

Data Privacy Policy

August 2023

Introduction

This data privacy policy provides you with information about the processing of personal data (1) while using our website "<https://vicendagroup.com>", (2) when interacting with us, for example when you contact us or when you sign up to receive information by e-mail from us (including for marketing purposes), and (3) in connection with the conclusion of a contract or the set-up of a customer account.

The abbreviation GDPR stands for Regulation (EU) 2016/679, the General Data Protection Regulation, which concerns people in the EU who visit our website (hereinafter "EU data subjects"). The abbreviation DPA stands for the Swiss Federal Act on Data Protection and concerns persons in Switzerland who visit our websites (hereinafter "Swiss data subjects").

Name and address of the controller

Within the meaning of the GDPR and the DPA, other data protection laws in the Member States of the European Union and other provisions related to data protection, the controller is:

Vicenda Group AG
Oberneuhofstrasse 3
6340 Baar, Switzerland

Telephone.: +41 41 724 86 60
E-mail: contact@vicendagroup.com
Website: <https://vicendagroup.com>

UID: CHE-454.245.125

Based on Article 27 DSGVO, Vicenda Group AG has appointed an EU data protection representative

For all questions regarding data protection in relation to the EU/the EEA, please contact our EU data protection representative:

EU-Datenschutz-Vertreter
ADVOVOX Rechtsanwalts GmbH
Sven Krüger
Großbeerenstraße 2-10
D-12107 Berlin, Germany

Telephone: +49 - (0) 30 - 22 48 75 28
Telefax: +49 - (0) 30 - 22 48 75 29
E-Mail: gdpr@advovox.de
Website: <https://advovox.de>

UID: DE 253207773

Disclosure of data to third parties

In principle, we do not disclose the personal data communicated to us to third parties.

However, we cooperate with third parties for the operation of our website or for the provision of products/services such as IT systems providers, cloud service providers, database providers, automated marketing solutions providers and consultants. Third parties may receive knowledge of personal data in this process. We carefully select our service providers – in particular regarding data protection and data security – and take all data protection measures necessary for permissible data processing.

Data processing outside the EU

In principle, we process data in Switzerland (data transfer at the conclusion of the contract, server log files, contact form, registration, cookies). The EU recognized that Switzerland offers an adequate level of data protection by Decision 2000/518/EC.

Exceptions apply to certain service providers, whose plug-ins and tools we use, and who process data outside Switzerland/the EU (see below on Cookies and Google Analytics). We ensure (1) the appropriate level of data protection and (2) the measures taken by the service provider for data protection and data security.

Your rights

In accordance with GDPR and DPA, you have certain rights. These rights may be exercised under the conditions and within the limits set by these regulations.

Right of access

In accordance with Article 25 DPA/15 GDPR, you have the right to request confirmation from us as to whether personal data relating to you is being processed. If this is the case, you have a right to access information about this personal data and to further information mentioned in Article 25 DPA/15 GDPR.

Right to rectification

In accordance with Article 32 DPA/16 GDPR, you have the right to request that we immediately rectify inaccurate personal data concerning you. Taking into account the purposes of the processing, you also have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Right to erasure

EU data subjects have the right to request that we immediately erase personal data concerning you. We are obliged to erase personal data immediately, provided that the corresponding requirements of Article 17 GDPR are met. Please refer to Article 17 GDPR for details. Swiss data subjects also have the right to request the erasure of data pursuant to Article 32 DPA, for example, when personal data are no longer necessary or the consent for processing has been withdrawn.

Right to restriction of processing

In accordance with Article 32 DPA/18 GDPR, under certain circumstances, data subjects have the right to request that we restrict the processing of their personal data.

Right to data portability

In accordance with Article 28 DPA/20 GDPR, data subjects have the right to receive the personal data that they have provided us in a structured, common and machine-readable format, and have the right to have us transfer this data to another controller without hindrance, provided that the processing is based on a declaration of consent or is based on a contract and the processing is carried out by automated means.

Right of objection

In accordance with Article 21 GDPR, EU data subjects have the right to object to the processing of personal data concerning them as based on Article 6 (1) e) or f) GDPR (processing in the public interest or based on the controller's or a third party's legitimate interests). This also applies to profiling based on these provisions. If you wish to exercise one of your rights, please contact us as the controller at the contact information indicated above or use any of the other forms we offer to communicate with us. If you have any queries, please contact us. Swiss data subjects may likewise object to the processing of their personal data pursuant to Article 32 DPA.

Provided that we have obtained your prior and unambiguous consent, we may use your personal data, in particular name and e-mail address as well as other indications and data collected in accordance with this Privacy Policy, for marketing and advertising purposes, e.g., to send you information and offers relating to our products and services, such as prospectuses, newsletters, and other advertising messages. You may withdraw your consent at any time, for which reason we provide an opt-out option in any communication with such a purpose. This also applies to profiling insofar as it is associated with such direct marketing.

Right to lodge a complaint with a supervisory authority

In accordance with Article 77 GDPR and 49 DPA, without prejudice to any other administrative or judicial remedy, EU data subjects have the right to lodge a complaint with the supervisory authority. This right exists in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR.

Swiss data subjects can avail themselves of the legal remedies of Article 32 DPA.

Server log files

When you visit our website, the company we use to operate the website processes and stores technical information about the terminal device used by you (operating system, screen resolution and other non-personal features) and about the browser (version, language settings), in particular the public IP address of the computer you use to visit our website, including the date and time of access. The IP address is a unique numeric address under which your terminal device sends/retrieves data to/from the Internet. Unless you share data that allows us to identify you while using our website, our service provider or we

are generally unable to know to whom an IP address belongs.

Furthermore, a user may be identified if legal action is taken against them (e.g., in the case of attacks on website) and we become aware of their identity during the investigation.

Our service provider uses the processed data in a non-personally identifiable manner for statistical purposes so that we can trace what kind of terminal devices, with which settings, are used to access our website, and then optimize them accordingly.

The IP address is further used so that you can technically access and use our website, and to detect and ward off attacks against our service provider or our website. Unfortunately, attacks designed to harm website operators or their users (e.g., to deny access and/or service, spy on or steal data, distribute malware and viruses, or for other unlawful purposes) are repeatedly carried out. Such attacks would impair the proper functioning of the data center of the company we have commissioned, the use of our website or its features, and the security of visitors to our website. The IP address and the time of access are processed to ward off such attacks. By means of this processing, we – by way of our service provider – pursue the legitimate interest of ensuring the functionality of our website and preventing unlawful attacks against us and our website visitors. The legal basis for processing is Article 6 (1) f) GDPR / an overriding private interest according to Article 31 DPA.

The stored IP data is deleted (by means of anonymization) as soon as it is no longer required for the detection of or defense against an attack.

Contact details

If you send us a message via one of the contact options offered (e.g., via e-mail or telephone), we will use the data you have communicated to us to process your request. The legal basis for this is our legitimate interest in answering your request in accordance with Article 6 (1) f) GDPR / an overriding private interest according to Article 31 DPA. If your request serves the conclusion of a contract with us, further legal basis for processing is Article 6 (1) b) GDPR / Article 31 (2) a) DPA. The data will be deleted after the completion of your request. If we are required by law to store the data for a longer period, the deletion will take place after the appropriate period expires.

Registration / Customer account

Upon creating a customer account, we shall process the data you provide to create and manage the account and to enable you to use the services associated with your customer account. The legal basis for processing is Article 6 (1) a) GDPR / informed consent according to DPA. If the creation of the customer account serves the conclusion of a contract with us, the additional legal basis for the processing is Article 6 (1) b) GDPR / Article 31 (2) a) DPA.

This data is stored until the customer account is deleted. If we are required by law to store the data for a longer period (e.g., to fulfill accounting obligations) or are permitted by law to store the data for a longer period (e.g., due to an ongoing legal dispute against the holder of a user account), the data shall be deleted after the end of the storage obligation or statutory permission.

Employment application opportunities (including via e-mail)

We are delighted by your interest in us and that you have applied or are applying for a position in our company. We would like to provide you with information concerning the processing of your personal

data in connection with the application below.

We process the information you have provided us in connection with your application in order to assess your suitability for the position (or, if applicable, other open positions in our company) and to conduct the application process.

The legal basis for the processing of your personal data is the exercise of legitimate interests in accordance with Article 6 (1) f) GDPR / an overriding private interest according to Article 31 DPA. Our interest lies in conducting the application process and possibly in the assertion or defense against claims.

In the case of an application is declined, the applicant's data shall be deleted within 6 months.

In principle, your data shall only be provided to those persons in the company who require it for the proper execution of our application process (on a need-to-know basis).

Cookies

We use cookies and similar technologies (local storage) for operating our website to ensure the website's technical functionality, to understand how visitors use our website and to store users' predefined settings in their browser.

A cookie is a small text file that your browser stores on your computer when you access our website. If you revisit our website later, we can read these cookies again. Cookies are stored for different periods of time. You may at any time configure which cookies your browser shall accept. This may, however, cause our website to no longer function properly. Furthermore, you can delete cookies yourself at any time. If you do not delete them, we can specify for how long a cookie is to be stored on your computer. Distinction is made here between so-called session cookies and persistent cookies. Session cookies are deleted by your browser when you leave our website or close the browser. Persistent cookies are stored for the period that we specify during the storage.

We use cookies for the following purposes:

- Technically necessary cookies are required for the use of the functions of our website (e.g., to identify that you have logged in). Certain functions cannot be provided without these cookies.
- Functional cookies are used to technically perform certain functions that you want to use.
- Analysis cookies serve to analyze user behavior.
- Third-party cookies (especially from Google Analytics, see below) are stored by third parties whose functions we integrate on our website to enable certain functions. They can also be used to analyze user behavior.

Most of the browsers used by our users allow us to configure which cookies are to be stored and make it possible to delete (certain) cookies. If you restrict the storage of cookies to certain websites or do not allow cookies from third-party websites, it may no longer be possible to make use of the full functionality of our website. Information on how to customize cookie settings for the most common browsers is available here:

- Google Chrome (<https://support.google.com/chrome/answer/95647?hl=en>)
- Internet Explorer (<https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>)
- Microsoft Edge (<https://www.microsoft.com/en-us/edge/learning-center/how-to-manage->

and-clear-your-cache-and-cookies)

- Firefox (<https://support.mozilla.org/en-US/kb/clear-cookies-and-site-data-firefox>)
- Safari (<https://support.apple.com/guide/safari/manage-cookies-sfri11471/mac>)

Google Analytics

This website uses Google Analytics, a web analytics service provided by Google Inc. (Google). Google Analytics uses cookies, i.e., text files stored on your computer, to enable analysis of our website usage by you. We use Google Analytics in such a way that your IP address is only used in an anonymous form and that your IP address is truncated as soon as technically feasible by Google within member states of the European Union or in other states which are party to the agreement on the European Economic Area. Only in exceptional cases is a full IP address transmitted to Google servers in the United States and truncated there. On our behalf, Google may use this information to evaluate your use of our website, compile reports about website activities, and provide us with further services related to website and Internet usage. The IP address sent from your browser as part of Google Analytics services is not merged with other data by Google. Pseudonymous data will be deleted after 12 months. The legal basis for processing is Article 6 (1) f) GDPR / an overriding private interest and your consent according to Article 31 DPA.

Detailed information regarding the data privacy declaration for Google Analytics is available under: <http://www.google.com/analytics/terms/> and https://support.google.com/analytics/answer/6004245?hl=en&ref_topic=2919631.

You can prevent data generated by the cookies and relating to your use of the website (including your IP address) from being collected and processed by Google Analytics, by downloading and installing a Google Analytics Opt-out Browser Add-on from the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>. If you do so, an opt-out cookie will be placed that will prevent tracking of your data during future visits of this website. In this case, however, please note that you might not be able to fully use all functions offered by this website.

Alternatively, click on the link <https://vicendagroup.com/en?disableGA=yes> to prevent Google Analytics from collecting data from this website in the future (the opt-out only works on this browser and only for this domain). An opt-out cookie shall then be stored on your device. If you delete your cookies in this browser, you must click on this link again.

LinkedIn

We utilize LinkedIn Company Page Analytics to gather insights about engagement on our official LinkedIn page. This enables us to better understand our audience and improve the content and services we provide. As part of this process, LinkedIn collects certain personal data from users who interact with our LinkedIn page.

When you visit our LinkedIn Company Page or engage with its content (such as liking, commenting, sharing, or following), LinkedIn may collect personal data such as your IP address, device information, browser type, and browsing patterns. Additionally, if you're logged into your LinkedIn account while interacting with our page, LinkedIn may associate these interactions with your LinkedIn profile.

The personal data collected by LinkedIn is made available to us in an aggregated and anonymized form through the LinkedIn Company Page Analytics. This data helps us understand the demographics and

preferences of our LinkedIn audience, allowing us to tailor our content to better serve your interests.

You have control over the data you share on LinkedIn and the interactions you have with our Company Page. To learn more about your privacy options and how LinkedIn collects, uses, and protects your data, we encourage you to review LinkedIn's Privacy Policy.

By interacting with our LinkedIn Company Page, you acknowledge that you have read and understood how LinkedIn collects and processes personal data, as well as our commitment to safeguarding your privacy.

LinkedIn offers the possibility to unsubscribe from e-mail messages, SMS messages and targeted ads as well as to manage ad settings at <https://www.linkedin.com/psettings/guest-controls>. LinkedIn also uses partners such as Quantcast, Google Analytics, BlueKai, DoubleClick, Nielsen, Comscore, Eloqua and Lotame, which may set cookies. Such cookies can be rejected at <https://www.linkedin.com/legal/cookie-policy>. LinkedIn's applicable privacy policy is available at <https://www.linkedin.com/legal/privacy-policy>. LinkedIn's cookie policy is available at <https://www.linkedin.com/legal/cookie-policy>.