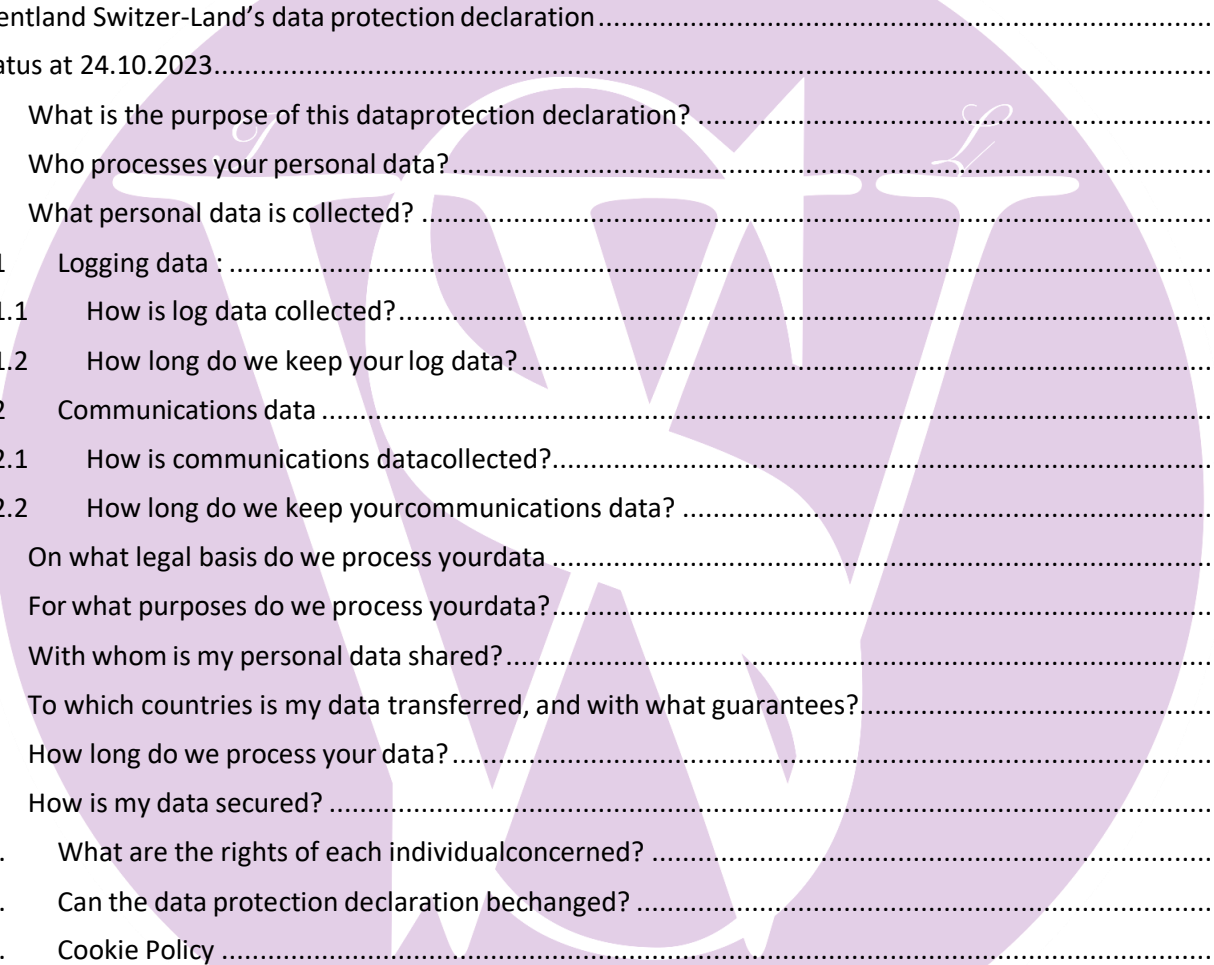


# Wentland Switzer-Land’s data protection declaration

## Status at 13.12.2023

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# 1. What is the purpose of this data protection declaration?

At **Wentland Switzer-Land S.A.** (hereinafter also referred to as "**we**", "**us**" or "**our**") we attach great importance to the protection of your personal data. The purpose of this statement is to inform you about how we collect, use, share and protect your data in accordance with the European Union's General Data Protection Regulation (GDPR) and the Swiss Federal Data Protection Act (DPA).

Please read this statement carefully to understand your data protection rights and how we ensure the confidentiality and security of your personal information. This privacy statement applies to <https://www.wentlandswitzerland.com/>, <https://www.wentlandswitzerland.ch/>, (collectively "webs").

## 2. Who processes your personal data?

The data controller is the private company that determines the purposes and means of processing your personal data.

The controller of your personal data in accordance with the European Union's General Data Protection Regulation (GDPR) and the Swiss Federal Data Protection Act (DPA) is, unless we indicate otherwise in a particular case :

### **Wentland Switzer-Land S.A.**

Chemin Auguste-Vilbert 14

1218 Grand-Saconnex Geneva, Switzerland

[info@wentlandswitzerland.com](mailto:info@wentlandswitzerland.com)

+41 022 306 00 59

If you have any questions or concerns about the processing of your personal data. You can contact our Data Protection Department at the following e-mail address

[dataprotection@wentlandswitzerland.com](mailto:dataprotection@wentlandswitzerland.com)

## 3. What personal data is collected?

We use the term "**data**" here interchangeably with "**personal data**".

**Personal data**" includes all information relating to an identified or identifiable natural person, i.e. the identity of this person can be established from the data itself or through additional data. This includes information such as your name, address, telephone number, e-mail address or an IP address assigned by your Internet service provider. In general, you can use our websites without providing any personal data. Where personal data is collected on our sites, we do so on a voluntary basis wherever possible.

We process different categories of data about you. The main categories are as follows:

- 3.1 Logging data: information relating to the use of the website and the platform, such as the web pages consulted, IP address, browser settings, frequency of visits, time and duration of visits, search terms, clicks on content, web page of origin.
- 3.2 Communication data: contact and identification data such as surname, first name, title, address, e-mail address, telephone number and customer number; interaction and usage data such as correspondence, chat content, information in forms and ratings and comments left.

We assume that the data you provide is correct and up to date. If you should be required to provide us with the data of third parties. We assume that the third party has consented to this and is aware of this data protection declaration.

We reserve the right to verify this data at a later date in the event of tangible evidence of unlawful use being brought to our attention.

### 3.1 Logging data :

In principle, our websites can be consulted without registration. When you visit our websites or use our services, our web servers temporarily record each access in what is commonly known as a server log file.

This routine procedure captures the following technical data:

- IP address of the requesting computer
- Date and time of access/request
- Website from which access was gained
- Name and URL of the data requested
- Your computer's operating system
- Browser you use (type, version and language)
- Name of your Internet Service Provider
- Time zone difference from Greenwich Mean Time (GMT)

- Application content (specific page)
- Access status / HTTP status code
- Last website visited
- Browser settings
- Language and version of your browser software
- Type of device (desktop, tablet, mobile)

This data can only be associated with you indirectly. It is not combined with other data sources. If we suspect unlawful use on the basis of specific evidence brought to our attention, we reserve the right to check this data.

### **3.1.1 How is log data collected?**

This technical data is generally collected each time you connect to a web server, without requiring any action on your part, using technologies such as cookies, web server logs, web beacons and similar technologies.

### **3.1.2 How long do we keep your log data?**

This information is kept by us for a maximum period of 10 days before being automatically deleted.

## **3.2 Communications data**

To process your requests for assistance, we have set up a contact form. We collect your data via this form.

In particular, we deal with :

- Your first and last name
- Your e-mail
- The subject of your message and your message.

This information is necessary for our teams to process your requests for assistance.

### **3.2.1 How is communications data collected?**

When you contact us via the contact form, by e-mail, by telephone or by post or any other means of communication, we collect the data you exchange with us, including your contact details and the metadata of the communication. If we need to determine your identity, we collect data that enables us to identify you (for example a copy of an identity document).

## 3.2.2 How long do we keep your communications data?

We generally keep this data for **12 months from the** last time we communicate with you. This period may be longer if necessary for evidential purposes, to comply with legal or contractual requirements, or for technical reasons. Personal inbox emails and written correspondence are generally retained for at least **10** years.

## 4. On what legal basis do we process your data

We use your data on the following legal bases, in different circumstances:

1. If you have given us your consent to process your data, we do so in accordance with Article 6(1)(a) of the GDPR.
2. When you benefit from our services, this is based on a contract or pre-contractual measures (in accordance with Article 6(1)(b) of the RGPD).
3. If we have legal obligations to comply with, we will process your data accordingly (in accordance with Article 6(1)(c) of the GDPR).
4. Finally, in certain cases where we have a legitimate interest, such as ensuring the security of our website, providing you with information about the use of our platform, or informing you about products similar to those you have already purchased or researched from us, we may also process your data, provided you have not opted out of such communications (in accordance with Article 6(1)(f) of the GDPR).

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

We process your data for the purposes set out below. These purposes and their objectives serve our interests and, where applicable, those of third parties.

We process your data for the purposes of :

- Putting our services at your disposal and keeping them up and running.
- Providing customer support.
- Monitor the use of our services.
- Detecting, preventing and resolving technical problems.
- We process personal data to comply with the laws, directives and recommendations of the authorities.
- To enable the use of our websites (establishment of the connection).
- Ensuring the long-term security and stability of our systems.
- Optimising the user experience (for example, retaining information from one web page to another).

When we offer you our services or when you use them, we need to collect certain data relating to the conclusion of the contract and the provision or use of the services. You are obliged to provide us with this information. If you do not provide us with this essential information, or if you do so incompletely, we may not be able to conclude a contract between you and us, or the provision of our services may not be possible, or only be possible to a limited extent.

## 6. With whom is my personal data shared?

It is important to note that log data is not shared with third parties or used for any other purpose. Furthermore, no personal user profile is generated from this data.

- Group companies (Wentland Switzer-Land SA, S3-ICT SA, PHHD HOLDING SA). All our companies are headquartered in Switzerland and comply with the various data protection regulations.

In connection with our contracts, the website, our products and services, our legal obligations, the protection of our legitimate interests, and the other purposes set out in section 5 "For what purposes do we process your data", we may disclose your personal data to third parties, in particular to the following categories of recipients:

**Service providers:** We work with service providers in Switzerland who process your data on our behalf or as joint controllers with us, or who receive your data from us as independent controllers. In particular, we use a Swiss service provider to host our websites

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

## **7. To which countries is my data transferred, and with what guarantees?**

In the context of our contracts, the website, our products and services, our legal obligations, the protection of our legitimate interests and other stated purposes, we may communicate your personal data to other parties. These parties are all located in Switzerland. For example, our platform infrastructure is operated on servers located in Swiss data centres.

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

We process your data for as long as required by our processing purposes, statutory retention periods and our legitimate interests in documenting and preserving evidence, or if retention is a technical requirement. You will find further information on the respective retention and processing periods for the different categories of data in sections 3.1.2 and 3.2.2 and for cookies in our cookie policy. In the absence of legal or contractual obligations to the contrary, we will delete or anonymise your data once the retention period has expired or processing has ceased as part of our normal processes.

## **9. How is my data secured?**

To enhance the security of our website and to ensure that your information remains private and secure when you send us messages or confidential data, we use a type of protection called SSL/TLS on our website. You can spot this when the address of the site begins with "https://" instead of "http://" in the bar at the top of your browser. Some browsers also display a small padlock next to the address to indicate that the connection is secure.

When SSL/TLS encryption is in place, this means that no one else can intercept or read the information you send via our contact form.

However, it is important to note that total data security, particularly when communicating by e-mail, can be compromised. Without using specific e-mail encryption methods such as PGP or S/MIME, there is a risk that third parties will be able to access your data. So, in general, transmitting data over the Internet involves a certain level of risk.

Our platform infrastructure is run on servers located in Swiss data centres that are ISO 27001 certified and apply high security standards.

## 10. What are the rights of each individual concerned?

Applicable data protection laws give you the right to object to the processing of your data in certain circumstances, including processing for direct marketing purposes, profiling for direct marketing purposes and other legitimate interests in processing.

To help you control the processing of your personal data, you have the following rights with respect to our processing of your data, in accordance with applicable data protection legislation:

- The right to ask us for information about whether we process data about you and, if so, which data;
- The right to request that we correct data if it is inaccurate;
- The right to request the deletion of data;
- The right to request that we provide certain personal data in a commonly used electronic format or transfer them to another data controller;
- The right to withdraw your consent, where our processing is based on your consent;
- The right to receive, on request, other information relevant to the exercise of these rights;

If you wish to exercise any of the aforementioned rights towards us, you may contact us in writing at our e-mail address [dataprotection@wentlandswitzerland.com](mailto:dataprotection@wentlandswitzerland.com). You will find our contact details in section 2 "Who processes your personal data". In order to prevent misuse, we need to identify you (for example by means of a copy of your identity card, if identification is not otherwise possible).

Please note that conditions, exceptions and restrictions may apply to the exercise of these rights in accordance with applicable data protection legislation (e.g. to protect third parties or trade secrets). In such cases, we will inform you.

If you do not agree with the way we respond to the exercise of your rights or with our data protection practices, you can let us know at [dataprotection@wentlandswitzerland.com](mailto:dataprotection@wentlandswitzerland.com).



If you are located in the EEA, the United Kingdom or Switzerland, you also have the right to lodge a complaint with the competent data protection supervisory authority in your country. You can find a list of authorities in the EEA here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en). You can contact the UK supervisory authority at the following address: <https://ico.org.uk/global/contact-us/>. You can contact the Swiss supervisory authority at the following address: <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html>.

In particular, we may need to further process your data and retain your personal data in order to perform a contract with you, to protect our own legitimate interests, for example in enforcing contractual claims, exercising or defending legal claims or complying with legal obligations. To the extent permitted by law, in particular to protect the rights and freedoms of other data subjects and to safeguard legitimate interests, we may also reject a data subject's request in whole or in part (e.g. by redacting content relating to third parties or our trade secrets).

## **11. Can the data protection declaration be changed?**

This data protection declaration does not form part of a contract with you. We may amend this data protection declaration at any time. The version published on this website is the current version.

Please note that this privacy policy may be amended or supplemented at any time, in particular in order to comply with any legislative, regulatory, case law or technological developments. In such a case, the date of the update will be clearly identified at the top of this policy. These modifications are binding on the User as soon as they are put online. The User should therefore consult this confidentiality and cookie use policy regularly to take note of any changes.

## **12. Cookie Policy**

On our website, we have chosen to use the minimum number of cookies required. To find out more, please consult our [cookie policy](#).