



## **Privacy Notice and Data Confidentiality**

We take the protection of your personal data very seriously and strive to make using our services safe. We are also committed to complying with all laws related to the protection of personal data. This Privacy Policy describes what data we collect and use, the purposes for which we do so, and how we protect your data.

## Content

1. Coverage
  2. Data collected
  3. Cookies and web tracking
  4. Measuring conversion of user actions with the Facebook pixel
  5. Share
  6. Data usage
  7. Data security and disclosure
  8. Protection of children's privacy
  9. Right to cancellation, information, change of data and contact details
  10. Contact us
1. Coverage

This Policy applies to WTN PAY membership and the wtn pay website available at <https://wtnpay.com>. Please note that this refers to additional WTN Pay websites, including those in other countries, to which other data protection regulations may apply.

As we continue to develop our websites to improve our services, we may need to amend and revise this Privacy Policy. If this is the case, we will inform you in advance and request your approval separately.

### 2. Data collected

The personal data we process about you includes any personal circumstances or materials that we receive from you in association with your WTN Pay membership and which can be attributed directly or indirectly to you (for example, through your membership number). This includes your Member ID, your full name, title, gender, date of birth, postal address, telephone number(s), fax number, email address, banking details and data about your purchasing habits associated with your WTN Pay membership (purchase date, purchase location, purchase time, purchase amount, currency, shopping cart, industry, purchase type - online/offline, in SME, in key account, with coupon, with APP WTN Pay).

### 3. Cookies and web tracking

We use cookies on all our websites, which are small text data stored on your computer that can later be retrieved. Cookies allow your registration in our services and the personalization of our website.

You can also use part of our website without registering or logging in. In this case, certain information will also be automatically recorded to allow us to compile statistical data on the use and efficiency of our website and to adapt it to the needs of our users.

Therefore, we record and process information about your IP address, the time and duration of your visit, the number of visits, your use of online forms, your search settings, your view settings and your favorites settings on our website. Cookies are stored for different periods.

Most of the cookies we use are automatically deleted as soon as you leave the website ("session cookies"). We log each time our website is accessed and each time a user opens one of the files stored on the website.

Cookies set by us are for our information only and are processed by

WTN Pay United States 2500 W International Speedway Blvd, Daytona Beach, FL 32114 E-mail: [usa@wtnpay.com](mailto:usa@wtnpay.com) to evaluate the information collected.

We use JavaScript to record your usage behavior 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 use, URL, page name, and the website that referred you to our page.

You can prevent us from recording this data by disabling JavaScript directly in your browser.

We also use the following tools:

#### Google Analytics

This is a web analysis tool of Google Inc., 1600 Amphitheater Parkway Mountain View, CA 94043, USA, hereinafter "Google", to record your online activities on our site and determine how many users are visiting us, what contents of our page are viewed and how often.

The evaluation is carried out anonymously. Google Analytics cookies, including the Google Analytics tool "anonymous IP address" and usage data, are generally transmitted to a Google server in the United States and stored there. For more information, see

<https://support.google.com/analytics/answer/6004245?hl=de>

<https://tools.google.com/dlpage/gaoptout?hl=de>

Google Analytics gives you the option to prevent data collection by visiting:

<https://tools.google.com/dlpage/gaoptout?hl=de>

## Google AdWords

This is used to record visits to the website for advertising (remarketing) purposes on Google and the Display Network.

When you visit a website, your browser stores cookies that allow you to be recognized as a visitor when you visit websites that belong to the Google advertising network.

On these pages, you may be presented with advertisements that relate to content you have previously viewed on other websites using Google's remarketing feature.

You can opt out of data collection by Google AdWords on the website <http://www.google.com/settings/ads>

## Google AdWords Conversion Tracking

Using Google AdWords Conversion Tracking, we generate conversion statistics that measure the effectiveness of our online advertising campaigns.

Cookies for conversion tracking are generated when a user clicks on one of the ads placed by Google.

According to Google's data protection regulations, no personal data would be processed. If you do not wish to be tracked, you can disable this use by disabling .

Google Conversion Tracking cookies through your browser settings.

## Salesforce Marketing Cloud

When using Salesforce Marketing Cloud, we record your behavior on our website to optimize our offer.

Using this information, we determine how many users visit us on the Internet and how often specific content is viewed.

This evaluation is carried out anonymously and is applied automatically through predictive intelligence to improve the representation of the offer.

With registered members, user-related behaviors on the website are recorded to improve user experience and used to display relevant content.

Salesforce cookies are typically transmitted to and stored on a Salesforce server in the United States.

## Microsoft Application Insights

Application Insights is a service from Microsoft that allows us to monitor and improve website performance and usability.

The service stores and analyzes anonymized telemetry data (number of page views, page load times, exceptions found, and AJAX dependency tracing).

Cookies (-ai\_user, ai\_session) are usually transmitted to a Microsoft server in the USA and stored there.

## Functional Cookies

Due to the dynamic structure of our website, additional cookies may be used for short-term use only, especially for temporary promotions.

These cookies are not personalized, but exclusively functional in nature.

---

To provide you with full transparency, we use a third-party provider who regularly checks our websites and the respective active list can be accessed [here](#).

Please note that standard internet browsers accept the use of cookies according to their configuration standards. You can set your browser to refuse the use of all or some specific cookies, or even to ask you to accept before using a new cookie.

Most browsers offer this option in the "Help" bar in their menu.

There you can also learn how to delete all cookies that have already been registered.

Please note that there is a possibility that you will not be able to use all the functions of our website if you do not accept the use of any cookies. By using our website, you agree to the use of the cookies mentioned above.

#### 4. Conversion Measuring of Users' Actions with Facebook Pixel

With your consent, we use the "Facebook Pixel" of Facebook Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA ("Facebook") on our website. This is a cookie, that is, a small text file that is stored on your computer and can be accessed later.

With its help, users' actions can be tracked after they have viewed 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, that is, it does not provide any information about the identity of the users.

However, the data is stored and processed by Facebook, so a connection to the respective user profile can be established and Facebook can use the data for its own advertising purposes, in accordance with the Facebook Data Policy (<https://www.facebook.com/about/privacy/>).

You can allow Facebook and its partners to show 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 can withdraw your consent to use the visitor action pixel at any time. If you wish to withdraw your consent, please send a written statement (by letter or email) to the following address:

#### 5. Share

The website contains "Share" buttons for 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 email electronic. The "Share" buttons can be recognized by their respective logos.

All "Share" buttons are configured in compliance with data protection requirements.

A direct connection between your browser and the server of the respective social network operator is established only when you click on the respective "Share" button on this website (and only then).

According to the operators of the aforementioned social networks, no personal data is collected by the social networks without clicking on the respective "Share" button.

Only data of logged in members, including 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.

We would like to point out here that, as the provider of the website, we do not receive any information about the content of the transmitted data and its use by social networks.

For more information on the use of data by social networks, please consult the privacy policies of the mentioned social networks.

## 6. Data usage

We use your personal data only in accordance with legal regulations.

We collect and process the personal data that you provide to us when you register as a member of WTN Pay and during the course of your membership, solely as part of the fulfillment of our contractual obligations to you and, furthermore, only in cases where you expressly give us your consent.

For example, we use your data to contact 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 to provide you with our services.

In addition, we also use your data to determine and assign you the benefits to which you are entitled by participating in the Rewards Program.

If you have also given us separate consent to do so, we will also use your data to inform you about offers and promotions from our Loyalty Merchants, for example.

## 7. Data Security and Disclosure

To protect your data, we use measures including encryption for data transmission (SSL encryption), firewalls, hacker defense programs and other state-of-the-art security measures.

For communication by email, we can only guarantee data security in accordance with the current state of the art.

Your data is basically used by WTN Pay USA. as the contractual partner of members who use WTN Pay as their service provider.

However, your personal data may be shared with/transferred to certain service providers listed below and within the WTN Pay Group.

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

We certify that we have carefully selected these service providers to ensure that data is processed legally and securely. In addition, we have also obliged the service providers to use your personal data only in accordance with our instructions for specific purposes and in accordance with US data protection regulations.

Any other use of the data by these providers of services is excluded.

For purchases made on the website, the following data may be transferred 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 a third-party payment service provider: first and last name, date of birth, gender, date of last modification of member ID (limited to billing and delivery address changes), changes to account data or customer data username, registration date, whether a password exists for the member ID and when it was last changed, data about 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 details (company name and tax identification number), contact details (email address, mobile phone number, telephone number).

In addition, we will share your personal data ensuring the required data security measures within the WTN Pay Group, whenever it is necessary for the purpose of electronic processing and management or for the provision of a specific service to you.

The companies of the WTN Pay Group are also obliged to us to use your personal data only for the specific purpose in each case and in accordance with US data protection regulations.

In particular, the services involved include contact via messages electronic (for example, email, SMS or push notifications), by fax, by telephone or by post informing 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 this is necessary for the provision of a specific service to you, we will provide the Loyalty Trader with the personal data necessary for this purpose.

Loyalty Merchants, in turn, are obliged to us to use your personal data only for the specific purpose in each case and in accordance with US data protection regulations.

7

At the time of registration, by clicking the submit button, you agree to the Terms of Use and this Privacy Policy and authorize the WTN Pay Group to contact you on the telephone or mobile number you entered regarding the Rewards Program using technology automated telephone, including autodialers, prerecorded messages and text messages, even if your telephone or mobile number is currently on any state, federal or corporate "Do Not Call" list, and you are not required to consent as a condition of membership .

#### 8. Right of withdrawal, information, data changes and contact details

You have the option, at any time, to withdraw your consent regarding the future use of your personal data used on this website without giving a reason.

By withdrawing your consent, we will no longer have the right to use your data. If you wish to withdraw your consent, please send a written statement (by letter or email) to the following address:

WTN Pay United States  
2500 W International Speedway Blvd, Daytona Beach, FL 32114  
Email: [usa@wtnpay.com](mailto:usa@wtnpay.com)

Please contact us at this address if you have any questions about the use of your personal data or if you wish to update or correct your data.

#### 9. Protection of children's privacy

We strive to protect the privacy needs of children under 13 years of age and encourage parents to actively participate in their children's online activities.

We comply with the requirements of the Children's Online Privacy Protection Act (COPPA) and other relevant laws. Our site is not directed to and is not intended for children under 13 years of age, and we will not knowingly collect personally identifiable information from them.

If we discover personal data about a child through an adult-oriented site, we will delete that data.

## 10. Contact

If you have any questions about this privacy policy, you may contact us using the following information:

WTN Pay United States  
2500 W International Speedway Blvd, Daytona Beach, FL 32114  
Email: [usa@wtnpay.com](mailto:usa@wtnpay.com)

Last update april 2024