



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 EPI 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”).

For the deployment of advertising and audience-measurement technologies on this website (see sections 3.0(C) and 8.0), Google and Meta do not act as processors of the EPI Company. They process the personal data received through their tags and pixels under their own controller terms applicable to advertisers. The Meta Business Tools Terms include a joint-controllership arrangement, within the meaning of Article 26 GDPR, for the collection and transmission of Business Tools Data; the Google Controller-Controller Data Protection Terms describe Google and the advertiser as independent controllers. In any event, each platform subsequently processes the data as an independent controller for its own purposes, on the basis of its own privacy information. You may exercise your rights either against the EPI Company at dpo@epicompany.eu, or directly against the relevant platform.

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.

Where you consent to advertising and marketing cookies (see sections 3.0(C) and 8.0), the EPI Company and the advertising platforms also process pseudonymous behavioural data and online identifiers, such as cookie identifiers, advertising identifiers, your IP address, user-agent and device data, the pages you view, your interactions on the website (for example clicks and form interactions) and conversion events. Although such data does not directly identify you by name, it may still constitute personal data within the meaning of the GDPR.

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 for information.

For this reason, we can process data such as your contact information, your email address, your phone number, 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.

Where telephone support is provided through a call centre, some telephone conversations may be recorded for the sole purpose of monitoring and improving the quality of the service. The recording may include your voice, the content of the conversation and any personal data that you communicate during the call. This processing is based on the legitimate interest of the EPI Company in ensuring the quality of its telephone support services. You will be informed before any recording begins. Recordings are retained for no longer than one month and access is restricted to authorised personnel and, where necessary, to service providers acting on our behalf.

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 consent obtained at the time of your subscription.

C. To measure the performance of our campaigns and to display relevant advertising

If you consent to marketing and advertising cookies, the EPI Company, as well as Google and Meta, each acting on the terms set out in section 1.0, process the data described in section 2.0 in order to: (i) measure the performance of our advertising campaigns and track conversions; (ii) display advertising to you on third-party platforms and re-engage (retarget) visitors who have not completed a desired action; (iii) build and refine advertising audiences; and (iv) exclude users who have already converted from further campaigns.

This processing relies on your prior consent, given through the cookie banner, in accordance with Article 5(3) of the ePrivacy Directive as transposed into the applicable national law and Article 6(1)(a) GDPR. No advertising tag is deployed, and no cookie is placed or signal sent to Google or Meta, before that consent has been given. You may withdraw your consent at any time, with effect for the future, through the cookie management tool (see sections 8.0 and 9.0).

The advertising setup described in this Privacy Policy is based on cookies and pixels deployed on this website only. It does not involve the upload of EPI customer lists or other first-party files to Google or Meta, the use of Google Customer Match, Meta Custom Audiences based on uploaded files, Google enhanced conversions or Meta advanced matching. Any extension of the setup to such activations would require a prior update of this Privacy Policy and of the related cookie information.

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 well-functioning 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).
- Configuration and management, on the EPI Company's behalf, of the advertising tags described in section 3.0(C) (media agency).

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

In addition, where you consent to advertising and marketing cookies, the data collected through the advertising tags and pixels is transmitted to Google and to Meta. These platforms do not act as processors of the EPI Company: they process the data under their own controller terms applicable to advertisers, as further described in section 1.0, and as independent controllers for their subsequent processing for their own 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 or by telephone, EPI Company keeps the relevant data relating to your request for the time required to process it. This data may be kept for longer where necessary to comply with our legal or regulatory obligations. Where telephone calls are recorded for quality-monitoring purposes, the recordings are kept for no longer than one month, in accordance with section 3.0(A).

For cookies and similar technologies, the lifetimes indicated in section 8.0 describe how long the relevant cookies or similar identifiers may remain stored on your device. Google and Meta may apply their own retention periods when they process the data as independent controllers for their own purposes, as described in their respective privacy information.

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

For most of the processing described in this Privacy Policy, the EPI Company processes your personal data within the European Economic Area (EEA). However, where you consent to advertising and marketing cookies, data collected through the Google and Meta tags and pixels may be transferred to these platforms and to their group entities located outside the EEA, including in the United States. Such transfers are framed by appropriate safeguards under Chapter V of the GDPR, namely the EU-US Data Privacy Framework where the recipient is certified, and/or the European Commission's Standard Contractual Clauses, complemented where necessary by additional measures.

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 manage the tags used to measure certain website interactions and improve performance.
- Matomo Analytics, an open-source web-analytics tool, to gather and analyze certain data.+.
- Advertising and marketing cookies and pixels (Google Ads and Meta), placed only after your consent, to measure the performance of our campaigns, track conversions, retarget visitors and build advertising audiences (see section 3.0(C)).

We use a cookie management tool (Cookiebot) 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.

Marketing and advertising cookies are presented as a separate, opt-in category, distinct from strictly necessary and analytics cookies. They are switched off by default and are activated only if you actively accept them, and refusing them is as easy as accepting them. No advertising tag is triggered, and no cookie is placed or signal sent to Google or Meta, before you have given your consent.

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.

The advertising and marketing cookies set with your consent include, in particular, the cookies listed below. The exact and up-to-date list, with their final names, purposes and lifetimes, is also available at any time through the cookie management tool (Cookiebot).

Cookie / technology	Provider	Purpose	Lifetime
_gcl_au	Google	Conversion attribution (conversion linker)	90 days
Google Ads / remarketing cookies (e.g. IDE, NID)	Google	Ad targeting and remarketing	Up to 13 months
_fbp	Meta	Identify the browser for advertising and measurement	90 days
_fbc	Meta	Store the click identifier for conversion attribution	90 days

fr	Meta	Advertising delivery and measurement	90 days
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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, where the conditions laid down by the GDPR are met, object to the processing of your personal data, in particular on grounds relating to your particular situation.

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 or by mail to the above address. Where we have reasonable doubts concerning your identity, we may ask you to provide the additional information necessary to confirm that you are the data subject to whom the request relates.

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.

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.