

Privacy Policy

Effective Date: 01 May 2025

Last Updated: 28 May 2025

1. Introduction

Welcome to **Squilio** — a cashback and donations platform operating under a white-label architecture that enables users to earn rewards and contribute to NGOs. This Privacy Policy explains how we collect, use, store, and protect your personal data in compliance with the **General Data Protection Regulation (GDPR)** and the **Swiss Data Protection Act (DSG)**.

2. Data Controller


The data controller responsible for your data under this policy is:

Carolina De Mattia

Brand Name: **Squilio**

Schötz 1, 5105 Auenstein, Switzerland

 Email: info@squilio.com

 Phone: +41 78 806 12 48

If you are using a white-labeled version of the Squilio platform, your data may also be processed by that brand, in which case they will be considered a joint controller.

3. What Data We Collect

We collect the following categories of personal and technical data:

a) Personal Data

- Name
- Email address
- Mobile number

- Hashed passwords
- Referral codes (if applicable)
- Communication preferences (opt-ins)
- Selected NGO for donations

b) Usage Data

- IP address (anonymized)
- Browser type and version
- Operating system
- Date and time of access
- Referrer URLs
- User interactions (clicks, purchases, navigation history)

c) Affiliate Click and Transaction Data

- Store visited
- Click metadata (timestamp, affiliate ID, white-label ID)
- Transaction value and status (pending/approved/paid)

d) Donation Data

- Amount donated
- Selected NGO
- Time and purpose of donation

4. How We Collect Your Data

Your data is collected when:

- You register or log in to the platform
- You interact with cashback offers or affiliate links
- You make a purchase via a tracked link
- You donate to an NGO
- You communicate with us via email, forms, or support channels
- You browse or use any part of the mobile or web application

5. Purpose of Data Collection

We collect and use your data for the following purposes:

Purpose	Legal Basis
Account creation and login	Contractual necessity
Cashback tracking and attribution	Legitimate interest
Donation processing	Consent
Transaction and user analytics	Legitimate interest
Communication and support	Legitimate interest
Marketing emails (if opted in)	Consent
Affiliate commission reconciliation	Legitimate interest
Compliance with laws	Legal obligation

6. Affiliate Tracking and Cookies

Our platform uses **cookies and tracking pixels** for:

- Affiliate click attribution (via partners such as AWIN)
- Ensuring cashback eligibility
- Improving user experience

By continuing to use the platform, you consent to this tracking. You may disable tracking, but this will prevent cashback functionality from working.

7. Affiliate Disclaimer

This website contains so-called affiliate links. If you make a purchase through one of these links, we may receive a commission — or you get your cashback.

You will see your cashback in your account after the purchase.

Note pursuant to Art. 13 GDPR / Art. 19 Swiss DSG:

Affiliate networks (e.g., AWIN) may store your IP address and other technical data to process the transaction correctly.

You may opt out of tracking — however, this will prevent cashback from being recorded and credited.

8. Data Sharing and Third Parties

We may share your data with:

- **Affiliate networks (e.g., AWIN)** to validate transactions

- **Email and Notification Services** (e.g., AWS SES, SendGrid, Firebase) for communication
- **NGOs** receiving your donations (only anonymized or aggregate data)
- **White-label brand admins** (limited access to brand-specific user activity)
- **Regulatory authorities**, if required by law

All third-party services are vetted for GDPR/DSG compliance.

9. White-label Architecture and Data Isolation

Squilio uses a **multi-tenant system**, which means your data is associated with a specific white-label brand and is **isolated from all others**. Super Admins may access platform-wide analytics but do not share identifiable user data across brands.

10. Data Retention

Data Type	Retention Duration
User account data	As long as the account is active
Transaction history	Indefinitely (for auditing & legal)
Affiliate click metadata	Minimum 180 days
Donations	Indefinitely (for impact reporting)
Logs and audits	Minimum 12 months

You can request deletion of your data; however, transactional data may be anonymized rather than deleted to comply with financial obligations.

11. Your Rights

As per GDPR/DSG, you have the right to:

- Access your personal data
- Correct inaccuracies
- Request deletion ("Right to be Forgotten")
- Restrict processing
- Object to processing
- Data portability (EU/EEA users only)

To exercise any of these rights, contact: **info@squilio.com**

12. Security Measures

We implement industry-standard security protocols including:

- **SSL/TLS encryption**
 - **JWT-based secure login sessions**
 - **Encrypted data storage**
 - **Role-based access control (RBAC)**
 - **Audit logging of sensitive activities**
 - **DDoS protection and WAF (Web Application Firewall)**
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13. International Data Transfers

If your data is stored or processed outside of your jurisdiction (e.g., via AWS or Firebase), we ensure this happens under lawful frameworks such as **Standard Contractual Clauses (SCCs)** or equivalent.

14. AI Chatbot and Voice Assistance

Our AI assistant (available on web and mobile apps) may process your inputs to provide responses about offers and FAQs. Voice input is transcribed locally and is not stored unless required for support queries. All interactions are anonymized and encrypted.

15. Changes to This Policy

This policy may be updated periodically. Material changes will be notified to you via email or app notifications.

Last updated: [Insert Date]

Please check this page regularly for the most current version.

16. Legal Disclosure

In accordance with § 5 of the German Telemedia Act (TMG) and Article 3 para. 1 lit. s of the Swiss Unfair Competition Act (UWG):


Website Owner:

Carolina De Mattia

Brand Name: Squilio

Schötz 1, 5105 Auenstein, Switzerland

 Email: info@squilio.com

 Phone: +41 78 806 12 48


UID Number (Switzerland): Registration in progress


Commercial Register: Incorporation planned in the Canton of Aargau

17. Contact Us

For any questions, data requests, or complaints:

 **info@squilio.com**

 **+41 78 806 12 48**

 You can also submit a request via the support page of your white-label portal.