

## Privacy Policy

### I. General

**figure it ag** operates the website <https://figureit.digital/> and the services offered on it, and is therefore responsible for the collection, processing, and use of your personal data (referred to as “personal data” in this privacy policy) and for ensuring that data processing complies with applicable data protection laws. Your trust is important to us, which is why we take data protection seriously and ensure appropriate security.

We process your personal data according to the processing principles outlined in Articles 6 to 8 of the Swiss Data Protection Act (DSG). Protecting your privacy is important to us, and we place a high value on complying with relevant data protection regulations. In this privacy policy, we provide comprehensive information about how we handle your personal data and explain your rights in connection with the processing of personal data in our company. The processing of personal data of our employees is regulated exclusively within the framework of specific contracts.

You will be informed about any applicable right to object in our chapter “VI. Your Rights.”

#### A. Scope

This privacy policy applies to all processing activities related to personal data on our website, during the conduct of competitions, and the use of our software-based solutions.

Depending on the data processing activity, in addition to applicable Swiss law, the Federal Act on Data Protection (DSG) of September 25, 2020, SR 235.1, European data protection law (Regulation (EU) 2016/679 (General Data Protection Regulation)) may also or exclusively apply. This is particularly relevant when using our website and monitoring the behavior of affected individuals located in the EU (Art. 3 para. 2 lit. b GDPR).

This privacy policy does not cover linked websites of other providers or websites that link to our website.

#### B. Contact Details of the Responsible Parties

##### 1. Responsible Party

figure it ag  
Bahnhofstrasse 4  
9100 Herisau

Email: [info@figureit.digital](mailto:info@figureit.digital)

Phone: +41 71 571 51 30

##### 2. Data Protection Officer

[datenschutz@figureit.digital](mailto:datenschutz@figureit.digital)

### 3. Contact Details of the Supervisory Authority

Federal Data Protection and Information Commissioner

Feldeggweg 1

3003 Bern, Switzerland

Phone: +41 58 462 43 95

Contact form: [Link to external site](#)

## II. Processing Activities

Depending on your relationship with us, we process different personal data about you for different purposes and based on different legal grounds.

### A. Visiting Our Website

#### Data Processing

When you access our website, the browser used on your device automatically sends information to the server of our website. This information is temporarily stored in a so-called log file. Our website is hosted on the servers of Novatrend Services GmbH.

#### Personal Data

The following data is collected without your intervention and stored until automated deletion:

- IP address of the requesting computer
- Owner of the IP address range (usually your internet access provider)
- Date and time of access
- Name and URL of the retrieved file
- Website from which the access occurs (referrer URL), including the search term used
- Status code (e.g., error message)
- Amount of data transmitted in bytes
- Your username from a registration/authentication
- Information about the browser (type, version, language setting, location) and operating system of your computer
- The subpages accessed on our website by the accessing system

- Other similar data and information used for threat prevention in the event of attacks on our IT systems

#### Purpose

The aforementioned data is processed for the following purposes:

- Ensuring a smooth connection to the website
- Ensuring comfortable use of our website
- Evaluating system security and stability, as well as for other administrative purposes
- Improving and developing our business and services

#### Processor

Novatrend Services GmbH, Bahnhofstrasse 18, CH-6340 Baar, Switzerland

#### Ensuring Data Protection

Processing by Novatrend takes place in Switzerland. We have concluded a data processing agreement with our processors.

#### Data Protection Declaration of the Processor

<https://www.novatrend.ch/en/privacy-statement>

#### Legal Basis

There is an overriding private interest in processing your personal data in accordance with Art. 31 para. 1 DSG or Art. 6 para. 1 sentence 1 lit. f GDPR.

#### Necessity

This information is necessary for the functionality of the website.

#### Retention Period

After your session ends, the data is deleted, but we retain the log file according to legal requirements.

#### B. Contacting Us

##### Data Processing

We offer you the opportunity to contact us directly via phone or email on our website. If you wish to contact us via email, you can also click on our email button, which will redirect you to your default email program. We have no influence over the processing of personal data on third-party websites. We do not record conversations.

Additionally, we offer you the option to schedule a personal consultation appointment via the “Book Consultation” button.

#### Personal Data

The following information may be provided:

- First and last name
- Email address
- Phone number (optional)
- Information you provide verbally or in writing

#### Purpose

The aforementioned data is processed for the following purposes:

- Contacting you
- Scheduling appointments
- Responding to your inquiry

#### Processor

For telephony, we use Google Voice & Google Meet from Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

For email services, we use Gmail from Google. For booking personal consultation appointments, we use Google Calendar from Google.

#### Ensuring Data Protection

Your personal data is generally processed by Google in Ireland. The transfer of European or Swiss personal data to Google may result in this data being transferred to its US parent company Google LLC in the USA or to third parties in a country that does not have equivalent data protection. We have agreed with Google that a transfer to the USA will be based on the EU-US or Swiss-US Data Privacy Framework or, if the Data Privacy Framework is invalidated, based on standard contractual clauses and appropriate and proportionate technical and organizational measures. By making your inquiry, you also consent to your personal data being transferred to insecure third countries in accordance with Art. 17 DSG or Art. 49 para. 1 lit. a GDPR.

#### Data Protection Declaration of the Processor

[Google Privacy Policy](#)

#### Legal Basis

This data processing is based on contractual or pre-contractual measures in accordance with Art. 31 para. 2 lit. a DSGVO or Art. 6 para. 1 sentence 1 lit. b GDPR.

#### Necessity

This processing activity is not necessary for the functionality of the website.

#### Retention Period

The data stored for the purpose of contacting you will be deleted after final processing, provided there is no legal retention obligation of 5 or 10 years.

### C. Cookies

#### 1. Basics

We use cookies on our website. We use cookies to create anonymized aggregate statistics that show us how our website is used and help us improve the content and functionality of our website.

A cookie is a small data block stored by a website on a visitor's computer or mobile device. A cookie does not necessarily mean that we can identify you. You can configure your browser settings so that no cookies are stored on your computer or mobile device. Completely disabling cookies may result in you not being able to use all the functions of our website. We process this data in our interest of a web-based market presence.

#### 2. Types of Cookies

Our website uses session cookies and persistent cookies.

Session cookies are used to increase the security of using our website, make our information user-friendly, and analyze the use of our websites. A session cookie is automatically deleted when you close your browser or after a short period of time.

Persistent cookies are used to optimize user-friendliness and speed up the use of our website. When you visit our website again, it is automatically recognized that you have been with us before and what entries and settings you have made so that you do not have to enter them again. Persistent cookies expire after a certain period of time.

#### 3. Managing, Deleting, or Disabling Cookies

Most internet browsers are set to accept cookies automatically by default. If you do not want cookies from our website to be stored on your device, you can configure your browser settings to warn you before certain cookies are stored. You can configure your browser settings so that your browser blocks most of our cookies and only allows certain cookies or blocks all cookies. You can also withdraw your consent to certain cookies by deleting the cookies that have already been stored.

For more information about cookies, please visit the websites of the respective browser platforms:

Internet Explorer:

<https://support.microsoft.com/de-de/topic/l%C3%B6sungen-von-cookiedateien-in-internet-explorer-bca9446f-d873-78de-77ba-d42645fa52fc>

Mozilla Firefox:

<https://support.mozilla.org/de-DE/kb/delete-cookies-remove-info-websites-stored>

Google

Chrome: <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=de&sjid=8303931592311908957-EU>

Safari:

<https://support.apple.com/de-de/guide/safari/ibrw850f6c51/mac>

Opera:

<https://help.opera.com/de/latest/web-preferences/>

Bitte beachten Sie, dass die teilweise oder vollständige Deaktivierung von Cookies dazu führen kann, dass Sie nicht alle Funktionen unserer Website nutzen können.

#### 4. Technically Necessary Cookies

##### 4.1 Session Identifier

We use cookies on our website to identify your user session. This allows us to save your settings across the website and provide you with the desired user experience.

##### 4.2 Cookies for Logging Your Consent

This cookie is used to store user settings regarding cookies on our website. User settings that were configured during a previous visit are stored in this cookie.

###### 4.2.1 Cookie Banner by Usercentrics

#### **Data Processing:**

We use the consent management service Usercentrics from Usercentrics A/S (“Usercentrics”), Havnegade 39, 1058 Copenhagen, Denmark, for our cookie banner. This allows us to obtain and manage the consent of website users for data processing.

#### **Personal Data:**

The following data may be processed:

- Date and time of access
- Browser information
- Device information
- Geographical location

- Cookie preferences
- URL of the visited page

**Purpose:**

The processing of this data aims to legally obtain your consent or rejection of certain data protection settings.

**Processor:**

Usercentrics A/S, Havnegade 39, 1058 Copenhagen, Denmark

**Ensuring Data Protection:**

Processing by Usercentrics takes place in the EU or the EEA. We have concluded a data processing agreement with our processors.

**Data Protection Declaration of the Processor:**

<https://usercentrics.com/privacy-policy/>

**Legal Basis:**

The use of a cookie banner is based on our overriding private interest in accordance with Art. 31 para. 1 DSG or Art. 6 para. 1 sentence 1 lit. f GDPR.

**Necessity:**

The functionality of the website cannot be ensured without this processing.

**Retention Period:**

The data will be deleted no later than 3 years after collection.

#### 4.2.1 Cookie Banner by Usercentrics

This cookie is used to store user settings regarding cookies on our website. User settings that were configured during a previous visit are stored in this cookie.

#### 5. Technically Unnecessary, Optional Cookies

We collect your data using optional cookies only with your explicit consent, which you give us by accepting the cookies in the cookie settings displayed on our website. You can adjust your consent at any time through the cookie settings (link in the footer).

#### 5.1 Google Tag Manager

**Data Processing:**

We use Google Tag Manager (“GTM”) on our website. GTM is a tag management system that integrates tags uniformly through a user interface. Tags are short pieces of source code that track activities and can access other systems to centrally control when

certain systems are triggered. Google Analytics is integrated into GTM. Thus, GTM is merely an interface between the website and the analytics software. You can prevent the setting of tags in the browser settings at any time. Further information about these systems and their data processing can be found in the following chapters.

### **Personal Data:**

GTM ensures the activation of other tools that themselves collect personal data. Depending on the integrated tool, GTM collects:

- IP addresses of website visitors
- Transmission of IP addresses to analytics programs

### **Purpose:**

We process your personal data for marketing and analysis purposes. We analyze your user behavior, conduct conversion tracking, create statistics, and optimize our marketing channels and approaches.

### **Processor:**

Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

### **Ensuring Data Protection:**

Your personal data is generally processed by Google in Ireland. The transfer of European or Swiss personal data to Google results in this data being transferred to Google in the USA or to third parties in a country that does not have equivalent data protection. We have agreed with Google that a transfer to the USA will be based on the EU-US or Swiss-US Data Privacy Framework or, if the Data Privacy Framework is invalidated, based on standard contractual clauses and appropriate and proportionate technical and organizational measures. By giving your consent via the cookie banner, you also consent to your personal data being transferred to insecure third countries in accordance with Art. 17 DSG or Art. 49 para. 1 lit. a GDPR.

### **Data Protection Declaration of the Processor:**

<https://policies.google.com/privacy?hl=en>

### **Legal Basis:**

The use of GTM is based on our overriding private interest in accordance with Art. 31 para. 1 DSG or Art. 6 para. 1 sentence 1 lit. f GDPR. Once you have consented to this privacy policy, we also process your personal data with your explicit consent in accordance with Art. 31 para. 1 DSG or Art. 6 para. 1 sentence 1 lit. a GDPR.

### **Necessity:**

This processing activity is not necessary for the functionality of the website.



**Retention Period:**

Your data will be stored on the device for up to two years unless renewed.

**5.2. Google Analytics 4****Data Processing:**

We use Google Analytics 4, a web analytics service provided by Google Ireland Limited (“Google”), located at Gordon House, Barrow Street, Dublin 4, Ireland, on our website.

Cookies are used to create pseudonymous user profiles. The data is stored on the device, anonymized, and evaluated in the form of statistics.

**Personal Data:**

In connection with the web analytics service of Google Analytics 4, the following data is processed:

- Masked IP address of the requesting computer
- Date and time of access
- Website from which the access occurs (referrer URL)
- Browser type and version
- Number of visits/users
- Session statistics

Three permanent cookies from Google Analytics 4 (`_gat`, `_gid`, `_ga`) are used, which are automatically deleted after a defined period.

The collected IP addresses are anonymized by Google Analytics (so-called IP masking). Only in exceptional cases is the full IP address transmitted to a Google server in the USA and shortened there.

**Purpose:**

We use Google Analytics for error analysis and to continuously improve the offerings on our websites through statistical evaluation.

**Processor:**

Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

**Ensuring Data Protection:**

Your personal data is generally processed by Google in Ireland. The transfer of European or Swiss personal data to Google results in this data being transferred to Google in the USA or to third parties in a country that does not have equivalent data protection. We have agreed with Google that a transfer to the USA will be based on the EU-US or Swiss-

US Data Privacy Framework or, if the Data Privacy Framework is invalidated, based on standard contractual clauses and appropriate and proportionate technical and organizational measures. By giving your consent via the cookie banner, you also consent to your personal data being transferred to insecure third countries in accordance with Art. 17 DSG or Art. 49 para. 1 lit. a GDPR.

**Data Protection Declaration of the Processor:**

<https://policies.google.com/privacy?hl=en>

**Legal Basis:**

Data processing is based on your explicit consent in accordance with Art. 31 para. 1 DSG or Art. 6 para. 1 sentence 1 lit. a GDPR.

**Necessity:**

This processing activity is not necessary for the functionality of the website.

**Data Transfer to Third Countries:**

Your data is generally processed by Google in Ireland. Personal data may also be transferred to the US parent company Google LLC. Google LLC is a participant in the EU-US and Swiss-US Data Privacy Frameworks. Thus, your personal data can be transferred to Google LLC in the USA without requiring additional guarantees.

**Retention Period:**

Your data will be stored on the device for up to two years unless renewed.

5.3. HubSpot Plugin for Newsletter

**Data Processing:**

You have the option to sign up for a newsletter on our website. A registration window will appear on our website, through which you can sign up for our newsletter by providing your contact details. We use a plugin from HubSpot, Inc., 25 First Street, Cambridge, MA 02141, USA, for the registration window. HubSpot operates the email marketing system for us.

The registration window for the newsletter only appears if you have given your consent via the cookie banner.

Further information on the processing of your personal data when signing up for the newsletter can be found in Chapter G.

**Personal Data:**

With the plugin for the registration window, we process the following information:

- Masked IP address of the requesting computer

- Date and time of access
- Website from which the access occurs (referrer URL)
- Browser type and version
- Number of visits/users
- Session statistics

**Purpose:**

The aforementioned personal data is processed for the purpose of sending and analyzing the newsletter.

**Processor:**

HubSpot, Inc., 25 First Street, Cambridge, MA 02141, USA.

**Ensuring Data Protection:**

The transfer of European or Swiss personal data to HubSpot results in this data being transferred to HubSpot, Inc. in the USA or to third parties in a country that does not have equivalent data protection. We have agreed with HubSpot that a transfer to the USA will be based on the EU-US or Swiss-US Data Privacy Framework or, if the Data Privacy Framework is invalidated, based on standard contractual clauses and appropriate and proportionate technical and organizational measures. By giving your consent via the cookie banner, you also consent to your personal data being transferred to insecure third countries in accordance with Art. 17 DSGVO or Art. 49 para. 1 lit. a GDPR.

**Data Protection Declaration of the Processor:**

<https://legal.hubspot.com/privacy-policy>

**Legal Basis:**

Providing your data is voluntary. The processing of your personal data is based on your explicit consent in accordance with Art. 31 para. 1 DSGVO or Art. 6 para. 1 sentence 1 lit. a GDPR, which you give via the cookie banner.

**Necessity:**

This processing activity is not necessary for the functionality of the website.

**Retention Period:**

Your data will be stored on the device for up to 30 minutes, but no longer than until the browser is closed.

**D. Social Media****1. LinkedIn**

**Data Processing:**

To facilitate communication with us, we operate a social media profile on LinkedIn at <https://www.linkedin.com/company/figureit-swiss/> by LinkedIn Ireland Unlimited Company (“LinkedIn”), Wilton Plaza, Gardner House, Dublin 2, Ireland. You can contact us through this profile.

Additionally, we have placed a LinkedIn social media button on our website to easily link you to our profile. This is not a plugin but merely an icon with a link. LinkedIn does not process any personal data from you on our website in this context.

**Personal Data:**

If you contact us through our social media profile or click on a social media button, the following information may be collected from you:

- User behavior
- IP address
- Connection data
- Device and browser information
- Data about the accessed content when clicking on the social media button
- Username, first and last name
- Image, data you provide to us during contact

By clicking on the social media button, you will be redirected to the provider’s website. We have no influence over the processing of personal data on third-party websites.

**Purpose:**

If you contact us via LinkedIn, we process the data to respond to your inquiry. The social media buttons serve to structure our website.

**Processor:**

LinkedIn Ireland Unlimited Company (“LinkedIn”), Wilton Plaza, Gardner House, Dublin 2, Ireland.

**Ensuring Data Protection:**

The transfer of European or Swiss personal data to LinkedIn may result in this data being transferred to its US parent company LinkedIn Corp. in the USA or to third parties in a country that does not have equivalent data protection. We have agreed with LinkedIn that a transfer to the USA will be based on the EU-US or Swiss-US Data Privacy Framework or, if the Data Privacy Framework is invalidated, based on standard

contractual clauses and appropriate and proportionate technical and organizational measures.

**Data Protection Declaration of the Processor:**

<https://de.linkedin.com/legal/privacy-policy>

**Legal Basis:**

If you contact us through our social media profile, we process your data based on our overriding private interest in accordance with Art. 31 para. 1 DSG or Art. 6 para. 1 sentence 1 lit. f GDPR to provide a means of communication.

**Necessity:**

This processing activity is not necessary for the functionality of the website.

**Retention Period:**

Data processed in connection with your contact will be deleted upon your request, provided there is no retention obligation of 5 or 10 years for communication. By accepting this privacy policy, you explicitly consent to this retention period.

**E. Management of Our Data**

**Data Processing:**

To process customer orders and manage our data, we use the CRM system HubSpot.

For the execution and implementation of projects, we may share your necessary personal data with HubSpot. To obtain approval or similar, or to protect our and your interests and legal claims, we may forward your data to authorities and courts.

**Personal Data:**

To process your order, we handle the following data:

- First and last name
- Address
- Phone number
- Email address
- Order information

**Purpose:**

The processing of your data aims to handle and deliver your order as well as to enforce any legal claims.

**Processor:**

HubSpot, Inc., 25 First Street, Cambridge, MA 02141, USA.

**Ensuring Data Protection:**

The transfer of European or Swiss personal data to HubSpot results in this data being transferred to HubSpot, Inc. in the USA or to third parties in a country that does not have equivalent data protection. We have agreed with HubSpot that a transfer to the USA will be based on the EU-US or Swiss-US Data Privacy Framework or, if the Data Privacy Framework is invalidated, based on standard contractual clauses and appropriate and proportionate technical and organizational measures. By giving your consent via the cookie banner, you also consent to your personal data being transferred to insecure third countries in accordance with Art. 17 DSG or Art. 49 para. 1 lit. a GDPR.

**Data Protection Declaration of the Processor:**

<https://legal.hubspot.com/privacy-policy>

**Legal Basis:**

This data processing is based on contractual or pre-contractual measures in accordance with Art. 31 para. 2 lit. a DSG or Art. 6 para. 1 sentence 1 lit. b GDPR. Providing your data is voluntary.

**Necessity:**

Data processing is necessary for handling your order.

**Retention Period:**

For business documents, we are subject to a legal retention period of your data according to Art. 958 f. OR of 10 years.

F. Use of steel it

**Data Processing:**

“steel it” is an independent software solution we offer for calculating quotes for sheet metal parts and automatically creating operation plans, which you can use as a web application via a web browser. The executions take place on a central or distributed infrastructure. The application allows the upload of STEP files containing 3D geometry data of sheet metal parts or entire assemblies.

If you choose cloud hosting by us, the software solution will be hosted by Amazon Web Services EMEA SARL (“AWS”), 38 Avenue John F. Kennedy, L-1855, Luxembourg. AWS is responsible for patching and maintaining the underlying infrastructure, including physical servers, network components, the virtualization layer, and the operating system.

When using steel it, personalized user accounts are available to you as a customer. The extent to which employees enter data or access such data is at your discretion. If you

allow your employees to use personal data, you will independently ensure the appropriate organization of access management, password assignment, etc.

**Personal Data:**

When using “steel it,” the following data may be processed, depending on the usage and hosting solution:

- Salutation, first and last name
- Email address
- Phone number

**Purpose:**

The purpose of this processing is to use the “steel it” software solution, set up user accounts, and support the customer in case of support needs.

**Processor:**

In the context of using “steel it” or in the case of support, maintenance, and upkeep, we act as a processor.

In this case, we process personal data exclusively within the framework of the data processing agreement and according to the customer’s instructions.

For support services, it is possible that we schedule appointments with you via Google Meet, a video conferencing service from Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

In the case of cloud hosting by AWS, Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, L-1855, Luxembourg, processes your data as a processor according to the agreed data processing agreement.

**Ensuring Data Protection:**

Your personal data is generally processed in Switzerland or the EU in the case of cloud hosting by AWS or video conferences in support cases by Google. The transfer of European or Swiss personal data to AWS and Google may result in this data being transferred to their US parent companies Amazon Web Services Inc. and Google LLC in the USA or to third parties in a country that does not have equivalent data protection. We have agreed with AWS and Google that a transfer to the USA will be based on the EU-US or Swiss-US Data Privacy Framework or, if the Data Privacy Framework is invalidated, based on standard contractual clauses and appropriate and proportionate technical and organizational measures. By giving your consent via the cookie banner, you also consent to your personal data being transferred to insecure third countries in accordance with Art. 17 DSG or Art. 49 para. 1 lit. a GDPR.

**Data Protection Declaration of the Processor:**

- [AWS Privacy Policy](#)
- [Google Privacy Policy](#)

**Legal Basis:**

This data processing is based on contractual or pre-contractual measures in accordance with Art. 31 para. 2 lit. a DSG or Art. 6 para. 1 sentence 1 lit. b GDPR.

**Necessity:**

This processing activity is necessary for the use of the “steel it” software solution.

**Retention Period:**

We retain the data for processing your order for at least the duration of the contract. Legally, we are required to keep business documents and booking receipts for 10 years. Longer retention for asserting our rights is reserved.

**G. Newsletter****Data Processing:**

You have the option to sign up for a newsletter on our website. The newsletter registration is only finalized with a double opt-in: After you sign up on our website, you will receive an email in which you must click the confirmation to receive the newsletter. If you do not wish to do this, simply ignore the confirmation email.

If you wish to unsubscribe from the newsletter at a later time, you can either click the unsubscribe link included in every email newsletter or contact us via email at [info@figureit.digital](mailto:info@figureit.digital) or by mail.

Your personal data will be forwarded to the service provider HubSpot, Inc., 25 First Street, Cambridge, MA 02141, USA, for the purpose of conducting the newsletter. HubSpot operates the email marketing system for us.

**Personal Data:**

For the registration and sending of the newsletter, we collect the following information:

- First and last name
- Email address

**Purpose:**

The aforementioned personal data is processed for the purpose of sending and analyzing the newsletter.

**Processor:**

HubSpot, Inc., 25 First Street, Cambridge, MA 02141, USA.



### **Ensuring Data Protection:**

The transfer of European or Swiss personal data to HubSpot results in this data being transferred to HubSpot, Inc. in the USA or to third parties in a country that does not have equivalent data protection. We have agreed with HubSpot that a transfer to the USA will be based on the EU-US or Swiss-US Data Privacy Framework or, if the Data Privacy Framework is invalidated, based on standard contractual clauses and appropriate and proportionate technical and organizational measures. By giving your consent via the cookie banner, you also consent to your personal data being transferred to insecure third countries in accordance with Art. 17 DSG or Art. 49 para. 1 lit. a GDPR.

### **Data Protection Declaration of the Processor:**

<https://legal.hubspot.com/privacy-policy>

### **Legal Basis:**

Providing your data is voluntary. The processing of your personal data is based on your explicit consent in accordance with Art. 31 para. 1 DSG or Art. 6 para. 1 sentence 1 lit. a GDPR, which you give through the double opt-in. Additionally, we collect your user data based on our overriding private interest in accordance with Art. 31 para. 1 DSG or Art. 6 para. 1 sentence 1 lit. f GDPR.

### **Necessity:**

This processing activity is necessary for the use of the “steel it” software solution.

### **Retention Period:**

The data stored for the purpose of the newsletter subscription will be retained by us until you unsubscribe from the newsletter. After unsubscribing, your data will be deleted from our servers as well as from HubSpot’s servers, unless the data is required for other legitimate processing activities.

## H. Conducting Competitions

### **Data Processing:**

We occasionally hold competitions on our website and at trade fairs. Details can be found in the applicable terms and conditions. To participate in the competitions, you can enter your data in a participation field on our website or on the participation form. The entered data is processed to conduct the competition and determine the winners. The public announcement of the winner will only be made with your explicit consent. The provided data may also be used to make you an offer or send our newsletter.

### **Personal Data:**

The following personal data is collected:

- Salutation

- First and last name
- Email address
- Street and house number
- Postal code
- City
- Information about the employer

**Purpose:**

The purpose of processing is to conduct the competition and determine a winner, as well as to send the newsletter to competition participants. Address data is collected if it is a physical prize that needs to be sent to the winner by mail.

**Processor:**

To conduct and manage the competitions, we use HubSpot, Inc., 25 First Street, Cambridge, MA 02141, USA.

**Ensuring Data Protection:**

The transfer of European or Swiss personal data to HubSpot results in this data being transferred to HubSpot, Inc. in the USA or to third parties in a country that does not have equivalent data protection. We have agreed with HubSpot that a transfer to the USA will be based on the EU-US or Swiss-US Data Privacy Framework or, if the Data Privacy Framework is invalidated, based on standard contractual clauses and appropriate and proportionate technical and organizational measures. By giving your consent via the cookie banner, you also consent to your personal data being transferred to insecure third countries in accordance with Art. 17 DSG or Art. 49 para. 1 lit. a GDPR.

**Data Protection Declaration of the Processor:**

<https://legal.hubspot.com/privacy-policy>

**Legal Basis:**

The processing of your personal data is based on your explicit consent in accordance with Art. 31 para. 1 DSG or Art. 6 para. 1 sentence 1 lit. f GDPR.

**Necessity:**

This processing activity is not necessary for the functionality of the website.

**Retention Period:**

The data stored for the purpose of the competition will be retained in accordance with the relevant legal provisions and as long as necessary to fulfill the aforementioned purposes.

## I. Widgets and Fonts

### 1. Google Fonts static solution

#### **Data Processing:**

Our website uses a font from Google Fonts, a font service provided by Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

#### **Personal Data:**

The font is loaded from our own storage space and is thus locally integrated into our website. No connection to Google servers is established. Consequently, your data is not processed by us or by Google through the integration of Google Fonts.

### III. Disclosure of Data to Third Parties

Your personal data will not be transferred to third parties for purposes other than those listed and to other contractors except those listed and their subcontractors.

### IV. Cross-Border Disclosure to Third Countries Without Adequate Protection Level

There is no disclosure to third countries without an adequate level of data protection or only subject to appropriate safeguards, such as the contractual obligation to maintain an adequate level of data protection (so-called standard contractual clauses). Personal data will only be transferred to third countries if the data protection requirements of Art. 9 and 16 DSG or Art. 44 ff. GDPR are met.

A third country is a country outside Switzerland or the European Economic Area (EEA) where Swiss data protection law or the European GDPR does not directly apply. A third country is considered unsafe if, according to the Federal Council or the EU Commission, the country does not have an adequate level of data protection.

There is a Data Privacy Framework between the EU and the USA. This framework ensures a GDPR-compliant transfer to the USA and corresponding compliant data processing, where all rights under EU law of the affected person can be preserved. Whether the specific data processor in the USA participates in this framework can be checked on the website: [www.dataprivacyframework.gov/s/](http://www.dataprivacyframework.gov/s/). Additionally, you can find further information on the processing of user data in the specific privacy policies of the data processors.

We inform you in this privacy policy when and how we transfer personal data to the USA or other unsafe third countries.

## V. Data Security

We take appropriate technical and organizational measures to ensure that your personal data cannot be viewed or stolen by unauthorized third parties. In particular, through appropriate technical (e.g., firewall, password protection, SSL encryption, etc.) and

organizational (e.g., restriction of authorized persons, training of authorized persons, etc.) measures, we ensure that only authorized persons have access to this data. Our data processing and security measures are continuously improved in line with technological developments.

We use SSL encryption for security reasons and to protect the transmission of confidential content, such as the inquiries you send to us as the website operator. You can recognize an encrypted connection by the fact that the address line of the browser changes from “http://” to “https://” and by the lock symbol in your browser line. When SSL encryption is activated, the data you transmit to us cannot be read by third parties

## VI. Your Rights

As an affected person, you can assert various claims against us in accordance with the applicable national and international law. To fulfill these claims, we may need to process your personal data again.

Depending on the applicable law, affected persons can assert the following rights:

### **Right to Information:**

Request information about your personal data processed by us. In particular, information according to Art. 25 ff. DSG or Art. 15 GDPR may include:

- The purposes of processing
- The category of personal data
- The categories of recipients to whom your data has been or will be disclosed
- The planned storage duration
- The existence of a right to correction, deletion, restriction of processing, or objection
- The existence of a right to complain
- The origin of your data, if it was not collected by us
- The existence of automated decision-making, including profiling, and, if applicable, meaningful information about its details

### **Right to Correction:**

Request the immediate correction of incorrect or completion of your personal data stored by us (Art. 6 para. 5 DSG or Art. 16 GDPR).

### **Right to Restriction of Processing:**

Request the restriction of processing your personal data, provided the accuracy of the data is disputed by you, the processing is unlawful, but you refuse its deletion, and we

no longer need the data, but you need it to assert, exercise, or defend legal claims, or you have objected to the processing according to Art. 21 GDPR (Art. 32 DSG or Art. 18 GDPR);

**Right to Data Portability:**

Receive your personal data that you have provided to us in a structured, commonly used, and machine-readable format or request the transfer to another responsible party (Art. 28 DSG or Art. 20 GDPR);

**Right to Deletion:**

Request the deletion of your personal data stored by us, provided the processing is not necessary for the exercise of the right to freedom of expression and information, to fulfill a legal obligation, for reasons of public interest, or to assert, exercise, or defend legal claims (Art. 32 DSG in conjunction with Art. 28 ZGB or Art. 17 GDPR);

**Right to Withdraw Consent:**

Withdraw your consent at any time. This means that we can no longer continue the data processing based on this consent for the future (Art. 30 para. 2 lit. b DSG or Art. 7 para. 3 GDPR);

**Right to Object:**

Object to the processing of your personal data if it is based on legitimate interests according to Art. 6 para. 1 sentence 1 lit. f GDPR (Art. 21 GDPR) and if there are reasons arising from your particular situation or if the objection is directed against direct advertising. In the latter case, you have a general right to object, which we will implement without specifying a particular situation;

**Right to Complain to a Supervisory Authority:**

Complain to a supervisory authority (see above) (Art. 49 DSG or 77 GDPR).

VII. Current Status and Changes to This Privacy Policy

We reserve the right to change this privacy policy at any time or to adapt it to new processing methods. The current privacy policy can be accessed at any time [here](#). Older versions of the privacy policy are available [here](#).