

# **Privacy Policy**

# 1. Preliminary Remarks

Our company, Weber Hartmann Vrijhof & Partners AG, Schaffhauserstrasse 418, 8050 Zurich (hereinafter "WHVP") is fully committed to protect the personal information of our clients, users, partners and others, where applicable. We address highest importance to comply with and apply all laws, rules and regulations and specifically also data protection.

The way WHVP deals with personal data collected from users visiting the website <a href="www.whvp.com">www.whvp.com</a> is outlined below.

Personal data is defined as information which is eligible to personal identification. Swiss Federal Act on Data Protection 2023 (Data Protection Act, FADP) establishes the legal basis for this policy. You can find the applicable law at: <a href="https://www.fedlex.admin.ch/eli/cc/2022/491/en">https://www.fedlex.admin.ch/eli/cc/2022/491/en</a>.

To enhance the readability of the content that follows, references to one gender encompass the other as well.

## 2. Access to the Website of WHVP

By accessing the website <u>www.whvp.com</u>, the user gives his consent and agrees to the usage of his personal data in the ways defined in this policy.

WHVP reviews regularly its privacy policy. The user is responsible to access the website to take note of the latest version.

# 3. The following Data is being collected

When visiting our website, technical data is automatically collected and transmitted to us. This data may be used to identify the user and analyze her behavior. The collected data may include the following:

- Browser type and version
- Operating system
- Pageviews
- File(s) you have accessed
- URL address of the referring website
- Date and time of the server request
- Host name of the accessing computer (IP address)

In addition, we collect personal data that is voluntarily provided to us by the user. This occurs in particular when the client contacts WHVP by telephone, e-mail or via the contact form. In some cases, this personal data is supplemented by information from publicly available sources, e.g., social media, employer websites, etc.

## 4. The use of collected Data

Personal data is collected in part to ensure the smooth use of the website. In addition, the information collected allows us to analyze how our electronic services are used and to optimize the website according to users' preferences.

If you have provided us with your contact information (including, without limitation, your email address), we may use it to send you our publications, marketing materials or similar communications.



If you no longer wish to receive these communications, you may let us know at any time by simply contacting us in a manner that is convenient to you.

## 5. How we protect your Data

WHVP and all its agents take the necessary technical and organizational measures to store the collected personal data securely and to protect it from loss and unauthorized access. However, complete data security cannot be guaranteed, as data transmission via the Internet depends on external factors over which WHVP has no influence.

# 6. Duration and Recipients of Personal Data Storage

The personal data gathered is retained by WHVP in accordance with legal grounds for storage, typically based on your consent. Once the need for storage ceases, the data will be deleted.

In general, WHVP refrains from disclosing personal data to external parties. However, certain service providers may have access to personal information, particularly for the upkeep of our IT systems. Additionally, we will furnish information to regulatory bodies or other authorities if mandated by legal obligations.

## 7. Your Rights

The applicable law and regulation grant the following rights in particular:

You, as the data subject shall receive the information required to be able to exercise your rights under the Data Protection Act (FADP) and to guarantee transparent data processing. In every case, you are entitled to the following information:

- a) the identity and the contact details of the controller;
- b) the processed personal data as such;
- c) the purpose of processing;
- d) the retention period for the personal data or, if this is not possible, the criteria for determining this period;
- e) the available information about the source of the personal data, if it has not been collected from the data subject;
- f) if applicable, whether an automated individual decision has been taken and the logic behind the decision;
- g) if applicable, the recipients or the categories of recipients to which personal data is disclosed, as well as the information specified in Article 19 paragraph 4 FADP.

## Article 19 paragraph 4 FADP:

If the personal data are disclosed abroad, the controller shall also inform the data subject of the State or the international body to which such data are disclosed [...].

Furthermore, you are entitled as follows:

- a) The right to demand that incorrect information is rectified.
- b) The right to demand that data is deleted if WHVP is not permitted or legally required to retain the data.
- c) The right to demand restriction of the data processing; WHVP can retain just enough information about you to ensure that the restriction is respected in the future.
- d) The right to data portability, meaning you can ask WHVP to provide you with your personal data in a structured, commonly used, machine readable form.



e) The right to object: you can object to your personal data being used for profiling, direct marketing or research purposes.

# 8. SSL Encryption

To guarantee the safety of your data while it's being transmitted, we employ the latest encryption methods such as HTTPS, including technologies like SSL.

#### 9. Cookies

Certain pages on our website utilize cookies, aimed at enhancing user-friendliness, effectiveness, and security. Cookies consist of small text files stored on your device by your browser. Most of these are 'session cookies,' automatically deleted after your visit, while others persist until manually removed. These cookies enable us to recognize your browser for subsequent visits. Browser settings can be adjusted to notify you about cookie placement, permitting their use on a case-by-case basis or rejecting them selectively or entirely. Additionally, automatic cookie deletion upon browser closure can be activated. Disabling cookies might limit the website's full functionality. More information regarding cookies can be found here: http://www.allaboutcookies.org.

# 10. Google Analytics

This website employs Google Analytics, a web analysis service provided by Google (Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA). Google Analytics utilizes cookies for this purpose, forming the foundation for analyzing your interactions with <a href="https://www.whvp.ch">www.whvp.ch</a>.

The data created by these cookies regarding your website usage will be sent to a Google server in the United States and stored there. Google will employ this data to assess your website visit, generate activity reports for our site, and offer additional services connected with website and internet usage. Google might also share this data with third parties, if required by law or when data processing is carried out by a third party on behalf of Google. Your IP address will never be merged with other data in Google's possession.

To avoid the installation of the Google Analytics cookie, you can adjust your browser software settings accordingly. However, please note that doing so might restrict your ability to use all the functions of our website to their full extent. You can also prevent data collection and storage for Google Analytics future in the by using Google's opt-out browser plug-in (https://tools.google.com/dlpage/gaoptout?hl=en). Keep in mind that if you regularly delete cookies from your browser or access our website using a different browser, you'll need to opt out each time. details about For Google Analytics, visit: https://marketingplatform.google.com/intl/en\_us/about/.

## 11. Facebook Share

Our website employs the Share feature provided by the social network Facebook. This service is offered by Facebook Inc., located at 1 Hacker Way, Menlo Park, CA 94025, USA. Clicking on the Facebook Share button or plug-in will lead you to your Facebook user account, provided you are logged in. This redirection occurs in a separate browser window, enabling you to share the digital content hosted on our website. You can also add a comment to the shared content if desired. The plug-in used in this process establishes a direct link between your browser and Facebook's server.

As a result, Facebook gains knowledge that you, identified by your IP address, have visited our website if you're logged in during the process. Subsequently, Facebook could associate your visit to our site with both you and your user account. We want to clarify that we lack information about the specific



content (which may include personal data) transmitted in this interaction, as well as how Facebook utilizes this data.

For more information on this matter, refer to Facebook's privacy statement at: <a href="http://de-de.facebook.com/policy.php">http://de-de.facebook.com/policy.php</a>.

Our website uses the Share function of the social network Facebook. The provider of the service is Facebook Inc., 1 Hacker Way, Menlo Park, CA 94025, USA. When you click on the Facebook Share button or plug-in, you will be redirected to your Facebook user account – provided you are logged in – in a separate browser window, and can then share the electronic publication stored on our website, adding a comment if you wish. The plug-in that is used for this sets up a direct connection between your browser and the Facebook server. Facebook thus acquires the information that you, with your IP address, have visited our website. Furthermore, it is then possible for Facebook to connect your visit to our website with you and your user account. We beg to inform you that we have no knowledge of the content of the data (possibly personal data) transmitted in this connection, or of how they are used by Facebook. Further information on this may be found in Facebook's privacy statement at: <a href="http://de-de.facebook.com/policy.php">http://de-de.facebook.com/policy.php</a>.

#### 12. LinkedIn Share

Our website employs the Share feature provided by the social network LinkedIn. This service is offered by LinkedIn Corporation, located at 2029 Stierlin Court, Mountain View, CA 94043, USA. Clicking the LinkedIn Share button or plug-in redirects you to your LinkedIn user account if you're logged in. This redirection occurs in a separate browser window, enabling you to share the digital content hosted on our website. You can also include a comment with the shared content if you so choose. The plug-in utilized for this process establishes a direct connection between your browser and LinkedIn's server.

As a result, LinkedIn gains information that you, identified by your IP address, have visited our website, assuming you're logged in during this process. Subsequently, LinkedIn could associate your visit to our site with both you and your user account. We want to emphasize that we lack knowledge about the specific content (which might involve personal data) transmitted during this interaction, as well as how LinkedIn employs this data.

For more comprehensive details regarding this matter, consult LinkedIn's privacy statement at: <a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a>.

## 13. X Crop. Share (Twitter)

Our website utilizes the Share feature provided by the social network X (also known as Twitter). This service is offered by X Corp., with its address at Suite 900, 1355 Market Street, San Francisco, CA 94103, USA. Clicking the X Share button or plug-in will redirect you to your X user account if you're logged in. This redirection takes place in a separate browser window, enabling you to share the digital content hosted on our website. If desired, you can also append a comment to the shared content. The plug-in responsible for this action establishes a direct link between your browser and X Corp.'s server.

Consequently, X Corp. gains awareness that you, identified by your IP address, have visited our website, assuming you're logged in during the process. Following this, X Corp. might link your visit to our site with both you and your user account. We wish to clarify that we possess no knowledge about the specific content (which may include personal data) transmitted during this interaction, nor do we understand how X Corp. utilizes this data.

For additional information regarding this matter, consult X Corp.'s privacy statement at: <a href="https://help.twitter.com/en/rules-and-policies/update-privacy-policy">https://help.twitter.com/en/rules-and-policies/update-privacy-policy</a>.



# 14. Responsible Authorities

If you believe that WHVP is in breach of data protection laws and regulations, you have the option to report the questionable conduct to the Federal Data Protection and Information Commissioner and/or the relevant authority in Switzerland. You can reach out to the Swiss regulatory body through the following

https://www.edoeb.admin.ch/edoeb/en/home/deredoeb/kontakt/kontaktformular dritte.html.

#### 15. Contact Information

For any questions or remarks regarding data protection, please contact

WHVP AG Schaffhauserstrasse 418 CH-8050 Zurich Switzerland

Email: info@whvp.ch

Phone: +41 44 315 77 77