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# **INTMAX Privacy Policy**

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## Version 1.0 – 4 October 2023

### About us

This privacy policy ("**Privacy Policy**") explains how we process and protect your personal data when you use this Website via <https://intmax.io/> (the "**Website**") or our services included INTMAX Wallet (<https://wallet.intmax.io/>).

The Website is operated by Ryodan Systems AG, Hirschengraben 40, 6003 Luzern, Switzerland (the "**Company**", "**we**", "**our**", or "**us**"). The Company is the controller for the data processing described below.

Unless otherwise defined in this Privacy Policy or our General Terms & Conditions, the definitions used in this Privacy Policy have the same meaning as in the Swiss Federal Act on Data Protection or the EU General Data Protection Regulation.

### 1 Personal data we collect

We may collect or receive personal information for a number of purposes connected with our business operations when you use our website or our services. This may include the following:

- Client requests (e.g. email address, details about your request)
- Website visitor details (e.g. IP address, logfiles)

### 2 How we collect personal data

We collect information about our users when they use our Website or our services, including taking certain actions within it.

#### Directly

- When users access, use, or otherwise interact with our Website.
- When users correspond with us and submit their data to us via electronic communication.

#### Indirectly

- From third parties, such as third-party cookies and Google Analytics.

### 3 Legal Basis and purposes

Our legal basis for collecting and using the personal data described in this Privacy Policy depends on the personal data we collect and the specific purposes for which we collect it.

**Contract:** To perform our contractual obligations or take steps linked to a contract with you. In particular:

- To provide our services.

**Consent:** We may rely on your freely given consent at the time you provided your personal data. In particular:

- To provide users with news, special offers, newsletters, and general information about goods and services which we offer.

**Legitimate interests:** We may rely on legitimate interests based on our assessment that the processing is fair and reasonable and does not override your interests or fundamental rights and freedoms. In particular:

- To maintain and improve our Website and services.
- To develop new services.
- For the legal enforcement of claims and rights.

**Necessity for compliance with legal obligations:** To meet regulatory and public interest obligations. In particular:

- To comply with applicable regulations and legislation.

### 3.1 Newsletter

We may send newsletters and other notifications by email and through other communication channels, if you register in our email list. We may have newsletters and other notifications sent by third parties or send them with the help of third parties.

In principle, you must expressly consent to the use of your e-mail address and other contact addresses, unless the use is permitted for other legal reasons. We use "double opt-in" for any consent in the case of e-mails, i.e. you will receive an e-mail with a web link that you must click to confirm, so that no misuse by unauthorized third parties can take place. We may log such consents including Internet Protocol (IP) address, date and time.

Newsletters and other notifications may contain web links or tracking pixels that record whether an individual newsletter or notification has been opened and which web links were clicked (performance measurement). Such web links and tracking pixels record the use of newsletters and other notifications. We need this statistical recording of usage, including success and reach measurement,

in order to be able to offer newsletters and other notifications effectively and in a user-friendly manner, as well as permanently, securely and reliably, based on the reading habits of the recipients.

You can unsubscribe from newsletters and other notifications at any time and thereby object in particular to the aforementioned collection of usage. You can do so by contacting us directly or following the link included in the footer of each newsletter we send you.

## **4 Data retention**

We retain personal data for so long as it is needed for the purposes for which it was collected or in line with legal and regulatory requirements or contractual arrangements.

## **5 Service Providers**

The Company may engage third party companies ("**Service Providers**") to facilitate the operation of our Website, assist in analyzing the usage of the Website, or perform Website and service-related services, such as payment and the provision of IT infrastructure services. These third parties have access to the user's personal data only to the extent necessary to perform these tasks on behalf of the Company.

Type(s) of service providers who might access your personal data:

- Professional advisors that we use, such as accountants and lawyers
- Public authorities
- Third parties like banks, marketing companies, consultants
- Software and IT service providers

## **6 Data transfers**

The Company and/or the Service Providers may transfer your personal data to and process it:

- In Switzerland
- In the European Union or the European Economic Area
- The United States

We may use service providers who are partly located in so-called third countries (outside the European Union or the European Economic Area or Switzerland) or process personal data there, i.e. countries whose level of data protection does not correspond to that of the EU or Switzerland.

We safeguard your personal data per our contractual obligations and applicable data protection legislation when transferring data abroad.

Such safeguards may include:

- the transfer to countries that have been deemed to provide an adequate level of protection according to lists of countries published by the Federal Council, as well as to countries where there is an adequacy decisions by the European Commission in place;
- applying standard data protection model clauses, binding corporate rules or other standard contractual obligations that provide appropriate data protection.

If a third country transfer takes place and there is no adequacy decision or appropriate safeguards, it is possible and there is a risk that authorities in the third country (e.g. intelligence services) can gain access to the transferred data and that the enforceability of your data subject's rights cannot be guaranteed.

## **7 Data disclosure**

We may disclose your personal data in the good faith belief that such action is necessary:

- To comply with a legal obligation (i.e., if required by law or in response to valid requests by public authorities, such as a court or government agency);
- To protect the security of the Website and defend our rights or property;
- To prevent or investigate possible wrongdoing in connection with us;
- To defend ourselves against legal liability.

## **8 Cookies**

The Website uses cookies and similar technologies (collectively "tools") provided either by us or by third parties.

A cookie is a small text file that is stored on your device by the browser. Comparable technologies are, in particular, web storage (local / session storage), fingerprints, tags, or pixels. Most browsers are set by default to accept cookies and similar technologies. However, you can usually adjust your browser settings so that cookies or similar technologies are rejected or only stored with your prior consent. If you refuse cookies or similar technologies, you may not be able to use all of our services without problems.

In the following, the tools we use are listed by category, whereby we inform you in particular about the providers of the tools, the storage period of the cookies, and the transfer of data to third parties. We

also explain in which cases we obtain your voluntary consent to use the tools and how you can revoke this consent.

## **8.1 Legal basis and revocation**

### **8.1.1 Legal basis**

We use tools that are necessary for the operation of the website on the basis of our legitimate interest in enabling you to use our website more conveniently and individually and to make use of it as time-saving as possible. In certain cases, these tools may also be necessary for the performance of a contract or to carry out pre-contractual measures. In these cases, access to and storage of information in the terminal device is absolutely necessary and is carried out in the EU on the basis of the implementation laws of the ePrivacy Directive of the EU member states.

We use all other tools, especially those for marketing purposes, on the basis of your consent. In these cases, access to and storage of information in the end device is subject to consent and is carried out in the EU on the basis of the implementation laws of the ePrivacy Directive of the EU member states.

If personal data is transferred to third countries, we refer you to our privacy policy, also with regard to the risks this may entail. If you have given your consent to use certain tools, we will (also) transfer the data processed when using the tools to third countries on the basis of this consent.

### **8.1.2 Obtaining your consent**

Our website uses a Cookie Banner to collect and manage consent and any revocations. When you make a decision in the consent banner, a cookie is set that records your consent or refusal. We use this technically necessary cookie on the basis of our legitimate interest in documenting your consent. Access to and storage of information in the end device is absolutely necessary in these cases and is carried out in the EU on the basis of the implementation laws of the ePrivacy Directive of the EU member states. If you delete your cookies, we will ask you for your consent again when you access the website at a later date.

### **8.1.3 Withdrawing your consent or changing your selection**

You can revoke your consent for certain or all tools at any time. To do so, please go to the settings in our cookie banner. There you can also change the selection of tools you wish to consent to as well as find additional information on the cookies and the respective storage period. Alternatively, you can assert your revocation for certain tools directly with the provider.

## **8.2 Essential Tools**

We use certain tools to enable the basic functions of our website ("Essential tools"). Without these tools, we could not provide our service. Therefore, Essential tools are used without consent based on

our legitimate interests or to fulfil a contract or to carry out pre-contractual measures. These cookies are used for the following purposes:

- store privacy preferences;
- authenticate users for login

### **8.3 Non-essential Tools**

In order to improve our website, we use tools to collect statistics and analyse general usage behaviour based on access data ("Non-essential tools"). We also use analytics services to evaluate the use of our various marketing channels. The legal basis for these non-essential tools is – unless otherwise stated – your consent.

#### **8.3.1 Google Analytics**

Our website uses the web analytics service Google Analytics 4, a service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google Analytics 4"). If you have not consented to the use of the analytics tools, your data will not be collected as part of Google Analytics 4.

Google Analytics 4 uses JavaScript and pixels to read information on your terminal device and cookies to store information on your terminal device. This is used to analyse your usage behaviour and to improve our website. The access data is compiled by Google on our behalf into pseudonymous usage profiles and transferred to a Google server in the USA. We will process the information obtained in order to evaluate your use of the website and to compile reports on website activities.

The data collected as part of the usage analysis of Google Analytics 4 is enriched with data from the Google Search Console and linked to data from Google Ads, in particular to measure the success of our advertising campaigns (so-called conversions).

The following data may be processed by Google Analytics 4: IP address; user ID and device ID; referrer URL (previously visited page); pages viewed (date, time, URL, title, length of stay); downloaded files; clicked links to other websites; achievement of certain goals (conversions); technical information (operating system; browser type, version and language; device type, brand, model and resolution); approximate location (country, region and city, if applicable, based on anonymised IP address).

This tool uses the following cookies:

- "\_ga" (2 years), "\_gid" (24 hours): Identification and differentiation of visitors by a user ID;

## 9 Data Security

We take reasonable technical and organisational security measures that we deem appropriate to protect your stored data against manipulation, loss, or unauthorised 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 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 personal data is important to us but remember that no method of transmission over the Internet or electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your personal data, we cannot guarantee its absolute security. We recommend using antivirus software, a firewall, and other similar software to safeguard your system.

## 10 Your rights

You have the below data protection rights. To exercise these rights, you may contact the above address or send an e-mail to: [customer@intmax.io](mailto:customer@intmax.io). Please note that we may ask you to verify your identity before responding to such requests.

- **Right of access:** You have a right to request a copy of your personal data, which we will provide to you in an electronic form.
- **Right to amendment:** You have the right to ask us to correct our records if you believe they contain incorrect or incomplete information about you.
- **Right to withdraw consent:** **If you have provided your consent to the processing of your personal data, you have the right to withdraw your consent with effect for the future. This includes cases where you wish to opt-out from marketing communications. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you initially consented unless there is another legal basis for processing. To stop receiving emails from us, please click on the 'unsubscribe' link in the email you received or contact us at [customer@intmax.io](mailto:customer@intmax.io).**
- **Right to erasure:** You have the right to request that we delete your personal data when it is no longer necessary for the purposes for which it was collected or when it was unlawfully processed.
- **Right to restriction of processing:** You have the right to request the restriction of our processing of your personal data where you believe it to be inaccurate, our processing is



unlawful, or where we no longer need to process it for the initial purpose, but where we are not able to delete it due to a legal obligation or because you do not want us to delete it.

- **Right to portability:** You have the right to request that we transmit your personal data to another data controller in a standard format such as Excel, where this is data which you have provided to us and where we are processing it on the legal basis of your consent or to perform our contractual obligations.
- **Right to object to processing:** **Where the legal basis for our processing of your personal data is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have a compelling legal basis for the processing which overrides your interests or if we need to continue to process the personal data for the exercise or defence of a legal claim.**
- **Right to lodge a complaint with a supervisory authority:** You have the right of appeal to a data protection supervisory authority if you believe that the processing of your personal data violates data protection law. The competent data protection authority in Switzerland is the Federal Council ([www.edoeb.admin.ch/edoeb/en/home.html](http://www.edoeb.admin.ch/edoeb/en/home.html)).

## 11 Links to third-party apps and sites

Our website may contain links to websites or apps that are not operated by us. When you click on a third party link, you will be directed to that third party's website or app. We have no control over, and assume no responsibility for, the content, privacy policies, or practices of any third party websites or services.

We maintain online presences on social networks to, among other things, communicate with customers and prospective customers and to provide information about our products and services. If you have an account on the same network, it is possible that your information and media made available there may be seen by us, for example, when we access your profile. In addition, the social network may allow us to contact you. The content communication via the social network and the processing of the content data is thereby subject to the responsibility of the social network. As soon as we transfer personal data into our own system, we are responsible for this independently. This is then done in order to carry out pre-contractual measures and to fulfil a contract. For the legal basis of the data processing carried out by the social networks under their own responsibility, please refer to their data protection declarations. Below is a list of social networks on which we operate an online presence:

- Twitter: [Privacy Policy](#)
- Telegram: [Privacy Policy](#)

- GitHub: [Privacy Policy](#)
- Discord: [Privacy Policy](#)

## **12 Changes to this privacy policy**

We may update our Privacy Policy from time to time. We, therefore, encourage you 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, do not hesitate to get in touch with us at: [customer@intmax.io](mailto:customer@intmax.io).