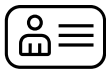


# Privacy Notice of the Anloware Ltd

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## Type of personal data



### General Data

We process general personal data about you.

*[Note: concerns Section 3: all categories of data].*



### Financial Data

We process your financial data.

*[Note: concerns Section 3 : communication data, master data, contract data].*



### Location Data

We process your location data.

*[Note: concerns Section 3: behavioral and preference data].*

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## Source of personal data



### Provided Data

We process personal data that you provide to us.

*[Note: concerns Section 3: especially penultimate paragraph].*



### Collected Data

We process personal data that we collect about you.

*[Note: concerns Section 3: especially last paragraph].*



### Received Data

We process personal data about you that we receive from third parties.

*[Note: concerns Section 3, especially last paragraph].*

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## Purpose of processing



### Marketing

We use your personal data for marketing and advertising.

*[Note: concerns Section 4: marketing purposes and relationship management (para. 4)].*



### Product Development

We use your personal data for the development and improvement of products and services.

*[Note: concerns Section 4: market research, to improve our services and operations, and for product development (para. 5)].*



### Other Purposes

We use your personal data for other purposes without direct connection with the core service.

*[Note: concerns Section 4: security purposes, etc. (para. 6 ff.)].*

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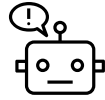
## Special processes



### Profiling

We analyse your behaviour and make assumptions about your interests and preferences

*[Note: concerns Section 6 para. 1 and 2 (and Section 3 behavioral and preference data)].*



### Automated Decision-Making

We make significant decisions based on fully automated processing.

*[Note: concerns Section 6 para. 3].*

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## Passing on to third parties



### Data Transfers

We transfer your personal data to other companies that decide themselves how to use the data.

*[Note: concerns Section 7].*

## Place of processing



### **Switzerland and EEA**

We only process your personal data in Switzerland and in the EEA.

*[Note: concerns Section 8].*



### **Worldwide**

We also process your personal data outside of Switzerland and the EEA.

*[Note: concerns Section 8].*

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## 1. What is this Privacy Notice about?

The Anloware Ltd (also «**we**», «**us**») collects and processes personal data that concern you but also other individuals («**third parties**»). We use the word «**data**» here interchangeably with «**personal data**».

[More](#)

«**Personal data**» means data relating to identified or identifiable individuals, which means that the relevant data, in combination with additional data, make it possible to draw conclusions about the identity of these individuals. «**Sensitive personal data**» is a subset of personal data that is specially protected under applicable data protection law. This includes, for example, data revealing racial or ethnic origin, health data, religious or philosophical beliefs, biometric data for identification purposes, and information relating to trade union membership. In Section 3, you will find information about the data we process in accordance with this Privacy Notice. «**Processing**» means any operation that is performed on personal data, such as collection, storage, use, alteration, disclosure and erasure.

In this Privacy Notice, we describe what we do with your data when you use anloware.com («**website**»), obtain services or products from us, interact with us in relation to a contract, communicate with us or otherwise deal with us. When appropriate we will provide a just-in-time notice to cover any additional processing activities not mentioned in this Privacy Notice. In addition, we may inform you about the processing of your data separately, for example in consent forms, terms and conditions, additional privacy notices, forms and other notices.

If you disclose data to us or share data with us about other individuals, such as family members, co-workers, etc., we assume that you are authorized to do so and that the relevant data is accurate. When you share data about others with us, you confirm that. Please make sure that these individuals have been informed about this Privacy Notice.

This Privacy Notice is aligned with the EU General Data Protection Regulation («**GDPR**»), the Swiss Data Protection Act («**DPA**») and the revised Swiss Data Protection («**revDPA**»). However, the application of these laws depends on each individual case.

## 2. Who is the controller for processing your data?

The Anloware Ltd, London, Zweigniederlassung Winterthur, (the «**Anloware Ltd**») is the controller for the Anloware Ltd's processing under this Privacy Notice, unless we tell you otherwise in an individual case.

[More](#)

For each processing activity there are one or several parties that are responsible for ensuring that the processing complies with data protection law. This party is called the **controller**. It is responsible, for example, for responding to access requests (Section 11) or for ensuring that personal data is processed securely and not used in an unlawful manner.

**Additional parties** may be **joint controllers** for the processing set out in this Privacy Notice if they participate in determining the purpose or means of the processing. If you wish to receive information about the controllers for a specific processing activity, you are welcome to ask us as part of your access right (Section 11). The Anloware Ltd remains your primary contact, even if there are other joint controllers.

In Section 3, Section 7 and Section 12, you will find additional information about **third parties with whom we work together** and who are controllers for their processing. If you have any questions for these third parties or if you wish to exercise your rights, please contact them directly.

You may contact us for data protection concerns and to exercise your rights under Section 11 as follows:

**Anloware Ltd, London, Zweigniederlassung Winterthur  
St. Gallerstrasse 188  
CH-8404 Winterthur  
dataprotection@anloware.com**

### 3. What data do we process?

We process various categories of data about you. The main categories of data are the following:

- **Technical data:** When you use our website or other online offerings, we collect the IP address of your terminal device and other technical data in order to ensure the functionality and security of these offerings. This data includes logs with records of the use of our systems. We generally keep technical data for 6 months. In order to ensure the functionality of these offerings, we may also assign an individual code to you or your terminal device (for example as a cookie, see Section 12). Technical data as such does not permit us to draw conclusions about your identity. However, technical data may be linked with other categories of data (and potentially with your person) in relation to user accounts, registrations, access controls or the performance of a contract.

[More](#)

**Technical data** includes the IP address and information about the operating system of your terminal device, the date, region and time of use and the type of browser that you use to access our electronic offerings. This can help us to provide an appropriate layout of the website or to show you a website customized for your region, for example. We know through which provider you access our offerings (and therefore also the region) because of the IP address, but usually this does not tell us who you are. However, this changes for example when you create a user account, because personal data can then be linked with technical data (for example, we can know the browser you use to access an account through our website). Examples of technical data include protocols («logs») that are created in our systems (for example the log of user logins to our website).

- **Registration data:** Certain offerings and services can only be used with a user account or registration, which can happen directly with us or through our third-party login service providers. In this regard you must provide us with certain data, and we collect data about the use of the offering or service. If you redeem a voucher issued by the Anloware Ltd with us, we may require certain data from you at the time of redemption. If we issue a voucher to you for one of our contractual partners, we may share or receive some of your registration data from the relevant contractual partner (see Section 7). Registration data may be required in relation to access control to certain facilities, potentially including biometric data, depending on the control system. We generally keep registration data for 12 months from the date the use of the service ceases or the user account is closed.

[More](#)

**Registration data** includes the information you provide when you create an account on our website (for example username, password, name, e-mail). It also includes the data that we may require from you before you can use certain free services. In relation to access controls, we may need to register you with your data (access codes in badges, biometric data for identification) (see the category «other data»).

- **Communication data:** When you are in contact with us via the contact form, by e-mail, telephone or by letter or other means of communication, we collect the data exchanged between you and us, including your contact details and the metadata of the communication. If we have to determine your identity, for example in relation to a request for information, a request for press access, etc., we collect data to identify you (for example a copy of an ID document). We generally keep this data for 12 months from the last exchange between us. This period may be longer where required for evidentiary purposes, to comply with legal or contractual requirements, or for technical reasons. E-mails in personal mailboxes and written correspondence are generally kept for at least 10 years.

[More](#)

**Communication data** is your name and contact details, the means, place and time of communication and usually also its content (i.e. the content of e-mails, letters, etc.). This data may also include information about third parties. For identification purposes, we may also process your ID document number or a password set by you or your press pass. For secure identification, the following required information must be provided for **media inquiries**: Publisher, name of publication, title, first name, surname, postal address, e-mail address and telephone number of the reporter.

- **Master data:** With master data we mean the basic data that we need, in addition to contract data (see below), for the performance of our contractual and other business relationships or for marketing and promotional purposes, such as name and contact details, and information about, for example, your role and function, your bank details, your date of birth, customer history, powers of attorney, signature authorizations and declarations of consent. We process your master data if you are a customer or other business contact or work for one (for example as a contact person of the business partner), or because we wish to address you for our own purposes or for the purposes of a contractual partner (for example as part of marketing and advertising, with invitations to events, with vouchers, with newsletters, etc.). We receive master data from you (for example when you make a purchase or as part of a registration), from parties you work for, or from third parties such as contractual partners, associations and address brokers, and from public sources such as public registers or the internet (websites, social media, etc.). We may also collect master data from our



shareholders and investors. We generally keep master data for 10 years from the last exchange between us or from the end of the contract. This period may be longer if required for evidentiary purposes, to comply with legal or contractual requirements, or for technical reasons. For contacts used only for marketing and advertising, the retention period is usually much shorter, usually no more than 2 years from the last contact.

[More](#)

**Master data** includes data such as name, address, e-mail address, telephone number and other contact details, gender, date of birth, nationality, data about related persons, websites, social media profiles, photos and videos, copies of ID cards; moreover, details of your relationship with us (customer, supplier, visitor, service recipient, etc.), details of your status, allocations, classifications and mailing lists, details of our **interactions** with you (if applicable, a history thereof with corresponding entries), reports (for example from the media), or official documents (for example excerpts from the commercial register, permits, etc.) that concern you. As **payment information**, we collect, for example, your bank details, account number and credit card data. Declarations of consent and opt-out information are also part of the master data, as well as information about third parties.

In relation to contact persons and representatives of our **customers, suppliers and partners**, master data includes, for example, name and address, information about the role or function in the company, qualifications and (where applicable) information about superiors, co-workers and subordinates and information about interactions with these persons.

Master data is not collected comprehensively for all contacts. The data collected in an individual case depends mostly on the purpose of the processing activity.

- **Contract data:** This means data that is collected in relation to the conclusion or performance of a contract, for example information about the contracts and the services provided or to be provided, as well as data from the period leading up to the conclusion of a contract, information required or used for performing a contract, and information about feedback (for example complaints, feedback about satisfaction, etc.). We generally collect this data from you, from contractual partners and from third parties involved in the performance of the contract, but also from third-party sources (for example credit information providers) and from public sources. We generally keep this data for 10 years from the last contract activity or from the end of the contract. This period may be longer where necessary for evidentiary purposes, to comply with legal or contractual requirements, or for technical reasons.

[More](#)

**Contract data** includes information about the **conclusion of the contract**, about your **contracts**, for example, the type and date of conclusion, information from the application process (such as the application for the performance of our products or services) and

information about the relevant contract (for example its duration) and the performance and administration of the contracts (for example information related to billing, customer service, technical assistance and enforcement of contractual claims). Contract data also includes information about deficiencies, complaints and changes to a contract, as well as information about customer satisfaction that we may collect, for example, through surveys. Contract data also includes **financial data**, such as credit information (meaning information that allows us to draw conclusions about the likelihood that receivables will be paid), information about reminders and debt collection. We receive this data partly from you (for example when you make payments), but also from credit agencies and debt collection companies and from public sources (for example a commercial register).

- **Behavioral and preference data:** Depending on our relationship with you, we try to get to know you better and to tailor our products, services and offers to you. For this purpose, we collect and process data about your behavior and preferences. We do so by evaluating information about your behavior in our domain, and we may also supplement this information with third-party information, including from public sources. Based on this data, we can for example determine the likelihood that you will use certain services or behave in a certain way. The data processed for this purpose is already known to us (for example where and when you use our services), or we collect it by recording your behavior (for example how you navigate our website or for example by detecting your motion profile through your use of your cell phone). We anonymize or delete this data when it is no longer relevant for the purposes pursued, which may be – depending on the nature of the data – between 2-3 weeks (for motion profiles) and 24 months (for product and service preferences). This period may be longer where necessary for evidentiary purposes, to comply with legal or contractual requirements, or for technical reasons. We describe how tracking works on our website in Section 12.

[More](#)

**Behavioral data** is information about certain actions, such as your response to electronic communications (for example if and when you have opened an e-mail) or your location. For example, we may collect your location data when you use our website. We will use signage at the relevant locations to tell you about the collection of anonymous motion profiles, and we will only create personalized motion profiles with your consent.

**Preference data** tells us what your needs are, which products or services might be of interest to you or when and how you will likely respond to messages from us. We obtain this information from the analysis of existing data, such as behavioral data, so that we can get to know you better, tailor our advice and offers more precisely to you and generally improve our offers. To improve the quality of our analyses, we may combine this data with other data that we also obtain from third parties, such as address dealers, administrative offices and publicly available sources such as the Internet, for example with information about your household size, income bracket and purchasing power, shopping behavior, contact data of relatives, and anonymous information from statistical offices.

Behavioral and preference data may be analyzed on a **personally identifiable basis** (for example to show you personalized advertising), but also on a **non-identifiable basis** (for example for market research or product development). Behavioral and preference data may also be combined with other data (for example, motion data may be used for contact tracing as part of a health protection concept).

- **Other data:** We also collect data from you in other situations. For example, data that may relate to you (such as files, evidence, etc.) is processed in relation to administrative or judicial proceedings. We may also collect data for health protection (for example as part of health protection concepts). We may obtain or create photos, videos and sound recordings in which you may be identifiable (for example at events, with security cameras, etc.). We may also collect data about who enters certain buildings, and when or who has access rights (including in relation to access controls, based on registration data or lists of visitors, etc.), who participates in events or campaigns and who uses our infrastructure and systems and when. Moreover, we collect and process data about our shareholders and other investors, in addition to master data, including information for registers, in relation to the exercise of their rights and events (for example general meetings). The retention period for this data depends on the processing purpose and is limited to what is necessary. This ranges from a few days for many security cameras, to a few weeks for contact tracing and visitor data, which is usually kept for 3 months, to several years or more for reports about events with images. Data relating to you as a shareholder or investor is kept in accordance with corporate law, but in any case for as long as you are invested.

Much of the data set out in this Section 3 is provided to us by you (through forms, when you communicate with us, in relation to contracts, when you use the website, etc.). You are not obliged or required to disclose data to us except in certain cases, for example within the framework of binding health protection concepts (legal obligations). If you wish to enter into contracts with us or use our services, you must also provide us with certain data, in particular master data, contract data and registration data, as part of your contractual obligation under the relevant contract. When using our website, the processing of technical data cannot be avoided. If you wish to gain access to certain systems or buildings, you must also provide us with registration data.

#### More

We provide certain services to you only if you provide us with **registration data**, because we or our contractual partners wish to know who uses our services, because it is a technical requirement or because we wish to communicate with you. If you or the person you represent (for example your employer) wishes to enter into or perform a contract with us, we must collect **master data, contract data and communication data** from you, and

we process **technical data** if you wish to use our website or other electronic offerings for this purpose. If you do not provide us with the data necessary for the conclusion and performance of the contract, you should expect that we may refuse to conclude the contract, that you may commit a breach of contract or that we will not perform the contract. Similarly, we can only submit a response to a request from you if we process **communication data** and – if you communicate with us online – possibly also **technical data**. Also, the use of our website is not possible without us receiving **technical data**.

As far as it is not unlawful we also collect data from public sources (for example debt collection registers, land registers, commercial registers, the media, or the internet including social media) or receive data from public authorities and from other third parties (such as credit agencies, address brokers, associations, contractual partners, internet analytics services, etc.).

#### More

The categories of personal data that we **receive about you from third parties** include, in particular, information from public registers, information that we receive in relation to administrative and legal proceedings, information in relation to your professional functions and activities (so that we can, for example, conclude and process transactions with your employer with your assistance), information about you in correspondence and meetings with third parties, credit information (where we conduct business with you in a personal capacity), information about you that persons related to you (family members, advisors, legal representatives, etc.) share with us so that we can conclude or perform contracts with you or involving you (for example references, your delivery address, powers of attorney, information about compliance with legal requirements such as those relating to fraud prevention and the combating of money laundering and terrorist financing, export restrictions, information from banks, insurance companies, sales and other contractual partners of us about your use or provision of services (for example payments, purchases, etc.), information from the media and the internet about the use or provision of services by you (for example payments made, purchases made, etc.), information from the media and the internet about you (where appropriate in a specific case, for example in the context of an application, marketing/sales, press review, etc.), your address and potentially interests and other socio-demographic data (especially for marketing and research purposes) and data in relation to the use of third-party websites and online offerings where such use can be linked to you.

#### 4. For what purposes do we process your data?

We process your data for the purposes explained below. Further information is set out in Sections 12 and 13 for online services. These purposes and their objectives represent interests of us and potentially of third parties. You can find further information on the legal basis of our processing in Section 5.

We process your data for purposes related to **communication** with you, in particular in relation to responding to **inquiries** and the **exercise of your rights** (Section 11) and to enable us to **contact** you in case of queries. For this purpose, we use in particular communication data and master data, and registration data in relation to offers and services that you use. We keep this data to document our communication with you, for training purposes, for quality assurance and for follow-up inquiries.

[More](#)

The above includes all purposes in relation to which we communicate with you, whether in the context of customer service or consulting, authentication in case the website is used, and for training and quality assurance (for example in customer service). We further process communication data to enable us to communicate with you by e-mail and telephone and by letter. Communication with you usually takes place in relation to other processing purposes, for example so that we can provide services or respond to an access request. Our processing also serves to document the communication and its content.

We process data for the conclusion, administration and performance of **contractual relationships**.

[More](#)

We conclude various contracts with our business and private customers, suppliers, subcontractors and other parties, such as partners in projects or parties in legal proceedings. In particular, we process master data, contract data and communication data and, depending on the circumstances, registration data relating to the customer or the persons for whose benefit the customer has received a service.

In the run-up of a business relationship, personal data – in particular master data, contract data and communication data – is collected from potential customers or other contractual partners (for example in an order form or a contract) or results from a communication. In connection with the conclusion of a contract, we process data to assess creditworthiness and to start a customer relationship. In some cases, this information is reviewed in order to comply with legal requirements.

As part of performing contractual relationships, we process data for the administration of the customer relationship, to provide and claim contractual services (which includes involving third parties, such as logistics companies, security service providers, advertising service providers, banks, insurance companies or credit information providers, who may in turn provide data to us), for consulting and for customer support. The enforcement of legal claims arising from contracts (debt collection, legal proceedings, etc.) is also part of the performance, as are accounting, termination of contracts and public communication.

We process data for **marketing purposes** and **relationship management**, for example to send our customers and other contractual partners personalized advertising for products and services from us and from third parties (for example from advertising partners). This may happen in the form of newsletters and other regular contacts, through channels for which we have contact information from you, but also as part of marketing campaigns. You can object to such contacts at any time (see at the end of this Section 4) or refuse or withdraw consent to be contacted for marketing purposes. With your consent, we can target our online advertising on the internet more specifically to you (see Section 12).

[More](#)

For example, if you consent we may send you information, advertising and product offers from us and from third parties (for example advertising partners), as printed material, electronically or by telephone. For this purpose, we process in particular communication and registration data. As most companies, we personalize communications so that we can provide you with customized information and offers that meet your needs and interests. Therefore, we combine data we process about you and collect preference data and use this data as a basis for personalization (see Section 3).

Relationship management includes addressing existing customers and their contacts, possibly personalized on the basis of behavioral and preference data. In the context of relationship management, we may also operate a customer relationship management system («CRM») in which we keep the data of customers, suppliers and other business partners that is required for relationship management, for example data about contact persons, relationship history (for example information about products and services purchased or supplied, interactions, etc.), interests, marketing measures and other information.

All this processing is important to us not only to promote our offerings as effectively as possible, but also to make our relationships with customers and other third parties more personal and positive, to focus on the most important relationships, and to use our resources as efficiently as possible.

We further process your data for **market research**, to **improve our services and operations**, and for **product development**.

[More](#)

We strive to continuously improve our products and services (including our website) and to respond quickly to changing needs. We therefore analyze, for example, how you navigate through our website or which products are used by which groups of people in which way and how new products and services can be designed (for further details, see Section 12). This helps us understand the market acceptance of existing products and services and the market potential of new products and services. To this end, we process in particular master data, behavioral data and preference data, but also communication data and information from customer surveys, polls and studies and other information, for example from the media, social media, the Internet and other public sources. We use pseudonymized or anonymized data for these purposes to the extent possible. We may also use media monitoring services or conduct media monitoring ourselves and process



personal data in order to conduct media monitoring or to understand and respond to current developments and trends.

With your prior consent, we use non-anonymized location data to point out interesting offers and products to you in the vicinity based on your position, to infer your interests from the position data (dwell time) and to inform you of which products and services other contractual partners with similar interests have used.

We may also process your data for **security** and **access control purposes**.

[More](#)

We continuously review and improve the appropriate security of our IT and other infrastructure (for example buildings). Like all companies, we cannot exclude data security breaches with absolute certainty, but we do our best to reduce the risks. We therefore process data, for example, for monitoring, inspection, analysis and testing of our networks and IT infrastructures, for system and error checks, for documentation purposes and in the context of backups. Access controls include electronic system access controls (for example logging into user accounts), as well as physical access controls (for example building access). For security purposes (to prevent and investigate incidents), we also keep access protocols and visitor lists and use surveillance systems (for example security cameras).

We process personal data to **comply with laws, directives and recommendations from authorities and internal regulations («Compliance»)**.

[More](#)

This includes, for example, the implementation of health security concepts or the regulated fight against money laundering and terrorist financing. In certain cases, we may also be required to make certain clarifications about our customers («Know Your Customer») or to report to the authorities. Disclosure and information or reporting obligations, for example in connection with supervisory and tax obligations, also require or entail data processing, for example archiving obligations and the prevention, detection and investigation of criminal offenses and other violations. This also includes receiving and processing complaints and other reports, monitoring communications, conducting internal investigations or disclosing documents to an authority if we have sufficient reasons to do so or are legally obliged to do so. We may also process your personal data in relation to external investigations, for example by a law enforcement or supervisory authority or by a mandated private entity. For all these purposes, we process in particular master data, contract data and communication data, but also, under certain circumstances, behavioral data and data from the category of «other data». The legal obligations may arise under Swiss law but also under foreign regulations to which we are subject, as well as self-regulations, industry standards, our own «corporate governance» and instructions and requests from authorities.

We also process data for the purposes of our **risk management** and as part of our **corporate governance**, including business organization and development.

[More](#)

For these purposes, we process in particular master data, contract data, registration data and technical data, but also behavioral and communication data. For example, as part of our financial management, we need to monitor our accounts receivable and accounts payable, and we need to avoid becoming victims of crime and abuse, which may require us to analyze data for relevant patterns of such activities. We may also conduct profiling and create and process profiles for these purposes and to protect you and us from criminal or abusive activity (see also Section 6). In the context of planning our resources and organizing our operations, we may need to evaluate and process data relating to the use of our services and other offerings or share information about them with others (for example outsourcing partners), which may also include your data. The same applies with respect to services provided to us by third parties. As part of our business development, we may sell businesses, parts of businesses or companies to others or acquire them from others or enter into partnerships, which may also result in the exchange and processing of data (including from you, for example as a customer or supplier or as a supplier representative).

We may process your data for **further purposes**, for example as part of our internal processes and administration or for quality assurance purposes and trainings.

[More](#)

These further purposes include, for example, training and educational purposes, administrative purposes (such as managing master data, accounting and data archiving, and testing, managing and continuously improving IT infrastructure), protecting our rights (for example to enforce claims in or out of court, and before authorities in Switzerland and abroad, or to defend ourselves against claims, for example by preserving evidence, conducting legal assessments and participating in court or administrative proceedings) and evaluating and improving internal processes. These further purposes also include safeguarding other legitimate interests that cannot be named exhaustively.



## 5. On what basis do we process your data?

Where we ask for your **consent** for certain processing activities, we will inform you separately about the relevant processing purposes. You may withdraw your consent at any time with effect for the future by providing us written notice (by mail) or, unless otherwise noted or agreed, by sending an e-mail to us; see our contact details in Section 2. For withdrawing consent for online tracking, see Section 12. Where you have a user account, you may also withdraw consent or contact us also through the relevant website or other service, as applicable. Once we have received notification of withdrawal of consent, we will no longer process your information for the purpose(s) you consented to, unless we have another legal basis to do so. Withdrawal of consent does not, however, affect the lawfulness of the processing based on the consent prior to withdrawal.

Where we do not ask for consent for processing, the processing of your personal data relies on the requirement of the processing for **initiating or performing a contract** with you (or the entity you represent) or on our or a third-party **legitimate interest** in the particular processing, in particular in pursuing the purposes and objectives set out in Section 4 and in implementing related measures. Our legitimate interests also include compliance with **legal regulations**, insofar as this is not already recognized as a legal basis by applicable data protection law (for example in the case of the GDPR, the laws in the EEA and in the case of the DPA, Swiss law). This also includes the marketing of our products and services, the interest in better understanding our markets and in managing and further developing our company, including its operations, safely and efficiently.

Where we receive sensitive personal data (for example health data, data about political opinions, religious or philosophical beliefs, and biometric data for identification purposes), we may process your data on other legal basis, for example, in the event of a dispute, as required in relation to a potential litigation or for the enforcement or defense of **legal claims**. In some cases, other legal basis may apply, which we will communicate to you separately as necessary.

## 6. What applies in case of profiling and automated individual decisions?

We may automatically evaluate personal aspects relating to you («**profiling**») based on your data (Section 3) for the purposes set out in Section 4, where we wish to determine preference data, but also in order to detect misuse and security risks, to perform statistical analysis or for operational planning. We may also create profiles for these purposes, i.e. we may combine behavioral and preference data, but also master data, contract data and technical data relating to you in order to better understand you as a person with your various interests and other characteristics.

[More](#)

If you are our customer, we may, for example, use «profiling» to determine which other products are likely to be of interest to you based on your purchases. We may also use profiling to assess your creditworthiness before offering you to pay for a purchase by invoice. An automated data analysis may also determine, for your own protection, the likelihood of a particular transaction being fraudulent. This allows us to suspend the transaction for further clarification. «Profiles» are to be distinguished from «profiling». «Profiles» refers to the combining of different data in order to draw conclusions on essential aspects of your personality (for example what you like, how you behave in certain situations) from the totality of this data. Profiles may also be used for marketing, for example, or for security purposes.

In both cases, we pay attention to the proportionality and reliability of the results and take measures against misuse of these profiles or profiling. Where these can produce legal effects concerning you or similarly significantly affect you, we generally ensure human review.

In certain situations, it may be necessary for the efficiency and consistency of decision-making processes that we automate discretionary decisions that produce legal effects concerning you or similarly significantly affect you («**automated individual decisions**»). In these cases, we will inform you accordingly and take the measures required by applicable law.

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An example for an automated individual decision is the automatic order acceptance by an online shop. Simple if-then decisions are not included (for example where a computer lets you access your user account after successfully checking your password), only discretionary decisions (for example the decision to enter into a contract). We will inform you in each case where an automated decision produces negative legal effects concerning you or similarly significantly affects you. If you do not agree with the result of such a decision, you will be able to communicate about it with a human being who will review the decision.

## 7. With whom do we share your data?

In relation to our contracts, the website, our services and products, our legal obligations or otherwise with protecting our legitimate interests and the other purposes set out in Section 4, we may disclose your personal data to third parties, in particular to the following categories of recipients:

- **Service providers:** We work with service providers in Switzerland and abroad who process your data on our behalf or as joint controllers with us or who receive data about you from us as separate controllers (for example IT providers, shipping companies, advertising service providers, login service providers, banks, insurance companies, credit information agencies, or address verification providers). For the service providers used for the website, see Section 12. Key service providers in the IT area are Infomaniak and IONOS.

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To be able to deliver our products and services efficiently and focus on our core competencies, we procure services from third parties in various areas. We disclose to these providers the data they require for their services, which may also concern you. These providers may also use such data for their own purposes, for example information about overdue claims and your payment history in case of credit information agencies or anonymized data to improve their services. In addition, we enter into contracts with these providers that include provisions to protect data, where such protection does not follow from the law. In some cases, our service providers may also process data on how their services are used and other data that is generated in the course of using their services as independent data controllers for their own legitimate interests (e.g., for statistical analysis or billing purposes). Service providers inform about their independent data processing activities in their own privacy statements.

- **Contractual partners including customers:** This refers to customers and our other contractual partners as this data disclosure results from these contracts. For example, they receive registration data in relation to issued and redeemed vouchers, invitations, etc. If you work for one of these contractual partners, we may also disclose data about you to that partner in this regard. These recipients also include contractual partners with whom we cooperate.

[More](#)

If you act as an employee for a company with which we have concluded a contract, performance of this contract may require us to tell the company, for example, how you have used our service. Cooperation partners and advertising partners receive selected master data, contract data, behavioral data and preference data from us so that they can carry out non-personal analyses in their fields (for example about the number of our customers who have viewed their advertising) and, on the other hand, so that they can use data for advertising purposes (including targeting you). For example, advertising partners

should be able to communicate with selected other customers of us and send advertising to them us.

- **Authorities:** We may disclose personal data to agencies, courts and other authorities in Switzerland and abroad if we are legally obliged or entitled to make such disclosures or if it appears necessary to protect our interests. These authorities act as separate controllers.

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Examples are criminal investigations, police measures (for example health protection concepts, the fight against violence, etc.), regulatory requirements and investigations, legal proceedings, reporting obligations and pre-court and out-of-court proceedings, as well as legal obligations to provide information and to cooperate. Data may also be disclosed if we wish to obtain information from public bodies, for example in order to justify a request for information or because we need to say about whom we require information (for example from a register).

- **Other persons:** This means other cases where interactions with third parties follows from the purposes set out in Section 4.

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Other recipients include, for example, delivery recipients or third-party payees specified by you, other third parties in relation to agency relationships (for example if we share your data with your lawyer or your bank) or persons involved in administrative or legal proceedings. If we cooperate with the media and share materials with them (for example photos), this may also affect you depending on the circumstances. The same applies if we publish content (for example photos, interviews, quotes, etc.), for example on our website or in our other publications. As part of our business development, we may sell businesses, parts of businesses or companies to others or acquire them from others or enter into partnerships, which may also result in the disclosure of data (including from you, for example as a customer or supplier or as a supplier representative) to those persons involved in these transactions. In relation to communicating with competitors, industry organizations, associations and other bodies, data may be exchanged that also affects you.

All these categories of recipients may involve third parties, so that your data may also be disclosed to them. We can restrict the processing by certain third parties (for example IT providers), but not by others (for example authorities, banks, etc.).

## **8. Is your personal data disclosed abroad?**

As explained in section 7, we disclose data to other parties. These are not all located in Switzerland. Your data may therefore be processed both in Europe and in Switzerland; in exceptional cases, in any country in the world.

If a recipient is located in a country without adequate statutory data protection, we require the recipient to undertake to comply with data protection (for this purpose, we use the revised European Commission's standard contractual clauses, which can be accessed here: [https://eur-lex.europa.eu/eli/dec\\_impl/2021/914/oj?](https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?)), unless the recipient is subject to a legally accepted set of rules to ensure data protection and unless we cannot rely on an exception. An exception may apply for example in case of legal proceedings abroad, but also in cases of overriding public interest or if the performance of a contract requires disclosure, if you have consented or if data has been made available generally by you and you have not objected against the processing.

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Many countries outside of Switzerland or the EEA currently do not have laws that ensure an adequate level of data protection under the DPA or the GDPR. The contractual arrangements mentioned compensate for this weaker or missing legal protection to some extent. However, contractual precautions cannot eliminate all risks (namely of government access abroad). You should be aware of these remaining risks, even though they may be low in an individual case, and we take further measures to minimize them.

Please note that data exchanged via the internet is often routed through third countries. Your data may therefore be sent abroad even if the sender and recipient are in the same country.

## **9. How long do we process your data?**

We process your data for as long as our processing purposes, the legal retention periods and our legitimate interests in documentation and keeping evidence require it or storage is a technical requirement. You will find further information on the respective storage and processing periods for the individual data categories in Section 3, and for cookies in Section 12. If there are no contrary legal or contractual obligations, we will delete or anonymize your data once the storage or processing period has expired as part of our usual processes.

[More](#)

Documentation and evidence purposes include our interest in documenting processes, interactions and other facts in view of legal claims, inconsistencies, IT and infrastructure security requirements and demonstrating good corporate governance and compliance. Retention may be a technical requirement if certain data cannot be separated from other data and we therefore need to keep it with it.

## **10. How do we protect your data?**

We take appropriate security measures in order to maintain the required security of your personal data and ensure its confidentiality, integrity and availability, and to protect it against unauthorized or unlawful processing, and to mitigate the risk of loss, accidental alteration, unauthorized disclosure or access.

[More](#)

Technical and organizational security measures may include encryption and pseudonymization of data, logging, access restrictions, keeping backup copies, giving instructions to our employees, entering confidentiality agreements, and monitoring. We protect your data that is sent through our website in transit by appropriate encryption. However, we can only secure areas in our control. We also require our data processors to take appropriate security measures. However, security risks can never be excluded completely; residual risks are unavoidable.

## 11. What are your rights?

**Applicable data protection laws grant you the right to object to the processing of your data in some circumstances, in particular for direct marketing purposes, for profiling carried out for direct marketing purposes and for other legitimate interests in processing.**

To help you control the processing of your personal data, you have the following rights in relation to our data processing, depending on the applicable data protection law:

- The right to request information from us as to whether and what data we process from you;
- The right to have us correct data if it is inaccurate;
- The right to request erasure of data;
- The right to request that we provide certain personal data in a commonly used electronic format or transfer it to another controller;
- The right to withdraw consent, where our processing is based on your consent;
- The right to receive, upon request, further information that is helpful for the exercise of these rights;
- The right to express your point of view in case of automated individual decisions (Section 6) and to request that the decision be reviewed by a human.

**If you wish to exercise the above-mentioned rights in relation to us**, please contact us in writing, at our premises or, unless otherwise specified or agreed, by e-mail; you will find our contact details in Section 2. In order for us to be able to prevent misuse, we need to identify you (for example by means of a copy of your ID card, unless identification is not possible otherwise).

You also have these rights in relation to other parties that cooperate with us as separate controllers – please contact them directly if you wish to exercise your rights in relation to their processing. You will find information on our key partners and service providers in Section 7 and additional information in Section 12.

Please note that conditions, exceptions or restrictions apply to these rights under applicable data protection law (for example to protect third parties or trade secrets). We will inform you accordingly where applicable.

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In particular, we may need to continue to process and keep your personal data in order to perform a contract with you, to protect our own legitimate interests, such as the assertion, exercise or defense of legal claims, or to comply with legal obligations. To the extent

legally permitted, in particular to protect the rights and freedoms of other data subjects and to safeguard legitimate interests, we may also reject a subject request in whole or in part (for example by redacting content that concerns third parties or our trade secrets).

If you do not agree with the way we handle your rights or with our data protection practices, please let us (Section 2) know. If you are located in the EEA, the United Kingdom or in Switzerland, you also have the right to lodge a complaint with the competent data protection supervisory authority in your country. You can find a list of authorities in the EEA here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en). You can reach the UK supervisory authority here: <https://ico.org.uk/global/contact-us/>. You can reach the Swiss supervisory authority here: <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html>.



## 12. Do we use online tracking?

We use various techniques on our website that allow us and third parties engaged by us to recognize you during your use of our website, and possibly to track you across several visits. This Section informs you about this.

In essence, we wish to distinguish access by you (through your system) from access by other users, so that we can ensure the functionality of the website and carry out analysis and personalization. We do not intend to determine your identity, even if that is possible where we or third parties engaged by us can identify you by combination with registration data. However, even without registration data, the technologies we use are designed in such a way that you are recognized as an individual visitor each time you access the website, for example by our server (or third-party servers ) that assign a specific identification number to you or your browser (so-called «cookie»).

[More](#)

**Cookies** are individual codes (for example a serial number) that our server or a server of our service providers or advertising partners transmits to your system when you connect to our website, and that your system (browser, cell phone) accepts and stores until the set expiration time. Your system transmits these codes to our server or the third-party server with each additional access. That way, you are recognized even if your identity is unknown.

Whenever you access a **server** (for example when you use a website or an app, or because an e-mail includes a visible or invisible image), your visits can therefore be «tracked». If we integrate offers from an advertising partners or a provider of an analysis tool on our website, they may track you in the same way, even if you cannot be identified in a particular case.

We use these technologies on our website and may allow certain third parties to do so as well. However, depending on the purpose of these technologies, we may ask for consent before they are used. You can also set your browser to block or deceive certain types of cookies or alternative technologies, or to delete existing cookies. You can also add software to your browser that blocks certain third-party tracking. You can find more information on the help pages of your browser (usually with the keyword «Privacy») or on the websites of the third parties set out below.

We distinguish the following categories of «cookies» (including other technologies such as fingerprinting):

- **Necessary cookies:** Some cookies are necessary for the functioning of the website or for certain features. For example, they ensure that you can move between pages without losing information that was entered in a form. They also ensure that you stay logged in. These cookies exist temporarily only («session cookies»). If you block them, the website may not work properly. Other cookies are necessary for the server to store options or information (which you have entered) beyond a session (i.e. a visit to the website) if you use this function (for example language

settings, consents, automatic login functionality, etc.). These cookies have an expiration date of up to 24 months.

- **Performance cookies:** In order to optimize our website and related offers and to better adapt them to the needs of the users, we use cookies to record and analyze the use of our website, potentially beyond one session. We use third-party analytics services for this purpose. We have listed them below. Before we use such cookies, we ask for your consent. Performance cookies also have an expiration date of up to 24 months. Details can be found on the websites of the third-party providers.

### **13. What data do we process on our social network pages?**

We may operate pages and other online presences («fan pages», «channels», «profiles», etc.) on social networks and other platforms operated by third parties and collect the data about you described in Section 3 and below. We receive this data from you and from the platforms when you interact with us through our online presence (for example when you communicate with us, comment on our content or visit our online presence). At the same time, the platforms analyze your use of our online presences and combine this data with other data they have about you (for example about your behavior and preferences). They also process this data for their own purposes, in particular for marketing and market research purposes (for example to personalize advertising) and to manage their platforms (for example what content they show you) and, to that end, they act as separate controllers.

[More](#)

We receive data about you when you communicate with us through online presences or view our content on the corresponding platforms, visit our online presences or are active on them (for example publish content, submit comments). These platforms also collect technical data, registration data, communication data, behavioral data and preference data from you or about you, among other things (see Section 3 about these terms). These platforms usually perform statistical analysis of the way you interact with us, how you use our online presences and our content or other parts of the platform (what you view, comment on, «like», forward, etc.) and combine this data with other information about you (for example information about your age and your gender and other demographic information). In that way, they create profiles about you and statistics on the use of our online presences. They use this data and profiles to display to you our or other advertisements and other personalized content on the platform and to manage the behavior of the platform, but also for market and user research and to provide us and other parties with information about you and the use of our online presence. We can control the analysis that these platforms generate regarding the use of our online presence to some extent.

We process this data for the purposes set out in Section 4, in particular for communication, for marketing purposes (including advertising on these platforms, see Section 12) and for market research. You will find information about the applicable legal basis in Section 5. We may disseminate content published by you (for example comments on an announcement), for example as part of our advertising on the platform or elsewhere. We or the operators of the platforms may also delete or restrict content from or about you in accordance with their terms of use (for example inappropriate comments).

For further information on the processing of the platform operators, please refer to the privacy information of the relevant platforms. There you can also find out about the countries where they process your data, your rights of access and erasure of data and other data subjects rights and how you can exercise them or obtain further information. We currently use the following platforms:

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#### **14. Can we update this Privacy Notice ?**

This Privacy Notice is not part of a contract with you. We can change this Privacy Notice at any time. The version published on this website is the current version.

Last updated: 2025-06-05