

# Privacy Policy Privera

## Table of contents

1.	Data controller and content of this Privacy Policy.....	2
2.	Contact person for data protection .....	2
3.	Scope and purpose of the collection, processing and use of personal data .....	2
3.1	Data processing when contacting us .....	2
3.2	Expression of interest for advertised properties .....	2
3.3	Data processing registration form rental property.....	3
3.4	Data processing for the tenant portal.....	5
3.5	Data processing for tenant concerns .....	6
3.6	Data processing for job applications .....	8
3.7	Data processing when reporting misconduct via our website.....	8
4.	Central data storage and analysis .....	8
5.	Disclosure and transmission abroad.....	9
5.1	Disclosure to group companies of Investis Group .....	9
5.2	Disclosure to and access by third parties .....	9
5.3	Transfer of personal data abroad.....	10
5.4	Information on data transfers to the USA .....	10
6.	Background data processing on our website.....	11
6.1	Data processing when visiting our website (log file data).....	11
6.2	Cookies .....	12
6.3	Tracking and web analysis tools .....	13
6.4	Social media.....	14
7.	Retention periods .....	16
8.	Data security .....	16
9.	Your rights .....	16

## 1. **Data controller and content of this Privacy Policy**

We, Privera AG, Worbstrasse 142, 3073 Gümligen, Switzerland (**company**), are the operator of the website [www.privera.ch](http://www.privera.ch) (**website**) and, unless otherwise stated in this Privacy Policy, are responsible for the data processing activities set out in this Privacy Policy.

Please read the information below to you understand what personal data we collect from you and for what purposes we use it. When it comes to data protection, we are guided primarily by the legal requirements of Swiss data protection law, in particular the Federal Data Protection Act (**FADP**), as well as the European General Data Protection Regulation (**GDPR**), the provisions of which may be applicable in individual cases.

Please note that the following information is subject to review and change from time to time. We therefore recommend that you consult this Privacy Policy regularly. Furthermore, other companies are responsible under data protection law for individual data processing operations listed below or are jointly responsible with us, so that in these cases the information provided by these providers is also authoritative.

## 2. **Contact person for data protection**

If you have any questions about data protection or would like to exercise your rights, please contact our data protection contact by sending an email to the following address: [compliance@privera.ch](mailto:compliance@privera.ch)

## 3. **Scope and purpose of the collection, processing and use of personal data**

### 3.1 **Data processing when contacting us**

If you contact us via our contact addresses and channels (e.g., by e-mail or telephone), your personal data will be processed. We process the data that you have provided to us, such as your name, e-mail address or telephone number and your request. In addition, the time of receipt of the request is documented. We process this data in order to implement your request (e.g., providing you with information about our products and services, assisting you with the processing of contracts, incorporating your feedback into the improvement of our products and services, etc.).

The legal basis for this data processing is our legitimate interest within the meaning of Art. 6 Para. 1f GDPR in the implementation of your request or, if your request is directed towards the conclusion or execution of a contract, the necessity for the implementation of the required measures within the meaning of Art. 6 Para. 1 b GDPR.

### 3.2 **Expression of interest for advertised properties**

You can express your interest in renting via the contact form for advertised rental properties. In such cases, we collect the following data and documents, with mandatory data in forms marked with an asterisk (\*):

- Title
- Last name

- First name
- E-mail address
- Telephone number

We use the data to establish your identity, to receive your expression of interest in a rental property and to communicate with you. We store this data together with the relevant documents in our property management software (see section 4) so that we can ensure correct processing of the expression of interest in a rental property. If we consider your expression of interest, we will pass on this data to the owner of the rental property. If your application is not considered, your data will be deleted within a period of 90 days. In this case, we will not share your data with owners.

For the presentation of advertised rental properties and for the expression of interest, we use the software application "immoscout24" from SMG Swiss Marketplace Group AG, Thurgauerstrasse 36, 8050 Zurich, Switzerland. Therefore, your data may be stored in a database of SMG Swiss Marketplace Group AG, which may allow SMG Swiss Marketplace Group AG to access your data if this is necessary for the provision of the software and for support in the use of the software. Information on the processing of data by third parties and any transfer abroad can be found in section 5 of this Privacy Policy.

The legal basis for processing your data for this purpose is the execution of a contract (pre-contractual phase) according to Art. 6 Para. 1 b GDPR.

SMG Swiss Marketplace Group AG may wish to use some of this data for its own purposes (e.g., for the delivery of marketing e-mails or for statistical analyses). SMG Swiss Marketplace Group AG is the data controller for these data processing operations and must ensure compliance with data protection laws in connection with these data processing operations. Information on data processing by SMG Swiss Marketplace Group AG can be found at <https://www.immoscout24.ch/c/de/ueber-uns/datenschutzerklaerung>

### **3.3 Data processing registration form rental property**

You can apply for advertised rental properties via the rental property application form. In such cases, we collect the following data and documents, with mandatory data in forms marked with an asterisk (\*):

- Title
- Last name
- First name
- Date of birth
- Civil status
- Place of origin/citizenship
- Residence permit

- Copy or photo of official documents (ID, passport, residence permit)
- Occupation
- Income
- Debt collection information
- References
- Pets
- Instruments
- Vehicles
- Preferred moving date
- Current residential address
- E-mail address
- Telephone number
- Etc.

The personal data processed may also include data about third parties:

- Partner/spouse
- Roommates, children, family and household members
- Employer
- Current/former landlord
- Reference persons
- Date of birth
- Company name, company address and VAT no. for corporate clients
- Telephone number

The data is used to establish your identity and to communicate with you. We also use this data to check your application, including credit checks and obtaining information or references from third parties. We store this data together with the relevant documents in our property management software (see section 4) so that we can ensure correct processing of the application for a rental property. If we consider your application, we will pass on this data to the owner of the rental property. If your application is not considered, your data will be deleted within a period of 90 days. In this case, we will not share your data with owners.

For the processing of tenant applications by means of a tenant portal, we use a software application from Flatfox AG, Speichergasse 31, 3011 Bern, Switzerland. Therefore, your data may be stored in a database of Flatfox AG, which may allow Flatfox AG to access your data if this is necessary for the provision of the software and for support in the use of the software. Information on the processing of data by third parties and any transfer abroad can be found in section 5 of this Privacy Policy.

The legal basis for processing your data for this purpose is the execution of a contract (pre-contractual phase) according to Art. 6 Para. 1 b GDPR.

Flatfox AG may wish to use some of this data for its own purposes (e.g., for the delivery of marketing e-mails or for statistical analyses). Flatfox AG is the data controller for these data processing operations and must ensure compliance with data protection laws in connection with these data processing operations. Information about data processing by Flatfox AG can be found at <https://flatfox.ch/c/de/datenschutzklarung/> .

To check your creditworthiness, we obtain a credit report from a credit agency on the basis of mathematical-statistical methods if required. For this purpose, we transmit the personal data required for a credit assessment to CRIF AG, Hagenholzstrasse 81, 8050 Zurich, and use the information received on the statistical probability of a payment default for a weighed decision on the establishment, implementation or termination of the contractual relationship. The credit report may contain probability values (score values) which have been calculated on the basis of scientifically recognised mathematical-statistical methods and which include address data in their calculation. Your protection interests are taken into account in accordance with the legal provisions.

The legal basis for the transfer of data is the fulfilment of a contract according to Art. 6 Para. 1 b GDPR.

### **3.4 Data processing for the tenant portal**

As a tenant, you can use the tenant portal to deal with all rental concerns directly with us as the administration. This includes keeping a digital rental dossier, reporting damage/repair reports and rental concerns (see 3.5 for more information on this) or obtaining helpful information on the topic of housing.

The request for a registration code for the first registration takes place via e-mail. For this we need the following information:

- Last name
- First name
- Property address (street, number, ZIP code, city)
- Reference number of your rental contract

After registration we additionally process

- E-mail address

- Selected screen name
- Password in secure form

For the maintenance of the digital rental dossier and the information on the topic of housing (for the notification of damage/repair reports and rental concerns, see 3.5), we process:

- Rental documentation such as contract documents

The data is used to establish your identity and to communicate with you. We also use this data to keep the rental dossier for you. We use the e-mail address for the periodic sending of information e-mails. We store this data together with the respective implemented measures in our property management software (see section 4) so that we can ensure correct processing of the rental property management.

Alternatively, you have the option of logging in using single-sign on (SSO). To do this, use the SSO services of your Google, Facebook or Microsoft account. For this purpose, we exchange the following data with the SSO services:

- Selected screen name
- Registration code
- E-mail address

From the SSO services, we only receive the information that you have successfully logged in via your respective account. For data processing in connection with identification via the SSO services are. The latter are data controllers and must ensure compliance with data protection laws in relation to these data processing operations. Information about data processing by SSO providers can be found here:

- Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, [Privacy Notice](#)
- Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, [Privacy Notice](#);
- Microsoft Ireland Operations, Ltd. One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland. [Privacy Notice](#)

### **3.5 Data processing for tenant concerns**

You can submit orders, damage and repair reports and other tenant concerns regarding a rental property via our website. In such cases, we collect the following data and documents, with mandatory data in forms marked with an asterisk (\*).

For registration we use:

- Registration code(\*)
- E-mail address(\*)

- First name(\*)
- Last name(\*)
- Telephone number(\*)

You can also make your requests without prior registration. To record your tenant concern, we use:

- Last name(\*)
- First name(\*)
- Company
- Property(\*)
- Floor
- Elevator
- Number of rooms and spaces
- Doorbell plate
- Address of the rental property
- E-mail address
- Telephone number
- Defect information
- Photos and further correspondence information

The data is used to establish your identity and to communicate with you. Furthermore, we use this data to check your tenant concerns, initiate the necessary measures and inform you about them. We store this data together with the respective implemented measures in our property management software (see section 4) so that we can ensure correct processing of the rental property management. Insofar as this is necessary for the fulfilment of the contract, we will also pass on the required information to any third-party service providers (e.g., technical installers, manufacturers, suppliers, key services, engraving service providers etc.) or other third parties involved (e.g., other tenants, neighbours, owners etc.).

We use a software application from imofix.io ag, c/o Domizilagentur GmbH, Baarerstrasse 43, 6300 Zug, Switzerland, to process damage and repair reports via an online portal. Therefore, your data may be stored in a database of imofix.io ag, which may allow imofix.io ag to access your data if this is necessary for the provision of the software and for support in the use of the software.

The legal basis for this data processing is the necessity of implementing the required contractual measures within the meaning of Art. 6 Para. 1 b EU-GDPR.

imofix.io ag may wish to use some of this data for its own purposes (e.g., for the delivery of or for statistical analyses). imofix.io ag is the data controller for these data processing operations and must ensure compliance with data protection laws in connection with these data processing operations. Information about data processing by imofix.io ag can be found at <https://imofix.io/privacy-policy>

### **3.6 Data processing for job applications**

You have the opportunity to apply for employment with our company spontaneously or in response to a specific job advertisement. In doing so, we process the personal data provided by you.

We use the data you provide to assess your application and suitability for employment. Application documents of unsuccessful applicants will be deleted at the end of the application process, unless you explicitly agree to a longer retention period or we are not legally obliged to retain them for a longer period.

Applications will be processed by Valores AG, Alte Bahnhofstrasse 7, 5506 Mägenwil, Switzerland, a sister company of Privera AG, which centralises human resources for the whole Investis Holding AG, Neumühlequai 6, 8001 Zurich (see 5.1).

For the processing of job applications, we use a software application from rexx systems Schweiz AG, Badenerstrasse 623, 8048 Zurich, Switzerland. Therefore, your data may be stored in a database of rexx systems Schweiz AG, which may allow rexx systems Schweiz AG to access your data if this is necessary for the provision of the software and for support in the use of the software. Information on the processing of data by third parties and any possible transfer abroad can be found in section 5 of this Privacy Policy.

The legal basis for processing your data for this purpose is the execution of a contract (pre-contractual phase) according to Art. 6 Para. 1 b GDPR.

### **3.7 Data processing when reporting misconduct via our website**

You can access a whistleblowing platform through our website if you want to report misconduct that affects the company. The whistleblowing platform is operated by EQS Group AG, Karlstrasse 47, 80333 Munich, Germany. We do not have access to your personal data. EQS Group AG is the data controller for these data processing operations and must ensure compliance with data protection laws in connection with these data processing operations. Information on data processing by EQS Group AG can be found at [this link](#). Information on the processing of data by third parties and any transfer abroad can be found in section 5 of this Privacy Policy.

## **4. Central data storage and analysis**

If it is possible to clearly assign the data to your person, we will store and link the data described in this Privacy Policy, i.e., in particular your personal details, your contact details and your contract data in a central property management software. This serves the efficient management of client data, allows us to adequately process your requests and enables the efficient management of the properties we manage on your behalf.



The legal basis for this data processing is our legitimate interest within the meaning of Art. 6 Para. 1 f GDPR in the efficient management of user data.

For central data storage in the central property management software, we use a software application from GARAIO REM AG, Gartenstrasse 1-3, 3007 Bern. Therefore, your data may be stored in a database of GARAIO REM AG, which may allow GARAIO REM AG to access your data if this is necessary for the provision of the software and for support in the use of the software. Information on the processing of data by third parties and any possible transfer abroad can be found in section 5 of this Privacy Policy. Further information on data processing in connection with GARAIO REM AG can be found at <https://www.garaiο-rem.ch/impressum/>

We operate our own data warehouse for central data analysis.

## **5. Disclosure and transmission abroad**

### **5.1 Disclosure to group companies of Investis Group**

Privera AG is a company of Investis Holding AG, Neumühlequai 6, 8001 Zurich. Investis Holding AG holds shares in numerous subsidiaries, including Privera AG and Valores AG (Investis Group). Valores AG, Alte Bahnhofstrasse 7, 5506 Mägenwil, provides numerous group services for all subsidiaries of Investis Holding AG, in the context of which personal data are also processed, for example in connection with HR, IT and financial accounting for various companies of Investis Group. Valores AG acts as an intra-group service provider for Privera AG. The transfer of personal data from Privera AG to Valores AG for the purposes mentioned in this Privacy Policy is based on a contractual basis which fulfils the data protection requirements of both Privera AG and Valores AG. It is guaranteed that none of the personal data collected by Privera AG and processed by Valores AG is passed on to other subsidiaries of Investis Holding AG.

You can find more information about Valores AG here: <https://valores.ch/>

### **5.2 Disclosure to and access by third parties**

Without the support of other companies, we would not be able to provide our services in the desired form. In order for us to be able to use the services of these companies, it is also necessary to pass on your personal data to these companies to a certain extent. A transfer is made to selected third-party service providers and only to the extent necessary for the optimal provision of our services.

Various third-party service providers are already explicitly mentioned in this Privacy Policy. The following service providers are involved:

- Microsoft Ireland Operations, Ltd. One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland. Further information on data processing in connection with Microsoft can be found at: <https://www.microsoft.com/de-de/trust-center/privacy/>

The legal basis for these disclosures is the necessity for the fulfilment of a contract within the meaning of Art. 6 Para. 1 b GDPR.

Your data will also be passed on if this is necessary to process the contractual relationship, i.e., e.g. to the service providers mentioned in 3.5 or providers of other services. The legal basis for

these disclosures is the necessity for the fulfilment of a contract within the meaning of Art. 6 Para. 1 b GDPR. The third-party service providers are responsible for this data processing in the sense of the Data Protection Act and not we. It is the responsibility of these third-party service providers to inform you about their own data processing activities - beyond the transfer of data for the provision of services - and to comply with data protection laws.

In addition, your data may be passed on, in particular to authorities, legal advisors, auditors or debt collection agencies, if we are legally obliged to do so or if this is necessary to protect our rights, in particular to enforce claims arising from our relationship with you. Data may also be disclosed if another company intends to acquire our company or parts thereof and such disclosure is necessary to conduct due diligence or to complete the transaction.

The legal basis for this data processing is our legitimate interest within the meaning of Art. 6 Para. 1 f GDPR in the protection of our rights and compliance with our obligations or the sale of our company or parts thereof.

### **5.3 Transfer of personal data abroad**

We are also entitled to transfer your personal data to third parties abroad, insofar as this is necessary to carry out the data processing mentioned in this Privacy Policy. Individual data transfers have been mentioned above in section 3. In doing so, the legal regulations on the disclosure of personal data to third parties are, of course, complied with. The states to which data is transferred include those which, according to the decision of the Federal Council and the EU Commission, have an adequate level of data protection (such as the member states of the EEA or, from the EU's point of view, also Switzerland), but also those states (such as the USA) whose level of data protection is not considered adequate (see Annex 1 of the Data Protection Ordinance (DPO) and the [EU Commission's website](#)). If the country in question does not have an adequate level of data protection, we ensure that your data is adequately protected at these companies by means of suitable guarantees, unless an exception is specified in the individual case for the data processing (cf. Art. 49 GDPR). Unless otherwise stated, these are standard contractual clauses within the meaning of Art. 46 Para. 2 c GDPR, which can be found on the websites of the [Federal Data Protection and Information Commissioner \(FDPIIC\)](#) and the [EU Commission](#). If you have any questions about the measures taken, please contact our contact person for data protection (see section 2).

### **5.4 Information on data transfers to the USA**

Some of the third-party service providers mentioned in this Privacy Policy are based in the USA. For the sake of completeness, we would like to point out for users resident or domiciled in Switzerland or the EU that there are surveillance measures in place in the USA by US authorities which generally allow the storage of all personal data of all persons whose data has been transferred from Switzerland or the EU to the USA. This is done without any differentiation, limitation or exception based on the objective pursued and without any objective criterion that would make it possible to limit the access of the US authorities to the data and their subsequent use to very specific, strictly limited purposes that are capable of justifying the interference associated both with the access to these data and with their use. Furthermore, we would like to point out that in the USA, data subjects from Switzerland or the EU do not have any legal remedies or effective legal protection against general access rights of US authorities that would allow them to gain access to the data concerning them and to obtain its correction or deletion. We explicitly draw your attention to this legal and factual situation in order to enable you to make an appropriately informed decision to consent to the use of your data.

We would also like to point out to users who are resident in Switzerland or a member state of the EU that, from the point of view of the European Union and Switzerland, the USA does not have an adequate level of data protection, partly because of the information specified in this section. Where we have explained in this Privacy Policy that recipients of data (such as Google) are based in the US, we will ensure that your data is adequately protected with our third-party service providers through contractual arrangements with those companies and any additional appropriate safeguards that may be required.

## **6. Background data processing on our website**

### **6.1 Data processing when visiting our website (log file data)**

When you visit our website, the servers of our hosting provider Swisscom (Schweiz) AG, Alte Tiefenastrasse 6, Worblaufen, mail: 3050 Bern, temporarily record each access in a **log** file. The following data is collected without your intervention and stored by us until automated deletion:

- IP address of the requesting end device;
- Date and time of access;
- Name and URL of the retrieved file;
- Website from which the access was made, if applicable with the search word used;
- Your device's operating system and the browser you use (incl. type, version and language setting);
- Device type in case of access by mobile phones;
- City or region from where the access was made; and
- Name of your internet access provider.

The collection and processing of this data is carried out for the purpose of enabling the use of our website (connection establishment), to ensure system security and stability on a permanent basis, to enable error and performance analysis and optimisation of our website (cf. concerning the last points also section 6.3).

In the event of an attack on the network infrastructure of the website or a suspicion of other unauthorised or improper use of the website, the IP address as well as the other data will be evaluated for the purpose of clarification and defence and, if necessary, used in the context of civil or criminal proceedings to identify the user concerned.

The purposes described above are our legitimate interest within the meaning of Art. 6 Para. 1 f GDPR and thus the legal basis for data processing.

Finally, when you visit our website, we use cookies as well as applications and tools that are based on the use of cookies. In this context, the data described here may also be processed. Further details can be found in the following sections of this Privacy Policy, in particular the following section 6.2.

## 6.2 Cookies

Cookies are information files that your web browser stores on your computer's hard drive or memory when you visit our website. Cookies are assigned identification numbers that identify your browser and allow the information contained in the cookie to be read.

Among other things, cookies help to make your visit to our website easier, more pleasant and more meaningful. We use cookies for various purposes that are required, i.e., "technically necessary", for your desired use of the website. For example, we use cookies to be able to identify you as a registered user after logging in, without you having to log in again each time when navigating the various sub-pages. The provision of the ordering functions is also based on the use of cookies. Furthermore, cookies also perform other technical functions required for the operation of the website, such as so-called load balancing, i.e., the distribution of the performance load of the page to different web servers in order to relieve the servers. Cookies are also used for security purposes, e.g., to prevent unauthorised posting of content. Finally, we also use cookies as part of the design and programming of our website, e.g., to enable the uploading of scripts or codes.

The legal basis for this data processing is our legitimate interest within the meaning of Art. 6 Para. 1 f GDPR in providing a user-friendly and up-to-date website.

Most internet browsers accept cookies automatically. However, when you access our website, we ask for your consent to the cookies we use that are not technically necessary, in particular when we use third-party cookies for marketing purposes. You can use the corresponding buttons in the cookie banner to make the settings you want. Details of the services and data processing associated with each cookie can be found in the cookie banner and in the following paragraphs of this Privacy Policy.

You may also be able to configure your browser so that no cookies are stored on your computer or a message always appears when you receive a new cookie. On the following pages you will find explanations on how to configure the processing of cookies in selected browsers.

- [Google Chrome for Desktop](#)
- [Google Chrome for Mobile](#)
- [Apple Safari](#)
- [Microsoft Windows Internet Explorer](#)
- [Microsoft Windows Internet Explorer Mobile](#)
- [Mozilla Firefox](#)

Deactivating cookies may mean that you cannot use all the functions of our website.

## 6.3 Tracking and web analysis tools

### 6.3.1 General information on tracking

We use the web analysis services listed below for the purpose of designing and continuously optimising our website in line with requirements. In this context, pseudonymised usage profiles are created and cookies are used (see also section 6.2). The information generated by the cookie about your use of this website is usually transmitted to a server of the service provider together with the log file data listed in section 6.1, where it is stored and processed. This may also result in a transfer to servers abroad, e.g., the USA (cf. on this, in particular on the lack of an adequate level of data protection and on the guarantees provided, sections 5.3 and 5.4).

Through the processing of the data we receive, among other things, the following information:

- Navigation path followed by a visitor on the website (incl. content viewed and products selected or purchased or services booked);
- Time spent on the website or sub-page;
- Sub-page on which the website is left;
- Country, region or city from where access is made;
- End device (type, version, colour depth, resolution, width and height of the browser window); and
- returning or new visitors.

On our behalf, the provider will use this information to evaluate the use of the website, in particular to compile website activities and to provide further services associated with the use of the website and the internet for the purposes of market research and the design of these websites in line with requirements. For these processing operations, we and the providers may be considered joint controllers under data protection law up to a certain extent.

The legal basis for this data processing with the following services is your consent within the meaning of Art. 6 Para. 1 a GDPR. You can revoke your consent or refuse processing at any time by rejecting or deactivating the relevant cookies in your web browser settings (see section 6.2) or by making use of the service-specific options described below.

Please refer to the respective data protection information of the provider for the further processing of the data by the respective provider as the (sole) responsible party under data protection law, in particular also a possible forwarding of this information to third parties, e.g., to authorities due to national legal regulations.

### 6.3.2 Google Analytics

We use the web analysis service Google Analytics from Google Ireland Limited (Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland) or Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (**Google**).

In deviation from the description in section 6.3.1, Google Analytics (in the version "Google Analytics 4" used here) does not log or store IP addresses. For accesses originating from the EU, IP address data is only used to derive location data and is then immediately deleted. When collecting measurement data in Google Analytics, all IP searches occur on EU-based servers before traffic is routed to Analytics servers for processing. Google Analytics uses regional data centres. If a connection is established in Google Analytics to the nearest available Google data centre, the measurement data is sent to Analytics via an encrypted HTTPS connection. At these centres, the data is further encrypted before being forwarded to Analytics' processing servers and made available on the platform. The IP addresses are used to determine the most suitable local data centre. This may also result in data being transferred to servers abroad, e.g., the USA (cf. on this, in particular on the lack of an adequate level of data protection and on the guarantees provided, section 5.3).

We also use the technical extension "Google Signals", which enables cross-device tracking. This makes it possible to associate a single website visitor with different end devices. However, this only happens if the visitor has logged into a Google service when visiting the website and at the same time has activated the "personalised advertising" option in their Google account settings. Even then, however, no personal data or user profiles become accessible to us; they remain anonymous for us. If you do not wish to use "Google Signals", you can deactivate the "personalised advertising" option in your Google account settings.

Users can prevent the collection of the data generated by the cookie and related to the website use by the user concerned (incl. the IP address) to Google as well as the processing of this data by Google by downloading and installing the browser plugin available under the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>.

As an alternative to the browser plugin, users can click this link to prevent Google Analytics from collecting data on the website in the future. In the process, an opt-out cookie is placed on the user's terminal device. If users delete cookies (see section 6.2 cookies), the link must be clicked again.

## **6.4 Social media**

### **6.4.1 Social media profiles**

On our website, we have included links to our profiles in the social networks of the following providers:

- LinkedIn Unlimited Company, Wilton Place, Dublin 2, Ireland, [Privacy Notice](#).
- YouTube, Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, [Privacy Notice](#);

If you click on the icons of the social networks, you will automatically be redirected to our profile in the respective network. This establishes a direct connection between your browser and the server of the respective social network. This provides the network with the information that you have visited our website with your IP address and clicked on the link. This may also result in data being transferred to servers abroad, e.g., the USA (cf. on this, in particular on the lack of an adequate level of data protection and on the guarantees provided, sections 5.3 and 5.4).

If you click on a link to a network while you are logged into your user account with the network in question, the content of our website can be linked to your profile so that the network can assign your visit to our website directly to your account. If you want to prevent this, you should log out before clicking on the corresponding links. A connection between your access to our website and your user account takes place in any case when you log in to the respective network after clicking on the link. The respective provider is responsible under data protection law for the associated data processing. Please therefore refer to the data protection information on the network's website.

The legal basis for any data processing attributed to us is our legitimate interest within the meaning of Art. 6 Para. 1 f GDPR in the use and promotion of our social media profiles.

#### **6.4.2 Social media plugins**

On our website, you can use social media plugins from the providers listed below:

- LinkedIn Unlimited Company, Wilton Place, Dublin 2, Ireland, [Privacy Notice](#)
- Youtube, Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, [Privacy Notice](#);

We use the social media plugins to make it easier for you to share content from our website. The social media plugins help us to increase the visibility of our content on social networks and thus contribute to better marketing.

The plugins are deactivated by default on our websites and therefore do not send any data to the social networks when you simply call up our website. To increase data protection, we have integrated the plugins in such a way that a connection is not automatically established with the networks' servers. Only when you activate the plugins by clicking on them and thus give your consent to the transmission and further processing of data by the providers of the social networks, does your browser establish a direct connection to the servers of the respective social network.

The content of the plugin is transmitted directly to your browser by the social network and integrated into the website by it. This provides the respective provider with the information that your browser has accessed the corresponding page of our website, even if you do not have an account with this social network or are not currently logged in to it. This information (including your IP address) is transmitted by your browser directly to a server of the provider (usually in the USA) and stored there (cf. on this, in particular on the lack of an adequate level of data protection and on the guarantees provided, sections 5.3 and 5.4). We have no influence on the scope of the data that the provider collects with the plugin, although from a data protection perspective we can be considered jointly responsible with the providers up to a certain extent.

If you are logged in to the social network, it can assign your visit to our website directly to your user account. If you interact with the plugins, the corresponding information is also transmitted directly to a server of the provider and stored there. The information (e.g., that you like a product or service from us) may also be published on the social network and may be displayed to other users of the social network. The provider of the social network uses this information, if necessary, for the purpose of placing advertisements and designing the respective offer in line with requirements. For this purpose, usage, interest and relationship profiles could be created, e.g., to evaluate your use of our website with regard to the advertisements displayed to you on the

social network, to inform other users about your activities on our website and to provide other services associated with the use of the social network. The purpose and scope of the data collection and the further processing and use of the data by the providers of the social networks as well as your rights in this regard and setting options for protecting your privacy can be found directly in the data protection information of the respective provider.

If you do not want the provider of the social network to assign the data collected via our website to your user account, you must log out of the social network before activating the plugins. The legal basis for this data processing is your consent within the meaning of Art. 6 Para. 1 a GDPR. You can revoke your consent at any time by declaring your revocation to the provider of the plugin in accordance with the information in their privacy policy.

## 7. Retention periods

We only store personal data for as long as it is necessary to carry out the processing operations explained in this Privacy Policy within the scope of our legitimate interest. In the case of contractual data, storage is required by statutory retention obligations. Requirements obliging us to retain data result from the provisions on accounting and from tax law regulations. According to these regulations, business communications, concluded contracts and accounting vouchers must be retained for up to 10 years, subject to longer statutory retention periods. Insofar as we no longer require this data to perform the services for you, the data will be blocked. This means that the data may then only be used if this is necessary to fulfil the retention obligations or to defend and enforce our legal interests. The data is deleted as soon as there is no longer any obligation to retain it and no longer any justified interest in retaining it.

## 8. Data security

We use appropriate technical and organisational security measures to protect your personal data stored with us against loss and unlawful processing, namely unauthorised access by third parties. Our employees and the service providers commissioned by us are obliged by us to maintain confidentiality and data protection. Moreover, these persons are only granted access to personal data to the extent necessary for the performance of their tasks.

Our security measures are continuously adapted in line with technological developments. However, the transmission of information via the internet and electronic means of communication always involves certain security risks and we cannot therefore give any absolute guarantee as to the security of information transmitted in this way.

## 9. Your rights

Provided that the legal requirements are met, you have the following rights as a data subject:

**Right to information:** You have the right to request access to your personal data stored by us at any time and free of charge when we process it. This gives you the opportunity to check what personal data we process about you and whether we process it in accordance with the applicable data protection regulations.

**Right to rectification:** You have the right to have inaccurate or incomplete personal data corrected and to be informed of the correction. In this case, we also inform the recipients of the data concerned about the adjustments we have made, unless this is impossible or involves disproportionate effort.



**Right to deletion:** You have the right to have your personal data deleted in certain circumstances. In individual cases, especially in the case of statutory retention obligations, the right to deletion may be excluded. In this case, the deletion of the data may be replaced by a blocking of the data if the conditions are met.

**Right to restriction of processing:** You have the right to request that the processing of your personal data be restricted.

**Right to data transmission:** You have the right to obtain from us, free of charge, the personal data you have provided to us in a readable format.

**Right to object:** You can object to data processing at any time, especially in the case of data processing in connection with direct marketing (e.g., marketing e-mails).

**Withdrawal right:** In principle, you have the right to revoke any consent you have given at any time. However, processing activities based on your consent in the past do not become unlawful as a result of your revocation.

To exercise these rights, please send us an e-mail to the following address:  
[compliance@privera.ch](mailto:compliance@privera.ch)

**Right to appeal:** You have the right to submit a complaint with a competent supervisory authority, e.g., against the way your personal data is processed.

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