

The Collab Privacy Policy

September 2023

1 General

This **privacy policy** explains how, for what purpose and where we process personal data in connection with our range of products and services and our websites. This policy is not exhaustive; other privacy policies or general terms and conditions, terms and conditions of participation, and similar documents may govern specific matters.

If you provide us with the personal data of other persons, please ensure that these persons are aware of this privacy policy and please only disclose their personal data to us if you are permitted to do so and if the personal data is correct. You are also obliged to ensure compliance with the Federal Act on Data Protection vis-à-vis these persons.

We process your personal data **responsibly**, in **compliance** with the applicable **statutory provisions** – in particular the Federal Act on Data Protection (FADP) and the Ordinance to the Federal Act on Data Protection (OFADP) – and in accordance with this **privacy policy**.

You may **unsubscribe** from **notifications and messages**, such as newsletters, at any time. We reserve the right to send notifications and messages that are of crucial importance for the provision of our web presence. By unsubscribing, you can object to the statistical recording of your usage for success and reach analysis.

By using this website or the platforms and apps provided by us, you agree to the gathering, processing and use of data in accordance with the following provisions. This website can be visited without registration being required. When visited, data such as pages accessed or the name of the file accessed, date and time are stored on the server for statistical purposes; this data is not directly linked to you. Personal data, in particular name, address or email address, are collected voluntarily as far as possible.

2 Contact details

The **responsibility** for the processing of personal data that we conduct here lies with:

The Collab

Zürcherstrasse 39
CH-8952 Schlieren

+41 44 438 28 38 | www.thecollab.ch

and the respective company affiliated with The Collab. If you have any questions or would like to exercise your rights as a data subject under data protection law (Section 10), please reach out to us through our **data protection contact**:

Patric Howald, lawyer, Zürcherstrasse 39, 8952 Schlieren, Switzerland, email: legal@halter.ch

3 Processing of personal data

3.1 Terminology

Personal data refers to all data that refers to an identified or identifiable person. **Processing** comprises *all* handling of personal data, regardless of the methods and processes used, specifically the retention, disclosure, collection, gathering, erasure, storage, alteration, destruction and use of personal data.

3.2 Type, scope and purpose

We **process** personal data primarily in order to be able to make our range of services available on a permanent, user-friendly, secure and reliable basis, to provide information about them and to fulfil our contractual and legal obligations. We also process your personal data for the following purposes in particular:

- Responding to your enquiries and communicating with you
- Providing, analysing and optimising our website and our social media pages
- Marketing and advertising, as well as providing information about new developments at The Collab and new services

Within this scope, we especially process information provided to us *voluntarily* by the data subject when contacting us – e.g. by letter, email, contact form, social media or phone – or when registering for a user account on our websites or on websites made available by us. We may store such data in an address book, customer relationship management system (CRM system) or using similar tools.

We also process personal data that we receive from third parties. This regularly includes personal data that we receive in correspondence, in meetings or in other exchanges with customers, partners, suppliers, etc. We may also process personal data that we collect from public sources or gather during the provision of our service offering, if and insofar as such processing is permissible by law.

We process personal data for the **duration** required for the respective purpose(s) or required by law. Personal data that no longer needs to be processed is anonymised or erased. Data subjects are generally entitled to have their data erased. Personal data that is no longer required will be deleted.

Personal data from **job applications** is only processed insofar as it is required for assessing the suitability of the applicant for the vacancy or the subsequent fulfilment of the employment contract.

3.3 Processing location

Generally speaking, we process and store your personal data in **Switzerland**.

3.4 Processing and transmission of personal data by/to third parties

We may **engage third parties to process personal data**, or process personal data in collaboration with, or with the help of, third parties, or **transfer personal data to third parties**. We take appropriate measures to also ensure an adequate level of data protection on the part of such third parties. In particular, **third parties** include:

- Other Group companies
- External service providers; suppliers and business partners

- Other customers
- Authorities and courts (where appropriate)

Such third parties are generally located in Switzerland and the European Economic Area (EEA) but may also be located in other countries and territories on Earth or elsewhere in the universe if an adequate level of data protection exists in the recipient country or if adequate data protection is guaranteed for other reasons, such as a corresponding contractual agreement – in particular on the basis of standard contractual clauses – or corresponding certification (see [Cross-border transfer of personal data, Federal Data Protection and Information Commissioner \[FDPIC\]](#)). In exceptional circumstances, such a third party may be located in a country without adequate data protection if the data protection requirements are met; for instance, explicit consent from the data subject.

4 Data security

We implement **adequate and suitable technical and organisational measures** to guarantee data protection and, in particular, data security. In accordance with our risk assessment, we implement, in particular, access controls as well as procedures for regularly reviewing, assessing and evaluating the effectiveness of such measures.

Access to our online content is provided with transport encryption (SSL/TLS, in particular with the Hypertext Transfer Protocol Secure (HTTPS)). Most browsers display a padlock in the address bar when transport encryption is active.

5 Website use

5.1 General

You can use this website to find out about our services without having to tell us who you are. As with any connection to a web server, the server through which we provide the website automatically logs and stores certain technical data and stores it for a short period of time. This includes the IP address and operating system of your device, the date and time of use, and the type of browser you use to access the website.

5.2 Cookies

Our websites and apps typically use cookies, tags and similar technologies that can be used to identify your browser or device. A cookie is a text file that is sent to your computer or is automatically stored on your computer or mobile device by the web browser you use when you visit our website or use our app. If you visit this website again or use our app again, we will be able to recognise you even if we do not know who you are. In addition to cookies that are only used during a session and are deleted after your website visit (**session cookies**), cookies can also be used to store user settings and other information for a certain period of time (e.g. two years) (**permanent cookies**). However, you can set up your browser so that it rejects cookies, stores them only for one session or deletes them early. Most browsers are set to accept cookies by default. We use permanent cookies to enable you to store user preferences (e.g. language, automatic login) so that we can better understand how you use our offers and content and so that we can show you offers and advertising tailored to you (which may also happen on websites of other companies; however, they will not learn who you are from us (if we even know this ourselves) – they will only see that the same user who is on their website was also on a particular page on our

website). Some of these cookies are set by us, some are set by contractual partners with whom we work. If you block cookies, certain functionalities (such as language selection) may no longer work.

By using our websites, platforms and apps and by consenting to receive newsletters and other marketing emails, you agree to the use of these technologies. If you do not want this, you must configure your browser or email program accordingly or uninstall the app, unless you can change this in the settings.

5.3 Social media plugins

The social media plugins used on the website allow you to recommend and share our content on social networks. The social media plugins can be recognised on the website by the logos of the respective social networks. When you interact with the social media plugin, data is sent to the respective provider of that social network.

5.4 Server log files

We may collect the following information each time you access our website if it is transferred from your browser to our server infrastructure, or if it can be determined by our web server: Date and time, including time zone, internet protocol (IP) address, access status (HTTP status code), operating system including user interface and version, browser including language and version, individual sub-pages of our website accessed including data volume transferred and the last website accessed in the same browser window (referrer URL).

5.5 Tracking pixels

We may use tracking pixels on our website. Tracking pixels are also called web beacons. Tracking pixels, including those of third parties whose services we use, are small, usually invisible images that are automatically accessed when visiting our website. Tracking pixels can be used to collect the same information as in server log files.

5.6 Contact form

If you send us an enquiry via the contact form, your details from the enquiry form, including the contact details you provided there, will be stored for the purpose of processing the enquiry and in the event of follow-up questions.

6 Notifications and messages

We send **notifications** and **messages**, e.g. newsletters, via email and other communication channels, such as instant messaging.

Notifications and messages may contain web links or tracking pixels that record if an individual message has been opened and which web links were clicked during this process. Such web links and tracking pixels can also record the use of notifications and messages by individual persons.

We send notifications and messages via, or with the help of, third-party service providers. Cookies may also be used during this process. We guarantee an appropriate level of data protection here.

In particular, we use:

ClickDimensions: a platform for email marketing and other CRM-based marketing; provider: ClickDimensions LLC (USA); privacy information: [Privacy Policy](#).

7 Success and reach analysis

We use services and programs to ascertain how our online presence is used. These can help us to measure the success and reach of our online presence and the effectiveness of third-party links to our website. We can also trial and compare how different versions of our online presence or parts of our online presence are used (A/B test method). Based on the results of the success and reach analysis, we can rectify faults, amplify the most popular content and make improvements to our online presence.

When using services and programs for success and reach analysis, the internet protocol (IP) addresses of individual users are saved. IP addresses are always shortened to ensure compliance with the principle of data economy through the corresponding pseudonymisation and to improve the privacy of visitors to our website (IP masking).

Where success and reach analysis services and programs are used, cookies may be set and user profiles generated. User profiles may, for example, include pages visited or content viewed on our website, information on the size of screen or browser window and – at least approximate – user locations. User profiles are always generated in pseudonymised form. We do not use user profiles to identify individual visitors to our website. Some services for which you are a registered user may assign the use of our online presence to your profile with the respective service, whereby you must generally have given prior consent to such assignment.

In particular, we use:

Google Analytics: success and reach analysis; provider: Google LLC (USA)/Google Ireland Limited (Ireland) for users in the European Economic Area (EEA) and Switzerland; privacy information: analysis using **cross-device tracking** and pseudonymised internet protocol (IP) addresses, which are transmitted in full to Google in the USA only **in exceptional cases**, [Privacy and Security Principles](#), [Privacy Policy](#), [Google Product Privacy Guide](#) (including Google Analytics), [How Google uses information from sites or apps that use our services](#) (information provided by Google), [How Google uses cookies](#), [Google Analytics Opt-out Browser Add-on](#), [Ad Personalization](#) (activation/deactivation/settings).

Google Tag Manager: integration and management of services for success and reach analysis and other services provided by Google and third parties; providers: Google LLC (USA)/Google Ireland Limited (Ireland) for users in the European Economic Area (EEA) and Switzerland; data protection information can be found in connection with the integrated and managed services.

This website may use **Google conversion tracking**. In this case, the following applies: if you reach our website via an ad placed by Google, then **Google Ads** places a cookie on your computer. The conversion tracking cookie is set when a user clicks on an ad placed by Google. These cookies expire after 30 days and are not used for personal identification. If the user visits certain pages of our website and the cookie has not yet expired, we and Google can recognise that the user clicked on the ad and was redirected to this page. Each Google Ads customer receives a different cookie. This means that cookies cannot be tracked via the websites of Ads customers. The information collected using the conversion cookie is used to generate conversion statistics for AdWords customers who have opted for conversion tracking. Customers find out the total number of users who clicked on their ad and were redirected to a page featuring a conversion tracking tag. However, they do not receive any information that can be used to personally identify users.

If you do not wish to participate in tracking, you can reject the necessary setting of a cookie, for example by changing your browser settings to generally deactivate the automatic setting of cookies or by setting up your browser to block cookies from the domain googleleadservices.com.

Please note that you cannot delete the opt-out cookies if you do not want measurement data to be recorded. If you delete all of your cookies in your browser, you must set the respective opt-out cookie again.

This website may use Google Inc.'s **remarketing function**. This function presents interest-based ads to website visitors within the Google advertising network. A cookie is stored in the website visitor's browser that makes it possible to recognise the visitor when they visit websites that belong to Google's advertising network. On these pages, the visitor may be shown ads that relate to content that the visitor has previously accessed on websites that use Google's remarketing function.

According to its own statements, Google does not collect any personal data during this process. If you do not want Google's remarketing feature to be used, you can deactivate it by changing the corresponding settings as described [here](#). Alternatively, you can deactivate the use of cookies for interest-based advertising via the Network Advertising Initiative by following these [instructions](#).

8 Social media

Our social media pages contain posts on current developments at The Collab and our range of services. Social media providers gather and analyse usage data such as the number of visits and demographic information about visitors to our company pages.

We receive evaluations from social media providers based on this information. These evaluations contain only aggregated or otherwise sufficiently anonymised data. Only the respective provider can identify you based on the usage data gathered. For this reason, please refer to the data protection information of the respective provider.

9 Third-party services

We use **third-party services** to ensure the permanent, user-friendly, secure and reliable provision of our offering and to ensure that content is integrated into our website. These services, e.g. hosting and storage services, video services and payment services, require your internet protocol (IP) address as they would otherwise not be able to transfer the corresponding content. Such services may be located outside Switzerland and the European Economic Area (EEA) as long as an adequate level of privacy is guaranteed.

Third parties whose services we use may also process aggregated, anonymised or pseudonymised data in connection with our web presence and from other sources – which may include cookies, log files and tracking pixels – for their own security, statistical and technical purposes.

Our website contains links to third-party websites. If you follow such links, please note that these websites have their own data protection guidelines and we do not accept any responsibility or liability for these data protection guidelines or the processing of your personal data by the operators of these websites.

9.1 Configuration options

We use third-party services to enable us to better communicate with you and other individuals; i.e. customers. We guarantee that such third parties also maintain an adequate level of data protection.

In particular, we use:

- **Microsoft Dynamics 365**: customer relationship management (CRM); provider: Microsoft Corporation (USA); privacy information: [privacy policy](#).

9.2 Maps

We use third-party services to embed maps in our website.

In particular, we use:

- **Google Maps** including Google Maps Platform: map service; provider: Google LLC (USA)/Google Ireland Limited (Ireland) for users in the European Economic Area (EEA) and Switzerland; privacy information: [Privacy and Security Principles](#), [Privacy Policy](#), [Google Product Privacy Guide](#) (including Google Maps), [How Google uses information from sites or apps that use our services](#) (information provided by Google), [How Google uses cookies](#), [Ad Personalization](#) (activation/deactivation/settings).

9.3 Fonts

We use third-party services to embed selected fonts, icons, logos and symbols in our website.

In particular, we use:

- **MyFonts (by Monotype)**: fonts; providers: Monotype Imaging Holdings Inc. (USA)/MyFonts Inc. (USA); privacy information: [Your Privacy](#), [Privacy Policy](#), [Web Font Tracking Privacy Policy](#).

9.4 Advertising

We use the opportunity to display targeted **advertising for our services** to third parties, such as social media platforms and search engines.

We use this kind of advertising in order to reach those individuals in particular with an interest in our online content or who already use our web content (**remarketing** and **targeting**). To do so, we may transmit the relevant – potentially also personal – data to third parties that offer such advertising. We can also track the success of our advertising; i.e. specifically whether it has led to visits to our website (**conversion tracking**).

Third parties engaged by us for advertising and with which you are registered as a user may assign this usage of our content to any profile you hold with them.

In particular, we use:

- **Facebook/Instagram ads**: social media advertising; providers: Facebook Inc. (USA)/Facebook Ireland Ltd. (Ireland); data protection information: remarketing and targeting, specifically with the **Facebook Pixel** as well as **Custom Audiences** and **Lookalike Audiences**, [Privacy Policy](#), [Ad Preferences](#) (registration as user necessary).
- **Google Ads (formerly AdWords)**: See **Section 7**.
- **LinkedIn Ads**: social media advertising; providers: LinkedIn Corporation (USA)/LinkedIn Ireland Unlimited Company (Ireland); data protection information: remarketing and targeting, specifically with the **LinkedIn Insight Tag**, [Privacy](#), [Privacy Policy](#), [Cookie Policy](#), [Retargeting Opt-out](#).

10 Rights of data subjects

Within the scope of the data protection legislation that applies to you and to the extent provided for therein, you have the right to information, correction and deletion, the right to restrict data processing and otherwise the right to object to our data processing – in particular data processing for the purposes of direct marketing, profiling carried out for direct marketing and other legitimate interests in processing – as well as the right to the delivery of certain personal data for the purpose of transferring it to another body ('data portability'). Please note, however, that we reserve the right to enforce the restrictions provided for by law, for example if we are obliged to retain or process certain data, have an overriding interest in the data (insofar as we may invoke it) or require the data to assert claims.

The exercising of such rights generally requires that you provide unambiguous proof of your identity (e.g. by means of a copy of an ID card if your identity is somehow unclear or cannot be verified). You can contact us at the address given in Section 2 to assert your rights.

Furthermore, every data subject has the right to assert their claims in court or to lodge 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 Final provisions

We reserve the right to amend and add to this Privacy Policy at any time. We will provide information on such amendments and addenda in a suitable format, particularly by publishing the respective current Privacy Policy on our website.