

Swissploitation Films Privacy Policy

Effective Date: 24.9.2020

Swissploitation Films GmbH, Langstrasse 14, 8004 Zürich, Switzerland (“Swissploitation”, “us”, “we”, “our” or “us”) operates madheidi.com and madinvest.co websites (“Service”).

This page (“Privacy Policy”) informs you of our policies regarding the collection, use and disclosure of Personal Data when you use our Service and the choices you have associated with that data.

We use your Personal Data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this Privacy Policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from madinvest.co.

We attach great importance to protection and security of your Personal Data. We regard the protection of your private sphere and the compliance with the data protection requirements as the key matter when collecting, processing, and using your Personal Data. Therefore, your Personal Data are collected, processed, and used exclusively in compliance with the provisions of data protection laws, in particular the Swiss Federal Act on Data Protection (FADP) and the General Data Protection Regulation (GDPR).

1. Definitions

“Service” is the madheidi.com/madinvest.co websites and all related services such as the offering of Mad Invest Shares, Heidi Bonds, or the sale of merchandise.

“Personal Data” is any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“Data Subject” is an identified or identifiable natural person, i.e. one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“Data Controller” means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

“Data Processor” means any natural or legal person who processes Personal Data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your Personal Data more effectively.

2. Information Collection and Use

We collect several different types of information for various purposes to provide and improve our Service to you.

2.1. Types of Data Collected

2.1.1. General

While using our Service, we may ask you to provide us with certain Personal Data. This may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Cookies and Usage Data

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or the instructions provided in any email we send.

2.1.2. Payment Data

To provide our Service, we may collect payment details, such as your credit card or debit card details.

2.1.3. Usage Data

We may also collect information on how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

2.1.4. Location Data

We may use and store information about your location if you give us permission to do so ("Location Data"). We use this data to provide features of our Service, to improve and customise our Service.

You can enable or disable location services when you use our Service at any time by way of your device settings.

2.1.5. Tracking & Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and we hold certain information. For more information on cookies, please refer to our separate Cookie Policy.

2.2. Use of Data

Swissploitation uses the collected data for various purposes:

- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

3. Legal Basis for Processing Personal Data

Our legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

Swissploitation may process your Personal Data because:

- We need to perform a contract with you
- You have given your consent to do so
- The processing is in our legitimate interests based on our evaluation that the processing is fair and reasonable
- The processing is in public interest, e.g. the compliance with applicable laws and regulation.

4. Data Retention

Swissploitation will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.

Swissploitation will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer periods.

5. Service Providers and Transfer of Data

We may employ third party companies (“Service Providers”) to facilitate the operation of our Service, assist us in analysing how our Service is used, or perform related services. These Service Providers have access to your Personal Data insofar as necessary to perform these tasks on our behalf and are required to safeguard it in accordance with our contractual obligations and applicable data protection legislation.

Such safeguards may include transfer of your Personal Data to countries where the data protection laws may differ from those in your jurisdiction but that have deemed to provide an adequate level of protection applying standard data protection model clauses, binding corporate rules or other standard contractual obligations which provide for appropriate protection of data. Swissploitation will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

Your consent to this Privacy Policy followed by your submission of Personal Data represents your agreement to that transfer.

In particular, we may use the following Service Providers:

5.1. Analytics

We may use third-party Service Providers to monitor and analyse the use of our Service.

- Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

5.2. Behavioral Remarketing

Swissploitation uses remarketing services to advertise on third party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimise and serve ads based on your past visits to our Service.

- Google Ads (formerly Google AdWords)

We use the services of Google Ads to draw attention to our Service with the help of advertising materials on external websites. The Google Ads (AdWords) remarketing service is provided by Google Inc.

The Google Ads service helps us determine in relation to the data of the advertising campaigns how successful the individual advertising measures are. We strive to show you advertisements that are of interest to you, to make our Service more interesting for you and to achieve a fair calculation of advertising costs.

The advertising materials are delivered by Google via so-called "Ad Servers". For this purpose, we use ad server cookies, through which certain parameters for measuring success, such as the insertion of ads or clicks by users, can be measured. If you access our Service via a Google ad, Google Ads stores a cookie on your device. These cookies usually expire after 30 days and are not intended to identify you personally. For this cookie,

the unique cookie ID, number of ad impressions per placement (frequency), last impression (relevant for post-view conversions) and opt-out information (mark that the user no longer wishes to be addressed) are usually stored as analysis values.

These cookies enable Google to recognize your Internet browser. If a user visits certain pages of an Ads customer's website and the cookie stored on their device has not expired, Google and the customer can recognize that the user has clicked on the ad and has been redirected to this page. Each Ads customer is assigned a different cookie. Cookies cannot therefore be traced via the websites of Ads customers. We do not collect and process any personal data in the aforementioned advertising measures. We only receive statistical evaluations from Google. On the basis of these evaluations we can recognize which of the used advertising measures are particularly effective. We do not receive any further data from the use of advertising material; in particular, we cannot identify users on the basis of this information.

Due to the marketing tools used, your browser automatically starts a direct connection to the Google server. We have no influence on the extent and the further use of the data which are raised by the use of this tool by Google and inform you therefore according to our knowledge: By the integration of Ads conversion Google receives the information that you called the appropriate part of our Internet appearance or clicked an announcement of us. If you are registered with a Google service, Google may associate your visit with your account. Even if you are not registered with Google or have not logged in, it is possible that the providers may obtain and store your IP address.

You can opt out of Google Analytics for Display Advertising and customise the Google Display Network ads by visiting the Google Ads Settings page: <http://www.google.com/settings/ads>

Google also recommends installing the Google Analytics Opt-out Browser Add-on - <https://tools.google.com/dlpage/gaoptout> - for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

- Twitter Ads

We use Twitter Ads, a service provided by Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07 Ireland ("Twitter").

We use Twitter Ads for drawing attention to our offers by means of advertising material. We are able to determine how successful the individual advertising measures are in relation to the data of the advertising campaigns. We thereby pursue our interest in showing you advertisements that are of interest to you, in making our Service more attractive for you and in reaching a fair calculation of advertising costs.

Information on your use of the Service established by means of cookies is normally transferred to a server operated by Twitter and stored there. As Twitter also maintains servers in the USA, it is possible that information be transferred to the United States.

Twitter Ads uses cookies. You can disable the use of cookies by Twitter Ads by selecting the appropriate settings in your browser; however, please note that in that case you may not be able to avail of the full functionality of this Service. Further information on Twitter Ads: <https://ads.twitter.com/login?lang=en>.

You can learn more about the privacy practices and policies of Twitter by visiting their Privacy Policy page: <https://twitter.com/privacy>

You can also opt-out from Twitter's interest-based ads by following their instructions: <https://support.twitter.com/articles/20170405>

- Facebook Ads

This Service also uses the remarketing function "Custom Audiences" of Facebook Inc., 1601 S California Ave, Palo Alto, California 94304, USA ("Facebook"). This remarketing function allows users of the website to see interest-based advertisements ("Facebook ads") when visiting the social network Facebook or other websites that also use this tool.

Your browser automatically establishes a direct connection to the Facebook server. We have no influence on the extent and further use of the data collected by Facebook through the use of this tool and therefore inform you according to our level of knowledge: By integrating Facebook Custom Audiences, Facebook receives the information that you have called up the corresponding website of our Internet presence, or that you have clicked on an advertisement from us. If you are registered with a Facebook service, Facebook can associate your visit with your account. Even if you are not registered with Facebook or have not logged in, it is possible that the providers may obtain and store your IP address and other identifying information.

You may access the following links for more information on data collection: <http://www.facebook.com/help/186325668085084>, <http://www.facebook.com/about/privacy/your-info-on-other#applications> as well as <http://www.facebook.com/about/privacy/your-info#everyoneinfo>. Please click here if you would like to withdraw your consent https://www.facebook.com/settings/?tab=ads#_=_.

Facebook adheres to the Self-Regulatory Principles for Online Behavioural Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA <http://www.aboutads.info/choices/>, the Digital Advertising Alliance of Canada in Canada <http://youradchoices.ca/> or the European Interactive Digital Advertising Alliance in Europe <http://www.youronlinechoices.eu/>, or opt-out using your mobile device settings.

For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>.

- Pinterest

Pinterest remarketing service is provided by Pinterest Inc.

You can opt-out from Pinterest's interest-based ads by enabling the "Do Not Track" functionality of your web browser or by following Pinterest instructions: <http://help.pinterest.com/en/articles/personalization-and-data>

You can learn more about the privacy practices and policies of Pinterest by visiting their Privacy Policy page: <https://about.pinterest.com/en/privacy-policy>

5.3. Payments

We may provide paid products and/or services within the Service. In that case, we use third-party services for payment processing (e.g. payment processors):

- Stripe (their Privacy Policy can be viewed at <https://stripe.com/us/privacy>)
- PayPal / Braintree (their Privacy Policy can be viewed at <https://www.paypal.com/webapps/mpp/ua/privacy-full>)
- Filmchain Ltd. UK (their Privacy Policy can be viewed at <https://filmchain.co/terms/>)
- Coinbase (their Privacy Policy can be viewed at <https://www.coinbase.com/legal/privacy>)

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

6. Disclosure of Data

6.1. Business Transaction

If Swissploitation is involved in a merger, acquisition or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.

6.2. Disclosure for Law Enforcement

Under certain circumstances, Swissploitation may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

6.3. Legal Requirements

Swissploitation may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Swissploitation
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

7. Security of Data

We take reasonable technical and organizational security measures that we deem appropriate in order to protect your data against manipulation, loss, or unauthorized third-party access. Our security measures are continually adapted to technological developments.

We also take internal data privacy very seriously. Our employees and the Service Providers that we retain are required to maintain secrecy and to comply with applicable data protection legislation. In addition, they are granted access to Personal Data only insofar as this is necessary for them to carry out their respective tasks or mandate.

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

8. Our Policy on “Do Not Track” Signals under the California Online Protection Act (CalOPPA)

We do not support Do Not Track (“DNT”). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

9. Your Data Protection Rights

You have the below data protection rights on the basis of applicable data protection laws. Please note that we may ask you to verify your identity (e.g. with a copy of an ID card, if your identity cannot otherwise be clearly identified) before responding to such requests.

- The right to access, amend and erase: You have a right to request an electronic copy of your Personal Data, correct your Personal Data if you believe it contains incorrect or incomplete information or delete your Personal Data when it is no longer necessary for the purposes for which it was collected or when it was unlawfully collected.
- To stop receiving emails from us, please click on the ‘unsubscribe’ link in the email you received.
- The right to object: You have the right to object to our processing of your Personal Data.
- The right of restriction: You have the right to request that we restrict the processing of your Personal Data.
- The right to data portability: You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- The right to withdraw consent: You also have the right to withdraw your consent at any time where Swissploitation relied on your consent to process your personal information.
- The right to complain with a supervisory authority: You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority.

10. Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click a third party link, you will be directed to that third party’s site. We strongly advise

you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

11. Children's Privacy

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

12. Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

13. Contact us

If you have any questions about this Privacy Policy, please contact us:

invest@madheidi.com

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8004 Zurich
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