

PRIVACY POLICY

When you use our website, various personal data is collected. Personal data is data that can be used to identify you personally. This privacy policy explains what data we collect and what we use it for. It also explains how and for what purpose this is done.

This declaration applies to the website www.hofstetter-partners.ch. Please note that references to other websites to which different data protection rules may apply are possible.

The services offered by Hofstetter Partners Direct AG are aimed at companies and not at private individuals.

This Privacy Policy is subject to Swiss law. Where applicable, provisions of the European Union (EU), in particular the EU General Data Protection Regulation (GDPR), are considered.

The person responsible for data processing on our website is: Hofstetter Partners Direct AG, Zilstrasse 72, 9016 St. Gallen, phone: +41 (0) 71 288 01 01, e-mail: info@hofstetter-partners.ch (see also our legal notice).

The obligation to appoint a data protection representative in the EU does not apply to Hofstetter Partners Direct AG in accordance with Art. 27 para. 2 let. a GDPR.

1. Recorded data

When collecting and processing personal data, we comply with the legal requirements of the applicable data protection laws.

1.1 General recording

Our website collects a range of general data each time it is accessed. This general data and information are stored in the server log files. The following data is recorded:

- IP address
- Date and time of the enquiry
- Time zone difference to GMT time zone
- Content of the request
- Access status/http status code
- Amount of data transferred in each case
- Website from which the request originates
- Browser (incl. language and version)
- Operating system

When using this general data, no allocation to a specific person takes place. The collection of this data is based on our legitimate overriding interests (Art. 31 para. 1 of the Federal Act on Data Protection [FADP] or Art. 6 para. 1 let. f GDPR) and is technically necessary to display our website to you and to ensure its stability and security.

1.2 Contact and contact form

If you contact us via the e-mail address provided and/or via the contact form provided, we will always treat the data you provide in compliance with the applicable data protection regulations. The data you provide will only be used to process your enquiry. The processing of your data is based on our legitimate overriding interests in responding to your enquiry (Art. 31 para. 1 FADP and Art. 6 para. 1 let. f GDPR). If the e-mail contact is aimed at concluding a contract, the additional legal basis for data processing is the initiation of the contract (Art. 31 para. 2 let. a FADP or Art. 6 para. 1 let. b GDPR).

We store the data you enter in the contact form and/or the data you provide via the e-mail address until you ask us to delete it, revoke your consent to storage, the purpose for data storage no longer applies (e.g. after your enquiry has been processed) or after 12 months after contacting us at the latest. Mandatory statutory provisions - in particular retention periods - remain unaffected.

Your data transmitted via our contact form is encrypted using an SSL certificate for security reasons and to protect the transmission of confidential content.

2. Cookies

Our website uses cookies, which are small text files that are stored on your computer and can be retrieved from there. Cookies are used to enable you to log in to our services and to personalise the website for you. For this purpose, our website is supported by cookies that collect information about your IP address, the time and duration of your visit, the number of your visits, the use of forms, your search settings, your display view, and your settings for favourites on our website.

The storage period of cookies varies depending on whether they are transient or persistent cookies.

- Transient cookies are automatically deleted when you close the browser. These include session cookies in particular. These store a so-called session ID, with which various requests from your browser can be assigned to the joint session. This allows your computer to be recognised when you return to our website. The session cookies are deleted when you close the browser.
- Persistent cookies are automatically deleted after a specified period, which may vary depending on the cookie. You can delete these cookies manually at any time in the security settings of your browser.

You can prevent the setting of cookies by our website at any time by means of a corresponding setting of the Internet browser used and thus permanently object to the setting of cookies. Furthermore, cookies that have already been set can be deleted at any time via an Internet browser or other software programmes. If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of our website may be fully usable.

The use of cookies is based on our legitimate overriding interests in simplifying the use of our website and being able to continuously improve its content (Art. 31 para. 1 FADP and Art. 6 para. 1 let. f GDPR).

2.1 Google Analytics

We use *Google Analytics* on our website, a web analytics service provided by Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland ("Google"). Google Analytics uses cookies to help the website analyse how users use the site. The information generated by the cookie about your use of the website is transmitted in anonymised form to a Google server in the USA and stored there. Thanks to anonymisation, this data cannot be assigned to a specific person. Google will process this information for the purpose of analysing your use of the website, compiling reports on user activity, and providing other services relating to website activity and internet usage. Google may transfer this information to third parties. The analysis activity is based on our legitimate overriding interests in constantly improving our website and its user-friendliness (Art. 31 para. 1 FADP and Art. 6 para. 1 let. f GDPR).

You can prevent Google from collecting the data generated by the cookie and relating to your use of the website (including your IP address) and from processing this data by Google by downloading and installing the browser plug-in available at the following link:

<http://tools.google.com/dlpage/gaoptout?hl=de>.

Google applies the Standard Contractual Clauses (SCC) of the European Commission to the transfer of data for online advertising and personal data originating from the European Economic Area, Switzerland and the United Kingdom, thereby guaranteeing a level of data protection appropriate to European and Swiss data protection law (<https://support.google.com/publisherpolicies/answer/10437486?hl=de>).

Further information on data processing by Google can be found in Google's privacy policy: <http://www.google.de/intl/de/policies/privacy>

2.2 Google Web Fonts

We use so-called web fonts provided by Google on this website for the standardised display of fonts. When you call up a page, your browser loads the required web fonts into your browser cache in order to display texts and fonts correctly.

For this purpose, the browser you are using must connect to Google's servers. This informs Google that our website has been accessed via your IP address. The use of Google Web Fonts is in the interest of a uniform and appealing presentation of our online offers. This constitutes a legitimate interest within the meaning of Art. 31 para. 1 FADP and Art. 6 para. 1 lit. f GDPR. Google applies the European Commission's Standard Contractual Clauses (SCC) for the transfer of data for online advertising and personal data originating from the European Economic Area, Switzerland and the United Kingdom, thereby guaranteeing a level of data protection appropriate to European and Swiss data protection law (<https://support.google.com/publisherpolicies/answer/10437486?hl=de>).

If your browser does not support web fonts, a standard font will be used by your computer.

Further information on Google Web Fonts can be found at <https://developers.google.com/fonts/faq> and in Google's privacy policy: <https://www.google.com/policies/privacy/>.

2.3 Google Tag Manager

This website uses Google Tag Manager. This service allows website tags to be managed via an interface. The Google Tool Manager only implements tags. This means that no cookies are used, and no personal data is collected. The Google Tool Manager triggers other tags, which in turn may collect data. However, the Google Tag Manager does not access this data. If deactivation has been carried out at domain or cookie level, it remains in place for all tracking tags, provided that these are implemented with the Google Tag Manager.

The use of Google Tag Manager is in the interest of a uniform and appealing presentation of our online offers. This constitutes a legitimate interest within the meaning of Art. 31 para. 1 FADP and Art. 6 para. 1 lit. f GDPR. Google applies the European Commission's Standard Contractual Clauses (SCC) for the transfer of data for online advertising and personal data originating from the European Economic Area, Switzerland, and the United Kingdom, thereby guaranteeing a level of data protection appropriate to European and Swiss data protection law (<https://support.google.com/publisher-policies/answer/10437486?hl=de>).

2.4 Google ReCAPTCHA

We use Google reCAPTCHA on our websites. The provider is Google. The purpose of reCAPTCHA is to check whether the data input on our websites (e.g. in a contact form) is made by a human or by an automated programme. For this purpose, reCAPTCHA analyses the behaviour of the website visitor based on various characteristics. This analysis begins automatically as soon as the website visitor enters the website. For the analysis, reCAPTCHA evaluates various information (e.g. IP address, time spent on the website by the website visitor or mouse movements made by the user). The data collected during the analysis is forwarded to Google.

Data processing is carried out on the basis of Art. 31 para. 1 FADP and Art. 6 para. 1 lit. f GDPR. The website operator has a legitimate interest in protecting its website from abusive automated spying and SPAM. Google applies the Standard Contractual Clauses (SCC) of the European Commission to the transfer of data for online advertising and personal data originating from the European Economic Area, Switzerland, and the United Kingdom, thereby guaranteeing a level of data protection appropriate to European and Swiss data protection law (<https://support.google.com/publisher-policies/answer/10437486?hl=de>).

Further information about Google reCAPTCHA and Google's privacy policy can be found in the following links:

<https://www.google.com/intl/de/policies/privacy/>

<https://www.google.com/recaptcha/intro/android.html>.

3. Social media plug-ins and tools

We may use the social media plug-ins and tools contained in the following table. When you visit our websites, you may use the tools described in section 1.1 of this declaration can be transmitted to the plug-in providers without further ado. The plug-in provider stores the data collected about you as

usage profiles and uses these for the purposes of advertising, market research and/or customising its website.

We have no influence on the data collected and data processing procedures of the plug-in providers. These are subject to the respective privacy policies of the third-party providers. Further information on the purpose and scope of data collection and its processing by the plug-in provider can be found in the following privacy policies of these providers.

Data processing via the plug-in providers is based on our legitimate overriding interests in improving the user-friendliness of our website and facilitating its linking options for the visitor (Art. 31 para. 1 FADP and Art. 6 para. 1 let. f GDPR).

Plug-in/tool	Privacy policy
Facebook	https://www.facebook.com/about/privacy
LinkedIn	https://www.linkedin.com/legal/privacy-policy

3.1 Facebook

Plugins from the social network Facebook are integrated on our pages. You can recognise the Facebook plugins by the Facebook logo or the "Like" button on our site. You can find an overview of the Facebook plugins here: www.facebook.com/about/privacy/.

When you visit our pages, a direct connection is established between your browser and the Facebook server via the plugin. Facebook receives the information that you have visited our site with your IP address. If you click on the Facebook "Like" button while you are logged into your Facebook account, you can link the content of our pages to your Facebook profile. This allows Facebook to associate your visit to our pages with your user account. We would like to point out that, as the provider of the pages, we have no knowledge of the content of the transmitted data or its use by Facebook.

Further information on this can be found in Facebook's privacy policy at www.facebook.com/about/privacy/.

The following contract addendum applies to the transfer of European data:
https://www.facebook.com/legal/EU_data_transfer_addendum.

It applies insofar as Facebook Ireland Ltd (4 Grand Canal Square Grand Canal Harbour Dublin 2 Ireland) processes European data as your processor in accordance with the terms of use for covered products and transfers of such data from the EU, the EEA, the United Kingdom or Switzerland to Facebook, Inc (1601 South California Avenue, Palo Alto, CA 94304, USA) take place.

3.2 LinkedIn

Plugins of the social network LinkedIn of LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA (hereinafter "LinkedIn") are integrated on our website. You can recognise the LinkedIn plugins by the LinkedIn logo or the "Recommend" button on our website. When you visit our website, a direct connection is established between your browser and the LinkedIn server via the plug-in. LinkedIn receives the information that you have visited our site with your IP address. If you click on the LinkedIn "Recommend" button while you are logged into your LinkedIn account, you can link the content of our pages to your LinkedIn profile. This allows LinkedIn to associate your visit to our pages with your user account.

We would like to point out that, as the provider of the pages, we have no knowledge of the content of the transmitted data or its use by LinkedIn. Details on data collection (purpose, scope, further processing, use) as well as your rights and setting options can be found in LinkedIn's privacy policy.

You can find this information at: <http://www.linkedin.com/legal/privacy-policy>.

LinkedIn's services require a data flow from the European Union (EU), the European Economic Area (EEA) and Switzerland to the United States (US) and back. To ensure that personal data is protected when transferred to countries outside the EU, EEA and Switzerland, the data is processed in accordance with the European Commission's Standard Contractual Clauses (SCC) (<https://www.linkedin.com/legal/l/eu-sccs>).

4. Newsletter

With your consent (Art. 31 para. 1 FADP or Art. 6 para. 1 letter A GDPR), you can subscribe to our newsletter, with which we inform you about our current interesting offers. We use the double opt-in procedure to subscribe to our newsletter. This means that after you have registered, we will send you an email to the email address you have provided, in which we ask you to confirm that you wish to receive the newsletter. If you click on this link, you confirm your newsletter registration. If you do not confirm your registration within one week, we will delete the e-mail address from our temporary list and your registration will be cancelled. The only mandatory information for sending the newsletter is your e-mail address, which we store after your registration.

You can revoke your consent to the sending of the newsletter at any time and unsubscribe from the newsletter. You can cancel or unsubscribe by clicking on the link provided in every newsletter e-mail or by sending an e-mail to info@hofstetter-partners.ch.

By confirming your newsletter registration, you consent to the storage of your e-mail address, including the date of registration, IP address and the list name of the desired newsletter. We will only use your e-mail address and the personal data optionally collected at the same time, such as your name and title, for the administration and sending of the newsletter you have requested, at the frequency specified when you registered.

We may also send you our newsletter as part of your user or contractual relationship (Art. 31 para. 1 FADP or Art. 6 para. 1 let. b GDPR). You can unsubscribe from the newsletter at any time by clicking

on the link provided in every newsletter email, by sending an email to info@hofstetter-partners.ch or by sending a message to the contact details provided in the legal notice.

We use *CleverReach*, a service of the third-party provider CleverReach GmbH & Co KG, Schafjückenweg 2, 26180 Rastede, Germany (CleverReach), to send our newsletter. If you register for our newsletter, your data may be transmitted to CleverReach and other external service providers. CleverReach is a service with which the newsletter dispatch can be organised and analysed. The data you enter for the purpose of receiving the newsletter (e.g. e-mail address) is stored on CleverReach's servers in Germany or Ireland.

Our newsletters sent with CleverReach enable us to analyse the behaviour of newsletter recipients. Among other things, we can analyse how many recipients have opened the newsletter message and how often which link in the newsletter was clicked on. Conversion tracking can also be used to analyse whether a predefined action has taken place after clicking on the link in the newsletter. Further information on data analysis by CleverReach newsletters can be found at <https://www.cleverreach.com/de/funktionen/reporting-und-tracking/>.

If you do not want CleverReach to analyse your data, you must unsubscribe from the newsletter.

The data you provide us with for the purpose of subscribing to the newsletter will be stored by us until you unsubscribe from the newsletter and deleted from both our servers and the CleverReach servers after you unsubscribe from the newsletter. Data stored by us for other purposes remains unaffected by this.

You can find out more about data processing by CleverReach in the corresponding data protection provisions: <https://www.cleverreach.com/de/datenschutz/>.

5. Data transmission

We may pass on personal data for processing or engage third parties for order processing. These third parties are subject to the same strict data protection regulations.

6. Duration of storage

The personal data that we process about you on our website will be deleted or blocked as soon as the purpose for which it was stored no longer applies. Data may also be stored if this is required by law. Blocking or deletion of the data can be postponed until the expiry of the relevant limitation and retention periods and if the data is still required for the conclusion or fulfilment of a contract.

7. Your rights

You have the following rights vis-à-vis us with regard to the personal data concerning you, insofar as these are subject to the Data Protection Act:

- Right to information (Art. 25 ff. FADP and Art. 15 GDPR),
- Right to rectification or erasure (Art. 32 para. 1 or 32 paras. 2 let. c FADP or Art. 16 et seq. GDPR),
- Right to restriction of processing (Art. 32 para. 2 let. a FADP or Art. 21 GDPR),
- Right to object to processing (Art. 32 para. 2 let. a FADP or Art. 21 GDPR).

If data processing on our website is based on your consent, you can revoke this consent at any time for the future without giving reasons. In order to process your requests to exercise your rights, it may be necessary for you to identify yourself so that we can clearly identify you.

To exercise your rights, please send an e-mail to info@hofstetter-partners.ch.

In Switzerland, there is no right of appeal to a supervisory authority. If the EU General Data Protection Regulation applies, there is a right of appeal to the competent data protection supervisory authority.

8. Data security

To protect your data, we have implemented numerous technical and organisational measures to ensure that the personal data processed via this website is protected as completely as possible. Please note that communication by e-mail, fax, mobile phone or Internet applications involves risks such as the possibility of the content of the message being viewed, altered or lost. We accept no liability for this.

Imprint

Company name	Hofstetter Partners Direct AG	
Address	Zilstrasse 72, 9016 St. Gallen	
Phone	+41 (0)71 288 01 01 Fax	+41 (0)71 288 50 36
E-mail / URL	info@hofstetter-partners.ch Web	www.hofstetter-partners.ch

Commercial register entry

Commercial Register Office of the Canton of St. Gallen (Switzerland)

Legal domicile of the company: St. Gallen (Switzerland)

Legal form: Public limited company

UID: CHE-107.457.068

VAT number: CHE-107.457.068 VAT

Authorised representative(s)

Thomas Hofstetter, Member of the Board of Directors