
PRIVACY NOTICE

Youballin SA (hereinafter the "**Company**", "**we**", "**us**", "**our**") collects Personal Data (as defined below) in compliance with applicable laws and regulations, in particular the Swiss Federal Data Protection Act 2020, as of 1 September 2023 ("**FDPA**"). The Company owns the intellectual property rights to its website and platform (collectively the "**Platform**"), as well as its content.

The Platform, its contents, texts, documents, trademarks, logos, names, images, graphics, arrangement and adaptations are protected by the Federal Act on Copyright and Related Rights (Copyright Act, CopA) (Bundesgesetz über das Urheberrecht und verwandte Schutzrechte, URG) of 9 October 1992 and subsequent amendments. Intellectual property may also be protected by other applicable laws.

Definitions

In accordance with the FADP, the definitions below have different meanings:

- "**Personal Data**" includes any information relating to an identified or identifiable natural person.
- "**Data Subject**" is an identified or identifiable natural person.
- "**Processing**" shall mean any operation or set of operations, whether or not by automatic means, which applies to (groups of) personal data, including collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, diffusion, communication by transmission, dissemination or any other form of disclosure, alignment or combination, restriction, erasure or destruction.
- "**Sensitive personal data**" are Personal Data worthy of special protection: (i) data concerning religious, philosophical, political or labor unions, (ii) data concerning health, the intimate sphere or racial or ethnicity, (iii) genetic data, (iv) biometric data that uniquely identify a natural person, (v) data concerning administrative and criminal prosecutions and sanctions, (vi) data concerning social assistance measures.
- "**Navigation data**" are acquired by the computer systems and procedural software used to operate this site during their normal operation. This is Personal Data whose transmission is implicit in the use of Internet communication protocols. This category includes IP addresses, addresses in URI/URL (Uniform Resource Identifier/Locator) notation, the time of the request, the type of request, the size of the outgoing packet, the status of the response given by the server (received, error, etc.) and other parameters relating to the operating system.

Data controller

The data controller is Youballin SA.

Type of Personal Data acquired, purpose, legal basis and data retention

The Personal Data is collected and managed for the purposes and within the retention period indicated below:

Data	Mode of data acquisition	Purpose of the processing	Legal basis of the processing	Data retention time
Technical data, such as IP address, browser characteristics (type, language, installed plug-ins, etc.).	Automatic during the visit of the website	Visit of the website by the user	Fulfillment of contractual obligations	10 years
First and last name, username, e-mail, date of birth.	During the registration on the Platform	Registering on the Platform	Fulfillment of contractual obligations	10 years
Personal Data for the fulfilment of the service (e.g. e-mail address, first name, last name, location, birthdate and other identification information).	Upon use of the service and or on explicit request	Marketing purposes	Consent	More than 10 years

Only with respect to marketing communication via e-mail your Personal Data could be stored for more than 10 years, if you do not wish to have your Personal Data used by us to promote or market our services, at any time you can opt-out by clicking the "unsubscribe" link on any e-mail you receive from us.

To whom will the data collected be communicated?

We will only disclose your Personal Data if we are obliged to do so in order to comply with our legal or regulatory obligations, for business or administrative reasons or because you have asked us to do so. The Company may disclose Personal Data to the following entities:

- to third parties who process Personal Data on our behalf (IT system or social-network providers and other kind of service providers such as consultants); or
- to any government, regulatory agency, enforcement or exchange body or court that so requires under applicable law or regulation.

Can the Company transfer data to a third country and/or international organizations?

The Company may engage one or more third-party providers that transfer Personal Data outside the European Economic Area ("EEA"). In this case, the Company makes sure that all necessary and appropriate measures are taken. Such measures include official Standard Contractual Clauses ("SCCs"), Binding Contract Rules ("BCR") or any other instrument to safeguard the Personal Data protection of the Data Subjects outside the EEA. Where applicable, the Company will ensure that third-party providers will rely on the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF).

Not automated individual decision making, including profiling

The Company does not take any decision based solely on automated processing and that has a legal consequence or a considerable adverse effect on the Data Subject, including profiling, under article 21 of FDPA. It is understood that the Customer will always comply with article 21 of the FDPA, namely: a) will inform the Data Subject about any decision that is based exclusively on automated processing and that has a legal consequence for or a considerable adverse effect (such as refusing to enter into a contract); and b) on request, will allow the Data Subject to express their point of view and that the automated individual decision be reviewed by a natural person.

Children Personal Data

We do not address the Platform and our services to children under the age of 16. We do not intend to, or knowingly, collect Personal Data from children under the age of 16.

Furthermore:

- if a Data Subject is under the age of 16, such individual shall not use the Platform, or provide us with any Personal Data either directly or by other means;
- if a minor has provided Personal Data to us, the Company shall ensure the child's parent or the legal representative of such child to contact us and request the deletion of the Personal Data from our systems; and
- if we learn that any Personal Data we collect has been provided by a child under the age of 16, we will promptly delete that personal information.

How we protect your personal data

The security of your Personal Data is important to us and we use various technical and organizational measures to protect it.

We are committed to safeguarding and protecting Personal Data by taking appropriate measures against accidental or unlawful destruction, loss, alteration or unauthorized disclosure.

Rights of the interested parties

Under the FADP, Data Subjects have a number of rights in relation to their Personal Data. Data Subjects have the right to request access, correction or deletion of such information, the right to limit or oppose the processing and, under certain circumstances, the right to data portability.

If a Data Subject has given his or her consent to the processing of his or her Personal Data, he or she has the right to revoke this consent at any time.

If you wish to exercise the above rights, please send an e-mail to the following address info@youballin.com.

We try to answer you within a maximum of one month, although we reserve the right to extend this period for more complex requests. We also reserve the right to charge a reasonable administration fee for any manifestly unfounded or excessive requests for access to Personal Data and for any additional copies of Personal Data requested.

You may also contact the Swiss data protection authority should our reply do not satisfy you:

- www.edoeb.admin.ch/edoeb/de/home/deredoeb/kontakt.html
- tel. +41 58 464 94 10, info@edoeb.admin.ch