics**, an analysis service of Google LLC (1600 Amphitheatre Parkway, Mountain View, CA, USA) and Google Ireland Ltd. (Google Building Gordon House, Barrow St, Dublin 4, Ireland; jointly "Google", with Google Ireland Ltd. being responsible for the processing of personal data). Google uses cookies and similar technologies to collect certain information on the behaviour of individual users on or in the relevant website as well as information on the end device used for this purpose (tablet, PC, smartphone, etc.). Google collects information on the behaviour of users on the website and the end device used and provides us with evaluations on this basis, but also processes certain data for its own purposes. We have configured Google Analytics in a way that IP addresses of visitors are anonymised before being forwarded to the USA. You can find information on data protection at Google Analytics [here](#). You can [disable Google Analytics by installing a respective browser add-on](#).
- **LinkedIn Insight Tag**, an analytical tool from LinkedIn Ireland Unlimited Company (Wilton Place, Dublin 2, Ireland). Using LinkedIn Tag, we are informed about you visiting our websites, whereby your IP address is also collected. In addition, timestamps and events such as access to websites are stored. This enables us to statistically evaluate your use of our website in order to constantly optimise it. For example, we learn which LinkedIn advertisement or interaction on LinkedIn you used to reach our website. This allows us to have better control over the display of our advertising. The data is stored on servers in the EU/EEA and the USA. We have configured LinkedIn Insight Tag to only forward visitors' IP addresses to the USA in a shortened or hashed version. Please note that LinkedIn can store the data allowing a connection to the respective user profile and LinkedIn can use the data for its own advertising purposes. Further information on LinkedIn's data protection and corresponding settings options can be found [here](#).

6. How do we process data in connection with social media?

We offer you the option on our website to use a “social media plugin” for Facebook, Instagram, LinkedIn, Twitter, etc., to incorporate features from these providers into our websites. These plugins are deactivated by default. As soon as you activate them (for example, by clicking the button), the corresponding providers can determine that you are on our website. If you have a corresponding account with the social media provider, they can allocate this information to you and thus track your use of online offers.

If you communicate with us via social media or digital communication tools and our profiles there (e.g. on Facebook, Instagram, Telegram, LinkedIn, etc.) or comment on or share content, we collect information for this purpose, which we use primarily to communicate with you, for marketing purposes and for statistical evaluations. Please note that when you visit our social media sites the platform provider itself also collects and uses data (e.g. on user behaviour), possibly together with other data known to it (e.g. for marketing purposes or to personalise the platform content). For more information on data processing by social network providers, please refer to the privacy policies of the respective social networks.

7. To whom do we disclose your personal data?

In connection with our processing activities, we also disclose your personal data to other recipients as specified below.

We further disclose personal data to **service providers** as required for their services. This particularly concerns IT service providers, but also consulting companies, analysis service providers, debt collection service providers, credit agencies, marketing service providers, etc. As far as service providers process personal data as processors, they are obliged to process personal data exclusively according to our instructions and to implement data security measures.

Data may also be disclosed to **other recipients**, e.g., to courts and authorities as part of legal proceedings and legal information and cooperation duties, to buyers of companies and assets, to financing companies in the case of securitizations, and to collection agencies.

In individual cases, it is possible that we also disclose personal data to other third parties for their own purposes, e.g. if you have given us your consent to do so or if we are legally obliged or entitled to disclose such data.

8. Do we disclose personal data abroad?

Some recipients of data are not only located in Switzerland. This applies in particular to certain service providers. These may be located outside the European Economic Area (EEA) and Switzerland (especially in the USA), but also in other regions and countries worldwide. For example, we may transmit data to authorities and other persons abroad if we are legally obliged to do so or, for example, in the context of a company sale or legal proceedings. Not all of these countries currently guarantee an adequate level of data protection according to the standards of Swiss law. We therefore take contractual precautions to contractually compensate for the lower level of legal protection, especially with the standard contractual clauses issued by the European Commission and recognised by the Swiss Data Protection and Information Commissioner (FDPIC). For more information and a copy of these clauses, please visit www.edoeb.admin.ch/edoeb/en/home/data-protection/handel-und-wirtschaft/transborder-data-flows.html.

In certain cases, we may transmit data in accordance with data protection law requirements even without such contracts, e.g., if you have consented to the corresponding disclosure or if the disclosure is necessary for the execution of the contract, for the establishment, exercise or enforcement of legal claims or for overriding public interests.

9. How long do we store and process personal data?

We store and process your personal data as long as it is necessary for the purpose of the processing (in the case of contracts, usually for the duration of the contractual relationship), as long as we have a legitimate interest in storing it (e.g. to enforce legal claims, for archiving and or to ensure IT security) and as long as the data is subject to a legal retention obligation (for example, for certain data, a ten-year retention period applies). If there are no legal or contractual obligations to the contrary, we will destroy or anonymise your data after the storage or processing period has expired within our normal processes.

In relation to cookies, you can find information on the duration of storage under the link "Cookie settings".

10. What are the legal bases for data processing?

As the case may be, data processing is only permitted if the applicable law specifically allows it. This does not apply under the FADP, but does apply, for example, under the GDPR as far as it is applicable. In this case, we base the processing of your personal data on the following legal bases:

- on your consent (Article 6(1)(a) and Article 9(2)(a) GDPR),
- that the processing is necessary for the performance of the contract or pre-contractual measures (e.g. the review of a contract proposal; Article 6(1)(b) GDPR),
- that the processing is necessary for the establishment or defence of legal claims or civil proceedings (Article 6(1)(f) and Article 9(2)(f) GDPR),
- that the processing is necessary for compliance with domestic or foreign legal provisions (Article 6(1)(c) and (f); Article 9(2)(g) GDPR),
- that the processing is necessary for a legitimate interest in the data processing, in particular the interests mentioned in section 4 (Article 6(1)(f) GDPR).

11. How do we protect your data?

We take appropriate security measures to protect the confidentiality, integrity and availability of your personal data to protect it against unauthorised or unlawful processing and to protect it against the risks of loss, accidental loss or alteration, unauthorised access. However, security risks cannot be completely ruled out; residual risks are unavoidable.

12. What rights do you have?

Under the applicable data protection law, you have certain rights to obtain further information about and influence our data processing. Particularly, these are the following rights:

- **Access right:** you can request further information about our data processing. We are at your disposal for this purpose. You can also submit a so-called information request if you wish to receive further information and a copy of your data.
- **Objection and deletion:** you may object to our data processing and request that we delete your personal data at any time if we are not obliged to continue processing or storing this data and if it is not necessary for the contract.
- **Correction:** you can have incorrect or incomplete personal data corrected or completed or complemented by a note that indicates your objection.
- **Data portability:** you also have the right to receive the personal data you have provided to us in a structured, common and machine-readable format or to have it transferred to a third party, as far as the respective data processing is based on your consent or is necessary for the execution of the contract.
- **Revocation:** if we process data based on your consent, you can revoke your consent at any time. The revocation is only valid for the future, and we reserve the right to continue to process data based on another basis in the event of a revocation.

If you wish to exercise any rights against us, please contact us in writing. You will find our contact details in section 2. As a rule, we will have to verify your identity (e.g., by means of a copy of your ID card). You are also free to file a complaint against our processing of your data with the competent supervisory authority. The competent supervisory authority in Switzerland is the Swiss Data Protection and Information Commissioner (FDPIC).

Status of this privacy policy: March 2023