



# **Wero Wallet Website Privacy policy**

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## Introduction

This is the Privacy Policy of the Wero wallet website accessible via the link: wero-wallet.eu. This Privacy Policy is intended to inform you about the processing of personal data that takes place via the WERO website and/or in communication between you and EPI Company.

This Privacy Policy may be modified, for example, in connection with new features on the website or to comply with new legal, contractual or administrative obligations. We, therefore, recommend that you regularly consult this Privacy Policy. Important changes will be announced on our website.

### 1.0 Who Is Responsible For Processing Your Personal Data?

The EPI Company (the European Payments Initiative Company) is the controller for the processing of your personal data. The EP Company is a *societas Europaea* under Belgian law, whose registered office is located at de Lignestraat 13, 1000 Brussel (Belgium) and which is registered in the Crossroads Bank of Enterprises under number 0755.811.726 (“**EPI Company**”, “**our**” or “**we**”).

## **2.0 What Data Do We Process?**

We process directly identifying data about you, such as your name, , email address etc., if you provide us with such data, for example when you contact us directly by e-mail or telephone with a specific question or when you want to keep up to date about WERO. We also process certain non-directly identifying data when you visit our website, such as your IP address, browser settings, usage data (for instance, the page you visit and how long you stay on a single page), data collected via Google Tag Manager for analytics purposes.

## **3.0 Why Do We Process Your Data?**

### **A. To answer your questions about WERO**

If you ask a question to us by telephone or via the contact form on the website, we will process your personal data in order to answer that question or request of information.

For this reason, we can process data such as your contact information, your email address, your correspondence with the EPI Company, and any other personal data you provide that may be relevant to answering your question.

The processing of these data is based on the legitimate interest of the EPI Company in order to be able to answer questions.

### **B. To keep you up to date about WERO**

If you choose to subscribe to our newsletter, we will process your email address and your name to send you periodic newsletters containing updates, news, and promotions related to our services and activities. This processing is based on your explicit consent obtained at the time of your subscription.

## **4.0 For the technical and functional management of our website**

We process personal data obtained when you visit our website for the technical and functional management of our website. By using your data, we can make sure that our website is properly functioning when you visit it.

To achieve this, we may collect:

- Your IP address
- Your browsing behavior on our website
- Data collected via Google Tag Manager for analytics and optimization

Google Tag Manager is used to manage website tags efficiently. While Google Tag Manager itself does not collect personal data, it may be used to deploy analytics tools that track website interactions and help us enhance user experience and improve website performance. These tools include Matomo Analytics and may include other third-party services based on your consent preferences.

The processing of these data is based on the legitimate interest of EPI Company in providing a wellfunctioning website.

## **5.0 Who Has Access To Your Personal Data?**

The EPI Company engages third parties to perform certain (processing) activities, such as :

- Hosting the website;
- Website analytics and optimization (via Google Tag Manager and Matomo Analytics).

These third-party providers act as processors and are contractually bound to only process personal data under EPI's instructions and for its purposes.

## **6.0 How Do We Protect Your Personal Data And How Long Do We Keep Your Personal Data?**

The EPI Company takes appropriate organisational and technical measures, taking into account the state of the art, the nature of processing and the potential risks, to protect your personal data in the best way possible from destruction, loss, modification or any other unauthorised processing.

The EPI Company does not store your personal data longer than necessary for the purposes for which they are processed, taking into account legal retention obligations.

For requests for information sent via our website, EPI Company keep your data (email address) for the time required to process your request. Your data may be kept for longer in order to comply with our legal and regulatory obligations.

## **7.0 Do We Transfer Your Personal Data Outside The European Economic Area?**

The EPI Company does not process your personal data outside the European Economic Area (EEA).

## 8.0 How We Manage Trackers And Other Features?

When you visit our website, cookies and other tracking technologies may be placed on your device to enhance your user experience, measure website traffic, and optimize our services, including, but not limited to:

- **Google Tag Manager** to track website interactions for performance improvements.
- **Matomo Analytics**, a privacy-focused, open-source tool, to gather and analyze certain data.

We use a cookie management tool that allows you to control your preferences at any time. Upon your first visit, a cookie banner will appear, giving you the option to:

- Accept all cookies,
- Reject non-essential cookies, or
- Customize your preferences by selecting which types of cookies you agree to use.

You can modify your cookie settings at any time by clicking on the icon in the bottom left corner of the screen. This tool provides detailed information on the different types of cookies used and their purposes.

For more information about how we use cookies and similar technologies, please consult our Cookie Policy via the cookie management tool.

## 9.0 How Can You Exercise Your Rights?

You have the right to request free of charge access to the personal data processed by the EPI Company, to request the correction or removal of your data or to request a restriction of the processing. You may also request the portability of your data and you may object, substantiated, to the processing of your personal data.

When the processing of your personal data is based on your consent, you may withdraw your consent at any time. Withdrawal of your consent does not affect the lawfulness of the processing based on consent before the withdrawal.

You can direct your dated and signed request based on the above rights to [dpo@epicompany.eu](mailto:dpo@epicompany.eu) or by mail to the above address. The EPI Company cannot handle your request without proof of your identity. Please note that the applicable legislation may impose conditions on exercising the above rights.

You also have the right to file a complaint with the supervisory authority, which is the Data Protection Authority (“Gegevensbeschermingsautoriteit” / “Autorité de protection des données”). It can be reached by mail at Rue de la Presse 35, 1000 Brussels, and by e-mail at the following e-mail address: [contact@apd-gba.be](mailto:contact@apd-gba.be).

## 10.0 Questions?

If you have further questions about this website or about this Privacy Policy, you may also contact the EPI Company via [dpo@epicompany.eu](mailto:dpo@epicompany.eu).