

# DATA PRIVACY POLICY

We take the protection of your personal data 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 data. This 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 the Lyconet Marketer and to the websites available at <http://www.lyconet.com>. Please note that this refers to additional myWorld 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 Privacy Policy. Should this be the case, we will inform you in advance and ask for your separate approval.

### 2. Which data is recorded

Personal data we process about you includes any personal or material circumstances that we receive from you in the course of your operation as Lyconet Marketer, and that can be attributed to you directly or indirectly (e.g. via your membership number). 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 in course of any myWorld membership, data regarding your shopping behaviour associated with your myWorld membership (purchase date, place of purchase, time of purchase, purchase amount, currency, shopping cart, industry, type of purchase – online/offline, in SME, in key account, with voucher, with myWorld Card). If you have given us this information, we will process the number and type of ID document presented, full name on the ID document, your nationality, place of birth, if available your personal number, your height, date of issue and expiry as well as the issuing authority of the ID, signature on the ID, the machine-readable zone, ID photo, selfie and liveness of the selfie. In addition, we process your t-shirt size and food preferences if you have provided this information as part of an event participation,

### 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 our services and help us customise our website for you.

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. 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 myWorld 360 AG, Grazbachgasse 87-93, 8010 Graz on behalf of Lyconet New Zealand Limited to evaluate the information collected.

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 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=de>. At <https://tools.google.com/dlpage/gaoptout?hl=de>, Google Analytics offers the option to opt out of data collection.

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

This allows us to record your online activities on our site and determine how many users visit us on the Internet, which content of our site is viewed, and how often. The evaluation is done anonymously. The cookies are stored on your computer. 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>.

#### **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 usage 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 in the Internet, which content of our site 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.

#### **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 us 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.

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'.

#### **Yandex Metrica**

This is a web analytics tool from YANDEX LLC, with a registered office located at 16 Lva Tolstogo St., Moscow 119021, Russia, and its affiliate, Yandex Oy, with a registered office at Moreenikatu 6, 04600 Mantsala, Finland. We use this tool to log your online activity on our website, to find out how many users visit us and to record the number of times they access each page. This process is anonymous. The cookies are stored on your computer. For more information, please visit [https://yandex.com/legal/metrica\\_agreement/](https://yandex.com/legal/metrica_agreement/)

#### **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.

## **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 and **Facebook**, 1601 South California Avenue, Palo Alto, CA 94304, USA. 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 data protection 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 data 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.

Here 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. 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. Use of data**

We use your personal data only in compliance with legal requirements. We collect and process the personal data that you provide to us when you register as a Lyonet Marketer and in the course of your activity in connection with the Marketing Agency, solely as part of our fulfilment 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 communicate with you to verify your identity and provide you with the Login area on the Lyonet 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 activity in connection with the Marketing Agency as a Lyonet 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.

## **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 data is basically used by Lyonet New Zealand as the contractual partner of the Lyonet Marketers that use myWorld 360 AG as their service provider. However, your personal data may be shared with / passed on to certain service providers listed below and within the Lyonet Group, the Lyoness Group and the myWorld 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 instructions for specific purposes and in accordance with the New Zealand data protection regulations. Any other use of the data by these service providers is excluded.

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).

In order to carry out a know-your-customer (KYC) process, which is necessary in some cases, we use the Klippa App B.V., Lübeckweg 2, 9723 HE Groningen, Netherlands, as a service provider. These are OCR services (optical character recognition) for analyzing ID documents. Apart from the scanning process, Klippa does not store any of the transmitted personal data. For more information, see OCR Software - [Automatic Text Recognition for Receipts and Invoices \(klippa.com\)](#).

In addition, we will share your personal data while ensuring the required data security measures within the Lyonet 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 Lyonet Group are also obligated to us to use your personal data only for the specific purpose in each case and according to the New Zealand 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 Lyonet Group operates internationally. Our business activities, management structures, and our technical infrastructure transcend national borders. Therefore, we also transfer your personal data abroad. You hereby consent to the transmission of your personal data to the member states of the European Economic Area, to Switzerland, and to other countries with adequate data protection. However, if your personal data 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 service providers, and Lyonet companies, unless you have given us your consent.

## **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. If you wish to withdraw your consent, please send a written declaration (by letter, fax, or e-mail) to the following address:**

Lyonet New Zealand Limited  
P O Box 302-258 North Harbour  
Auckland 0751, New Zealand

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.