

Privacy Policy for TWINT

Banca dello Stato del Cantone Ticino (hereinafter referred to as "BancaStato" or "Bank") takes the protection of your personal data very seriously. For this reason, we process your personal data in accordance with the Swiss Data Protection Act and this Privacy Policy. This Privacy Policy describes how and for what purpose your data is collected and used, and what choices you have in relation to personal data in the context of TWINT. Further information on the processing of your personal data by BancaStato and on your rights in relation to your data, as well as the contact details of the Data Protection Officer (DPO), can be found in the Privacy Policies published on [our website](#).

What data do we process and where does it come from?

Personal data processed include in particular personal details (name, address and other contact details, date and place of birth and nationality), identification data (e.g. document data, identity data) and any other authentication data.

Data processed may also be technical data, information resulting from the use of the BancaStato TWINT App (e.g. device ID, IP address, date of last login, client status, name of provider and language) and data accessed by BancaStato TWINT based on the client's smartphone settings (e.g. reception of BLE signals, geolocation, etc.).

In addition, we process BancaStato's internal identifiers (e.g. contract number, login data, transaction ID, client card data) and processing and transaction data (e.g. payment data, loyalty points).

We process personal data that we obtain in connection with the existing business relationship with TWINT users.

For what purposes do we process data?

The Bank processes personal data in accordance with applicable data protection law for the following purposes: client onboarding procedures, management of client relationships, implementation and execution of products, client acquisition, development of business relationships, protection and enhancement of the BancaStato brand, including the use of BancaStato TWINT, compliance and risk management and/or prevention, detection and investigation of criminal offences. BancaStato also processes personal data for the purpose of data analysis and creating client profiles in order to (i) provide the user with useful information about BancaStato's services (including BancaStato TWINT), (ii) provide added-value services, (iii) create targeted marketing campaigns for specific client segments, (iv) send push notifications which, based on their personal data, may be of interest to the user, (v) and analyse user behaviour with the aim of continuously optimising BancaStato TWINT and tailoring it to their needs. Further information on BancaStato's services can be found in the Terms and Conditions of Use of the "BancaStato TWINT" App.

Who has access to personal data?

For the purposes mentioned above, personal data may be shared with and processed by companies of the BancaStato Group, other service providers and business partners, financial intermediaries and other parties.

The client agrees that the Bank may use third parties to provide its services (e.g. TWINT Ltd., Swisscom (Switzerland) Ltd, Swissbilling SA and SIX) to which client data may be sent to the extent necessary. The Bank shall carefully select, instruct and monitor service providers, which only use data in accordance with the Swiss Data Protection Act.

In addition, BancaStato TWINT plans to use Google Analytics, an analysis tool provided by Google Inc. This is used to analyse user behaviour with the aim of continuously optimising BancaStato TWINT and tailoring it to their needs. Collected information is normally transferred to a Google Inc. server in the USA and stored there. According to Google, the masked IP address transmitted as part of the Google Analytics service is not associated with any other stored data.

The client is aware that Google Inc. may have to disclose this information to third parties insofar as the third parties process this data on behalf of Google Inc. or if this is required by law.

The client has the option to disable the collection and transmission of usage data to Google Inc. at any time (in the BancaStato TWINT app settings ("App analytics")).

For further information, please see the [privacy policy](#) of Google Analytics.

BancaStato TWINT also uses the App Center Software Development Kit (SDK) from Microsoft Corporation to transmit error reports in order to continuously improve the App. Error information collected via SDK is transmitted to Microsoft servers in the USA and stored there. This data is evaluated by Microsoft in order to create error reports and to provide additional services relating to the analysis of error messages.

Are personal data transferred abroad or to an international organisation?

We only transfer your personal data abroad to countries that are deemed to provide an adequate level of data protection or, in the absence of such legislation providing adequate protection, on the basis of appropriate safeguards (e.g. standard contractual clauses approved by the European Commission).

How long are personal data stored?

The client's personal data are stored for as long as necessary in order to provide BancaStato TWINT's services. They will be deleted or anonymised when they are no longer required for the provision of these services.

If BancaStato TWINT is not used for two years, it will be assumed that the client has removed it from their smartphone. In this case, the client's personal data will be erased or anonymised.

If authorisation for campaigns is subsequently revoked by the client, six months after such revocation, any coupons, client cards, and campaigns will be irreversibly deleted or anonymised by the TWINT system, which means that the client will not be able to benefit from any linked concessions and benefits.

The client is informed that in the case of some data, the Bank must comply with a longer retention period pursuant to other legal obligations.

What rights does the data subject have?

Every data subject has the right of access, the right to rectification, the right to erasure, the right to restriction of processing, the right to object and – where applicable – the right to data portability. You also have the right to lodge a complaint with a competent data protection supervisory authority (Federal Data Protection and Information Commissioner (FDPIC)).

You can revoke your consent to the processing of your personal data at any time. Please note that revocation does not have retroactive effect. In the case of revocation of consent granted to us to process personal data, the client acknowledges that the functionality of BancaStato TWINT is no longer guaranteed and is asked to cancel the Bank's TWINT services, closing their account and uninstalling BancaStato TWINT from their smartphone.

Changes to the Privacy Policy

This Privacy Policy was last updated in March 2024. Any subsequent changes or updates will be made available to you at www.bancastato.ch/twint. Please visit our website regularly to stay informed of current statements. If the client does not agree with the changes made, they must cancel the Bank's TWINT services and uninstall BancaStato TWINT from their smartphone.