



**XAURUM**  
Adding Value.

## **XAURUM PRIVACY POLICY AND COOKIE POLICY**

### **Introduction**

This privacy policy tells you how the Xaurum relevant companies use your personal data when you visit our website, interact with us, and buy our goods and services.

It also tells you about your privacy rights and how the law protects you.

This privacy policy describes the personal data collected or generated (processed) when you use Xaurum's websites ("**Site**"), xaurum.pro (CRM) and mobile application ("**App**"). It also explains how your personal data is used, shared and protected, what choices you have relating to your personal data and how you can contact us.

### **WHO is Responsible for the Processing of Your Personal Data?**

Xaurum entity responsible for the processing of your personal data will depend on how you interact with Xaurum's Site, CRM and App and where you are located in the world. The relevant Xaurum entities are referred to as "**Xaurum**", "**our**", "**we**" or "**us**" in this privacy policy.

Relevant Entities at this moment are Institute Auresco, Torch Technology AG (CH), Golden Node d.o.o (SI) and GN2 d.o.o. (SI).

### **WHAT Personal Data Do We Collect and WHEN?**

We ask you for certain personal data to provide you with the products or services you request. For example, when you make purchases, contact our customer support, request to receive communications, create an account, participate in our events or contests, or use our Site, CRM or App.

This personal data includes your:

- contact details including name, email, telephone number and billing address;
- login and account information, including username, password and unique user ID (UID);
- personal details including gender, date of birth and TAX number or personal identification number,
- personal photo and personal document photo (ID, driver's license or passport).

### **KIDS**

We comply with local laws and do not allow children to register on our Site, CRM or App when they are under the legal age limit of the country in which they reside.



## **TOOLS to Manage What Personal Data We Collect**

When using our App, CRM and Site, we also provide in-time notice or obtain consent for certain practices. For example, we will obtain consent to send you newsletters with information, news, tips and invites to certain events. We may obtain this consent through the App, CRM or Site or using the standard permissions available on your device.

In many cases, your web browser or mobile device platform will provide additional tools to allow you to control when your device collects or shares particular categories of personal data. For example, your mobile device or web browser may offer tools to allow you to manage cookie usage or location sharing. We encourage you to familiarize yourself with and use the tools available on your devices.

## **WHY and HOW Do We Use Your Personal Data?**

We use your personal data in the following ways:

### **To Provide the Features of the Site, App, CRM and Services You Request**

When you use our Site, CRM and App, we will use your personal data to provide the requested product or service. For example, if you make a purchase in our CRM, we will use the contact information you give us to communicate with you about the purchase. If you contact our customer support, we will use information about you, such as delivery or payment information, or the product you have purchased to help you resolve a problem or question.

In many cases, to use particular features within our Site, CRM and App you may need to provide us with additional data or additional consent to use particular data in a certain way.

### **To Communicate Information about our Products, Services, Events and for Other Promotional Purposes**

When you consent, we will send you marketing communications and news concerning Xaurum's products, services, events and other promotions. You can opt-out at any time after you have given your consent. This can be done through our CRM in the "Settings" section.

If you are an existing client of Xaurum (for example, if you have placed an order with us), we may use the contact details you provided to send you marketing communications about similar products or services where permitted by applicable law (unless you have opted-out). In other cases, we ask for your consent to send you marketing information. We may use the information that you provide to us as well as information from other Xaurum products or services to personalize communications on products and services that may be interesting for you.



### **To Operate, Improve and Maintain our Business, Products and Services**

We use the personal data you provide to us to operate our business. For example, when you make a purchase, we use that information for accounting, audits and other internal functions. We may use personal data about how you use our products and services to enhance your user experience and to help us diagnose technical and service problems and administer our Site, CRM and App.

### **To Protect Our or Others' Rights, Property or Safety**

We may also use your personal data about how you use our Site, CRM and App to prevent or detect fraud, abuse, illegal use, violations of our Terms and Conditions, and to comply with court orders, governmental requests or applicable law.

### **Other Purposes**

We may also use your personal data in other ways and will provide specific notice at the time of collection and obtain your consent where necessary.

### **Legal Grounds**

To process your personal data, we rely on certain legal grounds, depending on how you interact with our Site, CRM and App.

- When you purchase Xaurum products from our Site, CRM and App, we need your personal data to fulfill our contract with you. For example, we need your payment and contact details to deliver your order.
- When you use our App, we rely on your consent for processing and for certain limited purposes to fulfill our contract with you.
- We also rely on other legal grounds, such as our legitimate interests as a business, to comply with a legal obligation, or to protect your vital interests.

## **SHARING of Your Personal Data**

### **Xaurum's Sharing**

Xaurum shares your personal data with:

- Xaurum relevant entities for the purposes and under the conditions outlined above.
- Third party service providers processing personal data on Xaurum's behalf, for example for accounting and audits, deliveries, host, manage and service our data, distribute emails, research and analysis, manage brand and product promotions as well as administering certain services and features. When using third party service providers we enter into agreements that require them to implement appropriate technical and organizational measures to protect your personal data.



- Other third parties to the extent necessary to: (i) comply with a government request, a court order or applicable law; (ii) prevent illegal uses of our Site, CRM and App or violations of our Site's, CRM's and the App's Terms and Conditions and our policies; (iii) defend ourselves against third party claims; and (iv) assist in fraud prevention or investigation (e.g., counterfeiting).
- to any other third party where you have provided your consent.

We may also transfer personal data we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, spin-off, dissolution or liquidation).

## **PROTECTION and MANAGEMENT of Your Personal Data**

### **Encryption & Security**

We use a variety of technical and organizational security measures, including encryption and authentication tools, to maintain the safety of your personal data.

### **International Transfers of your Personal Data**

The personal data we collect (or process) in the context of our Site, CRM and App will be stored in the Switzerland and other countries. Some of the data recipients with whom Xaurum shares your personal data may be located in countries other than the country in which your personal data originally was collected. The laws in those countries may not provide the same level of data protection compared to the country in which you initially provided your data. Nevertheless, when we transfer your personal data to recipients in other countries, including the Switzerland, we will protect that personal data as described in this privacy policy and in compliance with applicable law.

### **Retention of your Personal Data**

Your personal information will be retained for as long as is necessary to carry out the purposes set out in this privacy policy (unless a longer retention period is required by applicable law). In general, this means that we will keep your personal data for as long as you keep your Xaurum account. Once you decide to cancel your Xaurum account, we will delete all the personal information about you that we have received from you. This can be done by contacting our customer support on email [support@xaurum.pro](mailto:support@xaurum.pro). For personal data related to product purchases, we retain this longer to comply with legal obligations (such as tax and sales laws and for warranty purposes).



## **YOUR RIGHTS Relating to Your Personal Data**

You have the right to request: (i) access to your personal data; (ii) an electronic copy of your personal data (portability); (iii) correction of your personal data if it is incomplete or inaccurate; or (iv) deletion or restriction of your personal data in certain circumstances provided by applicable law. These rights are not absolute. Where we have obtained your consent for the processing of your personal data, you have the right to withdraw your consent at any time.

If you like would to request a copy of your personal data or exercise any of your other rights, please contact us by email on [support@xaurum.pro](mailto:support@xaurum.pro).

## **Opting Out of Direct Marketing**

If you have a Xaurum account, you can opt-out of receiving Xaurum's marketing communications by modifying your preferences in the "Settings" section of our CRM. Alternatively, you can contact us by email on [support@xaurum.pro](mailto:support@xaurum.pro) .

## **COOKIES and Pixel Tags**

Xaurum collects information, which may include personal data, from your browser when you use our Site. We use a variety of methods, such as cookies and pixel tags to collect this information, which may include your (i) IP-address; (ii) unique cookie identifier, cookie information and information on whether your device has software to access certain features; (iii) unique device identifier and device type; (iv) domain, browser type and language, (v) operating system and system settings; (vi) country and time zone; (vii) previously visited websites; (viii) information about your interaction with our Sites such as click behavior, purchases and indicated preferences; and (ix) access times and referring URLs.

Third parties may also collect information via Sites through cookies, third party plug-ins and widgets. These third parties collect data directly from your web browser and the processing of this data is subject to their own privacy policies.

We use cookies and pixel tags to track our customers' usage of the Site and to understand our customers' preferences (such as country and language choices). This enables us to provide services to our customers and improve their online experience. We also use cookies and pixel tags to obtain aggregate data about site traffic and site interaction, to identify trends and obtain statistics so that we can improve our Site. There are generally three categories of cookies used on our Site:



- **Functional:** These cookies are required for basic site functionality and are therefore always enabled. These include cookies that allow you to be remembered as you explore our Site within a single session or, if you request, from session to session. They help make the shopping cart and checkout process possible as well as assist in security issues and conforming to regulations.
- **Performance:** These cookies allow us to improve our Site's functionality by tracking usage. In some cases, these cookies improve the speed with which we can process your request and allow us to remember site preferences you have selected. Refusing these cookies may result in poorly-tailored recommendations and slow site performance.
- **Social media and Advertising:** Social media cookies offer the possibility to connect you to your social networks and share content from our Site through social media. Advertising cookies (of third parties) collect information to help better tailor advertising to your interests, both within and beyond our Site. In some cases, these cookies involve the processing of your personal data. Refusing these cookies may result in seeing advertising that is not as relevant to you or you not being able to link effectively with Facebook, Twitter, or other social networks and/or not allowing you to share content on social media.

You can always change your preference by visiting the "Cookie Settings" at the bottom of each page of our Sites.

For a comprehensive and up-to-date summary of every third-party accessing your web browser, we recommend installing a web browser plugin built for this purpose. You can also choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings on each browser and device that you use. Each browser is a little different, so look at your browser Help menu to learn the correct way to modify your cookies. If you turn cookies off, you may not have access to many features that make our Sites and Apps more efficient and some of our services will not function properly.

### **CHANGES to Our Privacy Policy**

Applicable law and our practices change over time. If we decide to update our privacy policy, we will post the changes on our Site, CRM and App. If we materially change the way in which we process your personal data, we will provide you with prior notice, or where legally required, request your consent prior to implementing such changes. We strongly encourage you to read our privacy policy and keep yourself informed of our practices. This privacy policy was last modified in May 2018.

### **QUESTIONS and Feedback**

We welcome questions, comments, and concerns about our privacy policy and privacy practices.

If you wish to provide feedback or if you have questions or concerns or wish to exercise your rights related to your personal data, please contact Customer Service on email at [support@xaurum.pro](mailto:support@xaurum.pro).