



Woolsocks AG

Privacy & Cookie Statement

Version 1.1 – 27 January 2021

1. Introduction

This privacy & cookie statement ("**Statement**") provides information on the processing of personal data by Woolsocks AG, with registered address on Pilatusstrasse 38, 6002 Luzern, Switzerland, registered in the Commercial Register of the Canton of Lucerne under number CHE-328.679.380 ("**Woolsocks**"). Further contact details are provided at the bottom of this Statement.

This Statement applies to all personal data processed by Woolsocks and/or on behalf of Woolsocks concerning users ("**Users**", "**You**" or "**Your**") of the Woolsocks Platform ("**Woolsocks Platform**"), based on which they may be identified or become identifiable ("**Personal Data**").

This Statement sets out the elements necessary for Woolsocks' compliance with applicable privacy legislation, principles and practice, including but not limited to the General Data Protection Regulation ("**Applicable Laws**"). Woolsocks reserves the right to review and/or amend the Statement periodically, in order to comply with (local and/or European Union) legislation, and for any other purpose deemed reasonably necessary by Woolsocks.

Please find below an overview of the subjects which will be discussed in this Statement:

- Categories of Personal Data, purpose and legal grounds for processing
- Purpose, legal ground and retention period of data processing
- Retention period of Personal Data
- Security of Personal Data
- Transfer of Personal Data
- Rights in relation to Personal Data
- What are cookies
- Who places what types of cookies
- Questions and inquiries



2. Categories of Personal Data, purpose and legal grounds for processing

Based on the following legal grounds, Woolsocks is processing Personal Data for the following purposes:

- To ensure that You are able to use the Woolsocks Services (performance of contract).
- To improve the Woolsocks Services (legitimate interest). In doing so, Woolsocks ensures that the impact on Your privacy is as limited as possible, by, amongst others, aggregating Your Personal Data to the extent possible.
- For direct marketing purposes (consent).

Woolsocks retains Your Personal Data for these purposes until You withdraw Your consent.

Woolsocks will only process Personal Data to the extent necessary for the described purposes. If there is a need to process Personal Data for other purposes, Woolsocks will only do so if such processing is compatible with the original purposes or if You give consent to such processing. Woolsocks will in any event provide You with further information on such purpose prior to the further processing.

Woolsocks does not share Your Personal Data with partners for purposes other than to provide the Woolsocks Services You have requested. Woolsocks does not share Your Personal Data to earn money. However, Woolsocks may convert Your Personal Data into anonymous statistics. This enables Woolsocks to provide partners with useful commercial insights into Woolsocks Members' behaviour. These partners will therefore not at any moment in time have access to Your Personal Data.

General use of the Woolsocks App		
What personal data?	Why?	On what basis?
Identification details: Salutation, first name, last name, e-mail address, date of birth, language, location, device ID	Identification & to provide the Woolsocks Services	Performance of contract
Form data: Personal data that You entered through a	To pre-fill forms You need to fill in to use different Woolsocks Services	Consent



form in the Woolsocks App		
Usage data: Device brand, operating system, location details, cookies, user data, actions undertaken in the Woolsocks App, crash log	Providing and improving services	Legitimate interest
Communication: All communication between you and us	To provide our services	Performance of contract
Advertising data: Data needed to address You with respect to Woolsocks Services including name and e-mail address	To share information on the Woolsocks Services with You and to improve our ads and our direct marketing	Consent & Legitimate interest
Fundraising data: Type of challenge done by Your child, pay-out data for funds raised (Bank account holder name, IBAN, date of birth, user IP address, country of user, amount of pay-out)	To enable the child You have legal authority over to raise funds for	Performance of contract

Account Information Services		
What personal data?	Why?	On what basis?
Identification details: Woolsocks user ID, country of user	Identification & to provide the Account Information Services	Performance of contract
Bank account data: Account name, IBAN, payment data aggregation of the payment data of different connected bank accounts	To enable You to use the Account Information Services	Performance of contract



Banking Services		
What personal data?	Why?	On what basis?
KYC Identification details: Woolsocks user ID, country of user, location, name, date and place of birth, citizenship, Tax Identification Number, address, e-mail address, mobile number, employment status, annual net income and language	To complete Solarisbank's Know-Your-Customer ("KYC") process	Performance of contract
Bank account data: Account name, IBAN, payment data aggregation of the payment data of different connected bank accounts	To enable You to use the Banking Services provided by Solarisbank	Performance of contract
Bonus distribution: Your Solarisbank Bank Account balance, IBAN, and payer of funds	To distribute a Bonus to You	Performance of contract

Cancellation Services		
What personal data?	Why?	On what basis?
Identification details: Woolsocks user ID, country of user	Identification & to provide the Cancellation Services	Performance of contract
Data to identify you towards the service provider's service that you want cancelled: Name, address, date of birth, phone number, e-mail address, IBAN, card number, policy/client number, product name, branch, Tax ID, ID	To enable You to use the Cancellation Services. Woolsocks only asks for a Tax ID, ID number or copy of ID (and all other Personal Data) if this is required by the service provider You want to cancel. Woolsocks will immediately delete Your ID	Performance of contract & Explicit consent



number copy of ID and invoice number	copy after passing on that information to GoCancel	
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Cashback Services		
What personal data?	Why?	On what basis?
Identification details: Woolsocks user ID, country of user	Identification & to provide the Cashback Services	Performance of contract
Data for pay-out of Cashback: Bank account holder name, IBAN, date of birth, user IP address, country of user, amount of Cashback	Pay-out an approved Cashback, AML/CFT purposes, fraud detection and administrative bookkeeping	Performance of contract & Legal obligation
Data for personalised deals Cashback suggestions: Payment data received from BudgetBakers and/or Solarisbank	To offer You Cashback deals at stores where You have shopped before	Explicit consent
Data for Instant Pay-out: SEPA Direct Debit mandate data, Cashback profile of the Woolsocks Member, probability of default of the Woolsocks Member calculated based on the Payment Data received from BudgetBakers and/or Solarisbank	The direct debit mandate will enable OrangeBuddies to debit Your bank account if Your Cashback Sock balance is negative. Woolsocks uses payment data and the Cashback profile to calculate the maximum amount of Instant Pay-out and assess whether Instant Pay-out is available to You for a certain Cashback deal	Performance of contract & Explicit consent
Data for donation: Amount donated, name of donator, goal/fundraiser donated to (charity)	To process the donation	Performance of contract



organisation and/or local club)		
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3. Retention period of Personal Data

Woolsocks will, in principle, retain Your Personal Data in relation to the purposes mentioned above for one year after termination of the relationship between You and Woolsocks in accordance with the Woolsocks General Terms and Conditions. Please note Woolsocks may need to keep certain Personal Data for more than one year. This is because of compliance with legal obligations such as to comply with a law enforcement request or because such information is needed for the exercise of legal claims.

4. Security of Personal Data

Woolsocks handles Personal Data carefully and uses appropriate technical and organisational measures to preserve the integrity and security of Your Personal Data. Our implemented technical and organisational include, amongst others:

- access controls, on a 'need to know'-basis;
- pseudonymisation;
- encryption; and
- measures that prevent reading, copying, changing or removing during the storing, processing and transporting of Personal Data.

5. Transfer of Personal Data

Woolsocks transfers Your Personal Data – as necessary in view of the listed legal grounds – to the following recipients:

Partner	What data	Purpose	Privacy Statement
ActiveCampaign	Data needed to send you a newsletter	To send Users e-mails regarding the Woolsocks Services	https://www.activecampaign.com/legal/privacy-policy



BudgetBakers	Data needed to provide the Account Information Services	Account Information Services	https://www.woolsoc.ks.eu/legal/bb/BudgetBakers_Privacy-Policy_EN_v1.0.pdf
GoCancel	Data needed to provide the Cancellation Services	Cancellation Services	https://www.woolsoc.ks.eu/legal/gc/GoCancel_Privacy-Statement_EN_v1.0.pdf
Google Ireland	All the Data processed on the Woolsocks Platform and to send push notifications related to the Woolsocks Services	Storage of Woolsocks data and to send push notifications	https://cloud.google.com/privacy
Merchants	Data pertaining to Your purchase to receive Your Cashback after completion of the Beta Testing	To match your purchase with the Merchant's administration	Please see the privacy statement of the Merchant You selected
OrangeBuddies	Data needed to provide the Cashback Services	Cashback Services	https://www.woolsoc.ks.eu/legal/ob/OrangeBuddies_Privacy-Statement_EN_v1.1.pdf
Snippet Technologies Operations	Data to provide the Account Information Services and to provide Customer Services to Woolsocks Members pertaining to the general use of the App and Banking Services	To provide the Account Information Services, to provide Customer Services to Woolsocks Members pertaining to the general use of the App and Banking Services	https://www.snippetech.com/privacystatement
Solarisbank	Data needed to provide the Banking Services	Banking Services	https://www.solarisbank.com/en/privacy-policy/
Twilio	All Data to provide in-app notifications and included in such notifications	To communicate with you	https://www.twilio.com/legal/bcr/processo



Woolsocks UAB	Data needed to provide support to Woolsocks with respect to the Services including IT support, fundraiser monitoring, compliance, SEPA Direct Debit recollection process, Bonus distribution	To enable Woolsocks to provide the different Services	https://woolsocks.eu/legal-center
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Woolsocks does transfer certain Personal Data to a third country outside of the European Union/European Economic Area ("EU/EEA"), to countries such as the United States. These transfers of Personal Data only take place in compliance with the Applicable Laws and where appropriate safeguards are in place that ensure the level of protection of Data Subjects as required by these Applicable Laws (e.g. transfers on the basis of EU Model clauses).

6. Rights in relation to Personal Data

Data Subjects have the right of information, access, rectification, addition and erasure of Personal Data, and the right to object against or restrict the processing of Personal Data (or withdraw an earlier given consent), as well as the right to data portability. The procedure of Woolsocks that enables Data Subjects to exercise these rights, is described below.

Data Subjects may file a request to access Personal Data processed by Woolsocks and Woolsocks shall respond as soon as possible, and in any event within one (1) month, about:

- a) whether Woolsocks holds any Personal Data relating to the respective Data Subject; and,
- b) if so, information is provided on the purposes of the processing, the categories, the recipients (if applicable) the envisaged period for which the Personal Data will be stored, or the criteria used, the existence of the right to request rectification, erasure, restriction or to object to such processing, the right to lodge a complaint with a supervisory authority, the existence of automated decision-making, where the data is transferred to a third country, the appropriate safeguards and the source(s) of the Personal Data.



Woolsocks will comply with a legitimate request of a Data Subject for rectification, addition and erasure, if the Personal Data are factually incorrect, incomplete, or irrelevant for the purpose(s) of the data processing, or otherwise processed in violation with the Applicable Laws.

Woolsocks informs the Data Subject within one (1) month after receiving the request whether the request shall be complied with (in time), and if not, accompanied with the reasons for the delay or rejection. Information provided shall be free of charge. Data Subjects can exercise these rights at reasonable intervals. Data Subjects can exercise their rights by contacting the Privacy contact person in writing or per e-mail at (see address above).

Please note Woolsocks may at times be unable to fully comply with a request to erase Personal Data. This is because of compliance with legal obligations such as to comply with a law enforcement request or because such information is needed for the exercise of legal claims.

7. What are cookies?

By using the Woolsocks Platform, cookies are placed on Your device. Cookies are small text files that enable tracking information about Your use of the platform. For example, if You use the same device as before, cookies remember Your preferences and the content You see is loaded faster. There are different types of cookies; functional, analytical and tracking cookies.

8. Who places what types of cookies?

Woolsocks places functional and analytical cookies on Your device when You register at the Woolsocks Platform – as further set out below.

8.1. Functional and analytical cookies

These cookies are necessary to allow You to use the Woolsocks Platform, or to collect (aggregated) statistics about such use. More specifically, functional and analytical cookies are used in order to:

- remember Your selected currency, language settings and other preferences so You can use the Woolsocks website efficiently; and
- help Woolsocks understand how You use the Woolsocks Platform and improve the platform.

8.2. Tracking cookies

Woolsocks does not use any tracking cookies.



8.3. Permanent and session cookies

Two types of cookies are used on the Woolsocks Platform: session and permanent cookies. Session cookies are temporary cookies that remain on Your device until You leave the Woolsocks Platform. A permanent cookie remains on Your device for a longer period of time.

For the specifications of the cookies used by Woolsocks, see **Annex 1**.

Woolsocks partner Snippet Technologies Operations B.V. places cookies when You register on the Woolsocks platform.

8.4. Does Woolsocks also process Personal Data?

Cookies may involve the collection of Personal Data, as further set out in this Statement. Woolsocks collects the following Personal Data when You sign up for the newsletter:

- First name
- Last name
- E-mail address

8.5. How long are these Personal Data stored?

The data will be kept as short as possible and the retention period varies per type of cookie (please refer to **Annex 1**). After the expiry of this retention period, the data will be deleted.

8.6. How can you disable or delete cookies?

Woolsocks does not use tracking cookies, so there is no need for withdrawing or disabling previous consent.

9. Questions and inquiries

For queries and inquiries about this Statement, please contact the privacy point of contact: privacy@woolsocks.eu. Alternatively you may also contact our EU representative, Woolsocks A.G. French branch, 38 rue des Mathurins, 75008 Paris, France, RCS Paris / SIREN: 903 859 809 or send our EU representative an e-mail to eurepresentative@woolsocks.eu.

If you are unhappy with the way Woolsocks treats your complaint you may file a complaint with the relevant Data Protection Authority.



Country	Data Protection Authority	Website
France	Commission Nationale de l'Informatique et des Libertés	https://www.cnil.fr/
Italy	Garante per la protezione dei dati personali	https://www.garanteprivacy.it/home
Spain	Agencia Española de Protección de Datos	https://www.aepd.es/es
Switzerland	Eidgenössische Datenschutz- und Öffentlichkeitsbeauftragte	https://www.edoeb.admin.ch/edoeb/de/home/der-edoeb/links/datenschutz---schweiz.html

10. Annex 1 – Cookie details

10.1. First Party Cookies – Functional and Analytical Cookies (consent not required)

Name of the Cookie	Purpose of the Cookie	Permanent /session	Retention period
Language and Country cookie	With this cookie, Woolsocks remembers Your preferred language and country for the woolsocks.eu website	Permanent	6 months
Google Analytics	Distinguish unique Users and determine the start and end of a session	Permanent	12 months
Personal Data	To remember who signed up for the newsletter	Session	Woolsocks processes the data, but does not store it. That data is transported to Newsletter service ActiveCampaign