

# Blu Vela S.A. Privacy Policy

Blu Vela S.A. respects your privacy and works hard to protect your personal information. We want you to understand how we may collect, store, use and protect any personal information. We will not share your information with anyone except as described in this Privacy Policy.

When you downloaded our Mobile Apps or when you registered on our Website in order to use our services you agreed to accept this policy.

We may change this policy at any time. We will post notifications of revised versions of our policy on our website <http://www.shoppingbroadcast.com/privacy.html>, and revised policies will be immediately effective.

Throughout this Privacy Policy, we will refer to our website, software, Mobile Apps and services collectively as the “Service.” Please note, this Privacy Policy does not apply to information we collect by other means than your use of the Service (including offline) or from other sources.

## Information We Collect

When you register for or use a Blu Vela S.A. account, we collect the following information:

- a When you register by our application form: we collect your name, gender, date of birth, phone number and email address.
- b When you register by FaceBook: we collect your name, gender, date of birth, phone number and email address.
- c When you use our service by Mobile Apps: we record your account transactions (Check Ins), time of transaction and Merchant where you have done your Check-In,
- d When you use our service by our Website: we may collect information about your IP address.

Additional information from or about you may also be collected in other ways, including responses to customer surveys or your communications with our customer service team.

## We use technology to help us collect information:

### Cookies

It is important for us to track how our website is used, and we (or our service providers) may place “cookies” on your computer or device. Cookies are small data files that identify you when you use our services. You have the option to decline our cookies by using your browsers settings tools, but this may interfere with your use of our website and services.

## **Log File Information**

Log file information is automatically reported by your browser each time you access a web page. When you register with or view our site, our servers automatically record certain information that your web browser sends whenever you visit any website. These server logs may include information such as your web request, Internet Protocol (“IP”) address, browser type, referring / exit pages and URLs, number of clicks, domain names, landing pages, pages viewed, and other such information.

## **Protecting Personal information**

Any information that can be used to identify a person is “Personal Information”. This does not include information that has been aggregated or made anonymous. All information is securely stored on our servers in Frankfurt, Germany, Europe. Our measures include firewalls, system-wide data encryption, physical and electronic access controls, and strict rules regarding the access and use of data on our system.

## **Using Personal Information**

We use your Personal Information to provide you the features and functionality of the Service, and we may share it with our trusted third parties you agree to join, to ensure that you have a safe, high-performance experience when using the Service. When you use the Service, including creating Check-Ins, collecting points, redeeming discounts, contacting customer service or requesting technical support, in addition to many other interactions with Blu Vela S.A, we will apply the information that we have collected. Knowing this information allows us to verify your identity, communicate with you and enforce our agreements with you, as well as secure the best possible experience for all Blu Vela S.A. members by ensuring compliance with Switzerland federal laws and our own policies. We may also use this information to measure how our members use the Service, and improve and enhance our offerings to you. Blu Vela S.A. may use certain information about you without identifying you as an individual to third parties. We do this for purposes such as

analysing how the Service is used, diagnosing service or technical problems, maintaining security, and personalising content.

We use cookies and log file information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalised content and information; (c) monitor the effectiveness of our Service; (d) monitor aggregate metrics such as total number of visitors and traffic; (e) diagnose or fix technology problems reported by our users or engineers that are associated with certain IP addresses; and (f) help you efficiently access your information after you sign in.

## **Sharing Personal information**

Blu Vela S.A. will not rent or sell your Personal Information to others. Blu Vela S.A. may share your Personal Information with third parties and Merchants in Shopping Broadcast Digital Platform you join for the purpose of providing services to you (such as those described below). If we do this, such third parties' use of your Personal Information will be bound by terms at least as restrictive as this Privacy Policy. We may store personal information in locations outside the direct control of Blu Vela S.A. (for instance, on servers or databases co-located with hosting providers). Joining ShoppingBroadcast Digital Platform requires that we share some of your personal information with third parties, including but not limited to:

- a Blu Vela S.A. Business Account holders (Merchants) who manage the transaction process and registration process of our Loyalty Program,
- b Service providers who provide us a range of essential operational services including web/direct marketing, and managed technology services. Our contracts dictate that these service providers only use your information in connection with the services they perform for us and not for their own benefit.
- c Advertising clients in ShoppingBroadcast platform which give us possibilities to inform you about their brands.
- d Law enforcement authorities or government representatives who may require us to share information in order to comply with court order and other legal mandates, or when we believe that disclosure is necessary to report suspicious activities, prevent physical harm, financial loss, or violations of our agreements and policies.
- e Other third parties, subject to your prior consent or direction.

As we develop our business, we may buy or sell assets or business offerings. Customer, Member, transaction, email, and visitor information is generally one of the transferred business assets in these types of transactions. We may also transfer such information in the course of corporate divestitures, mergers, or dissolution. Except as otherwise described in this Privacy Policy, Blu Vela S.A. will not disclose Personal Information to any third party unless required to do so by law or subpoena or if we believe that such action is necessary to (a) conform to the law, comply with legal process served on us or our affiliates, or investigate, prevent, or take action regarding suspected or actual illegal activities; (b) to enforce our Terms of Use agreement, take precautions against liability, to investigate and defend ourselves against any third-party claims or allegations, to assist government enforcement agencies, or to protect the security or integrity of our site; and (c) to exercise or protect the rights, property, or personal safety of Blu Vela S., our Users or others.

## **Compromise of Personal Information**

In the event that personal information is compromised as a result of a breach of security, Blu Vela S.A. will promptly notify those persons whose personal information has been compromised, in accordance with the notification procedures set forth in this Privacy Policy, by email, or as otherwise required by applicable law. Your Choices About Your Information You may, of course, decline to submit personally identifiable information through the Service, in which case Blu Vela S.A. may not be able to provide certain services to you. You may update or correct your account information at any time by logging in to your account. You can review and correct the information about you that Blu Vela S.A. keeps on file by contacting us as described below.

## **Children's Privacy**

Protecting the privacy of young children is especially important. For that reason, Blu Vela S.A. does not knowingly collect or solicit personal information from anyone under the age of 15 or knowingly allow such persons to register with our Service. If you are under 15, please do not send any information about yourself to us, including your name, address, mobile number, or email address. No one under the age of 15 is allowed to provide any personal information to or on Blu Vela S.A. In the event that we learn that we have collected personal information from a child under the age of 13 without verification of parental consent, we will delete that information as quickly as possible. If you believe that we

might have any information from or about a child under the age of 15, please contact us: .

## **Links to Other Web Sites**

Blu Vela S.A. is not responsible for the practices employed by websites linked to or from our website, nor the information or content contained therein. Please remember that when you use a link to go from our website to another website, our Privacy Policy is no longer in effect. Your browsing and interaction on any other website, including those that have a link on our website, is subject to that website's own rules and policies. Please read over those rules and policies before proceeding.

## **Notification Procedures**

It is our policy to provide notifications, whether such notifications are required by law or are for marketing or other business related purposes, to you via email notice, written or hard copy notice, or through conspicuous posting of such notice on our website, as determined by Blu Vela S.A. in its sole discretion. We reserve the right to determine the form and means of providing notifications to you.

## **Changes to Our Privacy Policy**

If we change our privacy policies and procedures, we will post those changes on our website to keep you aware of what information we collect, how we use it and under what circumstances we may disclose it. Changes to this Privacy Policy are effective when they are posted on this page: <http://www.shoppingbroadcast.com/privacy.html>,

## **Contact**

Please contact our Privacy Department with any questions or concerns regarding our policy:

## **E-Sign Consent**

Applicant Consent to receive disclosures and other information electronically.

## **Important Notice**

In order to enrol for a Blu Vela S.A. Business Account as defined in the Blu Vela S.A. Terms of Service, Blu Vela S.A. must provide certain disclosures required by law and can only provide these disclosures electronically if the applicant consents.

- 1 Definitions** In this E-Sign Consent, the following definitions apply: "I" and "me" mean the person who is applying to establish a Blu

Vela S.A. Business Account. "You" means Blu Vela S.A. and any person, or company, that is an assignee of Blu Vela S.A.'s rights.

- 2 Consumer Consent** By checking the "I agree to have the Terms and Conditions presented electronically," which I hereby adopt as my electronic signature, I consent and agree that:
- a You can provide disclosures required by law and other information about my legal rights and duties to me electronically.
  - b My electronic signature on agreements and documents has the same effect as if I signed them in ink.
  - c You can send all communications, billing statements and disclosures, including, but not limited to, this Blu Vela S.A. E-Sign Consent, the Blu Vela S.A. Privacy Policy, and the Blu Vela S.A. Terms of Service (collectively defined as "Disclosures") to me electronically (1) via e-mail, (2) by access to a web site that we designate in an e-mail notice sent at the time the information is available, or (3) to the extent permissible by law, by access to a web site that we will generally designate in advance for such purpose.
  - d If I want a paper copy, I can print a copy of the Disclosure or download the information for my records.
  - e This consent applies to this application and Business Account, to all future Disclosures on this Business Account, to all future transactions in which I use Blu Vela S.A. with you, at any time, and to other Disclosures that you provide to me by email, unless I have, prior to such transaction, withdrawn my consent by the procedure mentioned below.
- 3 What I Will Need** I understand that in order to access and retain the electronic Disclosures I will need the following:
- a A computer with an Internet connection.
  - b A current web browser that includes 128-bit encryption. (Minimum recommended browser standards are Microsoft Internet Explorer version 6.0 and above, Firefox version 1.5 and above, or Safari 2.0 and above.) The browser must have cookies enabled.
  - c A valid email address.
  - d Sufficient storage space to save past Disclosures and/or an installed printer to print them.
  - e If I use a spam filter that blocks or re-routes emails from senders not listed in my email address book, I must add copies of the Disclosures within 180 days of the date of the

Disclosure, and that you will provide them to me by mail at no charge. I understand that I have the right to receive these Disclosures in paper form and that I may withdraw my consent and/or request paper copies by contacting you at:

- f Blu Vela S.A.
- g Customer Support — Legal
- h Via Maggio 1
- i 6900 Lugano, Switzerland
- j Any withdrawal of my consent to receive electronic Disclosures will be effective only after you have a reasonable period of time to process my withdrawal.

**4 Updating Email Address** At any time, I can update the email address to which you will send alerts to when my Disclosures are available. I can change my email address by signing into blu-vela.net and going to “Business Account.” I can also do this by contacting you at:

- 5 Blu Vela S.A.
- 6 Customer Support — Legal
- 7 Via Maggio 1
- 8 6900 Lugano, Switzerland

**9 Legal Effect**

10 By consenting, I agree that electronic Disclosures have the same meaning and effect as if you provided paper Disclosures to me. When you send me an email or other electronic notification alerting me that the Disclosure is available electronically and make it available online, that shall have the same meaning and effect as if you provided a paper Disclosure to me, whether or not I choose to view the Disclosure, unless I had previously withdrawn my consent to receive Disclosures electronically.

**11 General**

12 I understand and agree that you reserve the right to cancel this electronic Disclosure service, change the terms of use of this service or send Disclosures in paper form at any time. I understand and agree that you are responsible for sending notice of the Disclosures to me electronically including at the email address I have provided, but are not responsible for any delay or failure in my receipt of the email notices.