

PRIVACY POLICY

BLYTZ CASHLESS SRL

last updated on 20.07.2024.

Introduction

Blytz Cashless SRL (also referred to as "we", "us" or "Company"), is committed to protecting and respecting your privacy.

This privacy policy (the "Policy") explains what kind of personal data we collect and for what purposes, when providing you with our products and/or services (the "Services"), when you visit our website (www.blytzcashless.com), use our mobile application, and/or when you otherwise make contact with us.

All personal data collected by us are processed in accordance with the EU General Data Protection Regulation No. 2016/679 (the "GDPR"), applicable local data protection laws, and other applicable legal acts.

For any questions regarding this Policy or any requests regarding the processing of your personal data, please contact us at privacy@blytzcashless.com.

TYPES OF DATA WE COLLECT

We collect various types of personal data, including but not limited to:

- **Identity Data:** Name, surname, username or similar identifier
- **Contact Data:** Address, email address, telephone numbers
- **Financial Data:** Payment card details, bank account information
- **Transaction Data:** Details about payments to and from you, and other details of products and services you have purchased from us
- **Technical Data:** Internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website or mobile application
- **Profile Data:** Your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses
- **Usage Data:** Information about how you use our website, products and services
- **Marketing and Communications Data:** Your preferences in receiving marketing from us and our third parties and your communication preferences

When you use our cashless payment system at events, we may also collect:

- **Event-specific Data:** Event attendance, purchase history at the event, top-up amounts
- **Device Data:** Information about the RFID wristband or card you use with our system

HOW WE COLLECT YOUR PERSONAL DATA

We use different methods to collect data from and about you including through:

a) **Direct interactions:** You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise.

This includes personal data you provide when you:

- Create an account on our website or mobile application
- Use our cashless payment system at events and festivals
- Request marketing to be sent to you
- Enter a promotion or survey
- Give us feedback or contact us

b) **Automated technologies or interactions:** As you interact with our website or mobile application, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

c) **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources as set out below:

- Event organizers who use our Services
- Payment processors and financial institutions
- Analytics providers
- Advertising networks
- Search information providers
- Identity and contact data from publicly available sources

WHAT INFORMATION ABOUT YOU WE COLLECT, FOR WHAT PURPOSES AND ON WHAT LEGAL BASES

We have set out below, in a table format, a description of how and why we use your personal data:

| Purpose | Legal basis | Personal data |
|--|--|---|
| To conclude a contract with you, or to take steps at your request prior to entering into a contract | - Taking necessary steps before conclusion of a contract and/or conclusion of a contract | Name, surname, address, telephone, e-mail address, company details (if applicable) |
| To perform a contract concluded with you, including the provision of our cashless payment system and hardware leasing services | - Performance of a contract | Name, surname, address, telephone, e-mail address, payment information, transaction history |
| To provide customer support and respond to inquiries | - Legitimate interests | Name, email address, telephone number, details of your inquiry |
| To improve our Services and develop new features | - Legitimate interests | Usage data, device information, IP address, transaction history |
| To comply with legal obligations, including financial reporting and tax requirements | - Legal obligation | Name, address, transaction history, payment information |
| To send you important updates about our Services | - Legitimate interests | Email address |
| To send you marketing communications (with your consent) | - Your consent | Email address |
| To prevent fraud and ensure the security of our systems | - Legitimate interests | Transaction history, device information, IP address |

| | | |
|---|--|---|
| To conduct data analytics to improve our services | - Legitimate interests | Usage data, transaction history, anonymized where possible) |
| To manage our relationship with you, including notifying you about changes to our terms or privacy policy | - Performance of a contract - Legal obligation | Name, email address, communication preferences |

HOW WE USE AND PROCESS YOUR DATA

We use and process your personal data for various purposes, including:

- Providing and managing our services
- Processing transactions and payments
- Communicating with you about our services
- Improving and developing our products and services
- Conducting data analytics and market research
- Preventing fraud and ensuring the security of our systems complying with legal and regulatory obligations
- Marketing our products and services (with your consent where required)

We process your data using both automated systems and manual processes. We have implemented measures to ensure that our processing activities are fair, transparent, and in compliance with applicable data protection laws.

HOW WE SHARE YOUR PERSONAL DATA

We may share your personal data with:

- **Event organizers:** Limited to data necessary for event operations and reconciliation
- **Service providers:** Including payment processors, cloud hosting providers, IT support services
- **Professional advisors:** Such as lawyers, bankers, auditors and insurers
- **Regulatory authorities:** Government bodies, regulators, and other authorities where required
- **Business partners:** In the context of a business sale, merger, or acquisition
- **Marketing partners:** With your explicit consent, for marketing purposes

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

INTERNATIONAL DATA TRANSFERS

In case your personal data is transferred outside the European Economic Area (EEA), we will take necessary steps to ensure that your data is treated securely and in accordance with this Policy. This may include:

- Transferring to countries approved by the European Commission as having adequate protection;
- Using specific contracts approved by the European Commission that give personal data the same protection it has in Europe;
- Transferring data to US-based providers who are part of the EU-US Privacy Shield.

DATA RETENTION

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider:

- The amount, nature, and sensitivity of the personal data
- The potential risk of harm from unauthorized use or disclosure of your personal data
- The purposes for which we process your personal data and whether we can achieve those purposes through other means
- The applicable legal requirements

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Specific retention periods:

- Account information: As long as your account is active, plus 7 years after account closure
- Transaction data: 10 years for tax and accounting purposes
- Marketing preferences: Until you withdraw your consent

YOUR RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

If you wish to exercise any of these rights, please contact us at privacy@blytzcashless.com.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

HOW WE PROTECT YOUR PERSONAL DATA

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Our security measures include:

- Encryption of personal data in transit and at rest
- Regular security assessments and penetration testing
- Multi-factor authentication for accessing our systems
- Regular backups to ensure data can be recovered in case of a disaster
- Employee training on data protection and security best practices
- Physical security measures at our premises

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

COOKIES AND TRACKING TECHNOLOGIES

Our website and mobile application use cookies and similar tracking technologies to distinguish you from other users. This helps us to provide you with a good experience when you browse our website or use our app and also allows us to improve our services.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following types of cookies:

- **Strictly Necessary Cookies:** Required for the operation of our website
- **Analytical/Performance Cookies:** Allow us to recognize and count the number of visitors and to see how visitors move around our website
- **Functionality Cookies:** Used to recognize you when you return to our website
- **Targeting Cookies:** Record your visit to our website, the pages you have visited and the links you have followed

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

For more detailed information about the cookies we use and how to manage them, please see our Cookie Policy (www.blytzcashless.com/legal).

CHANGES TO THIS POLICY

We keep our privacy policy under regular review and will place any updates on our webpage (www.blytzcashless.com/legal).

Historic versions can be obtained by contacting us at privacy@blytzcashless.com

If we make any material changes to this privacy policy, we will notify you through a notice on our website or by sending you an email.

Contact Information

For any questions or concerns regarding this document, please contact:

Blytz Cashless SRL (hello@blytzcashless.com)

St. Johannesweg 15,

39050 Völs am Schlern,

Bolzano, Italia.

Acknowledgment

Blytz Cashless SRL reserves the right to update or modify this document at any time. Notification of changes will be provided through official communication channels.

By using Blytz Cashless SRL's products and services, you acknowledge that you have read, understood, and agree to comply with the information laid out in this document.