

SMARTTONI DATA PRIVACY POLICY

1. General information

smartTONi SA, which is registered at Avenue d'Ouchy 4, 1006 Lausanne, Switzerland, hereby commits to protect the Personal Data of its Clients, i.e. any data allowing the direct or indirect identification of any physical person such as a name, an identification number, location data, an online identifier, or one or more elements specific to one's physical, physiological, genetic, psychological, economic, cultural or social identity.

smartTONi SA inputs, records and processes only the data required for the following purposes:

- fulfilling its contractual obligations and the provision of its Services;
- customer relationship management;
- guarantee the high quality of its Services;
- the safe operation of the Services and the associated infrastructure;
- as well as for the invoicing the Services.

smartTONi SA is required to comply with the European Regulation 2016/679 on the protection of personal data (GDPR) and the Swiss laws on the protection of personal data.

By Client, smartTONi SA means a person who is in a contractual relationship or wishes to enter into a contractual relationship with smartTONi SA for the supply of products or services in the field of task operation network management.

2. Collection and use by smartTONi SA of its Client's Personal Data

By using smartTONi SA Products and Services, Clients agree to share personal data such as their email address, serial numbers of the devices used and IP addresses. smartTONi

SA may process this data for product improvement purposes, problem solving and certain commercial activities.

The use of smartTONi SA Products and Services requires Clients to provide the following valid data: first and last name, company name, tax identification numbers, an email address and a physical address.

3. Collection and use of Consumers' data by smartTONi SA's Clients

smartTONi SA's Clients are responsible for the processing and collection of Personal Data of persons to whom they provide services (Consumers). smartTONi SA may have to process Personal Data of Clients and their Consumers. In the context of data processing, smartTONi SA and smartTONi SA's Clients are required to comply with the European Regulation 2016/679 on the protection of personal data (GDPR) when the Consumer is a European citizen. When processing Data, smartTONi SA is also subject to Swiss data protection laws.

4. Use of smartTONi SA's Clients data by third parties

For the purposes of providing the Services, smartTONi SA may transfer Personal Data of Clients to third party subcontractors providing support services, such as technology service providers (hosts) or for the management of customer requests (ticketing). Clients consent to the use of their data for those activities that are related to the provision of services by smartTONi SA.

In addition, smartTONi SA may, with the Client's permission, share Client data with software providers (i.e. integrations) used by the Client, such as property management software or a payment terminal provider.

5. Use of cookies and tracking tools by smartTONi SA for the purpose of marketing and product and service improvements

By using smartTONi SA Products and Services, Customers consent to the use of cookies and tracking tools for marketing purposes and product and service improvements. For marketing purposes, this data is used by smartTONi SA for advertising campaigns and for performance analysis. These data are used in a strictly anonymous manner, and are deleted within the time limits and according to the procedures provided by European Regulation 2016/679 on the protection of personal data (GDPR).

By continuing to use smartTONi SA's Products and Services, the Client acknowledges and consents to comply to this Privacy Policy.

smartTONi SA reserves the right to modify this Privacy Policy at any time and without notice, and commits to make it available to its Customers.