



# Data Privacy Declaration

## 1. General information

Thank you for your interest in the website(s) of MiTwell, Inc., hereinafter referred to as the "Company". We take data protection and privacy issues very seriously and comply with the applicable data protection regulations.

Therefore, we would like to inform you with this declaration about data protection measures and which personal data we may store and how we use this data.

Responsible for the data processing on this website is

MiTwell, Inc.

No.55, Ln. 6, Chenglin Rd., Tucheng Dist., New Taipei City 236, Taiwan

Telephone: +886-2-7705-8788

[dataprivacy@MiTwell.com.tw](mailto:dataprivacy@MiTwell.com.tw)

## 2. What kind of data is collected and how is it used?

### 2.1 Data collection by this website

Whenever a user accesses the website, the user's internet browser automatically transfers the following data to the Company's web server for technical reasons:

- IP address of the requesting computer
- date and time of access
- name and URL of the retrieved file
- transferred data volume
- access status (file transferred, file not found etc.)
- identification data of the browser and operating system used
- name of the provider of user's internet access
- website from which access is made

This data is collected, processed and used for the purpose of enabling the use of the website (connection setup), system security and technical administration of the network infrastructure. A comparison with other databases or a transfer to third parties, also in excerpts, does not take place.

The data collected as part of the voluntary entries under "Contacts" will be used and processed exclusively for the purpose of processing the enquiry and to carry out the services you may have requested.



## 2.2 Use of Google Analytics

This website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website to analyse how users use the site. The information generated by the cookie about your use of this website is usually transferred to a Google server in the USA and stored there. However, if you activate the IP anonymization on this website, your IP address may be shortened previously by Google within Member States of the European Union or in any other countries. Only in exceptional cases the full IP address is transferred to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activity and to provide the website operator with further services related to website and internet use. The IP address transmitted by your browser within the scope of Google Analytics will not be aggregated with other Google data. You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of this website. You can also prevent Google from collecting the data generated by the cookie and relating to your use of the website (including your IP address) and from processing this data by downloading and installing the browser plug-in available under the following link <https://tools.google.com/dlpage/gaoptout?hl=en> (Please link to this Google website via hyperlink). You can prevent Google Analytics from collecting data by clicking on the following link. An opt-out cookie is set that prevents future collection of your data when you visit this website:

Google Analytics deaktivieren: <https://support.google.com/analytics/answer/181881?hl=en>

For more information on terms of use and privacy, please visit <https://policies.google.com/terms?hl=en> (Please link to this Google website via hyperlink) or <https://policies.google.com/?hl=en/> (Please link to this Google website via hyperlink). Please note that Google Analytics has been extended on the website by the code "anonymizelp" in order to guarantee an anonymous registration of IP addresses (so-called IP masking).

By accessing this website, you are fully acknowledge and agree on one hand that, the Company has an interest in evaluating the website data for purposes of website optimization and, on the other hand, a concerned person can reasonably foresee at the time when the personal data is collected and in view of the circumstances under which it is carried out (in particular the above-mentioned measures) that it will possibly be processed for this purpose.

## 3. Which cookies are used?

We use cookies on our website. If you do not want to take advantage of our cookies, you can find out in the help function of your browser how to set your browser to prevent it from accepting new



cookies or deleting existing cookies. There you will also learn how to block your browser for all new cookies or which settings you have to make in order to receive a notification of new cookies.

The cookies that we currently use on this website are listed in the cookie list that is available here: <https://www.mitwell.com.tw/cookie-list.html>

By accessing this website, you are fully acknowledge and agree on one hand that, the Company has an interest in evaluating the website data for purposes of website optimization and, on the other hand, a concerned person can reasonably foresee at the time when the personal data is collected and in view of the circumstances under which it is carried out (in particular the above-mentioned measures) that it will possibly be processed for this purpose.

## **4. Newsletter**

Our website offers you the opportunity to subscribe to our newsletter. This newsletter periodically provides information about our offers and services. Should you wish to subscribe to our newsletter, we require your valid email address. All further data that are transferred to us by subscribing to our newsletter are voluntary and have no influence on the possibility of subscribing to our newsletter.

We will store your IP address as well as date and time of your subscription. We will review the email address provided with a double opt-in procedure for the purpose of determining whether you are in fact the owner of this email address. If a third party misuses your e-mail address and uses your data without your knowledge when registering for the newsletter, we will delete this data after 24 hours. If you confirm that you are the owner of the given e-mail address, we will save your data and save it for the purpose of sending you our newsletter.

No data is transferred to third parties. You may cancel your subscription to the newsletter at any time. You will find additional details in the email confirming your subscription as well as in each newsletter.

## **5. Is other personal data collected and processed?**

We collect and process your personal data only if you request certain services and we need your data for this purpose or if you have voluntarily given us your express consent.

You can do this, for example, by completing a registration form or sending us an email, ordering products or services, submitting inquiries to us, requesting materials or registering. Unless otherwise required by law, we will only use your personal data for the purposes for which you have given your consent.



## 6. Will my data be transferred to third parties, e.g. authorities?

At the Company, those bodies within the Company receive your data that are required to fulfil our contractual and legal obligations. Some data is to be disclosed under strict contractual and legal requirements:

- Due to legal obligation:

In certain cases, we are required by law to transfer data to a requesting public authority.

Upon submission of a court order, we are obliged to provide owners of copyright and ancillary copyrights with information about customers who are alleged to have offered copyright-protected works on internet file-sharing sites. In these cases, our information contains the user ID of an IP address allocated at the time requested and, if known, the name and address of the customer.

In other respects, personal data will only be transferred to applicable institutions and public authorities within the framework of mandatory national legal provisions or if disclosure is necessary in the event of attacks on the network infrastructure for legal or criminal prosecution.

- To external service providers for data processing:

When service providers get access to our customers' personal data, this usually takes place in the course of so-called order processing of personal data. This is expressly provided for by law. In this case, the Company remains responsible for the protection of your data – in addition, the processor may also be responsible. The service provider works strictly in accordance with our instructions, which we ensure by means of strict contractual regulations, technical and organizational measures and supplementary controls.

The Company works with service providers as processors. These are Group companies of the Company and service providers for IT services (e.g. for technical-administrative tasks and for usage analysis), book keeping services, telecommunications, consulting and advisory services as well as sales and marketing.

The data protection regulations for instruction-bound order processing of personal data are complied with.

- To Group companies of the Companies:



The Company may transfer your personal data to Group companies of the Company in order to carry out a business relationship with you or for the purposes of legitimate interests.

If data are transferred abroad, they are based within the EU or the EEA or in a country which, according to the decision of the EU Commission, has an appropriate level of data protection or Taiwan. In the case of data transfers to Group companies of the Company domiciled in other countries, the Company ensures by way of guarantees that the data-importing Group company of the Company has been obligated to an appropriate level of data protection.

- To service providers:

The Company may transfer your personal data to service providers in order to carry out supporting business services for the purposes of legitimate interests.

If data are transferred, the Company will have contracts with these service providers in place to ensure that the data is handled according to the applicable data protection rules and has been obligated to an appropriate level of data protection.

Beyond this, we do not transfer data to third parties unless you have given your express consent, the transfer is obviously necessary for the provision of an offer or service requested by you or this is provided for by law. We also do not intend to transfer your data beyond this to a third country or international organization.

## **7. How long will my data be stored?**

We store data for as long as it is legally necessary or necessary for the provision of the service requested by you, or as long as it has been agreed upon in a declaration of consent.

## **8. Do I have a right to information and rectification of my stored data? What other rights do I have with regard to my stored data?**

You may at any time and free of charge request information about the scope, origin and recipients of the stored data as well as the purpose of the storage. In addition, you have the right to rectification, erasure or restriction of the processing of your data in accordance with data protection regulations, a right to object to the processing as well as a right to data portability. Please note that there is a right of appeal to a supervisory authority.



## 9. Can I withdraw my consent to the use of my data?

You have the right to withdraw your consent to the use of your data at any time. Just send an email to [[dataprivacy@Mitwell.com.tw](mailto:dataprivacy@Mitwell.com.tw)] or send a letter to the following address:

MiTwell, Inc.

No.55, Ln. 6, Chenglin Rd., Tucheng Dist., New Taipei City 236, Taiwan

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[dataprivacy@Mitwell.com.tw](mailto:dataprivacy@Mitwell.com.tw)

The data processing performed on the basis of your consent is legal until the time of withdrawal.

## 10. Who is my contact person if I have questions about data protection?

If you have any questions or comments, please feel free to contact the Company at any time:

[\[dataprivacy@Mitwell.com.tw\]](mailto:dataprivacy@Mitwell.com.tw)

## 11. How long is this data privacy declaration valid?

This data privacy declaration is up-to-date and dates from May 1st 2018. We reserve the right to amend the data privacy declaration at any time with effect for the future, in particular to adapt it to a further development of the website or the implementation of new technologies.