
Privacy Policy Smilu

Version 1.0 – April 9, 2026

About Us

This privacy policy (the "Privacy Policy") explains how we process and protect your personal data when you use this app or our services offered via www.saforia.ch (collectively, "our services").

The website is operated by Saforia GmbH, Chamerstrasse 176, 6300 Zug, Switzerland (the "Company," "we," "our," or "us"). The Company is the data controller for the data processing described below.

Unless otherwise defined in this Privacy Policy, the definitions used in this Privacy Policy have the same meanings as in the Swiss Federal Act on Data Protection ("FADP") or the EU General Data Protection Regulation ("GDPR").

1 Personal Data We Collect

When you use our services, we may collect or receive personal data for a number of purposes related to our business operations. This includes the following:

- First and last name (not collected by default)
- Email address
- Username
- Age range
- Gender
- Information about your emotional well-being, which users may voluntarily provide during conversations on the platform.

You are under no obligation to provide your personal data. However, please note that we cannot provide our services if you do not provide the data strictly necessary to perform the contract between you and us.

If you provide information about your emotional well-being or other information that allows conclusions to be drawn about your mental health or state of health, we will process this data only with your explicit consent.



This consent is given by voluntarily entering such content into the platform and accepting this privacy policy beforehand. Without this consent, we cannot provide the platform's corresponding functions.

This data is processed solely to provide the service and, if separately indicated and approved by you, to improve the platform.

The information you enter may be processed using artificial intelligence models to generate responses. This processing is carried out exclusively to provide the service and is subject to technical and organizational safeguards. The models do not make diagnoses or assess health risks.

2 How we collect personal data

We collect information about our users when they use our services, including certain actions on our website.

Directly

- Through our app, website, and electronic communications
- When you use our services
- When you provide us with services
- When you correspond with us electronically
- When you browse, fill out a form, or submit an inquiry while using our services

Indirectly

- Through public sources
- From public registers (e.g., commercial registers), news articles, and internet searches
- When our business clients engage us to provide professional services and share personal data that they control as part of that engagement
- From external service providers (see Chapter 5)

3 Legal Basis and Purposes of Data Processing

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 fulfill our (pre-)contractual obligations or to take measures related to a contract with you. In particular:

- To provide, improve, and expand our services.



- To provide you with customer service and support.

Consent: We may rely on your consent, which you freely provide when you provide your personal data. In particular:

- To send you news, special offers, newsletters, and general information about our services (with your explicit consent).
- If you apply for a job with us.

Legitimate Interests: We may rely on legitimate interests based on our assessment that the processing is fair and appropriate and that your interests or fundamental rights and freedoms do not override our legitimate interests. Specifically:

- Provision and maintenance of our services, as well as the detection, prevention, and mitigation of security threats.
- Analysis, improvement, personalization, and monitoring of our services and communications use.

Necessity to comply with legal obligations: To fulfill legal and public interest obligations. In particular:

- To inform you about changes to our services and our privacy policy
- To comply with applicable regulations and laws
- For the legal enforcement of claims and rights

4 Data Retention Periods

We retain personal data for as long as it is needed for the purposes for which it was collected and in accordance with legal and regulatory requirements or contractual agreements. After this period expires, we delete your personal data or anonymize it completely.

5 Recipients of Personal Data

We engage third-party companies (the "Service Providers") to facilitate the operation of our services, assist in analyzing service usage, or provide necessary services such as payment processing and IT support. These third parties have access to your personal data only to the extent necessary to perform these tasks.

Types of Service Providers that may access your personal data:

- Third parties that support us with IT and software solutions
- Third parties that assist us in gaining customer insights and with marketing activities



- Third parties that provide us with cloud hosting and infrastructure services
- Third parties involved in your case, such as lawyers, payment providers, manufacturers, KYC/AML service providers, and postal or courier service providers

6 Data Transfers to Third Countries

We and/or our service providers may transfer and process your personal data in the following locations:

- EU and EEA
- USA

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

We protect your personal data in accordance with our contractual obligations and applicable data protection laws when we transfer data abroad.

Such safeguards can include:

- Transfer to countries that, according to the Federal Council, offer an adequate level of protection, as well as countries for which the European Commission has issued an adequacy decision
- Application of standard contractual clauses, binding corporate rules, or other standard contractual obligations that ensure adequate data protection

If a transfer to a third country occurs and no adequacy decision or suitable safeguards are in place, there is a risk that authorities in that country (e.g., intelligence services) may gain access to the transferred data, and the enforceability of data subject rights cannot be guaranteed.

7 Data Sharing

We may disclose your personal data if we believe in good faith that such action is necessary:

- To comply with a legal obligation (i.e., when required by law or in response to legitimate requests from 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



8 Data on the Blockchain

When you use our services, or generally use any applicable blockchain in connection with our services, you should be aware that all transactions are publicly and irrevocably archived on the respective blockchain as soon as you sign and submit them to the network. These transactions typically contain information about how many tokens were bought, sold, transferred, or otherwise used, a timestamp, and the addresses involved. They do not contain personal data such as your name or email address. However, once someone knows that a particular address belongs to you, they can link all transactions involving that address to you.

9 Data Security

We implement appropriate technical and organizational security measures to protect your stored data from manipulation, loss, or unauthorized access by third parties. Our security measures are continuously adapted to reflect technological developments.

We also take internal data protection very seriously. Our employees and the service providers we engage are bound by confidentiality agreements and are obligated to comply with applicable data protection laws. Furthermore, they have access to personal data only to the extent necessary to fulfill their respective tasks or assignments.

The security of your personal data is important to us, but please bear in mind that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to protect your personal data using commercially reasonable means, we cannot guarantee absolute security. We recommend using antivirus software, a firewall, and similar software to protect your system.

10 Your Rights

You have the following data protection rights. To exercise these rights, you can contact us at the address above or email us at info@saforia.ch. Please note that we may ask you to verify your identity before responding to such requests.

- **Right of access:** You have the right to request a copy of your personal data that we provide to you electronically.
- **Right to rectification:** You have the right to ask us to correct our records if you believe they contain inaccurate or incomplete information about you.
- **Right to withdraw consent:** If you have consented to the processing of your personal data, you have the right to withdraw this consent at any time with effect for the future. This also applies if you wish to unsubscribe from marketing communications. Once we receive notification that you have withdrawn your consent, we will no longer process your data for the



purpose(s) to which you originally 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 info@saforia.ch.

- **Right to erasure:** You have the right to request that we erase your personal data if it is no longer necessary for the purposes for which it was collected or has been processed unlawfully.
- **Right to restriction of processing:** You have the right to request the restriction of processing of your personal data if you believe that the data is inaccurate, the processing is unlawful, or we no longer need to process the data for the original purpose, but we cannot erase it due to a legal obligation or because you do not wish to have it erased.
- **Right to data portability:** You have the right to request that we transfer your personal data to another controller in a standard format, such as Excel, provided that this data is data you have provided to us and we process it based on your consent or to fulfill our contractual obligations.
- **Right to object to processing:** If the legal basis for processing your personal data is our legitimate interest, you have the right to object to this processing on grounds relating to your particular situation. We will comply with your request unless we have compelling legitimate grounds for the processing which override your interests, or we need to process the personal data for the establishment, exercise, or defense of legal claims.
- **Right to lodge a complaint with a supervisory authority:** You have the right to lodge a complaint with a data protection supervisory authority if you believe that the processing of your personal data infringes data protection law. In the EU and the EEA, you can exercise this right, for example, with a supervisory authority in the Member State of your residence, your place of work, or the place of the alleged infringement. You can find a list of the relevant authorities at: https://edpb.europa.eu/about-edpb/members_de. The competent supervisory authority in Switzerland is the Federal Data Protection and Information Commissioner, Feldeggweg 1, CH-3003 Bern, info@edoeb.admin.ch.

11 Cookies

Our services use cookies and similar technologies (collectively referred to as the "Tools"), which are provided either by third parties or by us.

A cookie is a small text file that is stored on your device. Similar technologies include 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 configure your browser to reject cookies or similar technologies or to store them only with your prior consent. If you reject cookies or similar technologies, you may not be able to use all of our services without difficulty.



Below, the Tools we use are listed by category; we also provide information on the providers, their storage duration, and their purpose. If personal data is transferred to third countries, please refer to Chapter 6 of our Privacy Policy, and also to the potential risks involved.

We use tools necessary for the operation of the website based on our legitimate interest in providing you with a more convenient and personalized experience while minimizing your time. In certain cases, these tools may also be necessary to perform a contract or to take steps prior to entering into a contract. In these cases, access to and storage of information on your device are mandatory and are carried out in accordance with the implementing legislation of the EU Member States under the ePrivacy Directive.

All other tools, particularly those used for marketing purposes, are used based on your consent. In these cases, access to and storage of information on your device require your consent and are carried out in accordance with the implementing legislation of the EU Member States under the ePrivacy Directive. If you have given your consent to the use of specific tools, we will transfer the data processed by these tools to third countries based on that consent.

You can withdraw your consent for specific tools at any time in the settings of our cookie banner solution. Alternatively, you can also withdraw your consent for specific tools directly with the provider.

11.1 Technically necessary tools

[cookies einfügen]

11.2 Optional tools

[cookies einfügen]

12 Social Media and Links to Third-Party Apps and Websites

Our services contain links to websites or apps that are not operated by us. If you click on a third-party link, you will be redirected to their website or app. We have no control over the content, privacy policies, or practices of third-party websites or services.

We maintain online presences on social networks to communicate with customers and prospects and to provide information about our products and services. If you have an account on the same network, we may be able to see the information and media available there, for example, by accessing your profile. Furthermore, the social network may allow us to contact you. Once we transfer personal data to our own systems, we are solely responsible for it. This is done to carry out pre-contractual measures and fulfill a contract. Please refer to the privacy policies of the respective platforms for the legal basis of the data processing carried out independently by the social networks. Below is a list of social networks on which we maintain an online presence:

- Facebook: <https://www.facebook.com/privacy/policy>



- Instagram: <https://about.instagram.com/data-policy>
- LinkedIn: <https://www.linkedin.com/legal/privacy-policy>
- X: <https://x.com/de/privacy>
- TikTok: <https://www.tiktok.com/legal/page/eea/privacy-policy/de>

13 Newsletter

We send newsletters and other notifications by email and via other communication channels, and may also use third parties to deliver them.

In principle, you must expressly consent to receiving newsletters and other notifications from us, unless this is permitted for other legal reasons. For emails, we use a "double opt-in" consent process, meaning you will receive an email with a link you must click to confirm your subscription. This prevents unauthorized third parties from misusing it. We may log such consents, including the 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 links have been clicked (for performance measurement). Such web links and tracking pixels record newsletter and other notification use. We use this statistical analysis of usage, including performance and reach measurement, to offer newsletters and other notifications effectively, user-friendly, and in a sustainable, secure, and reliable manner based on recipients' reading habits.

You can unsubscribe from newsletters and other notifications at any time, thereby specifically objecting to the aforementioned collection of usage data. You can do this by contacting us directly or by following the link in the footer of every newsletter we send you.

14 Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We therefore recommend that you check this Privacy Policy regularly for changes.

Changes to this Privacy Policy will take effect when they are posted on this page.

15 Contact Us

If you have any questions about this Privacy Policy, please do not hesitate to contact us.

Saforia GmbH, Chamerstrasse 176, 6300 Zug, info@saforia.ch

