

Data Privacy Statement

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1. What is this Data Privacy Statement about?

In this Data Privacy Statement, we explain how we process personal data, in particular in the context of our business activities and in connection with our website, insofar as processing is not evident and the applicable data protection law requires information. This Data Privacy Statement serves as information and is not part of a contract with you, even if a contract refers to this Data Privacy Statement.

Further information on how we process personal data can be found in other documents, such as the General Terms and Conditions, in additional data protection information provided separately and in separate consent forms. If you would like further information about our data processing, please contact us (section 2).

“Personal data” means any information that can be associated with a particular person, and “processing” means any handling of it, e.g. procurement, use and disclosure.

2. Who is responsible for processing your data?

For data processing pursuant to this Data Privacy Statement, the following company is the “controller”, i.e. the body responsible under data protection law (also “we”):

Tellco Vested Benefits Foundation

Bahnhofstrasse 4
6431 Schwyz, Switzerland

If you have any questions about data protection, please feel free to contact our data controller by post or as follows:

dataprotection@tellco.ch or +41 (0)58 442 12 91

3. How do we process data in connection with our products and services?

If you use our products and services (collectively “services”), we process data for the preparation of the contract and for the performance of the corresponding contract. Our services are aimed at persons resident and habitually residing in Switzerland:

- If we conclude a contract with you (or are in contact with you in this regard), we will process the data prior to the conclusion of the contract. If the contract is concluded, we process information about it ourselves (e.g. conclusion date and subject matter of the contract). During and after the term of the contract, we process details about the contract or the provision of services, access data and login data for services available online, payments, contact with customer service, receivables, complaints, termination of the contract and any disputes in connection with the contract, if applicable, and corresponding procedures.
- Before we enter into a contract, we may also check the creditworthiness of our contractual partner, i.e. the likelihood of a payment default, especially if we make advance payments or if we check whether we will offer a particular payment option. For this purpose, we obtain address and credit rating information from CRIF AG (Zurich, Switzerland), a credit reporting agency. CRIF operates its own database. We only use these data for address verification and credit checks. They are then deleted (with the exception of a current address). Insofar as it makes sense for the conclusion of the contract, we may also refer to public registers (e.g. the commercial register) or the Internet.

- If we are in contact with you pursuant to a contract, we will process the data that you specifically transmit to us. This includes, in particular, information on your financial circumstances and your risk capacity and risk appetite. Within the scope of our statutory obligations and internal guidelines, we also conduct sanction and comparable checks of our clients, their management bodies and beneficial owners, and obtain data from the relevant databases, including identification data such as the date of birth of registered persons, information on economic and political connections and information on sanctions. This may also include particularly sensitive personal data.
- When you register and log in to a website from us, we process the information and details of your actions recorded during registration, while you are logged in or even before or after a login, if we can assign the data collected to you (see also section 6).
- If you transmit data to us in other ways, including when you participate in a competition or prize draw, we process the data transmitted, e.g. for notifying or publishing the winners.
- We also process this data for statistical evaluations that support the improvement and development of products and business strategies. We may also use your personal data for marketing purposes. Please refer to section 4 for further information.

In the case of contractual partners that are companies, we process fewer personal data because data protection law only collects data on natural persons (i.e. people). However, we process data from the persons who are our points of contact, e.g. names, contact details, professional details and information from the fields of communication, and information about executives etc. as part of the general information about companies with which we cooperate.

It may be that you provide us with data that also relates to other persons (e.g. authorised representatives, relatives and beneficial owners). We assume that this data is correct and you are entitled to make it available to us. We kindly ask that these persons be informed about our data processing activities (e.g. by reference to this Data Privacy Statement).

4. How do we process data in connection with advertising?

We also process personal data in order to promote our services and those of third parties:

- **Newsletters:** we send electronic information and newsletters that also include advertising for our offers, but also for offers from other companies we work with. We ask for your consent in advance, unless we promote certain offers to existing clients. In addition to your name and e-mail address, we also process information about which services you have used, whether you open our newsletters and which links you click on. Our e-mail mailing service provider uses a common technique which relies on an invisible image file, thus allowing us to measure and optimise the success of our newsletters. You can prevent this procedure by adjusting your e-mail client settings accordingly.
- **Online advertising:** please refer to the explanations in section 6.
- **Events:** we may host events. If you participate, we will process the login data for organising and running the event and, if necessary, to contact you afterwards. We can also make recordings at the event, which we share on social networks, for example. In this case, we will inform you separately.
- **Advertising calls:** we may also call our clients and potential clients in individual cases and process the relevant data about our contacts and any related persons at the company called.
- **Market research:** we also process data to improve services and develop new products, such as your response to newsletters or statements from customer questionnaires or surveys or from social media, media monitoring services and public sources.

5. How do we disclose data?

In the course of our activities, we may disclose personal data to various places. This includes, in particular, the following recipients:

- We are part of the Tellco Group. We therefore obtain certain services from the Group, e.g. accounting and IT services. However, the Group companies also support each other in other matters and may also exchange personal data for this purpose. We assume that such disclosures do not conflict with any confidentiality interests unless you inform us otherwise. We often work with group companies as a shared responsibility under data protection law. For your data subjects rights, please feel free to contact us (in this case, we will coordinate with other group companies), or also go directly to them.

- Persons associated with you, e.g. authorised representatives, guarantors, deputies and relatives, as well as contact persons of companies and the company itself;
- Intermediaries, if we work with brokers for our services and forward this information about you so that intermediaries can approach you directly;
- Economic information agencies and providers of sanctions and other databases to whom we may disclose the required information about you in the context of a request for information;
- Offices, authorities and courts in the context of our legal obligations and in connection with proceedings in which we are involved directly or as third parties;
- Third parties, for example in connection with the purchase or sale of assets by us;
- Service providers, especially providers of IT services (examples are providers of hosting or data analysis services), administration and advisory services, and also services provided by banks, the post office, etc. For service providers on our website, please refer to information in section 6. These service providers may also process personal data to the extent required.

Data recipients are not only located in Switzerland. This applies in particular to certain service providers (especially IT service providers). These and its subcontractors have locations within the EU and/or the EEA, but also in other countries, potentially worldwide. We may also transfer data to authorities and other persons abroad if we are legally obliged to do so or – e.g. in the context of a company sale or legal proceedings (see also section 7). Not all of these countries have adequate data protection. We compensate for the lower level of protection through the use of corresponding contracts, in particular the standard contractual clauses of the European Commission, which can be accessed [here](#). In certain cases, we may also transfer data in accordance with data protection regulations without such contracts, e.g. if you have consented to the corresponding disclosure or if the disclosure is necessary for the performance of the contract, for the establishment, exercise or enforcement of legal claims or for overriding public interests (e.g. in connection with the exercise of shareholder rights).

6. How do we process data in connection with our website?

6.1. What data is involved in using our website?

The explanations in section 6 refer primarily to our website. In the case of an app which we make available, similar processing takes place. Section 6 therefore also applies to our app, although there are certain differences in the detail.

For technical reasons, certain data are collected when using our website, which are temporarily stored in log files (log data), in particular the IP address of the end device, information about the Internet service provider and the operating system of your device, information on the referring URL, information on the browser used, date and time of access, and content accessed when you visit the website.

Our website also uses cookies, i.e. files that your browser automatically stores on your end device. This allows us to distinguish individual visitors, but usually without identifying them. Cookies may also contain information about the pages visited and the duration of the visit. Certain cookies (session cookies) are deleted when the browser is closed. Other (permanent cookies) will remain stored for a certain period of time so that we can recognise visitors on a later visit. We may also use other technologies, for example to store data in the browser, but also for recognition, such as pixel tags or fingerprints. Pixel tags are invisible images or a program code that are loaded by a server and allow certain evaluations. Fingerprints are information about the configuration of your terminal device, which differentiates your terminal device from other devices.

Log data and data we collect through cookies and similar technologies are used to enable our website to be used, and to ensure system security and stability. We also use this data to optimise our website and for statistical purposes. Cookies and other technologies may also originate from third-party companies that provide us with certain functions. You can find further information on this below.

You can configure your browser in the settings to block certain cookies or similar technologies, or delete cookies and other stored data. You can find more information on this in the help pages of your browser (usually under the keyword "Data privacy").

6.2. How do our service providers process data for our website?

Cookies and similar third-party technologies enable them to create analyses and evaluations for us so that we can track the use of our website and optimise our online offer. In addition, these third parties may target you with custom advertising on websites and social networks that these third parties or their partners operate, and measure how effective the advertising is (e.g. whether you came to our website via an advert and what actions you then carry out on our website). The relevant third parties may record the use of the website for this purpose and link their records to further information from other websites. In this way, they can record user behaviour across multiple websites and end devices in order to provide us with statistical evaluations on this basis. Providers may also use this information for their own purposes, e.g. for personalised advertising on their own website or other websites. If a user is registered with the provider, the user can assign the usage data to the person concerned.

Examples of our service providers are HubSpot and Google. You can find further details here below. We may also use other third parties that typically use similar ways to process personal and other data.

We use the services of HubSpot Germany GmbH (Berlin, Germany), among other things for personalised communication with you. You can find more information about HubSpot's data processing [here](#).

Google Analytics is used on our website, an analytics service provided by Google LLC (Mountain View, USA) and Google Ireland Ltd. (Dublin, Ireland). Google collects certain information about the behaviour of users on the website and the end device used. The IP addresses of visitors in Europe are truncated before being forwarded to the USA. Google provides us with evaluations based on the recorded data, but also processes certain data for its own purposes. Information on data protection from Google Analytics can be found [here](#), and if you have a Google account yourself, you can find further information [here](#).

6.3. How do we process data via social media?

We maintain our own presence on social networks and other platforms (e.g. LinkedIn). If you communicate with us or comment or share content there, we collect information that we use primarily for communicating with you, for marketing purposes and for statistical evaluations (see also sections 4 and 7). Please note that the provider of the platform also collects and uses data (e.g. user behaviour) themselves, together with other data known to it (e.g. for marketing purposes or for the personalisation of the platform content).

7. Is there any further processing?

Yes, because a large number of processes are not possible without personal data being processed; this includes normal and even unavoidable internal processes. It is not always possible to precisely determine this in advance, nor is it possible to determine the amount of data being processed either; however, please find information on typical (although not necessarily common) cases below:

- **Communication:** If we are in contact with you (e.g. when you call customer service or send us an e-mail), we process information about the content of the communication. This includes the type, time and place of communication. For the purposes of identification, we can also process information on your proof of identity. Where legally necessary, telephone conversations with us may be recorded and monitored;
- **Compliance with legal requirements:** we may also disclose data to authorities within the scope of legal obligations or powers and to comply with internal regulations.
- **Job applications:** if you are applying for a position with us, we will process the data we receive from you in the course of the application process and, if applicable, other data from public sources such as professional social media. We use this data in the context of your application and may also use it for non-personal statistical purposes. We will delete the data from unsuccessful applications after three months unless you agree to us keeping your details on file for future application procedures with us, and subject to your name and application date.
- **Prevention:** we process data in order to prevent criminal data and other violations, for example in the context of fraud prevention or internal investigations.
- **Legal proceedings:** insofar as we are involved in legal proceedings (e.g. court or administrative proceedings), we process data, e.g. about parties to the proceedings and other persons involved, such as witnesses or persons involved, and provide data to such parties, courts and authorities, possibly also abroad.
- **IT security:** we also process data for monitoring, controlling, analysing, backing up and verifying our IT infrastructure, as well as for backups and data archiving.
- **Competition:** we process data about our competitors and the market environment in general (e.g. the political situation, the association landscape, etc.). In doing so, we may also process data about key persons,

especially names, contact details, roles or functions and public statements.

- **Transactions:** If we sell or acquire receivables, other values, parts of operations or companies, we process data to the extent necessary for the preparation and execution of such transactions, e.g. details about clients or their contact persons or employees, and provide corresponding data to buyers and sellers.
- **Additional purposes:** We process data to the extent necessary for additional purposes such as education and training, administration (e.g. contract management, accounting, enforcement and defence of claims, evaluation and improvement of internal processes, creation of anonymous statistics and evaluations; acquisition or sale of receivables, business, parts of operations or companies and protection of other legitimate [interests](#)).

8. How long do we process personal data for?

We process your personal data for as long as is required for the purpose of processing (usually in the case of contracts for the duration of the contractual relationship), as long as we have a legitimate interest in storing the data (e.g. to enforce legal claims, archive and ensure IT security) and for as long as data are subject to a statutory retention obligation (e.g. a ten-year retention period applies for certain data). We delete or anonymise your personal data once these periods have expired.

9. What are your rights?

Under the conditions and within the scope of applicable data protection law, you have certain rights to request a copy of your personal data or to influence our processing of this data:

- **Information:** you may request information as to whether we process personal data about you, and, if so, further information about our data processing.
- **Rectification:** you can rectify incorrect personal data and complete incomplete data
- **Erasure and objection:** you may have personal data erased and object to the processing of your data with effect for the future, in particular in the context of direct marketing.

- **Transfer:** you may receive the personal data you have provided to us in a structured, commonly used and machine-readable format, insofar as the corresponding data processing is based on your consent or is necessary for the performance of the contract.
- **Withdrawal of consent:** if we process data based on your consent, you can withdraw your consent at any time. Withdrawal of consent only applies to the future and we reserve the right to continue processing data if the withdrawal of consent is based on some other basis.

If you would like to exercise this right, please do not hesitate to contact us (section 2). As a rule, we have to verify your identity (e.g. based on a copy of your identification document).

You are also free to lodge a complaint with the competent supervisory authority against our processing of your data in Switzerland, with the Federal Data Protection and Information Commissioner (FDPIC).

10. Can this Data Privacy Statement be amended?

This Data Privacy Statement is not part of a contract with you. We reserve the right to adjust this Data Privacy Statement at any time. The version published on this website (as amended) is the current version.