

Data Protection Notice (Swiss FADP / GDPR Aligned)

1. Controller

Show II

Contact: legal@show-ii.ch

2. Data Processed

Category	Data	Purpose	Legal Basis
Identity	Email, Client ID	Authentication, account mgmt	Contract (Art. 6(1)(b) GDPR / Art. 31 FADP)
Contact	Mobile (E.164)	Account recovery, verification	Legitimate interest / Contract
Communication	Telegram chat_id	Snippet delivery (opt-in)	Consent (Art. 6(1)(a) GDPR / Art. 31 FADP)
Payment	Payment provider customer ID, transaction data	Billing, credit grant	Contract
Usage	Publications accessed, credits consumed	Service provision, cap enforcement	Contract
Technical	IP hash, device hash (trial only)	Abuse prevention	Legitimate interest

3. Data Not Processed

- No passwords for Subscribers (magic link only).
- No full IP addresses stored (hashed only for trial abuse).
- No trading account credentials.
- No financial instrument holdings.

4. Cookies & Tracking

Cookie	Type	Duration	Purpose
session	HTTP-only, Secure, SameSite=Lax	30 days	Authentication (JWT)
theme	LocalStorage	Persistent	Dark/light mode preference

- **No third-party analytics cookies** (no Google Analytics, Mixpanel, etc.)
- **No advertising/tracking cookies**
- **No fingerprinting**

Cookie Deactivation

You may disable cookies in your browser settings:

- **Chrome:** Settings → Privacy and security → Cookies and other site data
- **Firefox:** Options → Privacy & Security → Cookies and Site Data
- **Safari:** Preferences → Privacy → Manage Website Data
- **Edge:** Settings → Cookies and site permissions → Manage and delete cookies

Note: Disabling the session cookie will prevent login. The theme cookie only affects visual preference.

4. Data Sharing (Subprocessors)

We engage carefully selected subprocessors for essential platform functions. All subprocessors operate under Data Processing Agreements (DPAs) and, where applicable, Standard Contractual Clauses (SCCs).

Category	Purpose	Safeguards
Payment processing	Billing, credit grant	DPA + SCCs
Email delivery	Snippet delivery	DPA
Messaging delivery	Telegram snippet delivery (opt-in)	User initiates
Database hosting	Data storage	DPA
Async job processing	Background tasks, retries	SCCs
Rate limiting	API protection	DPA

No data sold. No advertising tracking. No data shared beyond listed subprocessors.

5. Retention

Data	Retention Period
Account data	Duration of contract + 10 years (Swiss CO Art. 958f)
Payment data	10 years (Swiss CO Art. 958f)
Usage logs	2 years
Trial hashes (email/phone)	2 years (abuse prevention)
Technical logs	90 days
Session cookies	30 days (rolling)

6. Subscriber Rights

Under FADP/GDPR you may request:

- Access to your data
- Rectification of inaccurate data
- Erasure (where no legal retention obligation)
- Restriction of processing
- Data portability
- Objection to processing

Submit requests to: legal@show-ii.ch — response within 30 days.

7. Security

- TLS 1.3 for all traffic.
- JWT in HttpOnly, Secure, SameSite=Lax cookies.
- Bcrypt for admin password (rotated post-MVP).
- Database encryption at rest.
- No sensitive data in logs.
- Rate limiting via Redis (Edge Middleware).

8. International Transfers

Some subprocessors process data outside Switzerland/EU. Transfers rely on Standard Contractual Clauses (SCCs) and/or adequacy decisions.

9. Automated Decision-Making

No fully automated decisions with legal effect. Daily cap enforcement is rule-based, not AI.

10. Contact

Data Protection Officer: dpo@show-ii.ch

General: legal@show-ii.ch