

Privacy Policy WECONNEX AG

Version of May 24, 2018

In this data protection declaration, we, WECONNEX AG (henceforth 'us' or 'ourselves'), explain how we collect and process personal data. Personal data are all details that refer to a specific or identifiable person.

If you provide us with personal data of other persons (e.g. data of work colleagues), please ensure that these persons are familiar with this data protection declaration and only provide us with their personal data if you are permitted to do so and if these personal data are correct.

1. Responsible person / data protection officer / representative

Responsible for the data processing, which we describe here, is WECONNEX AG, Bohl 2, 9000 St. Gallen, unless otherwise stated in individual cases. If you have any legal concerns, you can inform us at the following contact address: WECONNEX AG, Mr. Lars Willi, Bohl 2, 9000 St. Gallen.

2. Collection and processing of personal data

We primarily process the personal data that we receive from our customers and other business partners within the scope of our business relationship with them and other persons/parties involved or the data we collect from the users operating our websites and other applications.

As far as this is permitted, we also take certain data from publicly accessible sources (e.g. operating registers, land registers, commercial registers, press, Internet). In addition to the data you provide us directly, the categories of personal data that we receive about you from third parties, in particular information from public registers, information that we receive in connection with official and legal proceedings, information in connection with their professional functions and activities, information about you in correspondence and discussions with third parties, information about you given to us by persons from your environment (family, consultant, legal representative, etc.) so that we can conclude or process contracts with you or with your involvement (e.g. References, your address for deliveries, authorizations, information on compliance with legal requirements such as the fight against money laundering and export restrictions, information on your person from the media and the Internet (if this is appropriate in a specific case, e.g. in the context of an application, press review, marketing/sales, etc.), your addresses, data in connection with the use of the websites (e.g. IP address, information about your device and settings, cookies, date and time of your visit, pages and contents accessed, functions used, referring website, location details)).

3. Purpose of data processing and legal bases

We use the personal data primarily to conclude and process our contracts with our business partners, in particular within the scope of NEXUS Projects and consulting services and the

purchase of products and services from suppliers as well as to comply with our legal obligations at home and abroad. If you work for such a customer or business partner, you can also be affected in this function with your personal data.

In addition, to the extent permitted and deemed appropriate, we process personal data for the following purposes in which we (and sometimes third parties) have a justified interest corresponding to the purpose:

- Offer and further development of our projects, services and websites and other platforms on which we are present;
- Communication with third parties and processing of their inquiries (e.g. applications, requests for services);
- Review and optimization of procedures for needs analysis for direct customer approach and collection of personal data from publicly available sources for customer acquisition;
- Communication and marketing, as far as you have not contradicted the use of your data (if we send you as an existing subscriber electronic newsletters or other direct advertising, you can contradict this at any time and we will then place you on a blacklist to prevent further mailings);
- Market and opinion research, media observation;
- Enforcement of legal claims and defense in connection with legal disputes and official proceedings;
- Prevention and investigation of criminal offences and other misconduct (e.g. conducting internal investigations, data analyses to combat fraud);
- Warranties for our operations, especially IT, our websites, apps and other platforms;
- Acquisition and sale of divisions, companies or parts of companies and other transactions under company law and the associated transfer of personal data as well as measures for business management and compliance with legal and regulatory obligations.

If you have given us your consent to process your personal data for specific purposes (e.g. when registering to receive newsletters), we will process your personal data within the scope of and based on this consent, unless we have another legal basis and require one. A given consent can be revoked at any time, which, however, has no effect on data already processed.

4. Tracking and other technologies in connection with the use of our website

We use "cookies" and similar techniques on our **websites** with which your browser or your device can be identified. A cookie is a small file that is sent to your computer or automatically stored on your computer or mobile device by your web browser when you visit our website. If you visit this website again, we can recognize you, even if we don't know who you are. In addition to cookies that are only used during a session and are deleted after your visit to the website ("session cookies"), cookies can also be used to store user settings and other information for a certain period of time ("permanent cookies"). However, you can set your browser to reject cookies, save

them only for one session or otherwise delete them prematurely. Most browsers are preset to accept cookies. We use session cookies to allow you to save user settings such as the language setting.

In our **newsletters** and other marketing e-mails we partly and as far as permitted also include visible and invisible picture elements, by whose retrieval from our servers we can determine whether and when you have opened the e-mail, so that we are able to measure and better understand how you can use our offers and tailor them to you.

By using our websites and consenting to receive newsletters and other marketing e-mails, you consent to the use of these techniques. If you do not want this, you must set your browser or e-mail program accordingly.

We use **Google Analytics** on our websites. This is a service provided by third parties who may be located in any country of the world (in the case of Google Analytics it is Google LLC in the USA, www.google.com), with which we can measure and evaluate the use of the website (non-personal). For this purpose, permanent cookies are used, which are set by the service provider. The service provider does not receive any personal data from us, but can track your use of the website, combine this information with data from other websites that you have visited and which are also tracked by service providers, and use this information for its own purposes (e.g. controlling advertising). If you have registered with the service provider yourself, the service provider also knows you. The processing of your personal data by the service provider is then the responsibility of the service provider in accordance with its data protection regulations. The service provider merely informs us how our respective website is used (no information about you personally).

We also use so-called plug-ins from social networks such as Facebook, Twitter, Youtube or Instagram on our websites. This is recognizable for you (typically via corresponding symbols). If you activate them (by clicking on them), the operators of the respective social networks can register that you are on our website and can use this information for their purposes. The processing of your personal data is then the responsibility of this operator according to its data protection regulations. We do not receive any information about you from him.

5. Passing on data to third parties and abroad

We will only pass on your personal data if you have expressly consented, if there is a legal obligation to do so or if this is necessary for the enforcement of our rights, in particular for the enforcement of claims arising from the relationship between you and us. Furthermore, we pass on your data to third parties as far as this is necessary in the context of the use of the website for the provision of the services requested by you and the analysis of your user behaviour, as described above. Insofar as this is necessary for the purposes mentioned, the data may also be passed on abroad. If our website contains links to third-party websites, we no longer have any influence on the collection, processing, storage or use of personal data by the third party after clicking on these links and accept no responsibility or liability for this, insofar as legally permissible.

These third parties and recipients of the data are partly inland but can be anywhere on earth. In particular, you must expect your data to be transmitted to all countries in which we are represented by Group companies, branches or other offices as well as to other countries in Europe and the USA. If we transfer data to a country without adequate legal data protection, we ensure an appropriate level of protection as provided for by law by using appropriate contracts (namely on the basis of the so-called standard contract clauses of the European Commission, which can be accessed [here](#), [here](#) and [here](#)) or so-called binding corporate rules or rely on the statutory exceptions of consent, contract execution, the establishment, exercise or enforcement of legal claims, overriding public interests, the published personal data or because it is necessary to protect the integrity of the persons concerned. You may at any time obtain a copy of the mentioned contractual guarantees from the contact person named under point 1, unless already stated above. However, we reserve the right to black out copies or to supply only extracts thereof for reasons of data protection law or secrecy.

6. Duration of the storage of personal data

We process and store your personal data as long as it is necessary for the fulfilment of our contractual and legal obligations or otherwise the purposes pursued with the processing, i.e. for the duration of the entire business relationship (from the initiation, processing up to the termination of a contract) as well as beyond that in accordance with the legal obligations for storage and documentation. It is possible that personal data may be stored for the period during which claims can be asserted against our company and insofar as we are otherwise legally obliged to do so or justified business interests require this (e.g. for evidence and documentation purposes). As soon as your personal data are no longer required for the above-mentioned purposes, they will be deleted or made anonymous as far as possible. For operational data (e.g. system logs), shorter retention periods of twelve months or less generally apply.

7. Data Security

We take appropriate technical and organizational security precautions to protect your personal data from unauthorized access and misuse, such as training, IT and network security solutions, encryption of data carriers and transmissions, controls.

8. Obligation to provide personal data

As part of our business relationship, you must provide the personal data that is necessary for the establishment and execution of a business relationship and the fulfilment of the associated contractual obligations (as a rule, you do not have a statutory obligation to provide us with data). Without this information, we will generally not be able to enter into or process a contract with you (or the entity or person you represent). The website cannot be used either if certain information is not disclosed to ensure data traffic (e.g. IP address).

9. Profiling

We process your personal data partially automatically with the aim of evaluating certain personal aspects (profiling). We use profiling in particular in order to be able to inform and advise you about products in a targeted manner. We use evaluation tools that enable us to communicate and advertise as required, including market and opinion research.

10. Rights of the data subject

You have the right to information, correction, deletion, the right to restriction of data processing and otherwise the right to object to our data processing and to the surrender of certain personal data for transfer to another party (so-called data portability) within the scope of the data protection law applicable to you and to the extent provided for therein (such as in the case of the DSGVO). Please note, however, that we reserve the right to enforce the statutory restrictions, for example if we are obliged to store or process certain data, have an overriding interest in it (insofar as we may invoke it) or need it for asserting claims. If there are costs for you, we will inform you in advance. We have already informed you of the possibility of revoking your consent in Section 3.

Note that the exercise of these rights can conflict with contractual agreements and this can have consequences such as premature contract termination or cost consequences. In this case we will inform you in advance where this is not already contractually regulated.

The exercise of such rights usually requires that you clearly prove your identity (e.g. by a copy of your identity card, where your identity is otherwise not clear or can be verified). To assert your rights, you can contact us at the address given in paragraph 1.

Furthermore, every data subject has the right to enforce his claims in court or to file a complaint with the competent data protection authority. The responsible data protection authority in Switzerland is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).

11. Amendments

We may revise this Privacy Policy at any time without notice. The current version published on our website applies. If the privacy statement is part of an agreement with you, we will notify you by e-mail or other appropriate means in the event of an update.

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