



## Online privacy policy Swisscom Trust Services

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## General

Data protection is a matter of trust, and your trust is important to us. We respect your privacy and your rights. The responsible and legally compliant handling of personal data is of great concern to Swisscom Trust Services AG, Konradstrasse. 12, 8005 Zurich, Switzerland ("we," "us," or "STS") is very concerned. This online data protection statement ("Statement") describes how we process your personal data when you visit our website (in relation to the requirements of the Swiss Data Protection Act (DPA) and the EU General Data Protection Regulation (GDPR)).

## 1 Processing of personal data, categories

Personal data are all details related to a specific or identifiable person. In addition to your contact details such as name, telephone number, address or e-mail address, and other details that you provide to us, for example, when registering, as part of an order, a purchase, a support request, or when requesting newsletters, participating in competitions or surveys and the like, this may also include the IP address that we register when you visit our website and combine with other information such as the pages accessed and reactions to offers displayed on our websites. See Chapter 1 of the comprehensive explanation.

As a rule, no legal or contractual obligation exists to disclose personal data. However, we must collect and process the personal data required to establish and process a contractual relationship. Otherwise, we cannot conclude or continue the contract in question. When you use our websites, processing specific data is also unavoidable. Logging specific (but generally non-personal) data cannot be prevented for technical reasons.

You may wish or be required to provide us with the personal data of third parties. We would like to point out that, in this case, you are obliged to inform the persons concerned about this privacy policy and to ensure the accuracy of the personal data concerned.

## 2 Purposes of the processing

We process your personal data on our websites for purposes such as:

- Performance of the contract, i.e., in particular
  - Initiation of a contract, in particular, e.g., requests for contract initiation, price information, technical information on the range of services, etc.
  - Payment transaction for a service, e.g., payment ("Purchase") of an identification service.
  - Ensuring customer support, e.g., inquiries regarding functional deficiencies or missing features
- Interest in marketing activities: We will accept your request for a newsletter or acceptance to one of our webinars and training courses. We will send you up-to-date information on our services or invite you to events.
- Further development of our services: Your requests are interesting for the further development of our products and thus generally increase customer satisfaction and competitiveness.

Further details on the purposes of the processing can be found under point 2 of the following comprehensive statement.

## 3 Legal basis of the processing

The processing of personal data requires a legal basis. The processing of your data is generally based on one or more of the following legal bases: The processing is necessary for

- the performance of a contract with you or for processing your contract request (Art. 6 [1] [b] GDPR; "performance of a contract"), or Art. 13 Para. 2 DSG
- (ii) compliance with a legal obligation (Art. 6 [1] [c] GDPR; "legal obligation"), or Art. 13 (2) DSG
- (iii) or the exercise of a legitimate interest (Art. 6 [1] [f] GDPR; "Legitimate Interest"), or Art. 13 (2) DSG
- (iv) or you have expressly consented to the processing, e.g., in the context of a newsletter order, sales inquiry, or webinar reservation (Art. 6 [1] [a] GDPR "Consent").



## 4 Hosting

This website is hosted externally. The personal data collected on this website is stored on the hoster(s)' servers. This may include but is not limited to IP addresses, contact requests, meta and communication data, contractual data, contact details, names, website accesses, and other data generated via a website.

External hosting is carried out for contract fulfillment vis-à-vis our potential and existing customers (Art. 6 [1] [b] GDPR or Art. 13 para. 2 DSG) and in the interest of a safe, fast, and efficient provision of our online offer by a professional provider (Art. 6 [1] [f] GDPR or Art. 13 para. 2 DSG).

If a corresponding consent has been requested, the processing is carried out exclusively based on Art. 6 [1] [a] GDPR, insofar as the consent includes the storage of cookies. The consent can be revoked at any time.

Our hoster will or will process your data only insofar as this is necessary to fulfill its service obligations and to follow our instructions regarding this data.

We use the following hoster(s):

HubSpot Germany GmbH,  
Am Postbahnhof 17,  
10243 Berlin, Germany  
CHE-323.559.900 VAT

### Job processing

We have a contract on order processing (AVV) for the above service concluded. This is a contract prescribed by data protection law, which ensures that it will only process the personal data of our website visitors by our instructions and in compliance with the GDPR.

## 5 Cookies

### 5.1 What are cookies?

So-called cookies are used on STS Internet pages. When you visit or use one of our internet pages, these small files are stored on your computer or mobile device. Cookies save specific settings about your browser and data about the exchange with the internet page via your browser. When a cookie is activated, it is assigned an identification number (cookie ID) that identifies your browser and allows the information contained in the cookie to be used. Most cookies we use are temporary session cookies automatically deleted from your computer or mobile device at the end of the browser session. As a rule, you can also set your browser so that you are informed about the setting of cookies and only allow cookies in individual cases, exclude the acceptance of cookies for certain circumstances, or generally activate the automatic deletion of cookies when closing the browser. If you deactivate cookies, the functionality of this website may be limited.

In addition, we also use permanent cookies. These remain stored on your computer or mobile end device after the end of the browser session. Depending on the type of cookie, these permanent cookies remain stored on your computer or mobile device for between one month and ten years. They are automatically deactivated after the expired programmed time.

### 5.2 Why do we use cookies?

The cookies we use enable various functions of our Internet pages. Cookies help, for example, to save your country and language preferences and your shopping cart across different pages of an internet session.

Using cookies also enables us to record and analyze the usage behavior of visitors to our website. This allows us to make our website more user-friendly and effective and to make your visit to our website as pleasant as possible. In addition, we can display information on the site that is specifically tailored to your interests.

### 5.3 What data is collected?

Cookies record usages information such as the date and time of accessing our website, the name of the website visited, the IP address of your terminal device, and the operating system used. Cookies also provide information, for example, about which of our Internet pages you visit and from which website you came to our Internet page.



We can also use cookies to track your research topics on our website.

For the processing of payments, we pass on your payment data to the credit institution commissioned with the payment.

#### 5.4 Cookies from third-party providers (Third Party Cookies)

The cookies or related technologies stored on your computer or mobile device may also originate from other Swisscom Group companies or independent third parties such as advertising partners, Internet, or payment service providers.

These cookies enable our partner companies to target you with individualized advertising and measure its impact.

The cookies of the partner companies also remain stored on your computer or mobile device for between one month and ten years. They are automatically deactivated after the programmed time has expired.

Our advertising partners only get access to data based on an identification number (cookie ID). This is online usage information such as our internet pages you have visited and your content.

## 6 Which web analysis tools do we use?

We use web analysis tools to obtain information about the use of our internet pages and improve our internet offer. A third-party provider usually provides these tools. As a rule, the data collected about using an Internet page is transmitted to the third party's server through cookies. Depending on the third-party provider, these servers may be located abroad.

The transmission of the data is carried out by shortening the IP addresses, which prevents the identification of individual end devices. The IP address transmitted by your browser when using third-party tools is not linked to other data from these third-party providers.

A transfer of this information by third-party providers only takes place due to legal regulations or in the context of order data processing.

We also use so-called re-targeting technologies on our internet pages. This enables us to address users of our websites with advertisements on the websites of third parties. The display of website ads is based on cookies in your browser, a cookie ID, and an analysis of previous use.

When you use our website, we only use the following third-party cookies and tracking technologies to recognize traffic and control the use of tools, as well as for troubleshooting and optimizing our website:

- Google Analytics
- Google Ads Conversion
- Google Dynamic Remarketing
- Google Conversion Tracking
- Google Maps - SRSIdent for map display
- Google reCAPTCHA – SRSIdent page

## 7 How can the use of cookies and web analysis tools be prevented?

Most internet browsers automatically accept cookies. However, you can instruct your browser not to accept cookies or to prompt you each time before accepting a cookie from an internet site you visit. You can also delete cookies on your computer or mobile device by using the corresponding function of your browser.

A list of the technologies used with details of the providers, the purpose of the respective technologies, the corresponding options for preventing or restricting their use, and further information from the respective providers can be found here:

<https://www.swisscom.ch/de/privatkunden/rechtliches/datenschutz.html#10>.

In addition, you can activate or deactivate the essential cookies by clicking on the "Cookies" link in the footer of our site.

If you decide not to accept our cookies or the cookies and tools of our partner companies, you will not see certain information on our Internet pages. You will be unable to use some functions designed to improve your visit. In this context, however, the settings selected in this way only apply to the websites operated by STS (<https://trust-services.swisscom.com>).

## 8 Categories of recipients and cross-border processing

We may make your data available to the following recipients in compliance with legal requirements:

- Swisscom Trust Services make its services available to you



- payment service providers, e.g., for the payment of identification services and
- Service providers who support us (e.g., service providers of the Swisscom Group) and
- Business partners (resellers) who conclude the commercial contract for the performance of services with you as the service recipient.
- Hosting provider who hosts the websites.
- Plugin providers who make their services available to you.

For further details on transferring personal data to third parties, please refer to section 4 of the following comprehensive statement.

## 9 Plugins and tools

### **YouTube with enhanced data protection:**

This website embeds videos from the YouTube website. The operator of the pages is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

We use YouTube in extended data protection mode. According to YouTube, this mode causes

After viewing the video, YouTube only stores information about visitors to this website.

View. The extended data protection mode makes the transfer of data to YouTube partners possible.

On the other hand, it is not necessarily excluded. Thus, regardless of whether you watch a video view, YouTube establishes a connection to the Google DoubleClick network.

As soon as you start a YouTube video on this website, a connection is established to the servers of YouTube is established. This tells the YouTube server which of our pages you have visited.

If you are logged into your YouTube account, you enable YouTube to track your browsing behavior directly.

To your personal profile. You can prevent this by logging out of your YouTube account.

Log out of your account.

Furthermore, YouTube can save various cookies on your end device after starting a video

or comparable recognition technologies (e.g., device fingerprinting). In this way

YouTube may receive information about visitors to this website. This information is used, among other things

Used to collect video statistics, improve the user experience, and

Prevent attempts at fraud.

If applicable, further data processing operations may be carried out after the start of a YouTube video.

Which we have no influence over.

YouTube is used in the interest of an appealing presentation of our online offers.

This constitutes a legitimate interest within the meaning of (Art. 6 [1] [f] GDPR or Art. 13 para. 2 DSG). Insofar as a corresponding

If consent has been requested, the processing is carried out exclusively based on Art. 6 para. 1 lit. a

GDPR. The consent can be revoked at any time.

For more information about privacy at YouTube, please see their privacy policy at:

<https://policies.google.com/privacy?hl=de>

### **LinkedIn:**

This website uses functions of the social network LinkedIn. The operator of the pages is LinkedIn Corporation (LinkedIn), 2029 Stierlin Court, Mountain View, CA 94043, USA.

When you call up one of our pages that contain LinkedIn functions, a connection is established to the LinkedIn serv-

ers. LinkedIn is informed that you have visited our website with your IP address. If you click the LinkedIn "Recom-

mend" button and are logged into your LinkedIn account simultaneously, LinkedIn can assign the visit to our web-

site to your user account. The use of LinkedIn is in the interest of an appealing presentation of our online offers.

This constitutes a legitimate interest within the meaning of (Art. 6 [1] [f] GDPR or Art. 13 para. 2 DSG).

For more information, please see LinkedIn's privacy policy at: <https://www.linkedin.com/legal/privacy-policy>.

### **Hubspot CRM:**



This website uses functions of the CRM tool from Hubspot. The operator of the pages is HubSpot Germany GmbH (Hubspot), Am Postbahnhof 17, 10243 Berlin, Germany.

We use the HubSpot CRM plugin to optimize our marketing activities and maintain contact with website visitors. The plugin enables us to collect and analyze information about interactions with our website to provide personalized content. It offers in the interest of a secure, fast, and efficient provision of our online offer by a professional provider. This constitutes a legitimate interest within the meaning of (Art. 6 [1] [f] GDPR or Art. 13 para. 2 DSG).

For more information, please see Hubspot's privacy policy at: <https://legal.hubspot.com/de/privacy-policy>.

#### **Google Analytics:**

This website uses functions of the web analysis service Google Analytics. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Analytics enables the website operator to analyze the behavior of website visitors. The website operator receives various usage data, such as page views, length of stay, operating systems used, and the user's origin. Google may summarise this data in a profile assigned to the respective user or their end device.

Google Analytics uses technologies that enable user recognition to analyze user behavior (e.g., cookies or device fingerprinting). The information Google collects about this website's use is usually transferred to a Google server in the USA and stored there.

The use of this analysis tool is based on Art. 6 para. 1 lit. f GDPR and Art. 13 para. 2 DSG. The website operator has a legitimate interest in analyzing user behavior to optimize both its website and its advertising. If a corresponding consent has been requested (e.g., consent to store cookies), the processing is carried out exclusively based on Art. 6 para. 1 lit. a GDPR; the consent can be revoked at any time.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. Details can be found here: <https://privacy.google.com/businesses/controllerterms/mccs/>.

#### **Google Analytics Remarketing:**

Our websites use the functions of Google Analytics Remarketing in conjunction with the cross-device functions of Google AdWords and Google DoubleClick. The provider is Google Inc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA.

This function makes it possible to link the advertising target groups created with Google Analytics Remarketing with the cross-device functions of Google AdWords and Google DoubleClick. In this way, interest-based, personalized advertising messages adapted to you depending on your previous usage and surfing behavior on one end device (e.g., mobile phone) can also be displayed on another of your end devices (e.g., tablet or PC).

If you consent, Google will link your web and app browsing history to your Google Account. This way, personalized advertising messages can be displayed on every device you log in with your Google account.

To support this feature, Google Analytics collects Google-authenticated IDs of users, which are temporarily linked to our Google Analytics data to define and create target groups for cross-device ad advertising.

You can permanently object to cross-device remarketing/targeting by deactivating personalized advertising in your Google account; follow this link: <https://www.google.com/settings/ads/onweb/>

Further information and the data protection provisions can be found in Google's data protection declaration at: <https://www.google.com/policies/technologies/ads/>

#### **Google AdWords and Google Conversion Tracking:**

This website uses Google AdWords. AdWords is an online advertising program of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States ("Google").

Within the framework of Google AdWords, we use so-called conversion tracking. When you click on an ad placed by Google, a cookie is set for conversion tracking. Cookies are small text files that the internet browser stores on the user's computer. These cookies lose their validity after 30 days and are not used to identify the user personally. If the user visits certain pages of this website and the cookie has not yet expired, Google and we can recognize that the user clicked on the ad and was redirected to this page.





Each Google AdWords customer receives a different cookie. The cookies cannot be tracked via the websites of AdWords customers. The information obtained using the conversion cookie is used to create conversion statistics for AdWords customers who have opted into conversion tracking. The customers learn the total number of users who clicked on their ad and were redirected to a page with a conversion tracking tag. However, they do not receive any information that personally identifies users. Suppose you do not wish to participate in the tracking. You can object to this by easily deactivating the Google conversion tracking cookie via your internet browser under user settings. You will then not be included in the conversion tracking statistics.

Google AdWords is used based on Art. 6 para. 1 lit. f GDPR and Art. 13 para. 2 DSG. The website operator has a legitimate interest in addressing potential customers via advertisements placed. If corresponding consent has been requested, the processing is carried out exclusively based on Art. 6 para. 1 lit. a GDPR.

You can find more information on Google AdWords and Google Conversion Tracking in Google's privacy policy: <https://www.google.de/policies/privacy/>

You can set your browser so that you are informed about the setting of cookies and only allow cookies in individual cases, exclude the acceptance of cookies for certain cases or in general and activate the automatic deletion of cookies when closing the browser. If you deactivate cookies, the functionality of this website may be limited.

#### **Google reCaptcha:**

Our websites in the resident area use "Google reCAPTCHA" (hereinafter "reCAPTCHA") on this website. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

The purpose of reCAPTCHA is to check whether the data input on this website (e.g. in a contact form) is made by a human being or by an automated programme. For this purpose, reCAPTCHA analyses the behaviour of the website visitor on the basis of 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 by the website visitor on the website or mouse movements made by the user). The data collected during the analysis is forwarded to Google.

The reCAPTCHA analyses run entirely in the background. Website visitors are not informed that an analysis is taking place.

The storage and analysis of the data is based on Art. 6 para. 1 lit. f DSGVO. The website operator has a legitimate interest in protecting its web offers from abusive automated spying and from SPAM. If a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a DSGVO; the consent can be revoked at any time.

For further information on Google reCAPTCHA, please refer to the Google Privacy Policy and the Google Terms of Use at the following links: <https://policies.google.com/privacy?hl=de> and <https://policies.google.com/terms?hl=de>

#### **Google Tag Manager:**

The Google Tag Manager is used on this website. The Google Tag Manager is a solution from Google LLC that allows companies to manage website tags via an interface. The Google Tag Manager is a cookie-less domain that does not collect any personal data. The Google Tag Manager triggers other tags, which may collect data. We would like to point this out separately. The Google Tag Manager does not access this data. If the user has made a deactivation at the domain or cookie level, this remains in place for all tracking tags implemented with Google Tag Manager.

On behalf of the operator of this website, Google will use this information to evaluate your use of the website, compile reports on website activity and provide other services relating to website activity and internet usage to the website operator. Google uses pseudonyms for this purpose. The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data. The Google Tag Manager is used based on Art. 6 para. 1 lit. f GDPR or Art. 13 para. 2 DSG. The website operator has a legitimate interest in a quick and uncomplicated integration and management of various tools on his website. If corresponding consent has been requested, the processing is carried out exclusively based on Art. 6 para. 1 lit. a GDPR.

You can find more information about Google Tag Manager at: <https://www.google.com/intl/tagmanager/>



## COMPREHENSIVE EXPLANATION

### 10 Storage period and data deletion

Your data will be stored at least until the purpose of their processing has been fulfilled and then deleted or made anonymous. Further information on the storage period and data deletion can be found under point 5 of the following comprehensive statement.

### 11 Your rights

You have several rights in relation to the processing of your personal data under the conditions set out in the applicable law, such as the rights of access, rectification, or erasure, unless there is a legal obligation to retain them. For more information on your rights, please refer to section 6 of the comprehensive statement below.

### 12 Changes

We reserve the right to adapt this declaration at any time. The version published on our Internet pages shall apply in each case. We will inform you of any changes appropriately and by the requirements of applicable law. For this purpose, we use our website.

<https://trustservices.swisscom.com/en/support/developer-section/service-status>, can also be subscribed to via RSS or e-mail.

### 13 Contact

If you have any questions or concerns about data protection, you can contact us as follows:

- By telephone: +41 (0) 800 724 724, menu selection "Fixed network and IT infrastructure", Keyword "Signing Service/ PRO number: 005038814 " or from Austria: +43 720 82 89 89
- By mail: Swisscom Trust Services AG, Data Protection, Konradstrasse 12, 8005 Zurich, Switzerland
- By e-mail: [sts.salessupport@swisscom.com](mailto:sts.salessupport@swisscom.com)

You can contact the Group Data Protection Officer of Swisscom AG as follows:

- By e-mail: [datenschutz@swisscom.com](mailto:datenschutz@swisscom.com)
- By post: Swisscom (Switzerland) Ltd, Dr. Nicolas Passadelis, LL.M., Data Protection Officer Swisscom Ltd and Swisscom (Switzerland) Ltd, P.O. Box, 3050 Bern

**In all cases, state the keyword "Swisscom Trust Services ".**

### 1 Categories of personal data as a visitor to our website

We process the following personal and sensitive data about you as a visitor to our website, which you have provided to us as part of an expression of interest, reservation, order/payment transaction, inquiry, or through your browser:

- Name and first name,
- Telephone number,
- E-mail address
- Company name
- Business address
- Internet address
- Your signature application used
- Your customer support number (PRO number)
- Interaction and usage data: IP address, date and time of connection, correspondence, end device type, device settings, operating system, software



- Website information: Cookie information, browser settings, frequency of visits to the website, duration of visits, Search terms, clicks on content, and origin website.
- Payment data, e.g., your debit or credit card
- Event information, e.g., data on preferences (e.g., food preferences) in the context of events
- If applicable, the information you have entered in the free text fields, e.g., support messages or event registrations.

Furthermore, we store the following data for these data:

- Contact history
- Appointment data
- Data on goods or services purchased or supplied
- Use of our website

## 2 Purpose of the processing

We process your personal data for the following purposes:

- Your consent: Exchange of information, e.g., in response to inquiries on the website or via email exchange.
- Contract initiation and processes: Exchange about the contents of an intended contract with us, discussion of the agreement, and conclusion of a contract, such as a price inquiry or a technical inquiry, or purchase of a service.
- Safeguarding your legitimate interests in connection with the performance of the contract and the trust service provided to you: If you have commissioned us to sell you a service provided by Swisscom (Switzerland) Ltd. or Swisscom IT Services Finance S.E., we will transmit your data to the support of the two companies as part of safeguarding your legitimate interests in the undisturbed provision of the service. For this purpose, you can also contact the support via our website using a form.  
Furthermore, the product manager will inform you via webinars to communicate news and changes to the service and product offer or to communicate necessary changes, e.g., in terms of use, contractual relationships, technical interfaces, or other adjustments.
- Compliance with a legal obligation: Your support requests may indicate malfunctions that legally impact signature operations. For this purpose, we need your data to investigate these effects further.

## 3 Legal basis

STS relies on the following legal bases when processing your data.

Purpose of processing	Data categories	Legal basis for the processing
Responding to expressions of interest, requests for information, contract initiation, payment for services	Name/first name, email address, business address, organisation, telephone number, Payment data	<ul style="list-style-type: none"> <li>• Overriding legitimate interest which is to obtain information</li> <li>• Contract initiation or payment</li> <li>• Overriding legitimate interest which is to achieve customer satisfaction and to be competitive</li> </ul>
Support purposes	Name/first name, e-mail address, business address, organisation, telephone number, customer support number, signature application, if applicable, further voluntary data in the reporting form.	<ul style="list-style-type: none"> <li>• Legitimate interest in solving the problem</li> <li>• Customer satisfaction, competitiveness and compliance with Swiss and EU legislation</li> </ul>
Marketing purposes, newsletter	Name/first name, email address, business address, organisation,	<ul style="list-style-type: none"> <li>• Consent</li> <li>• Overriding legitimate interest which is to obtain information</li> </ul>



	telephone number, interaction and usage data, website information, event information.	
Compliance with legal requirements	Name/first name, email address, business address, organisation, telephone number, interaction and usage data, website information.	<ul style="list-style-type: none"> <li>• Legal obligation and legitimate interest in complying with the law</li> </ul>
Website functionality and measurement of customer activity	Cookies	<ul style="list-style-type: none"> <li>• Predominantly legitimate interest in the functionality of the website or orientation of the offer in terms of customer satisfaction and competitiveness</li> <li>• or consent</li> </ul>

## 4 Categories of data recipients and cross-border processing

### 4.1 Categories of data recipients

Third parties in the context of compliance with legal obligations: We may disclose your personal data to third parties when deemed necessary or appropriate to comply with or verify compliance with applicable laws and regulations and respond to competent authorities' requests.

Service providers (within and outside the Swisscom Group): We use service providers who provide dedicated web services to provide the trust service. In part, these are operated by companies of the Swisscom Group. In addition, STS or the service providers of the Swisscom Group use third-party web services, e.g., a newsletter service, use a web agency that has access to the data in the event of support requests, and have its website hosted in a data center in Germany by an EU web hoster.

Web hosting: HubSpot Germany GmbH,

Web agency: Storylead, Zug, Switzerland, and Clickray, Poland

A business partner who has made our trust service available to you: Some of your personal data will be transferred to an appropriate business partner that provides signature applications with our service during your request for the trust services. A separate contract governs our legal relationship with this business partner.

Payment data is made available to payment service providers who are independent data controllers; check your payment data, and process the payment for Swisscom Trust Services.

### 4.2 Cross-border processing in countries outside the EEA (third countries)

Among other things, we use tools from companies based in the USA or other third countries that are not secure under data protection law. If these tools are active, your personal data may be transferred to these third countries and processed there. We want to point out that no level of data protection comparable to that in the EU can be guaranteed in these countries.

For example, US companies must hand over personal data to security authorities without you, as the data subject can take legal action against this. Therefore, it cannot be ruled out that US authorities (e.g., intelligence services) process, evaluate, and permanently store your data on US servers for monitoring purposes. We have no influence on these processing activities.

In addition, data is processed in Switzerland.

The EU Commission has recognized the decision that Switzerland has adequate data protection.

In all cases, we ensure adequate protection by the laws applicable in Switzerland and - if applicable - within the framework of the GDPR, for example, by concluding so-called EU standard contractual clauses with the recipients or by these data importers having recognized EU Binding Corporate Rules and carrying out corresponding transfer impact assessments. The EU Standard Contractual Clauses are a set of contractual clauses introduced by the European Commission to provide adequate protection for personal data in cross-border transfers.



## 5 Storage period and data deletion

We store and process your personal data for as long as is necessary to achieve the purpose for which it was collected or as long as is required or permitted by law.

Data on the processing activities of customer, prospect, and supplier management are reviewed every two years to determine whether further storage is necessary. If it is not required, the data is deleted. An exception to this is data that is to be classified as business documentation within the meaning of the GeBüV legislation in Switzerland as accounting-relevant data. These are subject to the statutory retention obligations.

## 6 Your rights

Within the framework of the GDPR or DSG, you have the following rights concerning your personal data:

### 6.1 Information

You have the right to obtain from us, free of charge, confirmation as to whether we are processing personal data relating to you and, if so, to request information on processing your personal data. This information includes, in particular, details of the purpose of the processing, the categories of personal data, and the recipients or categories of recipients to whom the personal data have been or will be disclosed.

### 6.2 Correction

You have the right, free of charge, to have your personal data processed by us corrected, and/or completed.

### 6.3 Deletion

You have the right to have your personal data deleted unless we are required by applicable laws and regulations to retain your personal data if:

- the personal data is no longer necessary for the purposes pursued;
- you have effectively objected to the processing (see below) or
- these have been unlawfully processed.

### 6.4 Restriction of processing

You may request us to restrict processing in the following cases:

- If you dispute the accuracy of the data for the duration of our review and subsequent correction or rejection of the correction.
- If you object to erasure in the event of unlawful processing and wish to restrict processing instead.
- If, after the purpose has been fulfilled, you request that the data should not be deleted but should be retained to assert rights.

The personal data concerned shall be segregated or marked for the duration of the restriction. Apart from storage, any further processing of this personal data will only be carried out with your consent or for the assertion, exercise, or defense of legal claims or the protection of the rights of another natural or legal person.

### 6.5 Data portability

You have the right, under certain conditions, to receive the personal data you have provided in a structured, commonly used, and machine-readable format. You are entitled to have this personal data transferred to another company without hindrance insofar as this is possible.

### 6.6 Right of objection

You have the right to object to our processing of your personal data at any time on grounds relating to your particular situation, and we may be required to stop processing your personal data. If you have the right to object and exercise this right, your personal data will no longer be processed by us for such purposes.

In particular, there is no right to object if we have compelling legitimate grounds for the processing which override your interests, rights, and freedoms or if the processing is necessary for the assertion, exercise, or defense of legal claims or the conclusion and performance of a contract.



## 6.7 Right of appeal

You also have the right to lodge a complaint with the competent supervisory authority, particularly in the Member State of your habitual residence or of the place of the alleged infringement, if you consider that processing your personal data infringes the GDPR.

In Switzerland, the FDPIC (Federal Data Protection and Information Commissioner) takes over the respective investigation of a suspected violation.

## 6.8 Contact points

You can exercise your rights regarding the processing of your personal data to the following contact points:

- By post: Swisscom Trust Services AG, Data Protection,  
Konradstrasse 12, 8005 Zurich, Switzerland
- By e-mail: [sts.salessupport@swisscom.com](mailto:sts.salessupport@swisscom.com)

You can contact the Data Protection Officer of Swisscom Ltd (Group) and Swisscom (Switzerland) Ltd as follows:

- By e-mail: [datenschutz@swisscom.com](mailto:datenschutz@swisscom.com)
- By post: Swisscom (Switzerland) Ltd, Dr. Nicolas Passadelis, LL.M., Data Protection Officer Swisscom Ltd and Swisscom (Switzerland) Ltd, P.O. Box, 3050 Bern

**In all cases, state the keyword "Swisscom Trust Services".**