



Privacy Policy – Numbrs Website

The Numbrs Website is operated by Numbrs Personal Finance AG (the **Numbrs Website** or **our Website**). Our registered office is Edenstrasse 20, 8045 Zurich, Switzerland and our company is registered in Zurich under entry CH-422.744.016. Numbrs Personal Finance AG provides the Numbrs App. This service is subject to separate terms and conditions, for more information and to view the terms and conditions for the Numbrs App please click [here](#).

Numbrs Personal Finance AG is registered under the terms of the Data Protection Act 1998 in the Information Commissioner’s Office Public Register of Data Controllers (at www.ico.org.uk) under registration number ZA202503.

A list of our companies and partners can be obtained by contacting us by email at info@numbrs.com or writing to us at Numbrs Personal Finance AG, Edenstrasse 20, 8045 Zurich, Switzerland.

For the purposes of this Policy, you, as contracting party, are referred to in this Policy as **“you”** or **“your”**.

The purpose of this Policy is to set out the purposes for which, and the manner in which, we may collect and use personal information obtained about you. By either registering as a user of any services provided by us on the Numbrs Website, and/or by using the Numbrs Website, you consent and to this use by us. The Numbrs Website is not intended for the use by anyone under the age of 16. If you are below the age of 16, you may not use the Numbrs Website.

We ask that you read this Policy carefully as it contains important information about what to expect when we collect personal information about you and how we will use your personal data.

Your use of Numbrs Website is also governed by our online Terms and Conditions. Please ensure you have read the Terms and Conditions as well as this Policy.

1. Use of Personal Information

We may use the information that you provide to us or that is obtained by us:

- to administer the Numbrs Website services;
- to analyse and profile your preferences (e.g. market, customer and product analysis) to enable us to:
 - provide you with a personalised browsing experience when using the Numbrs Website (such as language settings); and

- to review, develop and improve the products and services which we offer and to enable us to provide other customers with relevant information through our marketing programme(s);
- to contact you, upon your request;
- to make decisions about you using computerised or automated technology.

We may store and process your information on our own information technology systems or on systems owned by third parties that may store and process your information on our behalf.

You may object to the use of your personal data for marketing and/or research purposes.

2. Categories of personal data

The following categories of personal data may be obtained and processed by us in connection with you accessing our Website:

- IP-Address, Operating System, Browser Type, Browser Version, Browser Configuration, the Name of the Internet Provider and other type of information with regards to the devices you use to access our Website that enables the identification of the user's type of device, and the connection to our Website, and the exchange of data with the user's device, and to ensure the comfortable utilization of our Website;
- URL and IP-Address of the website from which you access or from which you are being transferred to our Website, including date and time;
- Subpages that you access while browsing our Website as well as the links you click on, including date and time;
- Content of any communication through our Website, including any type of information, that users exchange with Numbrs and/or other users via the Website (for example: questions that you direct at Numbrs using the contact feature or the content of an application to a job opening);
- When you requests to schedule a call with Numbrs, you voluntarily give us certain information. This can include your name, company name, position, email address, phone number and any other information you provide us with in order to schedule the call.

3. Disclosure of Your Information

We may give information about you to the following companies and organisations who may use it for the same purposes as set out in this Policy:

- to employees and agents of ours located within the European Economic Area and other approved third parties, to administer any accounts, products and services provided to you by us now or in the future;
- to agents who (on our behalf) profile your data so that we may tailor the goods/services we offer to your specific needs;
- to anyone to whom we transfer our rights and duties under our agreement with you; and/or
- if we have a legal duty to do so or if the law allows us to do so.

Furthermore, personal data which you provide us with, in order to get in touch with us, is collected in our secure and certified data centres. The data centres are, without exception,

located in Frankfurt, Germany. The data centers are operated by Amazon Web Services Inc. (410 Terry Avenue North, Seattle, Washington 98109-5210, USA), a leading global service provider. Amazon Web Services is subject to the General Data Protection Regulation and is also contractually obliged to process the personal data exclusively on our behalf and according to our strict security standards.

4. Cookies

We use cookies to distinguish you from other users. 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. By agreeing to this Policy you consent to the use of cookies by us as described in this Policy.

a) What types of Cookies do we use?

We use cookies and similar tools across the Numbrs to improve its performance and enhance your user experience.

- **First party cookies:** We set these cookies and they can only be read by us.
- **Persistent cookies:** We use persistent cookies which will be saved on your computer for a fixed period (usually 1 year or longer). They won't be deleted when the browser is closed. We use persistent cookies to recognise your device for more than one browsing session.
- **Session cookies:** We use session cookies which are only stored temporarily during a browsing session and will be deleted from your device when the browser is closed.
- **Third party cookies:** We use a number of third party suppliers who also set cookies on our website in order to deliver the services that they are providing. These cookies are known as third party cookies.

Depending on the type of cookies we use, cookies also allow us to make the Numbrs Website more user-friendly. The Numbrs Website may also use cookies to make sure you don't see the same content repeatedly and/or to deliver content specific to your interests. Details and functions of the cookies used on the Numbrs Website are set out in the following table:

Google Analytics. We use Google Analytics cookies in order to evaluate your use of the Numbrs Website and compile reports for us on activity on the Numbrs Website. You can learn about Google Analytics cookies by visiting this site [here](#).

Google AdWords Remarketing and Conversion Tracking. Google AdWords Remarketing and Conversion Tracking is a behavioral marketing service provided by Google. It connects the activity of www.numbrs.com with the Adwords advertising network and the Doubleclick cookie. You can learn about Google AdWords Remarketing and Conversion Tracking cookies [here](#). Data collected: Cookie and Usage Data.

Facebook Conversion Tracking. Facebook Conversion Tracking is a behavioral marketing service provided by Facebook. It connects the activity of www.numbrs.com with the Facebook advertising network. You can learn about Facebook Conversion Tracking [here](#). Data collected: Usage Data.

Twitter Conversion Tracking. Twitter Conversion Tracking is a behavioral marketing service provided by Twitter. It connects the activity of www.numbrs.com with the Twitter advertising network and the Twitter cookie. You can learn about Twitter Conversion Tracking [here](#). Data collected: Cookie and Usage Data.

b) Disabling Cookies

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of the Numbrs Website. Click here for more information on how to block cookies: <http://www.aboutcookies.org/Default.aspx?page=2>.

How to disable Third Party Cookies. Users based in the European Union can visit <http://www.youonlinechoices.eu/> to opt out of third party cookies. We are not connected with this site and are not responsible for its content.

5. IP Address

Your browser generates other information, including which language the Numbrs Website is displayed in, and your Internet Protocol address (**IP address**). An IP address is a set of numbers which is assigned to your computer during a browsing session whenever you log on to the Internet via your internet service provider or your network (if you access the Internet from, for example, a computer at work). Your IP address is automatically logged by our servers and is used to collect traffic data about visitors the Numbrs Website. We also use your IP address to help diagnose problems with our server, and to administer the Numbrs Website. We do not use your IP address to identify you personally.

6. Retention Period

If Numbrs collects your personal data, we will only store it for as long as is required to fulfil the purposes set out in this Privacy Policy, or until you withdraw your consent (where you consented to Numbrs using your personal data). This does not apply if we are obliged to keep the data for a longer period of time, in particular to comply with legal retention obligations.

7. Crime Prevention

In order to protect our customers and us from fraud and theft, we may pass on information that we obtain from making identity checks and other information in our customer records, including how you conduct your account, to other companies within our group and to financial and other organisations involved in fraud prevention and detection, to use in the same way. We may also disclose any information and data relating to you to the police or any regulatory or government authority in response to any request including requests in connection with the investigation of any suspected illegal activities.

8. Your Rights

Click here for a list of all of your rights: [Appendix Your Rights](#).

9. Security

We will treat all of your information in strict confidence and we will endeavor to take all reasonable steps to keep your personal information secure once it has been transferred to our systems. However, the internet is not a secure medium and we cannot guarantee the security of any data you disclose online. You accept the inherent security risks of providing information and dealing online over the Internet and will not hold us responsible for any breach of security unless this is due to our negligence or willful default.

10. General

You have the right to know what personal data (as defined and in accordance with the Data Protection Act 1998) that we keep about you, upon receipt of a written request to the address below. You also have the right to have any information we hold about you corrected if it is incorrect. If you are concerned that any of the information we hold on you may be incorrect, and you are unable to change it yourself as described below, please contact us at the address set out below.

Please be aware the Numbrs Website may link to other websites which may be accessed through the Numbrs Website. We are not responsible for the data policies or procedures or the content of these linked websites.

11. How do I change any details stored on the Numbrs Website?

If for any reason you are unsure about the personal and account information we are holding in your name, please contact us. We will happily review your file and update the records if required. You can contact us at: support@numbrs.com.

12. Contact Us

For assistance in using the Numbrs App, you may contact our support team. For general questions about this Policy and on data protection, you may contact us by email at info@numbrs.com or mail us at Numbrs Personal Finance AG, Edenstrasse 20, 8045 Zurich, Switzerland.

The address of our representative in the European Union is: Numbrs Personal Finance AG, Lohnerhofstrasse 2, 78467 Konstanz, Germany.

You may also choose to contact our data protection officer at any time.

Email: email@iitr.de. Address: Attorney at Law Dr. Sebastian Kraska, Marienplatz 2, 80331 Munich, Germany.

13. Changes to Policy

We keep our Policy under regular review. We may amend and update this policy from time to time. Any changes in the future will be posted on this page.

This Policy was last updated on September 16th, 2019.

