



# Privacy Policy

## 1. General Information

Data protection is important to us and we only process your data in accordance with the legal requirements. In this data protection declaration, we explain how we collect and process personal data. Personal data is understood to be all information that relates to an identified or identifiable person.

This data protection declaration is based on the Data Protection Act (DSG) and the European Data Protection Regulation (DSGVO). The General Data Protection Regulation (GDPR) does not only apply to the European Economic Area (EEA) including the European Union (EU), but also to companies and other data controllers in Switzerland and other - from the EU's perspective - so-called third countries.

### Modifications

We are obliged to adapt our data protection declaration to any changes in law and are therefore legally entitled to adapt this data protection declaration at any time without prior notice.

### Responsibility

Responsible for the provided information in this privacy policy and for any data processing is: Stronger Together – Asociación de extranjeros

For concerns and information regarding data protection, you can contact us by email to [.....]

### Data Security

We take data security seriously using appropriate technical and organisational security measures in order to protect your personal data against accidental or intentional manipulation, loss, destruction and/or against unauthorised access by third parties. We continuously improve our security measures in accordance with technological developments. Within our website, we use SSL (Secure Socket Layer) combined with the highest encryption level supported by your browser. If an individual page of our website has been transmitted in an encrypted form, you can tell by the “closed display” of the lock symbol in your browser's status bar.

## 2. Personal Data Processing

We mainly process personal data that have been collected when visiting our website/applications plus any data that have been collected from our customers and other business partners in the course of our business relationship with them and other persons involved. We primarily collect personal data directly from you. We may also receive personal data about you from third parties (which are listed below under Data Sharing).

This data may include the following categories:

- Information from publicly available sources (e.g. media, internet)
- Information from public registers (e.g. commercial register, debt collection register, land register)
- Information in connection with official or judicial proceedings
- Information concerning your professional functions and activities
- Information about you in correspondence and meetings with third parties
- Creditworthiness information (in case we do business with you on a personal basis)
- Information about you given by parties in your surroundings. That allows us to conclude contracts with you (e.g. references, your address for deliveries, powers of attorney, information on compliance with legal requirements, information from banks, insurance companies, distributors and other contractual partners).
- Information from the media and internet about you (only if specifically necessary, e.g. in the context of an application, press review, marketing, sales, etc.)
- Data in connection with the use of the website (e.g. IP address, MAC address of smartphone or computer, details of your device and settings, cookies, date and time of the visit, accessed pages and content, used functions, referring websites, location details)

### **Purposes and legal basis of data processing**

We process your data only for specified, transparent and business purposes and only when permitted by law. Please find in the following the different data processing operations on our website, including purposes and legal bases for data processing.

### **The following reasons are considered as a legal basis:**

Your consent: If you have given your approval to process your personal data for specific purposes, we will process your data within the scope of this consent unless any other legal basis will apply. You can cancel your consent at any time. However, data processing that has already taken place, will not be affected by this.

- The realisation of a contract or pre-contractual measures;
- The fulfilment of legal requirements;
- Our legitimate interests, unless your interests or fundamental rights are prevailing;
- To safeguard vital interests of you or another person or to perform a task in the public interest;
- Any other relevant legal requirements.

## Data Transfer

**General note:** in the course of providing our services and making our website available, we may need to use the services of third parties. In this context, it may happen that we commission third parties to process your personal data. We contractually ensure, however, that these third parties comply with the requirements of data protection. Under certain circumstances, we may also be obliged to disclose your data to authorities or other third parties.

**Abroad Data Transfer:** Under certain circumstances and within the scope of commissioned processing, your personal data may also be transferred to companies abroad. These companies are bound to data protection to the same extent. If the level of data protection in the country to which data is transferred does not correspond to that in Switzerland or the European Union, we ensure contractually that the same protection level will be guaranteed as in Switzerland or the European Union. Either through standard data protection clauses of the European Commission or a supervisory authority. Also, approved and authorised codes of practice together with binding and enforceable obligations of the recipient or approved certification mechanisms together with binding and enforceable obligations of the recipient apply.

We will only share your personal data if one of the following 6 conditions corresponds:

1. your consent has been given;
2. there is a legal obligation;
3. if it is necessary for exercising our rights, in particular the enforcement of claims arising from the contractual relationship;
4. if it is necessary for the fulfilment of the contract or the implementation of pre-contractual measures;
5. if we have a legitimate interest in doing so and your interests to the contrary do not outweigh ours;
6. if another legal permission exists.

## **Data Storage Time**

We only store personal data as long as this is necessary in order to fulfil the individual purposes for which the data had been collected in the first place. As per legal regulations, contractual data will be stored longer. Storage time regulations result from registration laws, on accounting and from tax laws. According to these regulations, business communication, concluded contracts and accounting vouchers must be stored for up to 10 years. When we no longer need such data for the performance of the services, the data will be blocked and we will only use the data for accounting and tax purposes.

## **Profiling**

Your personal data will be sometimes processed automatically relating certain personal aspects and thus being able to evaluate behaviour. We use Profiling in particular to inform and advise you in an individualized way about certain services or products of ours. This is why we use evaluation tools that allow us to communicate in a tailored way and to take appropriate advertising initiatives, including market and opinion research.

## **Information & Rights**

You have the right to obtain information from us as to which your personal data is stored, always under the scope of the applicable data protection law and as far as provided for therein (such as in the case of the DSGVO). In addition, you may request the correction of incorrect data or the deletion of personal data, provided that this does not contradict any legal obligations to retain data or any legal permissions for data processing. Furthermore, you may, under certain circumstances, restrict or not permit your personal data. You also have the right to request the data back from us (right to data portability). You have the right to receive the data in a common file format. We have already informed you about the possibility of revoking your consent (see above and under data processing operations).

We would like to point out that the exercise of your rights may be subject to legal restrictions. We reserve the right to assert these, e.g. if we are obliged to retain or process certain data, if we have an predominant interest in doing so (only if we are entitled to do so) or if we require them for the assertion of claims. Please note that the exercise of your rights may, under certain circumstances, conflict with contractual agreements and may have corresponding effects on the performance of the contract (e.g. premature termination of the contract or cost consequences). Where this is not already contractually regulated, we will inform you in advance.

The exercise of your rights requires that you prove your identity (e.g. a copy of your identity card if your identity cannot be proven otherwise). If there will be any costs for you, we will inform you in advance. If you are affected by the processing of personal data, you are able to enforce your rights in court or to file a complaint to the competent supervisory authority. The

competent supervisory authority in Switzerland is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).

### **3. Individual Data Processing Operations on our Website**

#### **Providing the Website and creating Log Files**

When you access our website, the provider of the pages automatically collects and stores information in so-called server log files, which your browser transmits to us. These are:

- Server name
- IP address
- Operating system
- Type of device
- Browser name and version
- Date and time of server request

This data cannot be assigned to a specific person and it is not merged with any other data sources. The log files are stored in order to guarantee the functionality of the website and to ensure the security of our information technology systems. This is our legitimate interest, which serves as the legal basis.

The data is only stored for as long as necessary achieving the purpose for which it was collected. Accordingly, the data is deleted after the end of each session. The storage of log files is absolutely necessary for the operation of the website, therefore it is not possible to file an objection.

#### **Using Cookies**

Our website uses cookies. Cookies are text files that are stored on your device's operating system by your browser when visiting our website. Cookies do not cause any damage to your computer and do not contain viruses. Most of the cookies we use are so-called "session cookies". They are automatically deleted at the end of your visit. Other cookies remain stored on your end device until you delete them. These cookies enable us to recognise your browser on your next visit. Certain settings (such as language settings or location information) will be saved so that you do not have to re-enter them when you return to the website. We use cookies to make our website more user-friendly, effective and secure. The use of cookies and the related processing of your data is based on the legal basis of our legitimate interests in the aforementioned purposes.

## **Right of Objection (cookies)**

Cookies are stored on your computer. You therefore have full control over the use of the cookies. You can delete them completely, deactivate or restrict their transmission by changing the settings in your browser. If cookies are deactivated for our website, it may no longer be possible to use all the functions of the website to their full extent.

## **Using our Contact Form**

On our website you can contact us via an electronic contact form. The data you enter in the input mask (name, e-mail address, etc.) will be transmitted to us and stored. The provided data is used to process your enquiry. Pre-contractual measures as well as our legitimate interests in dealing with the enquiry are the legal basis here. We only store your data as long as this is necessary to deal with your enquiry or as long as we are obliged to do so by law.

## **Google Web Fonts**

We use so-called web fonts on our website for the uniform display of fonts, which are provided by Google (Google Inc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA). When you visit one of our pages, your browser loads the required web fonts into its browser cache in order to display texts and fonts correctly. For this purpose, the browser you are using establishes a connection to Google's servers. This enables Google to know that our website has been accessed via your IP address. Google Web Fonts are used in the interest of a uniform and appealing presentation of our online offers. This is our legitimate interest, which serves as the legal basis for this data processing. If your browser does not support web fonts, a standard font will be used by your computer. Further information on Google Web Fonts can be found at <https://developers.google.com/fonts/faq> and in Google's privacy policy: <https://www.google.com/policies/privacy/>.

## **Using Google Analytics**

Our website uses Google Analytics, a service provided by Google Inc, 1600 Amphitheatre Parkway Mountain View, CA 94043, USA. Google uses cookies, which are stored on your device and hence enable an analysis of the website. The information generated by the cookie about your use of the website, such as browser type, operating system used, referrer URL (the previously visited page), IP address and time of server request will be transmitted to and stored by Google on servers in the United States. The IP address transmitted by your browser in this context will not be merged with other Google data. We have also added the code "anonymizeIP" to Google Analytics on this website. This ensures that all data is collected anonymously. Only in exceptional cases will the full IP address be transferred to a Google server in the USA and shortened there. Google may transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. In the case of Google Analytics, Google uses the data on our behalf to evaluate your use of the website, to compile reports on website activities and to provide us with other services related to website and internet use. Google Analytics is used on the legal

basis of our legitimate interests in analysing customer behaviour on our website, which enables us to improve our services.

## **Right of Objection (Google Analytics)**

You may refuse the use of cookies by adjusting the settings on your browser. However, we would like to point out that in this case you may not be able to use all the functions of this website. You can also deactivate Google Analytics by downloading and installing the browser add-on at <http://tools.google.com/dlpage/gaoptout?hl=de> . More information on the handling of user data by Google Analytics can be found in Google's privacy policy at <https://support.google.com/analytics/answer/6004245?hl=de> .

We use Google Analytics with the functions of Universal Analytics on our website. This allows us to analyse the activities of our website across devices (e.g. if accessing first with a laptop and later with a smartphone) made possible by assigning a pseudonymous user ID to a user. This happens, for example, when you register for a customer account or log in to your customer account. No personal data is forwarded to Google. The additional functions of Universal Analytics do not restrict the previously mentioned data protection measures such as anonymising the IP address or the possibility of objecting to the use of Google Analytics. The data collected as part of Google Analytics is stored only as long as it is necessary for the website analysis. After a period of 50 months at the latest, the data is automatically deleted.

## **Google reCAPTCHA**

On our website, we use the "reCAPTCHA" service of Google Inc (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA). This service enables us to distinguish whether the forms provided on this website are filled in by a natural person or improperly filled in by mechanical, automated methods. For this purpose, the following data is passed on to Google:

- Referrer URL (the address of the page from where the visitor comes).
- IP address
- Information on the operating system
- Cookies
- Mouse and keyboard behaviour
- Date and language settings
- All Javascript items
- Screen resolution

We use reCAPTCHA to prevent our website features from being misused through spam, machine processing and others. This is our legitimate interests, which serve as the legal basis for the data processing. The Privacy Shield agreement applies to the transfer of data to Google. You can find out more about reCAPTCHA at <https://developers.google.com/recaptcha/>. An overview of Google's use of data can be found at <https://policies.google.com/privacy?hl=de&tid=231560237376>.

If you want to prevent data about your behaviour being sent to Google, you must log out of Google before visiting our website and delete all Google cookies. You must request the deletion of data at Google from Google support at <https://support.google.com/?hl=de&tid=231560237376>.