

CrowdPay platform privacy policy

By visiting the CrowdPay website (including sub-domains) and using the CrowdPay service, users agree to the privacy policy of Crowd Solutions AG, Bellevueweg 42, 6300 Zug.

This data protection declaration gives you information about what data we collect on the CrowdPay website and how we process and use it.

Crowd Solutions AG is entitled to change this data protection declaration at any time and to publish the current version on the platform. Users will be informed of the change in advance by email. We therefore process your data in accordance with the following data protection declaration and the relevant statutory data protection regulations.

USAGE ANALYSIS

1. Data processing for usage analysis and marketing purposes

Data protection declaration for the use of Google Analytics

This website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses so-called "cookies", text files that are stored on your computer and that enable an analysis of your use of the website. The information generated by the cookies about your use of this website (including your IP address) is transmitted to a Google server in the USA and stored there. Google will use this information to evaluate your use of the website, to compile reports on website activity for website operators and to provide other services related to website activity and internet usage. Google may also transfer this information to third parties if this is required by law or if third parties process this data on behalf of Google. Under no circumstances will Google link your IP address with other Google data. You can prevent the installation of cookies by setting your browser software accordingly; however, please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Use of Google remarketing

This website uses the remarketing function of Google Inc. The function serves to present website visitors within the Google advertising network with interest-related advertisements. A so-called "cookie" is saved in the browser of the website visitor, which makes it possible to recognize the visitor when he or she visits websites that belong to the Google advertising network. On these pages, advertisements can be presented to the visitor that relate to content that the visitor has previously accessed on websites that use Google's remarketing function.

According to its own information, Google does not collect any personal data in this process. If you still do not want Google's remarketing function, you can always deactivate it by making the appropriate settings at <http://www.google.com/settings/ads>. Alternatively, you can deactivate the use of cookies for interest-based advertising via the advertising network initiative by following the instructions at http://www.networkadvertising.org/managing/opt_out.asp.

Google Tag Manager

Google Tag Manager is a solution with which we can manage so-called website tags via an interface, e.g. Integrate Google Analytics and other Google marketing services into our online offer. The Tag Manager itself, which implements the tags, does not process any personal data of the users. With regard to the processing of users' personal data, reference is made to the following information about Google services. Usage guidelines: <https://www.google.com/intl/de/tagmanager/use-policy.html>.

USAGE OF COOKIES

This site uses cookies. These are small text files that make it possible to store specific, user-related information on the user's device while using the website. Cookies make it possible, in particular, to determine the

frequency of use and number of users of the pages, to analyze behavior of the page usage, but also to make our offer more customer-friendly. Cookies remain stored at the end of a browser session and can be called up again when you visit the site again. If you do not want this, you should set your internet browser so that it refuses to accept cookies.

Cookies can be saved by switching them off in the browser settings. Please note that not all functions of this online offer can then be used.

SOCIAL MEDIA

2. CrowdPay uses so-called social plugins as listed below:

Facebook

CrowdPay uses social plugins from the social network facebook.com, which is operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook"). The plugins can be recognized by one of the Facebook logos (white "f" on a blue tile or a "thumbs up" sign) or are marked with the addition "Facebook Social Plugin". The list and appearance of the Facebook social plugins can be viewed here: <http://developers.facebook.com/plugins>.

When a user calls up a website of this offer that contains such a plugin, his browser establishes a direct connection to the Facebook servers. The content of the plugin is transmitted from Facebook directly to your browser, which integrates it into the website. The provider therefore has no influence on the amount of data that Facebook collects with the help of this plugin and therefore informs the user according to his level of knowledge:

By integrating the plugins, Facebook receives the information that a user has called up the corresponding page of the offer. If the user is logged into Facebook, Facebook can assign the visit to their Facebook account. If users interact with the plugins, for example by pressing the Like button or leaving a comment, the corresponding information is transmitted from your browser directly to Facebook and stored there. If a user is not a member of Facebook, there is still the possibility that Facebook will find out and save his IP address. According to Facebook, only an anonymized IP address is saved in Germany.

The purpose and scope of the data collection and the further processing and use of the data by Facebook as well as the related rights and setting options for protecting the privacy of users can be found in Facebook's data protection information: <http://www.facebook.com/policy.php>.

If a user is a Facebook member and does not want Facebook to collect data about him via this offer and link it to his member data stored on Facebook, he must log out of Facebook before visiting the website.

It is also possible to block Facebook social plugins with add-ons for your browser, for example with the "Facebook Blocker".

Instagram

Functions of the Instagram service are integrated on our website. These functions are offered by Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA. If you are logged into your Instagram account, you can link the content of our pages to your Instagram profile by clicking the Instagram button. This allows Instagram to associate your visit to our website with your user account. We would like to point out that, as the provider of the pages, we have no knowledge of the content of the data transmitted or how it is used by Instagram.

For more information, see Instagram's privacy policy: <http://instagram.com/about/legal/privacy/>

LinkedIn

This website uses functions of the LinkedIn network. The provider is LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA.

Every time one of our pages containing LinkedIn functions is accessed, a connection to LinkedIn servers is established. LinkedIn is informed that you have visited our website with your IP address. If you click LinkedIn's "Recommend" button and are logged into your LinkedIn account, LinkedIn is able to assign your visit to our website to you and your user account. We would like to point out that, as the provider of the website, we have no knowledge of the content of the transmitted data or its use by LinkedIn.

Further information can be found in LinkedIn's privacy policy at: <https://www.linkedin.com/legal/privacy-policy>

Twitter

This offer uses the buttons of the Twitter service. These buttons are offered by Twitter Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA. They can be recognized by terms such as "Twitter" or "Follow", combined with a stylized blue bird. With the help of the buttons it is possible to share a contribution or page of this offer on Twitter or to follow the provider on Twitter.

When a user calls up a website on this website that contains such a button, his browser establishes a direct connection to the Twitter servers. The content of the Twitter button is transmitted from Twitter directly to the user's browser. The provider therefore has no influence on the amount of data that Twitter collects with the help of this plugin and informs the user according to his level of knowledge. According to this, only the user's IP address and the URL of the respective website are transmitted when the button is obtained, but not used for purposes other than the display of the button

Further information can be found in Twitter's data protection declaration at <http://twitter.com/privacy>.

NEWSLETTER

If you would like to receive the newsletter offered on this website, we need an e-mail address from you as well as information that allows us to verify that you are the owner of the e-mail address provided and that you agree to receive the newsletter. Further data is not collected. We only use this data to send the requested information and do not pass it on to third parties. You can revoke your consent to the storage of data, email address and their use for sending the newsletter at any time, for example via the "unsubscribe" link in the newsletter.

Newsletter - Mailchimp

The newsletter is sent using the mail service provider 'MailChimp', a newsletter mailing platform of the US provider Rocket Science Group, LLC, 675 Ponce De Leon Ave NE # 5000, Atlanta, GA 30308, USA. You can view the data protection regulations of the shipping service provider here. The Rocket Science Group LLC d / b / a MailChimp is certified under the Privacy Shield Agreement and thus offers a guarantee to comply with the European level of data protection (PrivacyShield). The shipping service provider is based on our legitimate interests. Art. 6 para. 1 lit. f GDPR and an order processing contract in accordance with 28 para. 3 sentence 1 GDPR.

The shipping service provider can process the recipient's data in pseudonymous form, i.e. use without assignment to a user, to optimize or improve their own services, e.g. use for technical optimization of the dispatch and presentation of the newsletter or for statistical purposes. However, the shipping service provider does not use the data of our newsletter recipients to write to them themselves or to pass the data on to third parties.

CONTACT FORM

If you send us inquiries using the contact form, your details from the inquiry form, including the contact details you provided there, will be stored by us for the purpose of processing the inquiry and in the event of follow-up questions. We will not pass on this data without your consent.

TECHNICAL DATA

3. Secure data transmission

When using CrowdPay, your data will only be transmitted in encrypted form via SSL format. We secure the data and the website with the most modern technical measures against loss, destruction, access, modification or distribution by unauthorized persons.

4. Processing for advertising

By registering, you give us your consent that we may contact you for information of an advertising nature. We may use your email address, mobile phone number, telephone number and / or postal address for the purpose of providing relevant information related to CrowdPay (such as information, newsletters, etc.). Under no circumstances will we pass your data on to third parties for advertising purposes.

You can limit or revoke your consent regarding the commercial use of your data at any time by sending an email to info@crowdpay.ch.

5. Data collected

When registering as a CrowdPay credit account, we collect the following personal data and save it in the user profile:

Private individuals

Gender (title), title, first name, last name, address, date of birth, details of the employer, number of children, telephone number (s), your email address, the IP address of the device you are using and a password of your choice (in encrypted form) for registration on CrowdPay.

Companies

In relation to the borrower: company, legal form, company website (optional), address, email address, telephone number (s), number of employees, date of establishment, industry, and bank details (account holder and IBAN);

In relation to the borrower's authorized signatory (s): first name, last name, date of birth, place / country of birth, nationality, position in the company, address, email address and telephone number (s),

In connection with the borrower's user account: the IP address from which the registration and other accesses are made, the password (in encrypted form) for authentication of the borrower on CrowdPay.

We process and use your borrower data insofar as this is necessary for the proper performance of our contract for the use of CrowdPay.

6. Obtaining information from credit agencies

We obtain information about the borrower from one or more of the following credit bureaus, in particular about creditworthiness and the presence of negative characteristics for companies, in addition to the shareholding relationships, business figures, before the offer of invoicing and, if necessary, before providing non-binding information on possible loan amounts and financing conditions a. Payment experience, in particular about undisputed and unpaid receivables after the due date, as well as, if necessary, debt enforcement information and address data can be transmitted:

- CRIF AG, Hagenholzstrasse 81, CH-8050 Zurich
- Bisnode D&B Schweiz AG, Grossmattstrasse 9,
- 8902 Urdorf
- Intrium AG, Eschenstrasse 12, 8603 Schwerzenbach
- Central Office for Credit Information (ZEK), PO Box 1108, 8048 Zurich
- Information center for consumer credit (IKO), PO Box, 8048 Zurich

The credit agencies inquired about the creditworthiness using address data. Negative characteristics are characteristics that show, for example, an ongoing debt enforcement, bankruptcy or estate proceedings or that show an above-average risk of bad debt loss.

As a borrower, you consent to Crowd Solutions AG providing credit information about you to CRIF AG, Hagenholzstrasse 81, 8050 Zurich, the Central Office for Credit Information (ZEK), PO Box 1108, 8048 Zurich and

/ or Information Center for Consumer Credit (IKO). PO Box, 8048 Zurich and sends the credit agency data to these credit agencies. In addition, you agree that Crowd Solutions AG may also obtain additional recovery information about the borrower.

7. Processing the data

Personal data is all information that relates to a specific or identifiable person. A data subject is a person who is used to process personal data. Processing includes all handling of personal data, regardless of the means and procedures used, in particular the storage, disclosure, procurement, deletion, storage, modification, destruction and use of personal data.

We process personal data in accordance with Swiss data protection law. In addition, we process - insofar as and insofar as the EU GDPR is applicable - personal data in accordance with the following legal bases in connection with Art. 6 Para. 1 GDPR:

- lit. a) Processing of personal data with the consent of the data subject.
- lit. b) Processing of personal data to fulfill a contract with the data subject and to carry out corresponding pre-contractual measures.
- lit. c) Processing of personal data to fulfill a legal obligation to which we are subject in accordance with any applicable EU law or in accordance with any applicable law of a country in which the GDPR is fully or partially applicable.
- lit. d) Processing of personal data in order to protect the vital interests of the data subject or another natural person.
- lit. e) Processing of personal data in order to protect the legitimate interests of us or third parties, provided that the fundamental freedoms and fundamental rights as well as the interests of the data subject do not prevail. Legitimate interests are in particular our business interest in being able to provide our website, information security, the enforcement of our own legal claims and compliance with Swiss law.

We process personal data for the duration that is necessary for the respective purpose or purposes. In the case of longer-term storage obligations due to legal and other obligations to which we are subject, we restrict processing accordingly.

8. Disclosure of data to credit agencies

In the case of financing that is subject to the KKG (Federal Act on Consumer Credit), we are legally obliged to send data to the information center for consumer credit (IKO) about the application, any rejection, the admission (in any case borrower and loan amount as well as term and start of the installment) and deliver as agreed. In addition, data must be supplied on the obligations and any changes in creditworthiness to the central office for credit information (ZEK).

We also transmit data to the IKO / ZEK about claims due from a credit account if the customer has not performed the service owed despite being due, and

- the borrower has received a written warning at least twice after the due date of the claim, the debt collection has been initiated and the borrower has not contested the claim or the outstanding claims make up at least 10 percent of the net amount of the loan, or
- the contractual relationship underlying the claim was terminated without notice due to arrears in payment

GENERAL PROVISIONS

9. Announcement to cooperation partners

We cooperate with various banks and credit intermediaries in Germany and abroad or plan such cooperation for the future. As part of the financing, we can pass on data in anonymized form to cooperation partners.

Our cooperation partners will save the data received and, as part of their examination of whether they can finance the loan project and arrange financing for it, will process and use it. The cooperation partners process

the data in accordance with the respective data protection guidelines of the cooperation partners.

10. Copyrights

The copyrights and all other rights to content, images, photos or other files on the website belong exclusively to the operator of this website or the specifically named rights holders. The written consent of the copyright holder must be obtained in advance for the reproduction of all files.

Anyone who commits a copyright infringement without the consent of the respective rights holder can be punished and, if necessary, liable to pay damages.

11. General disclaimer

All information on this website has been carefully checked. We strive to offer our information in a current, correct and complete manner. Nevertheless, the occurrence of errors cannot be completely ruled out, which means that we cannot guarantee the completeness, accuracy and timeliness of information, including journalistic and editorial information. Liability claims from material or immaterial damage caused by the use of the information offered are excluded, unless there is evidence of willful or gross negligence.

The publisher can change or delete texts at his own discretion and without notice and is not obliged to update the content of this website. Use or access to this website is at the visitor's own risk. The publisher, his clients or partners are not responsible for damage, such as direct, indirect, accidental, to be determined in advance or consequential damage, which allegedly resulted from visiting this website and are therefore not liable for this.

The publisher also assumes no responsibility and liability for the content and availability of third-party websites that can be reached via external links on this website. The operators of the linked pages are solely responsible for their content. The publisher therefore expressly distances himself from all third-party content that may be relevant under criminal law or liability law or that violates common decency.

12. Data processing on behalf and transmission abroad

We can also outsource the data processing described in this data protection declaration in whole or in part to companies affiliated with us in Germany or abroad or to contractors outside Crowd Solutions AG in Germany or abroad.

13. Deletion, information and correction

The data will be deleted in the event of deletion of your user account opened with the registration, as long as there are no statutory retention requirements or there should be legal permission for further storage.

On request, we will provide you with information free of charge about the data stored about you and the purpose of storage. We always strive to ensure that your data is correct and up to date. Should incorrect information ever be saved, please let us know by email at info@crowdPay.ch so that we can correct it immediately.

14. Changes

We can change this privacy policy at any time without notice. The current version published on our website applies. Insofar as the data protection declaration is part of an agreement with you, we will inform you of the change by email or in any other suitable way in the event of an update.

DATA PROTECTION OFFICER CROWDPAY

Responsible body within the meaning of data protection laws, in particular the EU General Data Protection Regulation (GDPR) and data protection law (DSG), is: Crowd Solutions AG

Lic. Iur. Roger Bossard
Bellevueweg 42
6300 Zug