



## **Privacy Notice and Data Confidentiality**

We take the protection of your personal information very seriously and strive to make the use of our services secure. We are also committed to observing all laws related to the protection of personal information.

This Privacy Policy describes which of your data we collect and use, the purposes for which we do this, and how we protect your personal information.

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### 1. Area of applicability

This Policy applies to myWorld membership and access to and use of the WTN Pay website accessible at <https://wtnpay.com>. Please note that this Policy also applies to other WTN Pay websites, including those operated in other countries or directed to individuals residing in other countries, and in regard to which other privacy and data protection laws may apply.

As we continue to develop our websites to improve our services, we may need to occasionally amend and revise this Privacy Policy. Should this be the case, we will inform you in advance and direct you to the updated version of this privacy policy. Your continued participation in the Rewards Program and access and use of the WTN Pay website following delivery of this notice will be deemed acceptance of the amended and revised Privacy Policy. You can also determine whether changes to this Privacy Policy have been made by reviewing its date of last update that appears at the top of this document.

### 2. What personal information is collected

Personal information we collect about you includes details of any personal or material circumstances that we receive from you in association with your WTN Pay membership. This includes your member ID, your full name, title, gender, date of birth, postal address, address coordinates (longitude and latitude), your telephone number(s), fax number, e-mail address, bank details and data regarding your shopping behaviour associated with your existing WTN Pay membership (purchase date, place of purchase, time of purchase, purchase amount, currency, shopping cart, industry, type of purchase – online/offline, from SME, from key account, with voucher, with WTN Pay APP). This information may be attributed to you directly or indirectly (e.g. associated with your membership number).

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### 3. Cookies and web tracking

Our websites use cookies, which are small text files saved on your computer that can be accessed again later. Cookies enable you to log in to use our services and help us customise our website for you. You can use parts of our website without registering or logging in. Even in such cases, certain information will be recorded automatically to enable us to collect statistical data regarding the use and efficiency of our website and to adapt it to suit the needs of our users. We therefore record and process information about your IP address, the time and length of your visit, the number of visits, your use of online forms, your search settings, your view settings, and your favourites setting on our website. Cookies are stored for a varying length of time. The majority of the cookies we use are deleted automatically as soon as you leave the website ("session cookies"). We make a record of every time our website is accessed and every time a user opens one of the files stored on the website. The cookies set by us are solely for our information and are processed by WTN Pay Canadá, 10 Carlson Ct, Etobicoke, ON M9W 6L2, Canadá, on behalf of WTN Pay Retail Services Canada Inc. to evaluate the information collected.

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We use JavaScript to record your usage behaviour on our website in order to adapt our web services to the needs of our users. In doing so, we determine your browser type, location, time, and duration of your use, URL, page name, and the website that referred you to our page. You can stop us from recording this data by disabling JavaScript directly in your browser.

We also use the following tools:

#### Google Analytics

This is a web analytics tool provided by Google Inc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA, hereinafter referred to as "Google", to record your online activities on our site and to determine how many users are visiting us, what contents of our page are viewed, and how many times. The evaluation is done anonymously. Google Analytics cookies, including the Google Analytics tool "anonymous IP address" and usage data, are usually transmitted to a Google server in the United States and stored there. For further information, please refer to <https://support.google.com/analytics/answer/6004245?hl=en>. Google Analytics offers the option to opt out of data collection through access to <https://support.google.com/analytics/answer/6004245?hl=en>.

#### Google AdWords

This is used to record website visits for advertising purposes (remarketing) in Google and in the Display Network. When you visit a website, your browser saves cookies that allow you to be recognised as a visitor when you visit websites that belong to Google's advertising network. On these pages, ads that relate to content that you previously viewed on other websites that use Google's remarketing function can be presented to you as a visitor. You can opt out of data collection by Google AdWords on the website <http://www.google.com/settings/ads>.

#### Google AdWords conversion tracking

We use this to generate conversion statistics that measure the effectiveness of our online advertising campaigns. The conversion tracking cookie is set when a user clicks on an ad placed by Google. According to Google's privacy policy, no personal information is processed in terms of the foregoing. If you do not wish to participate in tracking, you can opt out of this usage by disabling the Google conversion tracking cookie in the usage settings of your Internet browser.

#### Salesforce Marketing Cloud

We use this tool to record your behaviour on our website to optimise our product offering. It helps us determine how many users visit us in the Internet, which content of our website is viewed, and how often. The evaluation is done anonymously and is used automatically by predictive intelligence to improve the presentation of our product offering. For registered members, the user-related behaviour on the website is recorded to improve the user experience and is used to display the relevant content. Salesforce cookies are usually delivered to a Salesforce server in the United States and stored there.

#### Microsoft Application Insights

Application Insights is a service from Microsoft that enables us to monitor and improve the performance and usability of the Website. The service stores and analyses anonymised telemetry data (Number of pageviews, page load times, exceptions encountered and tracing of AJAX dependencies). The cookies (-ai\_user, ai\_session) are usually transmitted to a Microsoft server in the USA and stored there.

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#### Functional Cookies

Due to the dynamic structure of our website, additional cookies only for short-term use may be used, particularly for temporary promotions. These cookies are not personalised, but are exclusively functional in nature. To offer you full transparency, we use an external provider who regularly checks our websites and the respective active list can be pulled up here.

Please note that the standard Internet browsers accept cookies according to the default settings. You can also set your browser to refuse all or certain cookies or to ask you before a new cookie is received.

The relevant instructions are provided by most browsers under the “Help” menu item in the menu bar. There you will also find out how to delete the cookies you have already received.

Please note that you may not be able to use all the features of our websites if you do not accept any or only some cookies. By using our website, you agree that the cookies and tools mentioned above may be used.

#### 4. Conversion measurement using the Facebook pixel

With your consent, we use the “Facebook Pixel” by Facebook Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA (“Facebook”) on our website. This is a cookie, i.e. a small text file that is stored on your computer and can be accessed again later. With its help, actions of users can be tracked after they have seen or clicked on a Facebook ad. This allows us to track the effectiveness of Facebook ads for statistical and market research purposes. The data collected in this way is anonymous to us, in other words, it does not provide any information on the identity of the users. However, the data is stored and processed by Facebook, so that a connection to the respective user profile is possible and Facebook can use the data for its own advertising purposes, according to the Facebook Data Policy (<https://www.facebook.com/about/privacy/>). You can allow Facebook and its partners to display ads on and off Facebook. A cookie may also be stored on your computer for these purposes. By using the website, you agree to the use of the visitor action pixel.

You may withdraw your consent to use the visitor action pixel at any time. If you wish to withdraw your consent, please send a written declaration (by letter, fax, or e-mail) to the following address:

WTN Pay Canadá, 10 Carlson Ct, Etobicoke, ON M9W 6L2, Canadá E-mail: [canada@wntpay.com](mailto:canada@wntpay.com)

## 5. Sharing

The website contains “Share” buttons for the social networks Facebook, 1601 South California Avenue, Palo Alto, CA 94304, USA, Twitter Inc., 795 Folsom St., Suite 600, San Francisco, CA 9410, and Instagram, Menlo Park, CA 94025. In addition, there is also a “Share” button for e-mail. The “Share” buttons can be recognised by their respective logos.

All “Share” buttons are set up in compliance with privacy requirements. A direct connection between your browser and the server of the operator of the respective social network is established only when you click on the respective “Share” button on this website (and only then). According to the operators of the social networks mentioned, no personal information is collected by the social networks without a click on the respective “Share” button. Only data of logged-in members, including the IP address, is collected and processed. If you do not wish to associate your visit to our website with your user account of the respective social network, please log out of the user account of that social network.

Please note that, as the provider of the website, we do not receive any information regarding the content of the data transmitted and its use by the social networks. For more information about the use of data by the social media networks, please refer to their respective privacy policies.

## 6. Use of data

We use your personal information only in compliance with applicable laws. We collect and process the personal information that you provide to us when you register as a WTN Pay member and in the course of your membership, solely as part of our fulfilment of our contractual obligations to you and administration and operation of such program, and furthermore, only in cases where you have given us your consent.

For example, we use your personal information to communicate with you to verify your identity and provide you with your personal member area on the WTN Pay website, to process your inquiries and orders, and provide you with our services. In addition, we also use your personal information to determine and allocate to you the Benefits to which you are entitled from participating in the Rewards Program.

If you have given us your separate consent to do so, we will also use your personal information for promotion purposes, such as to inform you of offers and promotions by our Loyalty Merchants.

## 7. Data security and transferring data

To protect your personal information, we use security measures that include encryption for data transmission (SSL encryption), fire- walls, hacker defence programs, and other conventional security measures.

For e-mail communications, however, we cannot guarantee the security of any unencrypted data. You consent to the use of this unsecure means of communication accept the risks associated therewith.

Your personal information is basically used by WTN Pay. as the contractual partner of the Members that use WTN Pay as their service provider. However, your personal information may be shared with or passed on to certain service providers listed below and to WTN Pay parent, affiliates and subsidiaries within the WTN Pay.

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We use certain service providers to handle our services, to communicate with members, and to manage our online presence.

We certify that we have selected these service providers carefully to ensure that the data is processed lawfully and securely. In addition, we have also obligated the service providers to use your personal information only according to our instructions for specific purposes and in compliance with applicable privacy laws. Any other use of personal information by these service providers is strictly prohibited.

For purchases made on the website, the following data may be passed on to the payment service provider named in the respective payment process using the 3D Secure v2 process as part of fraud prevention when a selected payment method is processed by an external payment service provider: First name and last name, birthday, gender, last date on which changes were made to the member ID (limited to billing and delivery address changes), changes to account data or user data, registration date, whether a password for the member ID exists and when the password was last changed, data on purchasing activity on our website (number of payment attempts in the last 24 hours, number of payment attempts in the last year, number of purchases in the last 6 months), company data (company wording and tax identification number), contact data (email address, cell phone number, telephone number).

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In addition, we will share your personal information within the WTN Pay Group, provided that this is necessary for the purpose of electronic processing and management or for the provision of a specific service for you or administration or management of the Rewards Program. The companies of the WTN Pay Group are also obligated to us to use your personal information only for the specific purpose in each case and in compliance with applicable privacy laws. In particular, the services concerned include contacting you by electronic messages (e.g. e-mail, SMS, or push notification), by fax, by telephone, or by letter informing you about products and promotions of the Loyalty Merchant, identifying offers that suit your interests, conducting satisfaction surveys, operating hotlines, and processing transactions. If and to the extent that this is necessary for the provision of a specific service for you, we will provide the Loyalty Merchant with the personal information required for this purpose. The Loyalty Merchants in turn are obligated to us to use your personal information only for the specific purpose in each case and in compliance with applicable laws. The WTN Pay Group operates internationally. Our business activities, management structures, and our technical infrastructure transcend national borders. Therefore, we also transfer your personal information abroad. This includes the transmission of your personal information to the member states of the European Economic Area, to Switzerland, and to other countries with adequate privacy and data protection. However, if your personal information is to be transferred to countries other than those just mentioned, we will first ask for your separate consent. We will not share your personal information with anyone other than the above-mentioned Loyalty Merchants, service providers, and WTN Pay Group companies, unless you have given us your consent.

#### 8. Right of withdrawal, right of access, right of correction and contact details

You have the option, at any time, to withdraw your consent regarding the future use of your personal information on this website without stating a reason. By withdrawing your consent, we no longer shall have the right to use your personal information for future endeavours. If you wish to withdraw your consent, please send a written declaration to that effect (by letter, fax, or e-mail) to the following address:

WTN Pay Canadá, 10 Carlson Ct, Etobicoke, ON M9W 6L2, Canadá

E-mail: [canada@wtnpay.com](mailto:canada@wtnpay.com)

Please contact us at this address if you have any questions regarding the use of your personal information or if you wish to access, update or correct your personal information in our custody or under our control.

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