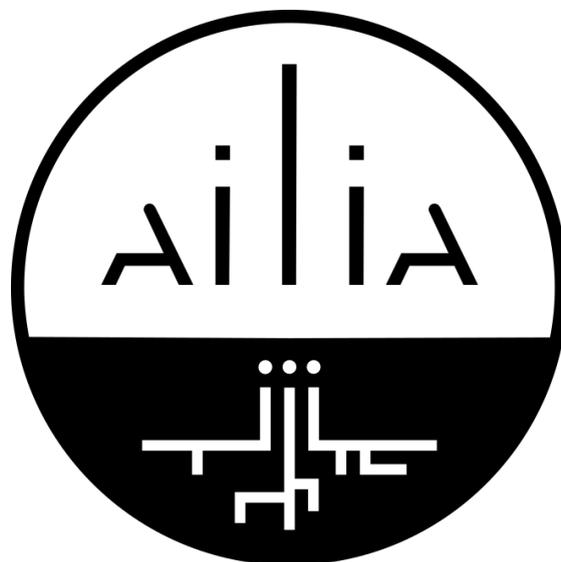


# AiliA: Data Protection Notice and Right of Objection

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alphabetical order

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# Privacy Policy

## Duty to inform about the collection of personal data

The following information is intended to provide you with an overview of the processing of your personal data by AiliA SA (also called «AiliA», «we» or «us») and your rights under data protection legislation.

Specifically, what information is processed and how it is used depends substantially on the services requested and/or agreed upon.

Please note, in particular, that AiliA provides both financial services (e.g., payment transactions) and software development and support services, and that your information may be handled differently depending on the service you use.

Further information and legally binding data protection provisions can also be found in the Terms and Conditions for specific products.

With regard to services offered by third party providers, please also read the relevant legal provisions and data protection policies of such third party providers (e.g. hosting providers) who offer services independently of AiliA SA.

### 1. Who is responsible for data processing and who can I contact?

AiliA SA - Weinberghöhe 27, 6300 Zug, CH  
E-mail: [privacy@takamaka.io](mailto:privacy@takamaka.io)

### 2. What information we collect and use

#### 2.1. In general

We process personal data that we obtain from our customers as part of our business relationship. This Data Protection Notice also applies to persons who do not have any business relationship with AiliA SA, but whose information is processed by AiliA for other reasons (e.g., people who write to us or otherwise contact us, visitors to our websites, recipients of information and marketing communications, contact persons for our suppliers, buyers and other business partners, participants in contests, competitions and customer events, visitors to our locations).

Data is collected and managed for the purposes and within the timeframe indicated below:



Data	Data acquisition mode	Purpose of treatment	Legal basis of the treatment	Data retention time
Technical data, such as IP address, the characteristics of the browser (type, language, plug-ins installed, etc.)	Automatic during the platform visit	Managing our relationships with you  Measures to improve our products, services and technologies  Analysis and statistics	Overriding private interest	30 days maximum
Identity information such as name, address, company name, photograph, email address, social security number, phone number, occupation, and more	Entered by the user when registering to the platform or using the contact forms	Risk management  Fulfilment of legal obligations  Negotiation and stipulation of contracts	Fulfilment of contractual and legal obligations (money laundering)	Up to 10 years after termination of the contractual relationship
Information on services purchased, means of payment used and price paid	Entered by the user while using the platform	Recording financial data for accounting purposes	Art. 958f Swiss Code of Obligations	10 years



Data	Data acquisition mode	Purpose of treatment	Legal basis of the treatment	Data retention time
E-mail, phone number, name, address	Entered by user	Managing our relationships with you  Information and direct marketing  Events	Preponderant private interest	Until request of cancellation
data obtained from third parties, in particular public databases or paid services (e.g. worldcheck)	Reception by third	Managing Risk  Fulfilment of legal obligations	Fulfilment of contractual and legal obligations (money laundering)	Up to 10 years after termination of the contractual relationship



## 2.2. Why do we process your data? (purpose of processing)

We always process your personal data for a specific purpose and only to the extent necessary to achieve that purpose. The main purposes of such data processing are as follows:

### 2.3. Negotiations and contracts

To confirm your identity and evaluate your application (including any need for personal guarantees or other collateral) and to perform compliance checks for legislative or regulatory requirements (e.g., compliance with anti-money laundering and fraud laws and regulations);

### 2.4. Managing Risk

2.4.1. Processing of data to meet Ailia's internal operational requirements for risk management, system or product development, and planning, insurance, audit, and administrative purposes.

2.4.2. Processing of data to provide payment products and services and to ensure their proper functioning, e.g. by conducting appropriate identity checks and making deposits to and withdrawals from your account in accordance with your instructions and the terms of the product in question. The purposes of data processing depend primarily on the specific order. They may include demand analysis, advice and execution of transactions.

### 2.5. Managing our relationship with you

To deal with customer service issues and complaints regarding products and services provided by us and our business partners, to clarify where you are located if we can no longer reach you.

### 2.6. Measures to improve our products, services and technologies

Checking and updating our systems and processes, for market research purposes, to find out how we can improve our existing products and services or what other products and services we might offer.

### 2.7. Information & Direct Marketing

We process personal information to send you information and advertisements, including through push notifications, about products and services that we think may be of interest to you, including products and services offered by us or our business partners. For example, when you sign up for a newsletter or SMS notification service, we process your contact information; in the case of emails, we also process information related to your use of the messages (e.g., whether you open an email and download



the embedded images) so that we can customize our offers to you and improve them overall. To find out more about you as a customer, we can also create profiles, e.g., by analyzing what types of products and services you use, how you would like to be contacted, etc. You may opt out of receiving information (blocking of advertising messages) or revoke any previous consent you may have given to the processing of data for marketing purposes, by sending AiliA SA a written request to this effect, including by e-mail (see information below that follow on the right of objection);

## 2.8. Events

We also process personal data when we hold events for clients (e.g., advertising events, sponsorship events, cultural and sporting events). Such data may include first and last names of participants and/or prospects, their mailing address and/or email address, and possibly other information, such as their date of birth, as circumstances dictate. We process this information for the purpose of executing customer events, but also so that we can contact you directly. For further information, please refer to the relevant conditions of participation. Each customer may opt out of receiving information (blocking of advertising messages) or revoke any previous consent given to the processing of data in the context of such customer events on a general level by sending AiliA a written request to this effect, including by e-mail (see information below on the right of objection);

## 2.9. Fulfilling legal obligations

Compliance with financial, anti-money laundering and tax legislation in relation to the recording and monitoring of communications, disclosure of data to tax, financial regulatory and other supervisory and/or national authorities and for the purposes of crime detection or prevention.

## 2.10. Analyses and statistics

To perform transaction and statistical analysis and similar analysis.

As well as for other purposes of which you will be informed on a case-by-case basis.

In specific cases, we will ask for your consent to process personal data for certain purposes such as transfer to third parties for their marketing purposes. Such consent must be given to us separately and can be revoked at any time.

## 3. Who will receive my data?

We will only disclose your personal information if we are required to do so to comply with our legal or regulatory obligations, for business or administrative reasons, or because you have asked us to do so. This is likely to include disclosure:



- inside the Company;
- to third parties who process personal data on our behalf (IT system providers and other service providers);
- to any government, regulatory agency, enforcement or exchange agency, or court that requires it under applicable law or regulation.

#### 4. Will my data be transferred to third countries or an international organization?

The data collected by the Company is stored in Switzerland. Should we transfer your data outside Switzerland, we will ensure that in the first instance the data is held in countries that provide adequate protection for personal data, such as the member states of the European Economic Area. If this is not possible, we will ensure that the provisions of the applicable legislation on the transfer of personal data to third countries will be complied with in any event.

#### 5. How long will my data be kept?

We retain your personal information as long as it is necessary for the purposes for which we collected it.

In the case of contracts, we retain your personal data at least for the duration of our contractual relationship. Please note that our business relationship has been established to last for years, as a long-term contractual obligation.

We also retain personal data whenever we have a legitimate interest in doing so. This may be the case, in particular, if we need personal data to exercise rights or defend against claims, for archiving purposes, to ensure IT security or as long as the statute of limitations on contractual or non-contractual claims is still running. For example, 10-year statutes of limitations normally apply, but there are also many cases where the statute of limitations is 5 years or even 1 year.

In addition, we retain your personal data for the applicable legal retention period, compliance with retention periods under tax or trade legislation or compliance with the 10-year retention period under money laundering legislation.

In certain cases we will ask for your consent if we wish to retain your personal data for a longer period.

Upon expiration of these periods, your data will be deleted or anonymized.

#### 6. What are my rights under data protection regulations?

Every data subject has the right to be informed about his or her data, the right to have it rectified or erased and to restrict its processing and/or to object to it, as well



as, to the extent applicable, to obtain a transfer of such data. In addition, to the extent applicable to you, there is a right to complain to a competent data protection supervisory authority.

You may revoke your consent to the processing of personal data at any time. Please note that such a revocation will only apply for the future. Any processing carried out before the revocation will not be affected. Such revocation may result in the termination of your business relationship with us.

To exercise your rights, please use the contact details provided in the section [\[Who is responsible for data processing and who can I contact?\]](#)

## 7. Am I required to provide information?

In the course of our business relationship, you must provide us with the personal information we need to initiate and conduct our business relationship and to fulfill our contractual obligations in this regard, as well as the information we must collect by law. Without such data, we will not be able to enter into or perform the contract (in which case we will notify you).

In particular, before we can enter into a business relationship with you, money laundering legislation requires us to verify your identity through your identification documents and to collect and record your full name, place and date of birth, nationality, address and identification document details. In order for us to fulfill this legal obligation, you must provide us with the information and documents required under the Anti-Money Laundering Act and promptly notify us of any material changes in the course of our business relationship. If you do not provide us with the required information and documents, we will not be able to initiate or continue our business relationship.

## 8. Security of data

AiliA SA adopts technical measures such as:

- cryptography
- pseudonymisation
- logging
- access control
- data backup on multiple servers and organizational
- instructions for our employees
- confidentiality agreement
- reviews

adequate to ensure the security of the information collected and processed from unlawful access, misuse, loss, falsification and destruction. Access to your personal information is permitted only to those who need it to perform their duties.

It is generally impossible, however, to completely rule out security risks: some residual risks are most often unavoidable. In particular, since perfect data security cannot be guaranteed for communications via email, instant messaging or similar means of communication, we recommend that you send confidential information



**AiliA SA**  
Weinberghöhe 27  
6300 Zug - CH  
mail: [info@takamaka.io](mailto:info@takamaka.io)

via particularly secure means such as mail or by agreeing on additional safeguards with our technical staff.

## 9. Biometric data

To the extent required by applicable law, we will seek your separate express consent to process biometric data such as the use of your fingerprints or other biometric identification systems for personal identity checks.

Please note, however, that biometric identification systems related to the use of applications such as the Android or IOS wallet depend on special digital services, including mobile apps and/or Wallet Service Providers such as Apple Pay, Samsung Pay that are operated by the relevant service providers and/or operating system operators. In this context, AiliA SA does not have access to your biometric data. Therefore, we recommend that you read the data protection policy of the service provider in question.



## Information on your right to object

### 1. Right to object to the processing of your data for direct marketing purposes

In some cases, we process your personal data to perform direct advertising. You have the right to object, at any time, to the processing of your personal data for the purposes of such advertising; and the same applies to profiling used in direct connection with such direct advertising.

If you object to such processing for direct marketing purposes, we will no longer process your personal data for such purposes.

### 2. Right of objection per specific case

You have the right to object at any time to the processing of your personal data carried out in the public interest or on the basis of a weighing of interests.

If you object, we will no longer process your personal data unless there are compelling and legally protected reasons to do so that outweigh your own interests, rights and freedoms or unless the processing is used for the enforcement, exercise or defense of legal claims. Please note that if you object, we will no longer be able to provide services to you or maintain a business relationship with you.

Your objection, which is unconditional as to form, should be addressed if possible to:

Ailia SA  
Weinberghöhe 27,  
6300 Zug, CH

Or by Email at: [privacy@takamaka.io](mailto:privacy@takamaka.io)

Se utilizzate più di un prodotto o servizio di Ailia SA siete pregati di specificare, nell'esercitare il vostro diritto di opposizione, a quali tipi di trattamenti vi opponete. In caso di incertezze riguardo alla portata della vostra opposizione, ci riserviamo la libertà di contattarvi per chiarire la questione.

If you use more than one Ailia SA product or service, please specify, when exercising your right to object, which types of processing you do object to. In case of uncertainty regarding the scope of your objection, we reserve the right to contact you to clarify the matter.