

WeGoEU Privacy Statement

@ December 2019

WeGoEU B.V. is the controller for the processing of personal data when you use the WeGoEU Mini-Program or in some cases when you make payments using the WeChat Pay feature at businesses in the European Union. We take your privacy very seriously and will always process your personal data in accordance with European data protection law. This document explains how we process your personal data in those situations.

When does this privacy statement apply?

This privacy statement applies in the following situations:

1. When you use the Mini-Program on WeChat;
2. When you use a coupon, you obtained through the Mini-Program with a merchant.

What data do we collect?

We collect the following categories of personal data:

- any information you submit on the Mini-Program, such as your name, telephone number, home address, email address and Open ID.
 - The data will be retained for 14 months after your last use of the account.
- information about your device;
 - The data will be retained for 14 months after it was collected.
- information about the way you use the app, such as your search behavior and your viewed pages;
 - The data will be retained for 14 months after it was collected.
- any payments you make in the Mini-Program.
 - These payment details will be retained for seven years, in accordance with applicable Dutch law.
- Details of any payments you make using WeChat Pay while you are in the European Union, not made using the Mini-Program. This includes the amount and place of the purchase and does not include details such as bank account number
 - These data will be retained for 14 months after the payment was made. After this term, they will be anonymized.
- the location of your phone, if you give us permission in WeChat.
 - Location data will be deleted within two weeks after the data was collected.

How do we use your info?

We use your information for the following purposes:

- to provide the services you have requested through the Mini-Program.
 - This processing is necessary to perform an agreement with you (art 6(1)(b) GDPR).
- to process payments, you have made through the Mini-Program.
 - This processing is necessary to perform an agreement with you (art 6(1)(b) GDPR).
- to show you (personalized) advertisements in the Mini-Program.

- This processing is necessary to pursue WeGoEU's legitimate interests (art 6(1)(f) GDPR). In this case, our legitimate interests are to place (relevant) first- and third-party advertisements through our Mini-Program.
- to report statistical or aggregated information to our partners.
 - This processing is necessary to pursue WeGoEU's legitimate interests (art 6(1)(f) GDPR).

Who do we share your data with?

We may share your personal data with a number of third parties, including the following:

- When you use WeChat, TenCent is able to collect information about your usage. We don't control how TenCent uses your personal data. We recommend reading the TenCent/WeiXin privacy policies for more information.
- When you make purchases, perform bookings or use services through the Mini-Program, we share your information with the relevant partner or merchant.
- We provide your information to some third parties that we employ to provide services in accordance with our instructions. We will

Where is your data stored?

Data controlled by WeGoEU is stored in data centers located in the Netherlands and subject to strict security requirements. The third parties mentioned above may store their data in other EU countries or outside the EU. When you use WeChat, your information is stored by TenCent in China. See the WeChat/WeiXin privacy policies for more information.

What are your rights?

European law grants you certain rights that allows you to exercise control over your personal data. In order to exercise any of these rights, please contact us using the information provided below or through the Mini-Program. In many cases you can also exercise your rights directly through the features built into the Mini-Program. Please note that if you contact us directly, we may ask you to verify your identity before we can process your request.

Note that we will review your request in accordance with the law, but we may not always (be able to) grant your request. If we deny your request, we will provide you with our reasons for doing so.

Please note that your use of the Mini-Program may result in several third parties gaining access to your personal data. Please note that you will have to exercise your rights with these third parties separately.

Right of access and correction

You have the right to ask us whether we hold any of your personal data and to receive a copy. You can contact us to exercise this right, but you can also access and supplement or correct most of your personal information directly through the Mini-Program.

Right of erasure and right to withdraw consent

You have the right to request the deletion of the personal data that we hold about you. You can exercise this right by deleting your account in the Mini-Program or by contacting us. Note that we won't delete any information which we are required to retain due to a legal obligation, to provide a service to you or information which we retain in anonymous or aggregated form.

When you give your consent for the processing of personal data, you always have the right to withdraw such consent. When you exercise your right of erasure, we will also consider this as an exercise of your right to withdraw consent. We will therefore delete any information which we process on the basis of your consent.

Right to data portability

You have the right to receive a machine-readable copy of your personal data. This applies only to data which you have provided to us and which we process with your consent or in accordance with an agreement between us and you.

Right to object

You have a right to object to the processing of your personal data on the basis of our legitimate interests, such as when we process your personal data for marketing purposes. You can exercise your right to object by deleting your account.

Right to restriction

In certain circumstances, European Union law affords you the right of restriction when we are considering a pending request, e.g. a request for erasure. Restriction means that your data may temporarily only be used for very limited purpose. However, because of the way our Mini-Program works, the right of restriction is not applicable here.

Right to file a complaint with a data protection authority

You have a right to file a complaint with a competent European data protection authority. The competent lead data protection authority for WeGoEU is located in the Netherlands. The contact details may be found here: <https://autoriteitpersoonsgegevens.nl/en/contact-dutch-dpa/contact-us>. Depending on where you reside, you may also be able to file your complaint with a supervisory authority in a different EU country.

Updates to this Privacy Statement

This document may be updated from time to time. Please check the Mini-Program for the latest version or contact us using the contact data below.

How can you contact us?

Please send an email to Jos Kobesen at info@wego.eu if you have a question, complaint, or would like to exercise your rights under the GDPR.