

# Privacy Policy

## 1. PREAMBLE

With the following privacy policy we would like to inform you which types of your personal data (hereinafter also abbreviated as "data") we process for which purposes and in which scope. The privacy statement applies to all processing of personal data carried out by us, both in the context of providing our services and in particular on our websites, in mobile applications and within external online presences, such as our social media profiles (hereinafter collectively referred to as "online services").

The terms used are not gender-specific.

Last Update: 31. July 2024



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## 2. CONTROLLER

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Phone: +41 55 256 81 11

Legal Notice: <https://bioengineering.ch>

## 3. CONTACT INFORMATION OF THE DATA PROTECTION OFFICER

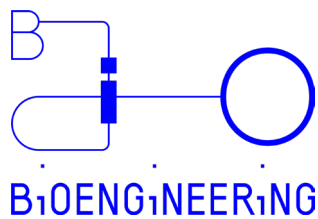
[info@bioengineering.ch](mailto:info@bioengineering.ch)

## 4. OVERVIEW OF PROCESSING OPERATIONS

The following table summarises the types of data processed, the purposes for which they are processed and the concerned data subjects.

### Categories of Processed Data

- Inventory data.
- Location data.
- Contact data.
- Content data.
- Usage data.
- Meta, communication and process data.
- Job applicant details.
- Images and/ or video recordings.



- Audio recordings.
- Log data.

#### **Categories of Data Subjects**

- Prospective customers.
- Communication partner.
- Users.
- Job applicants.
- Business and contractual partners.
- Persons depicted.

#### **Purposes of Processing**

- Provision of contractual services and fulfillment of contractual obligations.
- Communication.
- Security measures.
- Direct marketing.
- Web Analytics.
- Targeting.
- Office and organisational procedures.
- Affiliate Tracking.
- Organisational and Administrative Procedures.
- Job Application Process.
- Feedback.
- Marketing.
- Profiles with user-related information.
- Provision of our online services and usability.
- Information technology infrastructure.
- Public relations.
- Sales promotion.

## **5. RELEVANT LEGAL BASES**

**Relevant legal bases according to the GDPR:** In the following, you will find an overview of the legal basis of the GDPR on which we base the processing of personal data. Please note that in addition to the provisions of the GDPR, national data protection provisions of your or our country of residence or domicile may apply. If, in addition, more specific legal bases are applicable in individual cases, we will inform you of these in the data protection declaration.

- Consent (Article 6 (1) (a) GDPR) - The data subject has given consent to the processing of his or her personal data for one or more specific purposes.
- Performance of a contract and prior requests (Article 6 (1) (b) GDPR) - Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

- Legitimate Interests (Article 6 (1) (f) GDPR) - the processing is necessary for the protection of the legitimate interests of the controller or a third party, provided that the interests, fundamental rights, and freedoms of the data subject, which require the protection of personal data, do not prevail.
- Job application process as a pre-contractual or contractual relationship (Article 6 (1) (b) GDPR) - If special categories of personal data within the meaning of Article 9 (1) GDPR (e.g. health data, such as severely handicapped status or ethnic origin) are requested from applicants within the framework of the application procedure, so that the responsible person or the person concerned can carry out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law, their processing shall be carried out in accordance with Article 9 (2)(b) GDPR, in the case of the protection of vital interests of applicants or other persons on the basis of Article 9 (2)(c) GDPR or for the purposes of preventive health care or occupational medicine, for the assessment of the employee's ability to work, for medical diagnostics, care or treatment in the health or social sector or for the administration of systems and services in the health or social sector in accordance with Article 9 (2)(d) GDPR. In the case of a communication of special categories of data based on voluntary consent, their processing is carried out on the basis of Article 9 (2)(a) GDPR.

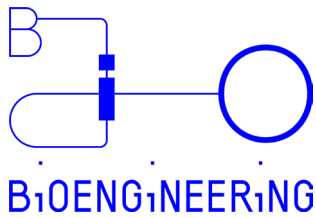
**Relevant legal basis according to the Swiss Data Protection Act:** If you are located in Switzerland, we process your data based on the Federal Act on Data Protection (referred to as "Swiss DPA"). Unlike the GDPR, for instance, the Swiss DPA does not generally require that a legal basis for processing personal data be stated and that the processing of personal data is conducted in good faith, lawfully and proportionately (Art. 6 para. 1 and 2 of the Swiss DPA). Furthermore, we only collect personal data for a specific purpose recognizable to the data subject and process it only in a manner compatible with this purpose (Art. 6 para. 3 of the Swiss DPA).

**Reference to the applicability of the GDPR and the Swiss DPA:** These privacy policy serves both to provide information pursuant to the Swiss Federal Act on Data Protection (FADP) and the General Data Protection Regulation (GDPR). For this reason, we ask you to note that due to the broader spatial application and comprehensibility, the terms used in the GDPR are applied. In particular, instead of the terms used in the Swiss FADP such as "processing" of "personal data", "predominant interest", and "particularly sensitive personal data", the terms used in the GDPR, namely "processing" of "personal data", as well as "legitimate interest" and "special categories of data" are used. However, the legal meaning of these terms will continue to be determined according to the Swiss FADP within its scope of application.

## 6. SECURITY PRECAUTIONS

We take appropriate technical and organisational measures in accordance with the legal requirements, taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, in order to ensure a level of security appropriate to the risk.

The measures include, in particular, safeguarding the confidentiality, integrity and availability of data by controlling physical and electronic access to the data as well as access to, input, transmission, securing and separation of the data. In addition, we have established procedures to ensure that data subjects' rights are respected, that data is erased, and that we are prepared to respond to data threats rapidly. Furthermore, we take the protection of personal



data into account as early as the development or selection of hardware, software and service providers, in accordance with the principle of privacy by design and privacy by default.

**Masking of the IP address:** If IP addresses are processed by us or by the service providers and technologies used and the processing of a complete IP address is not necessary, the IP address is shortened (also referred to as "IP masking"). In this process, the last two digits or the last part of the IP address after a full stop are removed or replaced by wildcards. The masking of the IP address is intended to prevent the identification of a person by means of their IP address or to make such identification significantly more difficult.

**Securing online connections through TLS/SSL encryption technology (HTTPS):** To protect the data of users transmitted via our online services from unauthorized access, we employ TLS/SSL encryption technology. Secure Sockets Layer (SSL) and Transport Layer Security (TLS) are the cornerstones of secure data transmission on the internet. These technologies encrypt the information that is transferred between the website or app and the user's browser (or between two servers), thereby safeguarding the data from unauthorized access. TLS, as the more advanced and secure version of SSL, ensures that all data transmissions conform to the highest security standards. When a website is secured with an SSL/TLS certificate, this is indicated by the display of HTTPS in the URL. This serves as an indicator to users that their data is being securely and encryptedly transmitted.

## **7. TRANSMISSION OF PERSONAL DATA**

In the course of processing personal data, it may happen that this data is transmitted to or disclosed to other entities, companies, legally independent organizational units, or individuals. Recipients of this data may include service providers tasked with IT duties or providers of services and content that are integrated into a website. In such cases, we observe the legal requirements and particularly conclude relevant contracts or agreements that serve to protect your data with the recipients of your data.

**Data Transmission within the Group of Companies:** We may transfer personal data to other companies within our group of companies or otherwise grant them access to this data. Insofar as this disclosure is for administrative purposes, the disclosure of the data is based on our legitimate business and economic interests or otherwise, if it is necessary to fulfill our contractual obligations or if the consent of the data subjects or otherwise a legal permission is present.

**Data Transfer within the Organization:** Data Transfer within the Corporate Group: We may transfer personal data to other companies within our corporate group or grant them access to it. If the data is shared for administrative purposes, it is based on our legitimate business and commercial interests or occurs if necessary to fulfil our contractual obligations, or when consent from the individuals concerned has been obtained or a legal permission exists.

## **8. GENERAL INFORMATION ON DATA RETENTION AND DELETION**

We delete personal data that we process in accordance with legal regulations as soon as the underlying consents are revoked or no further legal bases for processing exist. This applies to cases where the original purpose of processing is no longer applicable or the data is no longer needed. Exceptions to this rule exist if statutory obligations or special interests require a longer retention or archiving of the data.

In particular, data that must be retained for commercial or tax law reasons, or whose storage is necessary for legal prosecution or protection of the rights of other natural or legal persons, must be archived accordingly.

Our privacy notices contain additional information on the retention and deletion of data specifically applicable to certain processing processes.

In cases where multiple retention periods or deletion deadlines for a date are specified, the longest period always prevails.

If a period does not expressly start on a specific date and lasts at least one year, it automatically begins at the end of the calendar year in which the event triggering the period occurred. In the case of ongoing contractual relationships in the context of which data is stored, the event triggering the deadline is the time at which the termination or other termination of the legal relationship takes effect.

Data that is no longer stored for its originally intended purpose but due to legal requirements or other reasons are processed exclusively for the reasons justifying their retention.

**Further information on processing methods, procedures and services used:**

- **Data Retention and Deletion:** The following general retention and archiving periods apply under Swiss law:
  - 10 years - Retention period for books and records, annual financial statements, inventories, management reports, opening balances, accounting vouchers and invoices, as well as all necessary working instructions and other organizational documents (Article 958f of the Swiss Code of Obligations (OR)).
  - 10 years - Data necessary to consider potential claims for damages or similar contractual claims and rights, as well as for the processing of related inquiries based on previous business experiences and usual industry practices, will be stored for the statutory limitation period of ten years, unless a shorter period of five years is applicable, which is relevant in certain cases (Articles 127, 130 OR). Claims for rent, lease, and interest on capital, as well as other periodic services, for the delivery of food, for board and lodging, for innkeeper debts, as well as for craftsmanship, small-scale sales of goods, medical care, professional services by lawyers, legal agents, procurators, and notaries, and from the employment relationship of employees, expire after five years (Article 128 OR).

## 9. RIGHTS OF DATA SUBJECTS

Rights of the Data Subjects under the GDPR: As data subject, you are entitled to various rights under the GDPR, which arise in particular from Articles 15 to 21 of the GDPR:

- **Right to Object:** You have the right, on grounds arising from your particular situation, to object at any time to the processing of your personal data which is based on letter (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions. Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of the personal data concerning you for the purpose of such marketing, which includes profiling to the extent that it is related to such direct marketing.
- **Right of withdrawal for consents:** You have the right to revoke consents at any time.

- **Right of access:** You have the right to request confirmation as to whether the data in question will be processed and to be informed of this data and to receive further information and a copy of the data in accordance with the provisions of the law.
- **Right to rectification:** You have the right, in accordance with the law, to request the completion of the data concerning you or the rectification of the incorrect data concerning you.
- **Right to Erasure and Right to Restriction of Processing:** In accordance with the statutory provisions, you have the right to demand that the relevant data be erased immediately or, alternatively, to demand that the processing of the data be restricted in accordance with the statutory provisions.
- **Right to data portability:** You have the right to receive data concerning you which you have provided to us in a structured, common and machine-readable format in accordance with the legal requirements, or to request its transmission to another controller.
- **Complaint to the supervisory authority:** In accordance with the law and without prejudice to any other administrative or judicial remedy, you also have the right to lodge a complaint with a data protection supervisory authority, in particular a supervisory authority in the Member State where you habitually reside, the supervisory authority of your place of work or the place of the alleged infringement, if you consider that the processing of personal data concerning you infringes the GDPR.

Rights of the data subjects under the Swiss DPA:

As the data subject, you have the following rights in accordance with the provisions of the Swiss DPA:

- **Right to information:** You have the right to request confirmation as to whether personal data concerning you are being processed, and to receive the information necessary for you to assert your rights under the Swiss DPA and to ensure transparent data processing.
- **Right to data release or transfer:** You have the right to request the release of your personal data, which you have provided to us, in a common electronic format, as well as its transfer to another data controller, provided this does not require disproportionate effort.
- **Right to rectification:** You have the right to request the rectification of inaccurate personal data concerning you.
- **Right to object, deletion, and destruction:** You have the right to object to the processing of your data, as well as to request that personal data concerning you be deleted or destroyed.

## 10. PROVISION OF ONLINE SERVICES AND WEB HOSTING

We process user data in order to be able to provide them with our online services. For this purpose, we process the IP address of the user, which is necessary to transmit the content and functions of our online services to the user's browser or terminal device.

- **Processed data types:** Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features); Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties). Log data (e.g. log files concerning logins or data retrieval or access times.).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Provision of our online services and usability; Information technology infrastructure (Operation and provision of information systems and technical devices, such as computers, servers, etc.). Security measures.

- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

**Further information on processing methods, procedures and services used:**

- **Provision of online offer on rented hosting space:** For the provision of our online services, we use storage space, computing capacity and software that we rent or otherwise obtain from a corresponding server provider (also referred to as a "web hoster"); **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).
- **Collection of Access Data and Log Files:** Access to our online service is logged in the form of so-called "server log files". Server log files may include the address and name of the accessed web pages and files, date and time of access, transferred data volumes, notification of successful retrieval, browser type along with version, the user's operating system, referrer URL (the previously visited page), and typically IP addresses and the requesting provider. The server log files can be used for security purposes, e.g., to prevent server overload (especially in the case of abusive attacks, known as DDoS attacks), and to ensure server load management and stability; **LEGAL BASIS:** Legitimate Interests (Article 6 (1) (f) GDPR). **Retention period:** Log file information is stored for a maximum period of 30 days and then deleted or anonymized. Data, the further storage of which is necessary for evidence purposes, are excluded from deletion until the respective incident has been finally clarified.
- **Host Europe:** Services in the field of the provision of information technology infrastructure and related services (e.g. storage space and/or computing capacities); **Service provider:** Host Europe GmbH, Hansestrasse 111, 51149 Cologne, Germany; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <http://www.hosteurope.de/en/>; **Privacy Policy:** <http://www.hosteurope.de/en/terms-and-conditions/privacy/>; **Data Processing Agreement:** <https://www.hosteurope.de/Dokumente/>. **Basis for third-country transfers:** Switzerland - Adequacy decision (Germany).

## 11. USE OF COOKIES

Cookies are small text files or other types of storage markers that store information on end devices and read information from them. For example, to save the login status in a user account, the contents of a shopping cart in an e-shop, the content accessed, or the functions used of an online offer. Furthermore, cookies can be used for various concerns, such as for the functionality, security, and comfort of online offers as well as the creation of analyses of visitor flows.

**Notes on Consent:** We use cookies in accordance with legal regulations. Therefore, we obtain prior consent from users, unless it is not required by law. Permission is particularly not necessary if the storage and reading of information, including cookies, are absolutely necessary to provide a telemedia service (i.e., our online offer) expressly requested by the users. The revocable consent is clearly communicated to them and contains information on the respective cookie usage.

**Notes on the legal basis for data protection:** The legal basis on which we process users' personal data with the help of cookies depends on whether we ask them for consent. If users accept, the legal basis for processing their data is the declared consent. Otherwise, the data processed with the help of cookies are based on our legitimate interests (e.g., in a commercial operation of our online offer and its usability improvement) or, if this occurs within the fulfillment of our contractual obligations, when the use of cookies is necessary to fulfill our contractual obligations. We clarify the



purposes for which the cookies are used by us in the course of this data protection declaration or within the scope of our consent and processing processes.

**Storage Duration:** Regarding the storage duration, the following types of cookies are distinguished:

- **Temporary cookies (also: session or session cookies):** Temporary cookies are deleted at the latest after a user has left an online offer and closed his end device (e.g., browser or mobile application).
- **Permanent cookies:** Permanent cookies remain stored even after closing the end device. For example, the login status can be saved and preferred content can be displayed directly when the user revisits a site. Similarly, user data collected via cookies can be used for reach measurement. Unless we provide users with explicit information about the nature and storage duration of cookies (e.g., when obtaining consent), they should assume that they are permanent and the storage duration can be up to two years.

**General notes on revocation and objection (Opt-out):** Users can revoke the consents they have given at any time and also declare an objection to the processing according to legal requirements, also via the privacy settings of their browser.

- **Processed data types:** Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR). Consent (Article 6 (1) (a) GDPR).

**Further information on processing methods, procedures and services used:**

- **Processing Cookie Data on the Basis of Consent:** We implement a consent management solution that obtains users' consent for the use of cookies or for the processes and providers mentioned within the consent management framework. This procedure is designed to solicit, log, manage, and revoke consents, particularly regarding the use of cookies and similar technologies employed to store, read from, and process information on users' devices. As part of this procedure, user consents are obtained for the use of cookies and the associated processing of information, including specific processing and providers named in the consent management process. Users also have the option to manage and withdraw their consents. Consent declarations are stored to avoid repeated queries and to provide proof of consent according to legal requirements. The storage is carried out server-side and/or in a cookie (so-called opt-in cookie) or by means of comparable technologies in order to associate the consent with a specific user or their device. If no specific details about the providers of consent management services are provided, the following general notes apply: The duration of consent storage is up to two years. A pseudonymous user identifier is created, which is stored along with the time of consent, details on the scope of consent (e.g., relevant categories of cookies and/or service providers), as well as information about the browser, system, and device used; **Legal Basis:** Consent (Article 6 (1) (a) GDPR).

## 12. CONTACT AND INQUIRY MANAGEMENT

When contacting us (e.g. via mail, contact form, e-mail, telephone or via social media) as well as in the context of existing user and business relationships, the information of the inquiring persons is processed to the extent necessary to respond to the contact requests and any requested measures.

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g.

textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.); Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features). Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).

- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of processing:** Communication; Organisational and Administrative Procedures; Feedback (e.g. collecting feedback via online form). Provision of our online services and usability.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR). Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

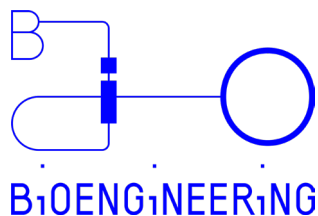
**Further information on processing methods, procedures and services used:**

- **Contact form:** Upon contacting us via our contact form, email, or other means of communication, we process the personal data transmitted to us for the purpose of responding to and handling the respective matter. This typically includes details such as name, contact information, and possibly additional information provided to us that is necessary for appropriate processing. We use this data exclusively for the stated purpose of contact and communication; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

### 13. VIDEO CONFERENCES, ONLINE MEETINGS, WEBINARS AND SCREEN-SHARING

We use platforms and applications of other providers (hereinafter referred to as "Conference Platforms") for the purpose of conducting video and audio conferences, webinars and other types of video and audio meetings (hereinafter collectively referred to as "Conference"). When using the Conference Platforms and their services, we comply with the legal requirements.

**Data processed by Conference Platforms:** In the course of participation in a Conference, the Data of the participants listed below are processed. The scope of the processing depends, on the one hand, on which data is requested in the context of a specific Conference (e.g., provision of access data or clear names) and which optional information is provided by the participants. In addition to processing for the purpose of conducting the conference, participants' Data may also be processed by the Conference Platforms for security purposes or service optimization. The processed Data includes personal information (first name, last name), contact information (e-mail address, telephone number), access data (access codes or passwords), profile pictures, information on professional position/function, the IP address of the internet access, information on the participants' end devices, their operating system, the browser and its technical and linguistic settings, information on the content-related communication processes, i.e. entries in chats and audio and video data, as well as the use of other available functions (e.g. surveys). The content of communications is encrypted to the extent technically provided by the conference providers. If participants are registered as users with the Conference Platforms, then further data may be processed in accordance with the agreement with the respective Conference Provider.



**Logging and recording:** If text entries, participation results (e.g. from surveys) as well as video or audio recordings are recorded, this will be transparently communicated to the participants in advance and they will be asked - if necessary - for their consent.

**Data protection measures of the participants:** Please refer to the data privacy information of the Conference Platforms for details on the processing of your data and select the optimum security and data privacy settings for you within the framework of the settings of the conference platforms. Furthermore, please ensure data and privacy protection in the background of your recording for the duration of a Conference (e.g., by notifying roommates, locking doors, and using the background masking function, if technically possible). Links to the conference rooms as well as access data, should not be passed on to unauthorized third parties.

**Notes on legal bases:** Insofar as, in addition to the Conference Platforms, we also process users' data and ask users for their consent to use contents from the Conferences or certain functions (e.g. consent to a recording of Conferences), the legal basis of the processing is this consent. Furthermore, our processing may be necessary for the fulfillment of our contractual obligations (e.g. in participant lists, in the case of reprocessing of Conference results, etc.). Otherwise, user data is processed on the basis of our legitimate interests in efficient and secure communication with our communication partners.

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.); Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features); Images and/ or video recordings (e.g. photographs or video recordings of a person); Audio recordings. Log data (e.g. log files concerning logins or data retrieval or access times.).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.); Users (e.g. website visitors, users of online services). Persons depicted.
- **Purposes of processing:** Provision of contractual services and fulfillment of contractual obligations; Communication. Office and organisational procedures.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

**Further information on processing methods, procedures and services used:**

- **Microsoft Teams:** Audio and video conferencing, chat, file sharing, integration with Office 365 applications, real-time collaboration on documents, calendar functions, task management, screen sharing, optional recording; **Service provider:** Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.microsoft.com/microsoft-teams/>; **Privacy Policy:** <https://privacy.microsoft.com/de-de/privacystatement>, Security information: <https://www.microsoft.com/de-de/trustcenter>. **Basis for third-country transfers:** EEA - Data Privacy Framework (DPF), Switzerland - Adequacy decision (Ireland).
- **TeamViewer:** Conference and communication software; **Service provider:** TeamViewer GmbH, Jahnstr. 30, 73037 Göppingen, Germany; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.teamviewer.com/en/>; **Privacy Policy:** <https://www.teamviewer.com/en/privacy-notice/>. **Basis for third-country transfers:** Switzerland - Adequacy decision (Germany).

## 14. CLOUD SERVICES

We use Internet-accessible software services (so-called "cloud services", also referred to as "Software as a Service") provided on the servers of its providers for the storage and management of content (e.g. document storage and management, exchange of documents, content and information with certain recipients or publication of content and information).

Within this framework, personal data may be processed and stored on the provider's servers insofar as this data is part of communication processes with us or is otherwise processed by us in accordance with this privacy policy. This data may include in particular master data and contact data of data subjects, data on processes, contracts, other proceedings and their contents. Cloud service providers also process usage data and metadata that they use for security and service optimization purposes.

If we use cloud services to provide documents and content to other users or publicly accessible websites, forms, etc., providers may store cookies on users' devices for web analysis or to remember user settings (e.g. in the case of media control).

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.). Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features).
- **Data subjects:** Prospective customers; Communication partner (Recipients of e-mails, letters, etc.). Business and contractual partners.
- **Purposes of processing:** Office and organisational procedures. Information technology infrastructure (Operation and provision of information systems and technical devices, such as computers, servers, etc.).
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

### Further information on processing methods, procedures and services used:

- **Microsoft Cloud Services:** Cloud storage, cloud infrastructure services and cloud-based application software;  
**Service provider:** Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://microsoft.com>; **Privacy Policy:** <https://privacy.microsoft.com/de-de/privacystatement>, Security information: <https://www.microsoft.com/de-de/trustcenter>; **Data Processing Agreement:** <https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>. **Basis for third-country transfers:** EEA - Data Privacy Framework (DPF), Switzerland - Adequacy decision (Ireland).

## 15. NEWSLETTER AND ELECTRONIC COMMUNICATIONS

We send newsletters, emails, and other electronic notifications (hereinafter "newsletters") exclusively with the consent of the recipients or based on a legal basis. If the contents of the newsletter are specified during registration for the newsletter, these contents are decisive for the users' consent. Normally, providing your email address is sufficient to sign up for our newsletter. However, to offer you a personalised service, we may ask for your name for personal salutation in the newsletter or for additional information if necessary for the purpose of the newsletter.

**Deletion and restriction of processing:** We may store unsubscribed email addresses for up to three years based on our legitimate interests before deleting them to be able to demonstrate previously given consent. The processing of these data is limited to the purpose of potentially defending against claims. An individual request for deletion is possible at any time, provided that at the same time the former existence of consent is confirmed. In case of obligations to permanently observe objections, we reserve the right to store the email address solely for this purpose in a blocklist.

The logging of the registration process is based on our legitimate interests for the purpose of proving its proper execution. If we commission a service provider to send emails, this is done based on our legitimate interests in an efficient and secure mailing system.

### Contents:

Information about us, our services, promotions and offers.

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Contact data (e.g. postal and email addresses or phone numbers); Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties). Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of processing:** Direct marketing (e.g. by e-mail or postal). Web Analytics (e.g. access statistics, recognition of returning visitors).
- **Retention and deletion:** 3 years - Contractual claims (AT) (Data required to consider potential warranty and compensation claims or similar contractual claims and rights, as well as to process related inquiries, based on previous business experiences and common industry practices, will be stored for the duration of the regular statutory limitation period of three years (Sections 1478, 1480 of the Austrian Civil Code).). 10 years - Contractual claims (CH) (Data required to consider potential compensation claims or similar contractual claims and rights, as well as to process related inquiries, based on previous business experiences and common industry practices, will be stored for the duration of the statutory limitation period of ten years, unless a shorter period of 5 years is applicable, which is relevant in certain cases. This period begins at the end of the calendar year in which the claim arose (Articles 127 and 128 Swiss Code of Obligations (CO))).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).
- **Opt-Out:** You can cancel the receipt of our newsletter at any time, i.e. revoke your consent or object to further receipt. You will find a link to cancel the newsletter either at the end of each newsletter or you can otherwise use one of the contact options listed above, preferably e-mail.

### Further information on processing methods, procedures and services used:

- **Measurement of opening rates and click rates:** The newsletters contain a so-called "web beacons", which is a pixel-sized file that is retrieved from our server, or the server of the dispatch service provider if one is used, when

the newsletter is opened. In the course of this retrieval, technical information such as details about the browser and your system, as well as your IP address and the time of access are collected. This information is used to technically improve our newsletter based on technical data or target audiences and their reading behavior, which can be determined by their access locations (identifiable by IP address) or access times. This analysis also includes determining whether and when newsletters are opened and which links are clicked. The information is assigned to individual newsletter recipients and stored in their profiles until deletion. The evaluations serve to recognize the reading habits of our users and adjust our content to them or send different content according to the interests of our users. The measurement of opening and click rates, as well as the storage of the measurement results in user profiles and their further processing, are based on user consent. Unfortunately, it is not possible to revoke success measurement separately; in this case, the entire newsletter subscription must be cancelled or objected to. In that case, stored profile information will be deleted; **Legal Basis:** Consent (Article 6 (1) (a) GDPR).

- **Brevo:** E-mail dispatch and automation services; **Service provider:** Sendinblue GmbH, Köpenicker Str. 126, 10179 Berlin, Germany; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.brevo.com/>; **Privacy Policy:** <https://www.brevo.com/de/legal/privacypolicy/>; **Data Processing Agreement:** Provided by the service provider. Basis for third-country transfers: Switzerland - Adequacy decision (Germany).

## 16. COMMERCIAL COMMUNICATION BY E-MAIL, POSTAL MAIL, FAX OR TELEPHONE

We process personal data for the purposes of promotional communication, which may be carried out via various channels, such as e-mail, telephone, post or fax, in accordance with the legal requirements.

The recipients have the right to withdraw their consent at any time or to object to the advertising communication at any time.

After revocation or objection, we store the data required to prove the past authorization to contact or send up to three years from the end of the year of revocation or objection on the basis of our legitimate interests. The processing of this data is limited to the purpose of a possible defense against claims. Based on the legitimate interest to permanently observe the revocation, respectively objection of the users, we further store the data necessary to avoid a renewed contact (e.g. depending on the communication channel, the e-mail address, telephone number, name).

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Contact data (e.g. postal and email addresses or phone numbers). Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of processing:** Direct marketing (e.g. by e-mail or postal); Marketing. Sales promotion.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

## 17. WEB ANALYSIS, MONITORING AND OPTIMIZATION

Web analysis is used to evaluate the visitor traffic on our website and may include the behaviour, interests or demographic information of users, such as age or gender, as pseudonymous values. With the help of web analysis we can e.g. recognize, at which time our online services or their functions or contents are most frequently used or requested for repeatedly, as well as which areas require optimization.

In addition to web analysis, we can also use test procedures, e.g. to test and optimize different versions of our online services or their components.

Unless otherwise stated below, profiles, i.e. data aggregated for a usage process, can be created for these purposes and information can be stored in a browser or in a terminal device and read from it. The information collected includes, in particular, websites visited and elements used there as well as technical information such as the browser used, the computer system used and information on usage times. If users have agreed to the collection of their location data from us or from the providers of the services we use, location data may also be processed.

The IP addresses of the users are also stored. However, we use any existing IP masking procedure (i.e. pseudonymisation by shortening the IP address) to protect the user. In general, within the framework of web analysis, A/B testing and optimisation, no user data (such as e-mail addresses or names) is stored, but pseudonyms. This means that we, as well as the providers of the software used, do not know the actual identity of the users, but only the information stored in their profiles for the purposes of the respective processes.

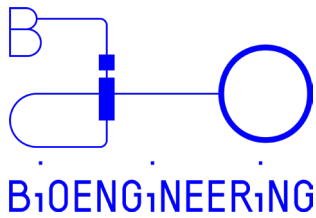
**Notes on legal bases:** If we ask users for their consent to use third-party providers, the legal basis for data processing is consent. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in efficient, economical and recipient-friendly services). In this context, we would also like to draw your attention to the information on the use of cookies in this privacy policy.

- **Processed data types:** Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features). Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Web Analytics (e.g. access statistics, recognition of returning visitors). Profiles with user-related information (Creating user profiles).
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion". Storage of cookies for up to 2 years (Unless otherwise stated, cookies and similar storage methods may be stored on users' devices for a period of two years.).
- **Security measures:** IP Masking (Pseudonymization of the IP address).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

### Further information on processing methods, procedures and services used:

- **Friendly Analytics:** Web Analytics Tool (based on Matomo)

We use Friendly Analytics to evaluate the usage and reach of our website. Friendly Analytics is a service provided by Friendly GmbH from Switzerland, which enables web tracking without processing and storing personal data and without setting cookies. All data collected and processed by us is stored by Friendly Analytics in Switzerland with providers



headquartered in Switzerland. Information about the type, scope, and purpose of data processing can be found in the privacy policy of Friendly Analytics.

Friendly Analytics is based on the open-source software Matomo. Therefore, the collected data largely corresponds to the data tracked by Matomo in its standard configuration.

In contrast to Matomo's standard configuration, Friendly Analytics is configured for maximum data protection:

- Anonymization of the last two bytes of the IP address
- No cookies are set
- If a customer uses the user ID function, the ID is replaced with a pseudonym (salted hash)
- If a customer transmits an e-commerce order ID to Friendly Analytics, it is replaced with a pseudonym
- Anonymization of the referrer URLs (we store only the domain of the referrer, not the path or query string, as these can contain personal data)
- No heatmaps and no session recording are enabled

Which data is tracked? Friendly Analytics tracks the following data. All this data is generally not attributable to a specific person and is therefore not considered personal data (PII):

- IP address (anonymized): The IP address of the website visitor. The last two bytes are anonymized, so this data is not considered personal.
- Date and time of the request
- Page Title: Title of the page accessed
- Page URL: URL of the page accessed
- Referrer URL (anonymized): URL of the page visited before the current page. For data protection reasons, we only process the domain without the path and query string.
- Screen resolution of the device
- Local time of the user's time zone
- Downloads: Files clicked and downloaded
- Outlinks: Links to an external domain that were clicked
- Page generation time (the time it takes for web pages to be generated by the web server and then downloaded by the user)
- User's location: Country, region, city, approximate geographic latitude, and longitude (Geolocation)
- Main language of the browser used (Accept-Language header)
- User-Agent of the browser used (User-Agent header). From the User-Agent, we recognize the browser, operating system, device used (desktop, tablet, mobile, TV, car, console, etc.), brand, and model; **Service provider:** Friendly GmbH, Werkhofstrasse 5, 6052 Hergiswil, Switzerland; **Website:** <https://friendly.ch/en/analytics>; **Privacy Policy:** <https://friendly.ch/en/privacy>. **Basis for third-country transfers:** EEA - Adequacy decision (Switzerland).
- **Matomo:** Matomo is software that is used for the purposes of web analysis and reach measurement. As part of the use of Matomo, cookies are generated and stored on the user's terminal device. User data collected through the use of Matomo is processed only by us and is not shared with third parties. The cookies are stored for a maximum period of 13 months: [https://matomo.org/faq/general/faq\\_146/](https://matomo.org/faq/general/faq_146/); **Legal Basis:** Consent (Article 6 (1) (a) GDPR). **Retention period:** The cookies have a maximum storage period of 13 months.



## 18. ONLINE MARKETING

We process personal data for the purposes of online marketing, which may include in particular the marketing of advertising space or the display of advertising and other content (collectively referred to as "Content") based on the potential interests of users and the measurement of their effectiveness.

For these purposes, so-called user profiles are created and stored in a file (so-called "cookie") or similar procedure is used by which the relevant user information for the display of the aforementioned content is stored. This information may include, for example, content viewed, websites visited, online networks used, communication partners and technical information such as the browser used, computer system used and information on usage times and used functions. If users have consented to the collection of their sideline data, these can also be processed.

The IP addresses of the users are also stored. However, we use provided IP masking procedures (i.e. pseudonymisation by shortening the IP address) to ensure the protection of the user's by using a pseudonym. In general, within the framework of the online marketing process, no clear user data (such as e-mail addresses or names) is secured, but pseudonyms. This means that we, as well as the providers of online marketing procedures, do not know the actual identity of the users, but only the information stored in their profiles.

The information in the profiles is usually stored in the cookies or similar memorizing procedures. These cookies can later, generally also on other websites that use the same online marketing technology, be read and analyzed for purposes of content display, as well as supplemented with other data and stored on the server of the online marketing technology provider.

Exceptionally, clear data can be assigned to the profiles. This is the case, for example, if the users are members of a social network whose online marketing technology we use and the network links the profiles of the users in the aforementioned data. Please note that users may enter into additional agreements with the social network providers or other service providers, e.g. by consenting as part of a registration process.

As a matter of principle, we only gain access to summarised information about the performance of our advertisements. However, within the framework of so-called conversion measurement, we can check which of our online marketing processes have led to a so-called conversion, i.e. to the conclusion of a contract with us. The conversion measurement is used alone for the performance analysis of our marketing activities.

Unless otherwise stated, we kindly ask you to consider that cookies used will be stored for a period of two years.

**Notes on legal bases:** If we ask users for their consent to use third-party providers, the legal basis for data processing is consent. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in efficient, economical and recipient-friendly services). In this context, we would also like to draw your attention to the information on the use of cookies in this privacy policy.

**Notes on revocation and objection:**

We refer to the privacy policies of the respective service providers and the possibilities for objection (so-called "opt-out"). If no explicit opt-out option has been specified, it is possible to deactivate cookies in the settings of your

browser. However, this may restrict the functions of our online offer. We therefore recommend the following additional opt-out options, which are offered collectively for each area:

- a) Europe: <https://www.youronlinechoices.eu>.
  - b) Canada: <https://www.youradchoices.ca/choices>.
  - c) USA: <https://www.aboutads.info/choices>.
  - d) Cross-regional: <https://optout.aboutads.info>.
- **Processed data types:** Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features). Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).
  - **Data subjects:** Users (e.g. website visitors, users of online services).
  - **Purposes of processing:** Web Analytics (e.g. access statistics, recognition of returning visitors); Targeting (e.g. profiling based on interests and behaviour, use of cookies); Affiliate Tracking; Marketing. Profiles with user-related information (Creating user profiles).
  - **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion". Storage of cookies for up to 2 years (Unless otherwise stated, cookies and similar storage methods may be stored on users' devices for a period of two years.).
  - **Security measures:** IP Masking (Pseudonymization of the IP address).

## 19. PROFILES IN SOCIAL NETWORKS (SOCIAL MEDIA)

We maintain online presences within social networks and process user data in this context in order to communicate with the users active there or to offer information about us.

We would like to point out that user data may be processed outside the European Union. This may entail risks for users, e.g. by making it more difficult to enforce users' rights.

In addition, user data is usually processed within social networks for market research and advertising purposes. For example, user profiles can be created on the basis of user behaviour and the associated interests of users. The user profiles can then be used, for example, to place advertisements within and outside the networks which are presumed to correspond to the interests of the users. For these purposes, cookies are usually stored on the user's computer, in which the user's usage behaviour and interests are stored. Furthermore, data can be stored in the user profiles independently of the devices used by the users (especially if the users are members of the respective networks or will become members later on).

For a detailed description of the respective processing operations and the opt-out options, please refer to the respective data protection declarations and information provided by the providers of the respective networks.

Also in the case of requests for information and the exercise of rights of data subjects, we point out that these can be most effectively pursued with the providers. Only the providers have access to the data of the users and can directly take appropriate measures and provide information. If you still need help, please do not hesitate to contact us.

- **Processed data types:** Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of

authorship or the time of creation.). Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features).

- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Communication; Feedback (e.g. collecting feedback via online form). Public relations.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

**Further information on processing methods, procedures and services used:**

- **LinkedIn:** Social network - We are jointly responsible with LinkedIn Ireland Unlimited Company for the collection (but not the further processing) of data from visitors for the purposes of creating „Page-Insights" (statistics) for our LinkedIn profiles. This data includes information about the types of content that users view or interact with, or the actions they take, as well as information about the devices used by the users (e.g., IP addresses, operating system, browser type, language settings, cookie data) and details from the users' profiles, such as job function, country, industry, seniority, company size, and employment status. Privacy information regarding the processing of user data by LinkedIn can be found in LinkedIn's privacy notices: <https://www.linkedin.com/legal/privacy-policy> We have concluded a special agreement with LinkedIn Ireland, the 'Page Insights Joint Controller Addendum (the 'Addendum')' (<https://legal.linkedin.com/pages-joint-controller-addendum>), which specifically regulates the security measures that LinkedIn must observe and wherein LinkedIn has agreed to fulfill the rights of the affected parties (i.e., users can, for example, direct requests for information or deletion directly to LinkedIn). The rights of the users (in particular to access to information, erasure, objection, and complaint to the competent supervisory authority) are not restricted by the agreements with LinkedIn. The joint responsibility is limited to the collection of data by and transmission to Ireland Unlimited Company, a company based in the EU. The further processing of the data is the sole responsibility of Ireland Unlimited Company, particularly regarding the transmission of data to the parent company LinkedIn Corporation in the USA; **Service provider:** LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.linkedin.com>; **Privacy Policy:** <https://www.linkedin.com/legal/privacy-policy>; **Basis for third-country transfers:** EEA - Data Privacy Framework (DPF), Switzerland - Adequacy decision (Ireland). **Opt-Out:** <https://www.linkedin.com/psettings/quest-controls/retargeting-opt-out>.

## 20. PLUGINS AND EMBEDDED FUNCTIONS AND CONTENT

Within our online services, we integrate functional and content elements that are obtained from the servers of their respective providers (hereinafter referred to as "third-party providers"). These may, for example, be graphics, videos or city maps (hereinafter uniformly referred to as "Content").

The integration always presupposes that the third-party providers of this content process the IP address of the user, since they could not send the content to their browser without the IP address. The IP address is therefore required for the presentation of these contents or functions. We strive to use only those contents, whose respective offerers use the IP address only for the distribution of the contents. Third parties may also use so-called pixel tags (invisible graphics, also known as "web beacons") for statistical or marketing purposes. The "pixel tags" can be used to evaluate information such as visitor traffic on the pages of this website. The pseudonymous information may also be stored in cookies on the user's device and may include technical information about the browser and operating system, referring

websites, visit times and other information about the use of our website, as well as may be linked to such information from other sources.

**Notes on legal bases:** If we ask users for their consent to use third-party providers, the legal basis for data processing is consent. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in efficient, economical and recipient-friendly services). In this context, we would also like to draw your attention to the information on the use of cookies in this privacy policy.

- **Processed data types:** Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features); Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties). Location data (Information on the geographical position of a device or person).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Provision of our online services and usability.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion". Storage of cookies for up to 2 years (Unless otherwise stated, cookies and similar storage methods may be stored on users' devices for a period of two years.).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

**Further information on processing methods, procedures and services used:**

- **Google Maps:** We integrate the maps of the service "Google Maps" from the provider Google. The data processed may include, in particular, IP addresses and location data of users; **Service provider:** Google Cloud EMEA Limited, 70 Sir John Rogerson's Quay, Dublin 2, Ireland; **Legal Basis:** Consent (Article 6 (1) (a) GDPR); **Website:** <https://mapsplatform.google.com/>; **Privacy Policy:** <https://policies.google.com/privacy>. **Basis for third-country transfers:** EEA - Data Privacy Framework (DPF), Switzerland - Adequacy decision (Ireland).
- **Vimeo:** Social network and video platform; **Service provider:** Vimeo Inc., Attention: Legal Department, 555 West 18th Street New York, New York 10011, USA; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://vimeo.com>. **Privacy Policy:** <https://vimeo.com/privacy>.

## 21. MANAGEMENT, ORGANIZATION AND UTILITIES

We use services, platforms and software from other providers (hereinafter referred to as "third-party providers") for the purposes of organizing, administering, planning and providing our services. When selecting third-party providers and their services, we comply with the legal requirements.

Within this context, personal data may be processed and stored on the servers of third-party providers. This may include various data that we process in accordance with this privacy policy. This data may include in particular master data and contact data of users, data on processes, contracts, other processes and their contents.

If users are referred to the third-party providers or their software or platforms in the context of communication, business or other relationships with us, the third-party provider processing may process usage data and metadata that can be processed by them for security purposes, service optimisation or marketing purposes. We therefore ask you to read the data protection notices of the respective third party providers.

- **Processed data types:** Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.); Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features). Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.). Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Provision of contractual services and fulfillment of contractual obligations. Office and organisational procedures.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

## 22. JOB APPLICATION PROCESS

The application process requires applicants to provide us with the data necessary for their assessment and selection. The information required can be found in the job description or, in the case of online forms, in the information contained therein.

In principle, the required information includes personal information such as name, address, a contact option and proof of the qualifications required for a particular employment. Upon request, we will be happy to provide you with additional information.

Where available, applicants are welcome to submit their applications via our online form, which is securely encrypted to the latest standards. Alternatively, applications can also be sent to us by email. However, we kindly remind you that emails are not inherently encrypted over the Internet. While emails are usually encrypted in transit, they are not encrypted on the servers from which they are sent and received. Therefore, we cannot assume responsibility for the security of the application during its transmission from the sender to our server.

For the purposes of searching for applicants, submitting applications and selecting applicants, we may use applicant management or recruitment software and platforms and services from third-party providers in compliance with legal requirements.

Applicants are welcome to contact us about how to submit their application or send us their application by post.

**Processing of special categories of data:** To the extent that special categories of personal data (Article 9(1) GDPR, e.g., health data, such as disability status or ethnic origin) are requested from applicants or communicated by them during the application process, their processing is carried out so that the controller or the data subject can exercise rights arising from employment law and the law of social security and social protection, in the case of protection of vital interests of the applicants or other persons, or for purposes of preventive or occupational medicine, for the assessment of the employee's work ability, for medical diagnosis, for the provision or treatment in the health or social sector, or for the management of systems and services in the health or social sector.

**Erasure of data:** In the event of a successful application, the data provided by the applicants may be further processed by us for the purposes of the employment relationship. Otherwise, if the application for a job offer is not successful, the applicant's data will be deleted. Applicants' data will also be deleted if an application is withdrawn, to which applicants are entitled at any time. Subject to a justified revocation by the applicant, the deletion will take place at the latest after the expiry of a period of six months, so that we can answer any follow-up questions regarding the application and comply with our duty of proof under the regulations on equal treatment of applicants. Invoices for any reimbursement of travel expenses are archived in accordance with tax regulations.

**Admission to a talent pool** - Admission to a talent pool, if offered, is based on consent. Applicants are informed that their consent to be included in the talent pool is voluntary, has no influence on the current application process and that they can revoke their consent at any time for the future.

Duration of data retention in the applicant pool in months: 6 months

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.). Job applicant details (e.g. Personal data, postal and contact addresses and the documents pertaining to the application and the information contained therein, such as cover letter, curriculum vitae, certificates, etc., as well as other information on the person or qualifications of applicants provided with regard to a specific job or voluntarily by applicants).
- **Data subjects:** Job applicants.
- **Purposes of processing:** Job Application Process (Establishment and possible later execution as well as possible later termination of the employment relationship).
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Job application process as a pre-contractual or contractual relationship (Article 6 (1) (b) GDPR).

## 23. CHANGES AND UPDATES

We kindly ask you to inform yourself regularly about the contents of our data protection declaration. We will adjust the privacy policy as changes in our data processing practices make this necessary. We will inform you as soon as the changes require your cooperation (e.g. consent) or other individual notification.

If we provide addresses and contact information of companies and organizations in this privacy policy, we ask you to note that addresses may change over time and to verify the information before contacting us.

## 24. TERMINOLOGY AND DEFINITIONS

In this section, you will find an overview of the terminology used in this privacy policy. Where the terminology is legally defined, their legal definitions apply. The following explanations, however, are primarily intended to aid understanding.

- **Affiliate Tracking:** Custom Audiences refers to the process of determining target groups for advertising purposes, e.g. the display of advertisements. For example, a user's interest in certain products or topics on the Internet may be used to conclude that the user is interested in advertisements for similar products or the online store in which the user viewed the products. "Lookalike Audiences" is the term used to describe content that is viewed as suitable by users whose profiles or interests presumably correspond to the users for whom the profiles were created. For the purposes of creating custom audiences and lookalike audiences, cookies and web beacons are typically used.
- **Contact data:** Contact details are essential information that enables communication with individuals or organizations. They include, among others, phone numbers, postal addresses, and email addresses, as well as means of communication like social media handles and instant messaging identifiers.
- **Content data:** Content data comprise information generated in the process of creating, editing, and publishing content of all types. This category of data may include texts, images, videos, audio files, and other multimedia content published across various platforms and media. Content data are not limited to the content itself but also include metadata providing information about the content, such as tags, descriptions, authorship details, and publication dates.
- **Controller:** "Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- **Inventory data:** Inventory data encompass essential information required for the identification and management of contractual partners, user accounts, profiles, and similar assignments. These data may include, among others, personal and demographic details such as names, contact information (addresses, phone numbers, email addresses), birth dates, and specific identifiers (user IDs). Inventory data form the foundation for any formal interaction between individuals and services, facilities, or systems, by enabling unique assignment and communication.
- **Location data:** Location data is created when a mobile device (or another device with the technical requirements for a location determination) connects to a radio cell, a WLAN or similar technical means and functions of location determination. Location data serve to indicate the geographically determinable position of the earth at which the respective device is located. Location data can be used, for example, to display map functions or other information dependent on a location.
- **Log data:** Protocol data, or log data, refer to information regarding events or activities that have been logged within a system or network. These data typically include details such as timestamps, IP addresses, user actions, error messages, and other specifics about the usage or operation of a system. Protocol data is often used for analyzing system issues, monitoring security, or generating performance reports.
- **Meta, communication and process data:** Meta-, communication, and procedural data are categories that contain information about how data is processed, transmitted, and managed. Meta-data, also known as data about data, include information that describes the context, origin, and structure of other data. They can include details about file size, creation date, the author of a document, and modification histories. Communication data capture the exchange of information between users across various channels, such as email traffic, call logs, messages in social networks, and chat histories, including the involved parties, timestamps, and transmission paths. Procedural data describe the processes and operations within systems or organisations, including workflow documentations, logs of transactions and activities, and audit logs used for tracking and verifying procedures.
- **Personal Data:** "personal data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

- **Processing:** The term "processing" covers a wide range and practically every handling of data, be it collection, evaluation, storage, transmission or erasure.
- **Profiles with user-related information:** The processing of "profiles with user-related information", or "profiles" for short, includes any kind of automated processing of personal data that consists of using these personal data to analyse, evaluate or predict certain personal aspects relating to a natural person (depending on the type of profiling, this may include different information concerning demographics, behaviour and interests, such as interaction with websites and their content, etc.) (e.g. interests in certain content or products, click behaviour on a website or location). Cookies and web beacons are often used for profiling purposes.
- **Targeting:** "Tracking" is the term used when the behaviour of users can be traced across several websites. As a rule, behavior and interest information with regard to the websites used is stored in cookies or on the servers of the tracking technology providers (so-called profiling). This information can then be used, for example, to display advertisements to users presumably corresponding to their interests.
- **Usage data:** Usage data refer to information that captures how users interact with digital products, services, or platforms. These data encompass a wide range of information that demonstrates how users utilise applications, which features they prefer, how long they spend on specific pages, and through what paths they navigate an application. Usage data can also include the frequency of use, timestamps of activities, IP addresses, device information, and location data. They are particularly valuable for analysing user behaviour, optimising user experiences, personalising content, and improving products or services. Furthermore, usage data play a crucial role in identifying trends, preferences, and potential problem areas within digital offerings
- **Web Analytics:** Web Analytics serves the evaluation of visitor traffic of online services and can determine their behavior or interests in certain information, such as content of websites. With the help of web analytics, website owners, for example, can recognize at what time visitors visit their website and what content they are interested in. This enables them, for example, to better adapt the content of their websites to the needs of their visitors. For the purposes of web analytics, pseudonymous cookies and web beacons are often used to recognize returning visitors and thus obtain more precise analyses of the use of an online service.