

Effective date: 10 May 2017

1. General

1.1. Our Privacy Policy

Receptio by Syspay SA (registered number: CH-660.1.239.012-5) with its registered office at Rue des Alpes 21, Geneva 1201, Switzerland (“we” or “us”) are committed to protecting your information and respecting your privacy.

This Privacy Policy and any other documents referred to therein set out the basis on which any personal data we collect from you, or which you provide to us, through our website <https://receptio.ch> (“Website”) or in connection to your Receptio Account (as defined in the Receptio Terms and Conditions) will be processed by us. When you complete any form, speak with our staff or submit any details to us or using our Website, we will collect, use and disclose your personal information in the manner described in this Privacy Policy.

1.2. Changes to this Privacy Policy

Any changes we make to this Privacy Policy in the future will be posted on this page. Any new Privacy Policy will be effective from the time that it is posted on the Website. We reserve the right to make changes to our Privacy Policy at any time, without notice, where such change is required by applicable legislation.

If we make any material changes to the way your personal data are used, we will notify you by email prior to the change becoming effective. You may object to any new use or change in use of your personal data by contacting us as set out in section 10 (Contact Us) below. We will treat such objection as a notice to terminate your Receptio Account should you be in a possession of one.

2. Information We Collect

2.1 Information We Collect from You

We may collect and process the following data about you:

- your full name, address, email address, telephone number, date of birth and bank or payment card details and any proof of your identity and/or address that we may request,
- details of any transactions you carry out through our UpgradeGenius platform, our Website, using your Receptio Account and of the fulfillment of your requests,

- details of any bank account (including, but not limited to, account holder, account name, account number, IBAN, sort code, online banking PIN, Transaction Authentication Number “TAN” and password, available balance and transaction history of your bank account,),
- details of any credit, debit or other card used by you for transactions,
- your participation in any promotion sponsored by us,
- correspondence that you send us,
- calls that we make to you or you make to us,
- surveys that you complete,
- information collected through cookies – please see section 9 Cookies for more details,
- your IP address, log-in times, operating system and browser type,
- details of your visits to our Website including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access whilst visiting our Website.

2.2 Information We Collect from Third Parties about You

In order to fulfil our legal obligations to prevent fraud and money laundering, we will obtain information about you from third party agencies, including your financial history, country court judgments and bankruptcies, from credit reference and fraud prevention agencies when you open a Receptio Account and at any time when we feel it is necessary to prevent fraud and minimise our financial risks.

3. How We Use Your Information

We use information held about you in the following ways:

- to register an upgrade booking transaction through Receptio’s UpgradeGenius Upgrade Management System,
- to operate and administer your Receptio Account and to provide services that you have requested,
- to carry out your instructions to make and receive payments and undertake transactions using our services, including verifying that you have sufficient funds in your nominated bank account to make such payments,
- to allow you to participate in interactive features of the Website,

- to notify you about changes to our service(s),
- to comply with financial services regulations including retention of financial information and transactions,
- for financial and identity checks, fraud prevention checks, anti-money laundering and credit checks,
- for customer service, including answering questions and responding to feedback and complaints,
- to enhance the security of our services,
- to provide you with information, products or services that you request from us or which we feel may interest you.

4. Storing Your Personal Data

4.1 Data Security

We are committed to ensuring that your information is secure. To prevent unauthorised access or disclosure of information we have physical, electronic and managerial procedures in place to keep your information safe. Once logged into your Receptio Account, all internet communication is secured using Secure Socket Layer (SSL) technology with high security 128bit encryption.

If you are concerned that any of your login details have been compromised, you can change them any time once you are logged on but you should always also immediately contact our Customer Service and tell us why you think your login details have been compromised.

Details of how to contact Customer Services are available from the “Contact” section of your Receptio Account as well as in the Contact Us section of our Website.

Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website or to us made in any other means. Any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

4.3. Data Retention

Provided that you are a user of the UpgradeGenius Upgrade Management System or a holder of a Receptio Account – certain personal records, which will include your personal data such as your name, contact details, customer number and transaction history etc., will be kept for a period of at least five (5) years following the closure of your Receptio account. The latter is a regulatory requirement, which we must comply with. We do not store your Account password.

5. Disclosure of Your Information

5.1. Group Companies

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries who are based in different countries within the EEA. This may be necessary in order to, among other things, fulfil your request, process your payment details, provide support services and monitor fraudulent activities.

5.2. Fraud, Credit Reference Agencies and Government Bodies

When you transact UpgradeGenius or you open a Receptio Account, at intervals of up to every 3 months and at any other time we feel it is necessary to do so to protect our financial interests and prevent money-laundering or fraud, we share certain information about you and/ or your Receptio Account, financial history and transactions as part of our normal business operations with our banks, payment facilitator partners, credit/debit card processing services, identity verification service providers and credit reference to identify and verify users, to limit our exposure to fraud and other criminal activities and to manage our financial risk. We can provide you with a list of the credit reference agencies we use upon your written request to the email address set out in the Contact Us section on our Website. When conducting identification or fraud prevention checks, the relevant parties may retain a record of our query along with your information and may share this information with other fraud prevention agencies.

When we receive formal written complaint, it is our policy to contact the complaining party directly in order to address their concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any disputes relating to the transfer of personal data that cannot be resolved between Receptio by Syspay and a third party.

5.3. Other Disclosures

We will share your personal information with third parties only in the ways that are described in this Privacy Policy. We do not sell your personal information to third parties. We may also disclose your personal information to:

- a prospective buyer of our business or a buyer of a substantial number of the shares in our business, if Receptio by Syspay SA is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Web site of any change in ownership or uses of your personal data, as well as any choices you may have regarding your personal data,
- the police, other lawful enforcement body, regulatory body or court if we are under a duty or required by law to disclose or share your personal data, or to

protect the rights, property, or safety of ourselves or our group companies, our customers, or others,

- third parties where you have expressed an interest in receiving information about their goods and services, and
- third parties who referred you to us initially and to whom we owe a commission payment as a result of the referral. Where the commission payment is based on transaction volumes, numbers or types of transactions, we may share that information with that third party, but we will not disclose the full details of each of your transactions without your further written consent.
- third parties we may occasionally use to provide you with the services that you have requested. We require these third parties to not use your personal information for any other purpose.

6. Communicating With You

We may contact you by email to the email address provided to us by you or otherwise registered with your Receptio Account or by telephone to the contact telephone numbers you have provided us with.

You may also receive system-generated transactional emails such as confirmation of uploads, notification of receipt of payments, notification of password changes etc. which are necessary for the proper operation and administration of your account.

6.1. Newsletters and Marketing

As a user of UpgradeGenius or a holder of a Receptio Account, you will occasionally receive information by email from us, unless you have chosen not to receive such communication.

From time to time we do share aggregated information about our customers' use of our website and services with other companies for research and analysis purposes, but you cannot be identified from this aggregated information.

6.2. Phishing

Phishing is the name given to attempts to steal personal details and financial account details from a website user. "Phishers" use fake or "spoof" emails to lead users to counterfeit websites where the user is tricked into entering their personal details, such as credit card numbers, user names and passwords. WE WILL NEVER SEND EMAILS ASKING YOU FOR SUCH DETAILS AND OUR STAFF WILL NEVER ASK YOU FOR YOUR PASSWORD.

If you do receive such an email or are asked for your password by anyone claiming to work for us please forward the email or report the incident by contacting Customer Services.