

Privacy Statement

Scope

This Privacy Statement Swapfiets governs the collection, use and other forms of processing of personal data by Swapfiets ("Swaprad GmbH") related to our services, our Swapfiets products and this website.

Who is responsible for collecting and processing of your personal data?

Swaprad GmbH (Pliniusstraße 8, 48488 Emsbüren) is the legal entity responsible for all collection and all processing of your personal data in connection with the products, services and websites of Swapfiets.

Why do we collect your personal data?

When you choose to register your personal data, contact us, or visit our websites, we will collect some personal data about you. We may process these personal data for the following purposes:

1. communicate with you in a personal way or to inform you about Swapfiets products or services;
2. provide customer service, including service around the purchase of services and products, fulfil warranty obligations and product recalls for our own services and those of related companies, and to deal with any enquiries or complaints;
3. administer and fulfil your purchases of Swapfiets products including the financial and logistic handling;
4. administer your account;
5. administer your participation in any contests, promotions, surveys or website features;
6. perform market research and improve our business, services and Swapfiets products;
7. perform statistical analyses and reporting;
8. providing services on the Internet;
9. communicating with participants and offering a loyalty program;
10. provide app functionality, including providing relevant commercial messages;
11. to communicate future promotional and marketing information including direct marketing purposes and retargeting;
12. to comply with our legal obligations, resolve disputes, or enforce our agreements;
13. as otherwise stated at or about the time information is collected.

Which personal data we collect?

Which personal data we exactly collect, depends on the which websites, products or services you use. In general there are three categories of personal data we collect or use:

Personal data you provide	This is the personal data that you enter when you use our websites, products or services. This data includes e.g. your name, address, gender, email address, phone number, age, birth date, Swapfiets products you bought, the account name and password that you create, bank details for buying Swapfiets products etc.
Data collected via sensors	Many products are equipped with one or more sensors or use the sensors of the devices on which the products are provided. Examples of sensors are GPS receivers, Wi-Fi or Bluetooth receivers, a camera and touch screens. In accordance with the purposes for processing the via the sensors collected data about you and the used devices will be sent to Swaprad GmbH other third parties that need the data for providing the agreed services to Swaprad GmbH.
Metadata	This is data that is collected or generated automatically when you use the websites, products or services of Swapfiets. Metadata is often collected or generated when using a computer or device when you send data via a computer network, such as the Internet. This data contains data that may be used by the user interface or device activities, as well as IP addresses, unique device identifiers, MAC addresses of Wi-Fi and Bluetooth devices, cookies and data from computer activities itself.

How do we collect your personal data?

In the table below we describe per way of collecting the categories of personal data that are collected and the purposes for which we process the personal data:

Ways of collecting	Categories of personal data collected	Purposes for processing the personal data
Registration for our newsletter	<ul style="list-style-type: none"> Personal data you provide 	The above described purposes: 1, 2, 6, 7, 8, 11, 12 and 13
Contact form customer service	<ul style="list-style-type: none"> Personal data you provide 	The above described purposes: 1, 2, 6, 7, 8, 11, 12 and 13
Swapfiets account creation	<ul style="list-style-type: none"> Personal data you provide 	The above described purposes: 1, 2, 4, 6, 7, 8, 9, 11, 12 and 13
Product Swapfiets registration	<ul style="list-style-type: none"> Personal data you provide 	The above described purposes: 1, 2, 3, 6, 7, 8, 9, 11, 12 and 13
Buying Swapfiets products on the website	<ul style="list-style-type: none"> Personal data you provide 	The above described purposes: 1, 2, 3, 6, 7, 8, 9, 11, 12 and 13
Attend to product promotion, events or online forum	<ul style="list-style-type: none"> Personal data you provide 	The above described purposes: 1, 5, 6, 8, 11, 12 and 13
Visit our websites (cookies)	<ul style="list-style-type: none"> Metadata <p>NB: please refer to our Cookie Policy Swapfiets for further details</p>	The above described purposes: 6, 7, 8, 11, 12, and 13
Log on our websites via social media	<ul style="list-style-type: none"> Personal data you provide <p>NB: we never get access to your social media account</p>	The above described purposes: 1, 6, 7, 8, 11, 12 and 13

Use of our app	<ul style="list-style-type: none"> • Personal data you provide • Data collected via sensors • Metadata <p>NB: you will be informed about this via the Privacy Statement of the app.</p>	The above described purposes: 1, 2, 6, 7, 8, 10, 11, 12 and 13
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If you choose to provide your personal data on one of the above ways and provide your explicit consent or visit our websites and accepts the cookies you authorize

Swaprad GmbH

and its service providers to collect, store, use, disclose, and otherwise process your personal data in connection with the purposes as described above. You have the right to withdraw your consent which you may have given to the processing of your personal data at any time.

How do we share or transfer your personal data?

You should be aware that Swaprad GmbH is part of a business group within SwapThis Holding. As a consequence your personal data may be shared within and/or transferred to other business group companies or other SwapThis Holding companies around the world.

Swaprad GmbH may share your personal data also with third party service providers to perform certain processing activities on behalf of Swaprad GmbH. Swaprad GmbH requires these service providers to process and protect your personal data diligently. Other than set out in this statement, Swaprad GmbH

will not sell, rent, lease, or provide your personal data to third parties allowing them to use your personal data for their own purposes.

Swaprad GmbH might sell (part of) a business company to another company. Where such business relates to Swapfiets, such transfer of ownership may include the transfer of your personal data to the new owner.

We will otherwise only release your personal data if so required or authorized by law, where necessary for preventing or combating fraud, where necessary for dispute resolution, or for any other pressing legitimate need which under the circumstances must outweigh your privacy interests, such as the security of our business and the safety of our staff.

How do we protect your personal data?

Swaprad GmbH will take appropriate technical and organizational security measures against loss or unlawful processing of this data. This may include using secure registration forms, encryption of data, and restricting access to your personal data.

Please note that some third countries do not provide for an adequate level of protection for your personal data. However, you can be assured that Swaprad GmbH will take appropriate safeguards for the confidentiality and protection of your data.

How long do we retain your personal data?

After you opt out or delete your account, your personal data will be deleted within a reasonable timeframe. We have a retention policy in place and will only retain the personal data to comply with our legal obligations, resolve disputes, and enforce our agreements.

Cookies, web beacons and similar techniques

If you are using our websites, services, applications, communications (including email) and accessing or using tools, we may use cookies, web beacons and other similar technologies for storing information to provide you with a better, faster and safer browser experience.

Please refer to our [Cookie Policy](#) for the explanation of cookies, web beacons and similar techniques, how we use these techniques and how you can control these techniques.

Children

We strongly recommend that parents take an active role in supervising the online activity of their children under the age of sixteen. Swaprad GmbH generally does not intend to collect personal data from and/or generally does not intentionally communicate with children. However, in case we need to communicate with a child, we will endeavour to give the parents or legal guardians a reasonable opportunity to consent before we use the personal data of the child, except where we merely answer the child's question or service the child's request.

Policy changes

We may change this Privacy Statement from time to time. We will inform you when we update the Privacy Statement but we also encourage you to take notice of this policy regularly. This policy was last modified on 8 May 2018.

Your rights

Furthermore, you can at all times request information on the personal data stored about you, their origin, recipients or type of recipients to whom the data are provided, as well as the purpose of the storage and may have the right to request rectification, blocking and/or deletion of your data. For these purposes you can contact us via the below mentioned email address.

Questions and feedback

Please send us your questions and comments about privacy to our Data Protection Officer via privacy@swapfiets.de.