

Personal Data Protection Policy

Owner	Andrew Smith, Security Owner and Data Protection Contact (andrew@swaptqr.com)
Version	1.1, effective October 19, 2026
Review cycle	At least once a year, and whenever our data processing changes
Part of	Swapt Information Security Policy

1. Purpose

This policy describes how Swapt collects, uses, shares, keeps and deletes personal data, including any data obtained through TikTok Shop APIs.

2. Our role

For sellers who use Swapt, Swapt acts as a service provider (processor). We process buyers' personal data only on the seller's instructions and to provide the Swapt service.

3. What we collect, and where it comes from

- **From buyers who choose to opt in** on a seller's Swapt page: email address, and, where the seller asks for them, name, phone number, shipping address and the order number they type in.
- **From TikTok Shop APIs**, with the seller's authorization: product and SKU data, and the status of an order whose number the buyer provides. We do not request or store buyer names, addresses, phone numbers or emails from TikTok Shop.
- **From sellers:** account and billing contact details.

4. How we use it

- Only to provide the service the seller set up: confirming an order is genuine, delivering the reward the buyer asked for, sending the emails the buyer agreed to receive, and reporting results to the seller.
- TikTok Shop data is used only for the seller who authorized it. It is never sold, never used for advertising, never combined across sellers, and never used to contact buyers.
- Every marketing email includes a one-click unsubscribe, and unsubscribes are honored right away.

5. Sharing

We share personal data only with the infrastructure providers needed to run the service (Google Cloud, Cloudflare, AWS, Temporal and Sentry), under their data processing terms, and with integrations a seller

connects on purpose (for example their own Klaviyo account). We disclose data to authorities only where the law requires it.

6. Protection

Personal data is protected under the Information Security Policy: TLS for all traffic to and from Swapt, encryption at rest, least-privilege access with MFA, separation between sellers, and monitoring.

7. Data subject requests

We help sellers and TikTok Shop respond to buyers' requests to access, correct or delete their personal data. We act on a request within 30 days, or sooner if the seller or the law requires it. Requests can be sent to andrew@swaptqr.com.

8. Retention and deletion

- Personal data is kept while the seller's account is active, or for a shorter period if the seller asks.
- When a seller's contract ends, their TikTok Shop and other partner tokens are revoked and deleted immediately, and their buyers' personal data is deleted within 30 days unless the law requires us to keep it. Backups roll off within the backup retention period.

9. Breaches

Suspected breaches are handled under the Incident Response Plan. Affected sellers and TikTok Shop are notified without undue delay, and within 72 hours of confirming a breach that involves their data.

10. Training and review

Everyone with access to personal data is briefed on this policy when they join and once a year. The policy is reviewed at least once a year.