

# DATA PRIVACY POLICY

We take the protection of your personal data very serious and strive to make the use of our services secure. We are also committed to implementing and complying with data protection principles and all relevant provisions of the Personal Data (Privacy) Ordinance (PDPO), Cap. 486 of the Laws of Hong Kong. This Data Privacy Policy describes which of your data we collect and use, the purposes for which we do this, and how we protect your data.

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### 1. Area of applicability

This Policy applies to your operation as a Lyonet Marketer and to the websites available at <http://www.lyconet.com> and [www.lyoness.com](http://www.lyoness.com). Please note that this refers to other Cashback World websites, even to those of 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 Data Privacy Policy. Should this be the case, we will inform you in advance and ask for your separate approval. The existing regulations will apply to you until we received the said approval.

### 2. Which data we recorded

Personal data about you that we process includes any information about material or personal circumstances that we obtained from you in the course of your operation as a Lyonet Marketer, and that may be attributed to you directly or indirectly (e.g. via your membership). This includes your membership 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 and bank details and, in the course of any Cashback World membership, data produced about your buying habits (date of purchase, place of purchase, time of purchase, amount of purchase, currency, shopping cart, sector, type of purchase – online/offline, from SME, from Key Account, with voucher, with Cashback card).

### 3. Cookies and web tracking

Our websites use so-called cookies, which are small text files saved on your computer that can be accessed again later. Cookies enable you to log in to our services and help us customise our website for you. You may also delete cookies from your browser.

You can also use part of our website without registering or logging in. In this case, certain information will also 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 setting, and your favourites setting on our website. Cookies are stored for a range of different periods, but the duration of storage is not longer than necessary and will not exceed one year. 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 on our websites are used exclusively for information purposes and are processed by mWS myWorld Solutions AG (Grazbachgasse 87-93, 8010 Graz, Austria) on behalf of Lyoness Asia-Pacific Limited, Suite 3101-02, 31/F, Tower 6, The Gateway, Harbour City, Tsim Sha Tsui, Hong Kong for the purpose of analysing the data collected.

You may choose to accept or reject cookies. If you reject the cookies, you will not be able to use some of the functions of our website, such as saving your preferences in using our website.

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. However, please note that disabling JavaScript might limit the functionality of the website.

We also use the following tools:

#### **Google Analytics**

This is a web analytics tool 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 online, what contents of our page are viewed, and how often. 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>. At <https://tools.google.com/dlpage/gaoptout?hl=en>, Google Analytics offers the option to opt out of data collection.

The use and the security of the data by Google cannot be checked by us, and you may refer directly to Google for more information.

#### **Piwik Open Analytics Platform**

This allows us to record your online activities on our site and determine how many users visit us online, which content of our site is viewed, and how often. The evaluation is done anonymously. The Cookies are stored on your computer and will be stored only as long as necessary. You may delete the cookies anytime from your browser. For additional information, please refer to <https://piwik.org/faq/>.

### 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>.

The transfer, use and the security of the data by Google cannot be checked by us, and please refer directly to Google for more information.

### 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. 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 user settings of your Internet browser.

### Salesforce Marketing Cloud

We use this to record your behaviour on our website to optimise our product offering. It helps us determine how many users visit us online, which content of our site is viewed, and how often. The analysis 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.

The transfer, use and the security of the data by Salesforce cannot be checked by us. The further use and security of the data can also not be checked by us.

### Hotjar

We collect non-personal information, including standard internet log information and details of your behavioural patterns when you visit our website. This is done to enable to provide you with a better user experience, to identify preferences, to diagnose technical problems, to analyse trends and to improve our website.

The following information may be collected related to your device and browser: device's IP address (captured and stored in an anonymized form), device screen resolution, device type (unique device identifiers), operating system, and browser type, geographic location (country only) preferred language used to display our website. The following information is collected related to your user interaction: mouse events (movements, location and clicks), keypresses.

For a sampling of visitors, Hotjar also records information which is collected from our website: referring URL and domain, pages visited, geographic location (country only), preferred language used to display our website, date and time when the website pages were accessed.

By visiting the opt-out page <https://www.hotjar.com/opt-out> and clicking on "Disable Hotjar" you can at any time refuse to collect your data from Hotjar when you visit our website.

You may opt-out from having Hotjar collect your information when visiting our website at any time by visiting the [Opt-out](https://www.hotjar.com/opt-out) page <https://www.hotjar.com/opt-out> and clicking 'Disable Hotjar'.

In addition to the cookies described in the analytics tools used, the following additional cookies are used:

Cookie	Domain	Purpose/function
Language	Lyoness	This cookie saves the language settings of the user.
cookiesession1	Lyoness	This cookie is used to distribute the load of the HTTP requests in the network infrastructure.
authSession	Lyoness	Cookie that is created for the duration of a session and contains the session ID.
authToken	Lyoness	Authentication cookie created for logged-in users to identify them uniquely.
LyoToolbar_SessionID	Lyoness	This cookie is for communicating with the Cashback Bar.
lyo_AT_cookie_privacystatement	Lyoness	This cookie is used to track whether the website user has consented to the use of cookies.
__RequestVerification_Token	Lyoness	This is an anti-counterfeiting token cookie that serves to prevent a CSRF attack.

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. Under the "Help" item, you may 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.

**You can revoke your consent to the transfer of your data at any time. If necessary, the revocation must be addressed in writing (by letter, fax or e-mail) to the following address:**

Lyonesse Asia-Pacific Limited  
Suite 3101-02, 31/F, Tower 6, The Gateway,  
Harbour City, Tsim Sha Tsui, Hong Kong  
Fax: +852 3977 4048  
E-mail: [international@lyconet.com](mailto:international@lyconet.com)

#### **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 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 us to conclude the identity of 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 can always prohibit the use of Cookies or delete existing cookies.

**You may withdraw your consent to the use of the visitor action pixel at any time. You must inform us in writing (by post or e-mail) of your wish to withdraw consent using the following address:**

Lyonesse Asia-Pacific Limited  
Suite 3101-02, 31/F, Tower 6, The Gateway,  
Harbour City, Tsim Sha Tsui, Hong Kong  
Fax: +852 3977 4048  
E-mail: [international@lyconet.com](mailto:international@lyconet.com)

#### **5. Sharing**

The website contains "Share" buttons for the social networks **Twitter Inc.**, 795 Folsom St., Suite 600, San Francisco, CA 94107, USA, **XING**, which is operated by XING AG, Dammtorstrasse 30, 20354 Hamburg, Germany, **LinkedIn** Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA, **Facebook**, 1601 South California Avenue, Palo Alto, CA 94304, USA, and **GooglePlus** of the social network Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States. In addition, there is also a "Share" button for e-mail. The "Share" buttons can be recognised by their respective logos.

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 data is collected by the social networks without a click on the respective "Share" button. Data, such as the IP address amongst others, are only collected and processed from members who have logged onto the respective social network. 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 wish to point out 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, and we therefore reject any liability for the use of such social networks by you. For more information about the use of data by the social media networks, please refer to the privacy policies of the social networks mentioned.

#### **6. Purpose of collecting data and use of data**

We use your personal data only in compliance with legal requirements. We collect and process the personal data you provide to us when you register as a Lyconet Marketer and in the course of your operation as a Lyconet Marketer, solely as part of our fulfilment of our contractual obligations to you, and furthermore, only in cases where you expressly give us your consent thereto.

Amongst others, we use your data to communicate with you to verify your identity, and to enable us to provide you with your personal login area on the Lyconet website, to process your enquiries and orders, and provide you with our services. In addition, we also use your data to determine the benefits due to you as a result of your operation as a Lyconet Marketer and allocate them to you.

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

We further use your data to protect your security on the internet and avoid cybercrime.

We may from time to time send you service-related announcements when we consider it necessary to do so (for example, emergency maintenance notice). Kindly note that you may not opt out of these service-related announcements since they are not for marketing and promotional purposes.

#### **7. Data security and transferring data**

To protect your data, we use measures that include encryption for data transmission (SSL encryption), firewalls, hacker defence programs, and other state-of-the-art security measures. For e-mail communication, we can only guarantee the security of the data according to the current state of the art.

Your personal data will generally be used by Lyonesse Asia-Pacific Limited as the contractual partner of the Lyconet Marketers that use mWS myWorld Solutions AG, (Grazbachgasse 87-93, 8010 Graz, Austria) as their service provider. However, your personal data may be forwarded/transferred to certain service providers listed below and within the Lyonesse Group:

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 data only according to our specific instructions for specific purposes and in accordance with Hong Kong data protection regulations. Any other use of the data by these service providers is excluded.

In addition, we will transfer your personal data while ensuring the required data security measures within the Lyonesse Group, provided that this is necessary for the purpose of electronic processing and management or for the provision of a specific service for you. The companies of the Lyonesse Group are also obligated to us to use your personal data only for the aforementioned purposes in each case and according to Hong Kong data protection regulations. In particular, the services concerned include contacting by electronic messages (e.g. e-mail, SMS, or push notification), by fax, by telephone, or by letter informing about products and promotions of the Loyalty Merchant, identifying offers that suit your interests, conducting satisfaction surveys, operating hotlines, and processing transactions.

The Lyonesse Group operates internationally. Our business activities, management structures, and our technical infrastructure transcend national borders. Therefore, we also transfer your personal data abroad, and will, as far as possible for us, make sure that your personal data is safe in other jurisdictions, in accordance with the respective laws and regulations.

We will not share your personal information with anyone other than the above-mentioned friendly Loyalty Merchants, service providers, and Lyonesse companies, unless you have given us your consent.

**You can revoke your consent to the transfer of your data at any time. If necessary, the revocation must be addressed in writing (by letter, fax or e-mail) to the following address:**

Lyonesse Asia-Pacific Limited  
Suite 3101-02, 31/F, Tower 6, The Gateway,  
Harbour City, Tsim Sha Tsui, Hong Kong  
Fax: +852 3977 4048  
E-mail: [international@lyconet.com](mailto:international@lyconet.com)

#### **8. Right of withdrawal, information, changing data 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 stating a reason. By withdrawing your consent, we no longer shall have the right to use your data. You must inform us in writing (by post or e-mail) of your wish to withdraw consent using the following address:**

Lyonesse Asia-Pacific Limited  
Suite 3101-02, 31/F, Tower 6, The Gateway,  
Harbour City, Tsim Sha Tsui, Hong Kong  
Fax: +852 3977 4048  
E-mail: [international@lyconet.com](mailto:international@lyconet.com)

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

You can also contact us at the above address to ask for information which of your personal data we currently store. You can additionally ask us to delete all your stored personal data.

This document was originally prepared in English. Should there be any discrepancy between the English and Chinese versions, the English version shall prevail.