

General

Last updated: May 25, 2018

This Statement explains how personal data relating to you will be handled by 4Finance AG, P.O. Box 159, 6312 Steinhausen, Switzerland Register number CHE 113.803.925 Tel./Fax: +41433331038.

("SmartMoneyMatch", "4Finance", "4Finance AG", "4Finance Ltd", "we" or "us") and sets out how and why your personal data will be collected and processed by 4Finance AG and on its behalf by its third party service providers.

<https://www.smartmoneymatch.com/contact>

APPLICATION OF THIS STATEMENT

This Statement applies to the way we collect and process your personal data. Personal data will be collected and processed by SmartMoneyMatch when you or a company with which you are connected engage with (our "**Websites**") or otherwise.

We will collect personal data:

- **From you:** for example through our Websites, when you avail of our products and services, when you supply us with services, when you attend one of our events, or an event hosted at our premises and when you correspond with us; and
- **From third-party sources:** including companies or companies with which you are connected and from publicly available resources (e.g., the Companies Registration Office, newspapers and other publications).

As a Visitor or Member of our Services, the collection, use, and sharing of your personal data are subject to this Privacy Policy (which includes our Cookie Policy and other documents referenced in this Privacy Policy) and updates.

Change

SmartMoneyMatch ("we" or "us") can modify this Privacy Policy, and if we make material changes to it, we will provide notice through our Services, or by other means, to provide you the opportunity to review the changes before they become effective. If you object to any changes, you may close your account. You acknowledge that your continued use of our Services after we publish or send a notice about our changes to this Privacy Policy means that the collection, use, and sharing of your personal data is subject to the updated Privacy Policy.

Please ensure that you regularly read the latest version of this page. The first paragraph of the Policy tells you when the last update was made.

Lawful basis and purpose of the processing

We process your personal data purpose-related and according to the legal grounds listed in the federal act of data protection (FADP) on <https://www.admin.ch/opc/en/classified-compilation/19920153/index.html>.

- Legitimate interest

Most of our processing activities are based on a legitimate interest of our association or a third party. We follow a process to carefully measure our interest against yours in a detailed legitimate interest assessment. As far as the purpose of the processing allows, your data is processed pseudonymized or anonymized.

- To fulfill contractual or pre-contractual obligations

Your data will be processed to provide services to you within the framework of our business contract. The purpose of the processing is linked to the contractual agreements between yourself and us alongside related documentation, where additional information can be found.

We may also process your data:

- Based on your consent

To the extent you have explicitly consented to the processing of your data such consent constitutes a lawful basis for the data processing until you withdraw your consent. You have the right to withdraw your consent at all times.

- Based on legal and regulatory requirements
- Based on public interest
- Based on protecting a vital interest of the data subject or another natural person

Information we collect

We may collect information about you when you use this Site or when you apply for or use other services offered by 4Finance AG in the following ways:

- We may also collect personal information about you as a result of us recording certain telephone calls which our employees may have with you, and store those recordings, to satisfy our legal and regulatory obligations or for 4Finance AG Business purposes.
- If you register to use the password-protected or country-specific portions of our site, we will ask you to provide us with certain information about yourself. This information may include your name, company name, title, address, country of residence, e-mail address, telephone number, account number, assets, income and financial situation.

We use such information about you to verify your identity and eligibility to receive certain products or services, to provide information to you about products and services that we believe may be of interest to you, and to respond to your requests for information. We may also use cookies or web bugs on such portions of our Site to collect Usage Information, and to facilitate your movement within the Site (e.g., remembering passwords during a session and recording the country you may have elected as your country of residence). We may collect information concerning the attachments you open within newsletters that are sent to you electronically. We may also collect personal information about you from applications, forms or questionnaires you may complete or agreements you enter into with us or in the course of your establishing or maintaining a customer relationship with us, and your transactions with us or others who provide services to us. If you decline to provide us with the personal information we require, then we may not be able to make our services available to you.

Security of data transfers

Please note that data that is transported over an open network, such as the Internet or email, may be accessible to anybody.

Information we obtain about you from other sources.

We also process data that we haven't obtained directly from you. This procession occurs whenever a user provides us with information, or we collect information from other sources. In such cases, we process the respective data within the scope of the fulfillment of our contractual obligations towards the respective user and to safeguard our legitimate interests, while giving due consideration to your interests.

Data from address book uploads

- First and last name
- Email addresses
- Job title and company name
- City and country
- Phone number (or other contact information)

Intended purpose

We make it possible for users to expand their network on SmartMoneyMatch and invite non-users. When a user makes use of this feature, personal data is processed on their behalf and under their responsibility. SmartMoneyMatch makes appropriate functions available to users to manage the data processed on their behalf and in particular to delete this data. Users have the right and the option to cease the processing of personal data on their behalf at any time.

Source of the data

Users who want to expand their personal network and already have access to your data can upload this information to SmartMoneyMatch.

4Finance AG cannot guarantee the confidentiality of any communication or material transmitted via such open networks. When disclosing any personal information via an open network, you should remain mindful of the fact that it is potentially accessible to others, and consequently, can be collected and used by others without your consent. In particular, while individual data packets are often encrypted, the names of the sender and recipient are not. A third party may, therefore, be able to trace an existing bank account or relationship or one that is subsequently created. Even if both the sender and recipient are located in the same country data may also be transmitted via such networks to other countries regularly and without controls, including to countries that do not afford the same level of data protection as your country of domicile.

Your data may be lost during transmission or may be accessed by unauthorized parties. We do not accept any liability for direct or indirect losses as regards the security of your data during its transfer via Internet. Please use other means of communication if you think this is necessary or prudent for security reasons.

Protection, Processing, and Use of Personal Data

We use your personal information to enhance the quality of the products or services we wish to provide to our customers or in connection with your investments with or through us and to maintain contact details for those with whom we deal. We restrict access to personal information about you to those employees, agents or other parties who need to know that information to provide products or services to you. We maintain physical, electronic and procedural safeguards to guard your personal information, including firewalls, individual passwords and encryption and authentication technology.

We do not use for purposes other than as set out above, or disclose to any third party any personal information about our customers or former customers, except with such customer's consent or as otherwise permitted or required by law. In cases where we believe that additional products and services may be of interest to you, we may share your personal information with affiliates of 4Finance AG to the extent permitted by applicable law. We may also disclose this information to firms that perform services on our behalf to the extent permitted by applicable law. These service providers are required to treat the information confidentially and use it only for the purpose for which it is provided. Certain jurisdictions may have more stringent privacy requirements that will prevent disclosure of your personal information to any other person or entity, including affiliates. We will retain your personal information by applicable data protection laws for so long as it is needed.

What rights can you exercise?

You have legal rights available to you with regard to data access, rectification, erasure, restriction of processing and objection to processing, as well as the right to data portability, amongst others. Also, you can withdraw any consent you may have given to data processing at any time, and have the right to lodge a complaint with the Swiss supervisory authority.

- **Right to object**
You have the right to file an objection at any time to any processing of your personal data.
- **Right of access**
You can request to receive clear and transparent access to information regarding the processing of your personal data.
- **Right to rectification**
You have the right to demand that we correct any of your personal data that is incorrect and complete any personal data that is incomplete.
- **Right to erasure**
In certain cases, we are obliged to delete your personal data once you have requested this.
- **Right to the restriction of processing**
In certain cases, you can demand that restrictions be placed on the processing of your personal data.
- **Right to data portability**
Any data disclosure report you've requested can also be sent to third parties.
- **Right to withdraw consent**
You can withdraw any consent you have given to data processing at any time.
- **Right to lodge a complaint**
You have the option of submitting an official complaint to the supervisory authority.

Period saved for and right to object.

We save this data until the respective user either deletes this data themselves or their user account is deleted. The invited non-users can select an opt-out link in the invitation email to object to the sending of further invitations or invitation reminders to their respective email address.

Cookie policy

All websites of 4Finance AG use cookies, i.e., Google Analytics for statistical purposes and to improve the user experience.

What is a cookie?

Cookies are small files which are stored on your computer to keep track of your visit to the website and your preferences; as you move between pages, and sometimes to save settings between visits. Cookies help the builders of websites gather statistics about how often people visit certain areas of the site and help in tailoring websites to be more useful and user-friendly. For more information on cookies, please visit the Swiss Information Commissioner's Office website (<http://www.edoeb.admin.ch/dokumentation/00153/00262/00264/index.html?lang=en>) for a thorough and detailed description of the purpose and usage of cookies and information on how to control and delete cookies from your browser.

How are cookies used on this website?

- The cookies we store on 4inance AG websites are used to:
- Track the number, and type of visits to the website, and its pages

- For us to determine which parts of the site are working well, and which need improvement, store your preferences, for screen layouts, including your preferred language and country, gather statistics on the number of users and their usage patterns, improve the speed and performance of the website pages. Third party cookies and partners Occasionally we will use third-party plug-ins and components to improve the user's experience. These components may also use cookies for similar purposes. Neither the third party nor 4Finance AG has access to any data collected by the other via cookies.

Deleting Cookies

You may opt-out of cookies (and the use of this website) at any time, by deleting the cookies that were set by the site. Deleting cookies can be done via the settings of your internet browser and delete all cookies. To find how to manage and delete cookies, please visit the Information Commissioner's Office website (<http://www.edoeb.admin.ch/index.html?lang=en>).

Links

This Site may contain hyperlinks to other websites that are not operated or monitored by 4Finance AG. These other websites are not subject to this Policy, and we are not responsible for their content or for the policy they apply to the treatment of personal data. We recommend that you read the policy used by these websites and check how these websites protect your personal data and whether they are trustworthy.