

## Data Protection Policy of DSCnet

With this Data Protection Policy, we, DSCnet AG (hereinafter "DSCnet"), the issuer of the AntePAY Card, would like to inform you about how we process personal information in the course of our business and inform you about your rights. We understand the importance of the processing of personal data for you as the data subject, and the protection of your privacy is of paramount importance to us.

As an internationally oriented company, we attach great importance to both the Swiss data protection regulations and the EU General Data Protection Regulation (GDPR).

### **I. Name and Address of the Data Controller**

We as data controllers decide on the purposes and means of processing personal data. Our contact address can be found at <https://antepay.com/>. For inquiries regarding data protection, you can contact:

DSCnet AG  
Oberneuhofstrasse 3  
6340 Baar  
Switzerland  
[dataprotection@dscnet.ch](mailto:dataprotection@dscnet.ch)

### **II. Description and Scope of Data Processing**

Via the AntePAY webshop, customers have the possibility to order AntePAY Cards online after registration (registration of a user account, see point III below). At the same time, we also sell the AntePAY Cards through selected outlets.

In addition, the AntePAY Card is accepted by various partners as a means of payment (so-called acceptance points). Both the sales outlets and the acceptance points (collectively the "business partners") may register with us online or in writing as part of an on-boarding process (see Section III below).

As part of these processes, we collect various personal data (all information pertaining to specific or identifiable natural/legal persons), and in this privacy statement we are informing you about the use of the data collected.

In the first instance, we process personal data that we receive directly from our customers and our business partners or other persons involved as part of our business activities. We process the personal data collected for contract processing and invoicing, as well as for communication purposes. The processing of personal data is also required for the fulfillment of legal obligations.

Furthermore, we process personal data, as far as permitted and required, for the following purposes, in particular but not exclusively, those in which we (and also third parties) have a legitimate interest corresponding to the purpose:

- Assertion of legal claims and defense in connection with legal disputes and regulatory proceedings
- Information on compliance with legal requirements (such as anti-money laundering and export restrictions)
- Prevention and investigation of criminal offenses and other misconduct (e.g., conducting internal investigations, KYC checks, creditworthiness information, anti-fraud data analysis)
- Measures for IT, building, and installation security and the protection of our employees and other persons and items of value entrusted to us (such as access controls, visitor lists, network and mail scanners, telephone records)
- Any transactions under company law and, as a result, the transfer of personal data as well as measures for business management and, to that extent, compliance with legal and regulatory obligations
- Information from banks, insurance companies, distributors, and other contractual partners about us for claiming or providing services from you (e.g., payments/purchases made)
- Offer and further development of our offers and services
- Advertising and marketing (including the conducting of events), as far as you have not objected to the use of your data
- Market and opinion research, media monitoring incl. creation of statistics and reports

If you have given consent to the processing of your personal data for specific purposes, we process your personal data within the framework of and on the basis of this consent, unless we have a different legal basis and we require it. You may revoke your consent at any time for the future.

#### **1. Disclosure to Third Parties and Transmission Abroad**

In the course of our business, we may disclose your personal information to third parties in Switzerland, the EU, or other countries, such as our provider or payment service provider (see below under point VII). We may also be required to disclose your personal information in order to comply with legal or regulatory requirements.

If we transfer data to a country without adequate legal data protection, we ensure an adequate level of protection by means of data transmission contracts (namely based on the so-called standard contractual clauses of the European Commission) or through reliance on the statutory exceptions of consent, contract execution, determination, the exercise or enforcement of legal claims, overriding public interests, or published personal data, or because it is necessary to protect the integrity of data subjects. Please contact us if you would like a copy of our data transfer agreements.

## **2. Storage Duration**

The personal data collected by us is stored only as long as necessary for the execution of the contractual relationship or for the purposes otherwise pursued with the processing and/or where a legal storage and documentation obligation or a predominant private or public interest exists. As soon as your personal data is no longer required for the above-mentioned purposes, it will generally be deleted or anonymized as far as possible.

## **3. Objection and Deletion Option**

As part of the business relationship, you must provide all personal information necessary to complete a purchase and fulfill the related contractual obligations. Without this information, we will generally be unable to conclude a contract with you or process a purchase.

## **III. Registration/On-boarding**

### **1. Description and Scope of Data Processing**

#### **1.1 Registration of Customers**

To use the shopping facilities of the webshop, customers must register on the website. Customers must create a user account for this purpose. In this case, the data entered in the input mask will be transmitted to us and saved. This data is, in particular

- First and last name
- Address
- Gender
- E-mail address
- Date of birth
- Password
- Mobile number

## **1.2 On-boarding of Business Partners**

For the sale of the AntePAY Card or the acceptance of the AntePAY Card as a form of payment, business partners must register with us on the website or in writing. The on-boarding process stores the following data in particular:

- Company name and legal form
- Business address
- Gender
- E-mail address
- Phone number
- Field
- Password
- Information on the verification of the authorized signatory (including nationality, residence address)
- Information on the identification of the business partner (including an extract of criminal records, ID/passport copy)

## **1.3 Additional Data**

At the time of registration of customers and business partners, the following data is also stored:

- IP address
- The date and time of registration
- The page on which the form was filled out

Before confirming registration and on-boarding, we make reference to this Data Protection Policy.

## **IV. Provision of the Website and Creation of Log Files**

### **1. Description and Scope of Data Processing**

Every time you visit our website, our system automatically collects data and information from the computer system of the accessing computer. In doing so, the following data is collected:

- Information regarding the browser type and version used
- The user's operating system

- The user's Internet service provider
- The user's IP address
- The date and time of access
- The website from which the user's system accesses our website
- The page requested on the website

The IP addresses are stored in the log files of our system. Not affected by this is the other data that allows the data to be assigned to a user. This data is not stored together with other personal data of the user.

## **2. Purpose and Legal Basis for Processing Your Data**

Temporary storage of the IP address by the system is necessary to enable the delivery of the website to the user's device. To this end, the user's IP address must remain stored for the duration of the session.

The data is stored in log files to ensure the website's functionality. In addition, the data is used to optimize the website and to ensure the security of our information technology systems. No evaluation of the data for marketing purposes is undertaken in connection with this.

Our legitimate interest in data processing also lies in these purposes.

## **3. Storage Duration**

All data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. When collecting the data to be provided to the website, this is the case when the respective session is completed.

Should any data be stored in log files, this will be deleted after seven days at the latest. Data may be stored for longer than this. In this case, the IP addresses of the users are deleted or alienated so that it is no longer possible to attribute them to the accessing client.

## **V. Use of Cookies**

### **1. Description and Scope of Data Processing**

Our website uses cookies. Cookies are small text files that are automatically saved on your computer's hard drive when you visit our website. Cookies do not pose a risk to the computer.

Technically necessary cookies increase the functionality of the website. Technically unnecessary cookies increase the user-friendliness of the website.

Our cookies can either be used as session cookies (temporary cookies that identify you as a user and track your progress within our websites while your browser is open) or as persistent cookies (cookies that allow our websites to "remember" who you are and what your preferences are within our websites and which remain on your computer or device even after you close your browser).

The user data collected in this way is pseudonymized via technical means. It is, therefore, no longer possible to attribute the data to the accessing user. The data is not stored together with the user's other personal data.

## **2. Purpose and Legal Basis for Processing Your Data**

The purpose of using technically necessary cookies is to simplify the use of websites for users. Some features of our website will not be available if the use of cookies is disallowed. In such cases, it is necessary that the browser is recognized even after changing the page.

We require cookies for the following applications:

- Applying language settings
- Applying log-in information

The use of technically unnecessary cookies is for the purpose of improving the quality of our website and its contents. By analyzing cookies, we learn how the site is used and can constantly optimize our service as a result.

For these purposes, our legitimate interest also lies in the processing of personal data.

## **3. Storage Duration, Objection and Deletion Option**

The session cookies are deleted after a short time, but at the latest when you close your browser. With persistent cookies, the site remembers your preferences and settings so that they will be available again on your next visit to the site. Persistent cookies are deleted after a certain period of time.

Thus, as a user, you have full control of the use of cookies. By changing the settings in your Internet browser, you can disable or restrict the transmission of cookies. Cookies that have already been saved can be deleted at any time. This can also be done automatically. If cookies are deactivated for our website, it may no longer be possible to use all of the website's features.

## **VI. Newsletter**

### **1. Description and Scope of Data Processing**

In the future, it will be possible to subscribe to a free newsletter on our website. We send information about our offer to our existing and potential customers, as well as business partners, at irregular intervals. We use external providers for the dispatch and administration of newsletters.

When registering for the newsletter, your personal data, such as your name and e-mail address, will be transmitted to the third-party provider. In addition, the third party stores the date and time of registration for the newsletter in log files and may also collect other information that we do not know about.

Prior to registration, your consent to the processing of the data will be obtained and reference will be made to this Data Protection Policy. No transfer of data to third parties takes place in connection with data processing for the dispatch of newsletters. The data will be used exclusively for sending the newsletter.

### **2. Purpose and Legal Basis for Processing Your Data**

The collection of your e-mail address serves to deliver the newsletter. The collection of other personal data as part of the subscription process ensures the prevention of misuse of the services or of the e-mail address used.

We process your personal data collected when registering for the newsletter, based on your consent.

### **3. Storage Duration**

All data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. The user's e-mail address will be stored for as long as the subscription to the newsletter is active.

The other personal data collected during the subscription process will generally be deleted after a period of seven days.

### **4. Objection and Deletion Option**

The subscription to the newsletter can be canceled by the user at any time. A relevant link can be found in every newsletter for this purpose. This also allows for withdrawal of consent to the storage of personal data collected during the subscription process.

## **5. Purposes of Data Processing and Legal Bases**

We only use personal data provided on contact forms to process the requested orders. The other personal data processed during the sending process is used to prevent misuse of the contact form and to ensure the security of our information technology systems. This is also our legitimate interest in the processing of data.

## **6. Storage Duration**

In order to ensure compliance with our contractual and legal obligations (in particular with regard to the duties of storage and documentation as a licensed attorney), we need access to all user communications. As a result, personal data from the registration process will be deleted at the earliest after ten years.

## **VII. Involvement of Third Parties**

### **1. IT Provider**

We work with third parties who provide services to us, and we may share your personal information with, for example, IT providers who may have limited access to your personal information in the software or system support.

### **2. Use of Amazon Web Services (AWS)**

We rely on the services of Amazon Web Services ("AWS") for data storage. AWS is a service of Amazon Web Services Inc., a software company based in the United States and having a subsidiary – Amazon Web Services EMEA SARL – located in L-2338 Luxembourg. AWS is certified according to both the EU-American and the Swiss-American Privacy Shield and, thus, guarantees adequate data protection. More information about AWS data protection can be found in the current data protection declaration available at <https://aws.amazon.com/privacy> .

### **3. Web Analysis by Google Analytics**

#### **3.1 Scope of Personal Data Processing**

We use Google Analytics, a web analysis service of Google Inc. ("Google"), on our website. Google Analytics uses persistent cookies (see above) for collecting anonymous information, such as the number of visitors to the site, from where visitors log in, which pages you view, and how long you spend on our site.

As a rule, the information regarding your use of this website generated by the cookies will be forwarded to a Google server in the USA and stored there. Google will use this information on our behalf to analyze your use of the website, to compile reports on website



activity, and to provide additional services associated with the use of the website and Internet to us.

Our website uses Google Analytics with the extension "\_anonymizeIp()". As a result, IP addresses are only processed in truncated form in order to prevent Google from identifying specific individuals. If data collected about you is identifiable to you personally, it will be blocked immediately and the personal data will be deleted as soon as possible. The IP address of the user is shortened by Google within member states of the European Union or in other EEA contracting states before the transmission. Only in exceptional cases will the entire IP address be transmitted to a Google server in the USA and truncated there. Google will not link the IP address transferred by your browser as part of Google Analytics with any other data held by Google.

### **3.2 Purpose and Legal Basis for Processing Your Data**

The processing of users' personal data enables us to analyze the surfing behavior of our users. We are in a position to compile information about the use of the individual components of our website by evaluating the data obtained. This helps us to continuously improve our website and to make it more user-friendly. For these purposes, we have a legitimate interest in the processing of the data. By anonymizing the IP address, users' interests in protecting their personal data are sufficiently taken into account.

### **3.3 Duration of Storage and Options for Objection and Removal**

The data will be deleted as soon as it is no longer needed for our recording purposes. Thus, as a user, you have full control of the use of cookies. By changing the settings in your Internet browser, you can disable or restrict the transmission of cookies. Cookies that have already been saved can be deleted at any time. This can also be done automatically. If cookies are deactivated for our website, it may no longer be possible to use all of the website's features.

Third-party information about Google:

Address:

Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland

User terms and conditions:

<http://www.google.com/analytics/terms/de.html>

Overview of data protection:

<http://www.google.com/intl/de/analytics/learn/privacy.html>

And the data protection policy:

<http://www.google.de/intl/de/policies/privacy>

## **VIII. Social Plug-ins**

### **1. Facebook**

Our site uses social plug-ins ("plug-ins") from the social network Facebook, which is operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook"). These plug-ins are labeled with a Facebook logo or the words "social plug-in from Facebook" or "Facebook social plug-in". You can find an overview of the Facebook plug-ins and what they look like here: <https://developers.facebook.com/docs/plugins>

When you access a page on our website that contains such a plug-in, your browser establishes a direct connection to Facebook's servers. The content of the plug-in is transferred from Facebook directly to your browser and embedded into the page. Thanks to this connection, Facebook receives the information that your browser has accessed the relevant page of our website, even if you do not have a Facebook account or are not currently logged in to Facebook. This information (including your IP address) is transmitted by your browser directly to a Facebook server in the USA and stored there.

If you are logged in to Facebook, it can directly link your visit to our site to your Facebook profile. If you interact with the plug-ins, for example by pressing the "Like" button or making a comment, this information is also transmitted directly to a Facebook server and stored there. The information is also posted on your Facebook profile and displayed to your Facebook friends.

To see the purpose and scope of data collection and the further processing and use of data by Facebook, as well as your rights and settings options to protect your privacy, please refer to the privacy policies of Facebook: <http://www.facebook.com/policy.php>. If you do not want Facebook to directly associate the information gathered through our website with your Facebook account, you must log out of Facebook before visiting our website. It is also possible to block Facebook plug-ins with add-ons for your browser.

### **2. Twitter**

Our website uses social plug-ins ("plug-ins") from the Twitter micro-blogging service, which is operated by Twitter Inc., 1355 Market St, Suite 900, San Francisco, CA 94103, USA ("Twitter"). These plug-ins are identified by a Twitter logo, for example in the form of a blue "Twitter bird". An overview of the Twitter plug-ins and their appearance can be found here: [https://about.twitter.com/en\\_us/company/brand-resources.html](https://about.twitter.com/en_us/company/brand-resources.html)

When you access a page on our website that contains such a plug-in, your browser establishes a direct connection to Twitter's servers. The content of the plug-in is transferred by Twitter directly to your browser and embedded into the page. Thanks to this connection, Twitter receives the information that your browser has accessed the relevant page of our website, even if you do not have a profile on Twitter or are currently not logged in to Twitter. This information (including your IP address) is transmitted by your browser directly to a Twitter server in the USA and stored there. If you are logged in to Twitter, Twitter can link

your visit to our site directly to your Twitter account. If you interact with the plug-ins, for example by pressing the "Tweet" button, that information is also transmitted directly to a Twitter server and stored there.

The information is also published on your Twitter account and displayed to your contacts there. To see the purpose and scope of data collection and the further processing and use of data by Twitter, as well as your rights and settings options for the protection of your privacy, please refer to the privacy policies of Twitter: <https://twitter.com/privacy>. If you do not want Twitter to immediately link the data collected via our website to your Twitter account, you must log out of Twitter before you visit our website. You can completely block the loading of plug-ins with add-ons for your browser, for instance with the script blocker "NoScript" (<http://noscript.net/>).

### **3. Plug-ins**

On our website further social plug-ins ("plug-ins") can be used by social networks. In order to increase the protection of your data when visiting our website, the plug-ins are not unrestricted, but are only integrated into the page using an HTML link (the so-called Shariff solution from c't magazine). This integration ensures that no connection to the servers of the provider of the respective social network is established when you access a page of our website that contains such plug-ins. If you click on one of the buttons, a new browser window will open and access the page of the respective service provider, where you can, for example, press the Like or Share button (after entering your login details, if needed). For the purpose and scope of data collection and further processing and use of data by the providers on their pages, as well as your rights and settings options for protecting your privacy, please see the privacy policies of the providers in question.

## **IX. Your Rights as a Data Subject**

You have the right to information, correction, restriction of data processing, deletion of personal data, objection, revocation of the data protection declaration consent for the future, and data portability within the scope of the applicable data protection law and insofar as provided therein (as in the case of the GDPR).

You also have the right to enforce your claims in court or to file a complaint with the relevant data protection authority. The competent data protection authority in Switzerland is the Federal Data Protection and Information Commissioner.

## **X. Modification of this Data Protection Policy**

We reserve the right to change this Data Protection Policy at any time without notice. We will inform you of any changes by posting the updated Data Protection Policy on our website. If the Data Protection Policy is part of an agreement with you, we will e-mail you an updated Data Protection Policy or notify you in any other appropriate manner. Any change we make will be effective from the date we publish it on our website.