

Privacy Policy Sekisui Alveo

1. Name and address of the person responsible

The persons responsible within the meaning of the EU General Data Protection Regulation (hereinafter referred to as “GDPR”), other national data protection laws of the member states and other data protection regulations are:

Sekisui Alveo AG
Luca Naglieri / Frank Voermans
Ebikonerstrasse 75
6043 Adligenswil
Schweiz
Tel. +41 41 228 92 92

2. Who can I contact if I have any questions?

Patricia Ugolini Reiners
Ebikonerstrasse 75
6043 Adligenswil
Schweiz
Tel. +41 41 228 92 92
E-Mail: Datenschutz.SAAG@SekisuiAlveo.com

3. General information on data processing

3.1 Scope of the processing of personal data

As a matter of principle, we process the personal data of our users only to the extent necessary to provide a functional website and our contents and services. The processing of personal data of our users regularly only takes place with the user’s consent. An exception is made in those cases where prior consent cannot be obtained for factual reasons and the processing of the data is permitted by legal regulations.

3.2. Legal basis for the processing of personal data

Insofar as we obtain the consent of the data subject for the processing of personal data, Art. 6 (1) of the EU GDPR serves as the legal basis.

When processing personal data that is necessary for the performance of a contract to which the data subject is a party, Art. 6 (1) (b) of the GDPR serves as the legal basis. This also applies to processing operations that are necessary to carry out pre- contractual measures.

Insofar as the processing of personal data is necessary to fulfil a legal obligation to which our company is subject, Art. 6 (1) (c) of the GDPR serves as the legal basis.

In the event that vital interests of the data subject or another natural person require the processing of personal data, Art. 6 (1) (d) of the GDPR serves as the legal basis.

If the processing is necessary to safeguard a legitimate interest of our company or a third party and if the interests, fundamental rights and freedoms of the data subject do not outweigh the former interest, Article 6 (1) (f) of the GDPR serves as the legal basis for the processing thereof.

3.3. Data deletion and storage duration

The personal data of the data subject will be deleted or blocked as soon as the purpose of the storage no longer applies. Furthermore, data may be stored if this has been provided for by the European or national legislator with respect to EU regulations, laws or other regulations to which the person responsible is subject. Data will also be blocked or deleted when a storage period prescribed by the above-mentioned standards expires unless there is a need to continue storing the data for the purpose of concluding or fulfilling a contract.

4. Provision of the website and creation of log files

4.1. Description and scope of data processing

Whenever our website is accessed, our system automatically collects data and information from the computer system of the accessing computer.

The following data is collected:

- a) Information about the browser type and version used
- b) The user's operating system
- c) The Internet service provider of the user
- d) The IP address of the user
- e) Date and time of access
- f) Websites from which the user's system accesses our website.

The data is also stored in the log files of our system. Not affected by this are the IP addresses of the user or other data that allow the data to be assigned to a user. This data is not stored together with other personal data of the user.

4.2. Legal basis for data processing

The legal basis for this temporary storage of data is Art. 6 (1) (f) of the GDPR.

4.3. Purpose of data processing

The temporary storage of an IP address by the system is necessary to enable the website to be accessed on the user's computer. For this purpose, the user's IP address must remain stored for the duration of the session.

These purposes also include our legitimate interest in data processing in accordance with Art. 6 (1) (f) of the GDPR.

4.4. Duration of storage

The data will be deleted as soon as it is no longer necessary for the purposes for which it was collected. In the case of the collection of data for the provision of the website, this is after one day.

4.5. Possibility of objection and removal

The collection of data for the provision of the website and the storage of the data in log files is mandatory for the operation of the website. There is, therefore, no possibility of an objection on the part of the user hereto.

5. Use of cookies

5.1. Description and scope of data processing

Our website uses cookies. Cookies are text files that are stored in the Internet browser or by the Internet browser on the user's computer system. If a user accesses a website, a cookie may be stored on the user's operating system. This cookie contains a characteristic string of characters that enables the browser to be uniquely identified when the website is accessed again.

We use cookies to make our website more user-friendly. Some elements of our website require the accessing browser to be able to be identified even after a page change.

Only the cookie settings are stored and transmitted in the cookies.

We also use cookies on our website that enable an analysis of the surfing behaviour of the users.

In this way the following data may be transmitted:

- a) Search terms entered
- b) Frequency of page views
- c) Use of website functions
- d) Duration of stay on the website

When accessing our website, the user will be informed in advance about the use of cookies for analysis purposes and his/her consent to the processing of the personal data used in this context will be obtained. In this context, reference is also made to this data protection declaration.

5.2. Legal basis for the data processing

The legal basis for the processing of personal data using technically necessary cookies is Art. 6 (1) (f) of the GDPR.

The legal basis for the processing of personal data using cookies for analysis purposes is Art. 6 (1) (a) of the GDPR if the user has given his/her consent.

5.3. Purpose of the data processing

The purpose of using technically necessary cookies is to simplify the use of websites for users. Some functions of our website cannot be offered without the use of cookies. For these, it is necessary that the browser is recognised even after a page change.

The user data collected by cookies that are technically necessary is not used to create a user profile.

Analysis cookies are used for the purpose of improving the quality of our website and its contents. These analysis cookies enable us to find out how the website is being used and thus to constantly optimise our offer.

These purposes also include our legitimate interest in the processing of personal data in accordance with Art. 6 (1) (f) of the GDPR.

5.4. Duration of storage, objection and removal possibilities

Cookies are stored on the user's computer and transmitted by the user to our site. Therefore, you as a user, have full control over the use of cookies. By changing the settings in your Internet browser, you can deactivate or restrict the transmission of cookies. Cookies that are already stored may be deleted at any time. This can also be done automatically. If cookies for our website are deactivated, it may not be possible to use all the functions of the website to their full extent.

6. Contact form and e-mail contact

6.1. Description and scope of data processing

On our website, there is a contact form that can be used for contacting us electronically. If a user takes advantage of this possibility, the data entered into the form fields is transmitted to us and stored. The data transmitted and stored is:

- a) First and last name
- b) Contact address
- c) E-mail address
- d) Telephone number.

At the time the message is sent, the following data is also stored:

- a) The IP address of the user
- b) Date and time of registration.

For the processing of the data, your consent will be obtained during the sending process and reference will be made to this privacy policy.

Alternatively, it is possible to contact us via the e-mail address provided. In this case, the user's personal data transmitted with the e-mail will be stored.

In this context, the data will not be passed on to third parties. The data will be used exclusively for processing the conversation.

6.2. Legal basis for data processing

The legal basis for the processing of the data is Art. 6 (1) (a) of the GDPR if the user has given his/her consent.

The legal basis for the processing of data transmitted in the course of sending an e-mail is Art. 6 (1) (f) of the GDPR. If the e-mail contact is for the purpose of concluding a contract, the additional legal basis for processing is Art. 6 (1) (b) of the GDPR.

6.3. Purpose of the data processing

The processing of the personal data from the form fields serves us only for the processing of the establishment of contact. In the case of contacting us by e-mail, this is also the necessary legitimate interest in the processing of data.

The other personal data processed during the sending process serves to prevent misuse of the contact form and to ensure the security of our information technology systems.

6.4. Duration of storage

The data will be deleted as soon as it is no longer necessary for the purpose for which it was collected. For personal data from the contact form fields and that sent by e-mail, this is the case when the respective conversation with the user has ended. The conversation ends when it can be concluded from the circumstances that the matter in question has been finally clarified.

Any additional personal data collected during the sending process will be deleted after a period of seven days at the latest.

6.5. Possibility of objection and removal

The user has the possibility of revoking his/her consent to the processing of personal data at any time. If the user contacts us by e-mail, he/she may object to the storage of his/her personal data at any time. In such a case, the conversation cannot be continued.

An objection can be made in any form with the reference or subject heading "Objection", stating your company, your name and your email address and should be addressed to:

Sekisui Alveo AG, Ebikonstrasse 75, 6043 Adligenswil, Switzerland, Tel. +41 41 228 92 92, Email: Datenschutz.SAAG@SekisuiAlveo.com

All personal data stored in the course of the contact will be deleted in this case.

7. Rights of the data subject

If your personal data is processed, you are a "data subject" within the meaning of the GDPR and you are entitled to the following rights in relation to the person responsible:

7.1. Right to information

You can request confirmation from the person responsible as to whether personal data concerning you is being processed by us.

If such processing has taken place, you can request information from the data controller about the following:

- a) the purposes for which the personal data is processed;
- b) the categories of personal data that are processed;
- c) the recipients or categories of recipients to whom the personal data concerning you has been or will be disclosed;
- d) the envisaged duration of the storage of the personal data concerning you or, if it is not possible to give specific details, the criteria for determining the duration of storage;
- e) the existence of a right of rectification or erasure of personal data concerning you, a right to have the processing limited by the controller or a right to object to such processing;
- f) the existence of a right of appeal to a supervisory authority;
- g) any available information as to the source of the data, if the personal data is not collected from the data subject;

- h) the existence of automated decision making, including profiling, in accordance with Art. 22 (1) and (4) of the GDPR and, at least in these cases, meaningful information about the logic involved and the scope and intended impact of such processing on the data subject.

You have the right to request information as to whether personal data concerning you is transferred to a third country or an international organisation. In this context, you have the right to request to be informed of the appropriate guarantees in accordance with Art. 46 of the GDPR in connection with such transfer.

7.2. Right of rectification

You have the right to ask the data controller to correct and/or complete the data if the personal data processed concerning you is incorrect or incomplete. The data controller shall make the correction without delay.

7.3. Right of limit processing

Under the following conditions, you may request the restriction of the processing of personal data concerning you:

- a) if you dispute the accuracy of the personal data concerning you for a period of time that enables the person responsible to verify the accuracy of the personal data;
- b) if the processing is unlawful and you object to the deletion of the personal data and request instead the restriction of the use of the personal data;
- c) the controller no longer needs the personal data for the purposes of the processing, but you need the personal data for the purpose of asserting, exercising or defending legal claims; or
- d) if you have lodged an objection to the processing operation pursuant to Art. 21 (1) of the GDPR and it has not yet been established whether the legitimate reasons given by the controller outweigh your reasons.

Where the processing of personal data relating to you has been restricted, such data may be processed, with the exception of storage, only with your consent or for the purpose of pursuing, exercising or defending legal claims or protecting the rights of another natural or legal person or on grounds of a matter of important public interest of the Union or a member state.

If the restriction on processing has been restricted in accordance with the above conditions, you will be informed by the controller before the restriction is lifted.

7.4. Right of cancellation

7.4.1. Cancellation obligation

You may request that the controller deletes the personal data concerning you without delay and the controller is obliged to delete such data without delay if one of the following reasons applies:

- a) the personal data concerning you is no longer necessary for the purposes for which it was collected or otherwise processed;
- b) you revoke your consent on which the processing was based pursuant to Art. 6 (1) (a) or Art. 9 (2) (a) of the GDPR and there is no other legal basis for such processing;
- c) you object to the processing pursuant to Art. 21 (1) of the GDPR and there are no legitimate reasons for such processing, or you object to the processing pursuant to Art. 21 (2) of the GDPR.
- d) the personal data concerning you was processed unlawfully;
- e) the deletion of personal data relating to you is necessary to comply with a legal obligation under European Union law or the law of the member states to which the controller is subject;
- f) the personal data concerning you has been collected in relation to information society services offered, in accordance with Art. 8 (1) of the GDPR.

7.4.2. Information to third parties (right to be forgotten)

If the data controller has made public the personal data concerning you and is obliged to delete such data pursuant to Art. 17 (1) of the GDPR, he/she shall take reasonable measures, including technical measures, taking into account available technology and implementation costs, to inform data controllers who process the personal data that you, as a data subject, have requested them to delete all links to such personal data or copies or replications of this personal data.

7.4.3. Exceptions

The right of cancellation does not exist insofar as the processing is necessary

- a) on the exercise of the right to freedom of expression and information;
- b) to comply with a legal obligation requiring processing under European Union or national law to which the controller is subject or to perform a task carried out in the public interest or the exercise of official authority vested in the controller;
- c) for reasons of public interest relating to public health pursuant to Art. 9 (2) (h) and (i) and Art. 9 (3) of the GDPR;

- d) for archival, scientific or historical research purposes in the public interest or for statistical purposes pursuant to Art. 89 (1) of the GDPR, insofar as the right referred to in section (a) is likely to render impossible or seriously prejudice the attainment of the objectives of such processing, or
- e) to assert, exercise or defend legal claims.

7.5. Right to information

If you have asserted the right to rectify, erase or limit the processing in relation to the controller, the controller is obliged to notify all recipients to whom the personal data concerning you have been disclosed of this rectification, erasure or limitation of processing, unless this proves impossible or involves a disproportionate effort.

You have the right in relation to the controller to be informed of these recipients.

7.6. Right to data transferability

You have the right to receive the personal data concerning you that you have provided to the data controller in a structured, common and machine-readable format. You also have the right to have this data communicated to another person in charge without interference from the person in charge to whom the personal data has been communicated, provided that

- a) the processing is based on consent pursuant to Art. 6 (1) (a) of the GDPR or Art. 9 (2) (a) of the GDPR or with respect to a contract pursuant to Art. 6 (1) (b) of the GDPR and
- b) the processing is carried out by means of automated procedures.

In exercising this right, you also have the right for the personal data concerning you to be transferred directly from one person responsible to another, as far as this is technically feasible. The freedoms and rights of other persons must not be affected by this.

The right to data transferability shall not apply to the processing of personal data necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

7.7. Right to withdraw the declaration of consent under data protection law

You have the right to revoke your data protection declaration of consent at any time. Revocation of your consent does not affect the legality of the processing that has taken place on the basis of your consent until revocation.

7.8. Automated decision in individual cases including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, that has a legal effect upon you or significantly affects you in a similar manner. This shall not apply if the decision

- a) is necessary for the conclusion or performance of a contract between you and the person responsible;
- b) is authorised by European Union law or the law of the member states to which the person responsible is subject and that law contains appropriate measures to safeguard your rights and freedoms as well as your legitimate interests; or
- c) with your express consent.

However, these decisions may not be based on special categories of personal data under Art. 9 (1) of the GDPR, unless Art. 9 (2) (a) or (g) of the GDPR applies and adequate measures have been taken to protect the rights and freedoms as well as your legitimate interests.

With regard to the cases referred to in a) and c), the controller shall take appropriate measures to safeguard the rights and freedoms as well as your legitimate interests, which shall at least include the right to obtain the intervention of a person from the controller, to express his or her point of view and to challenge the decision.

7.9. Right of appeal to a supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right to complain to a supervisory authority, in particular in the member state in which you reside, place of employment or place of the alleged infringement, if you consider that the processing of personal data relating to you is in breach of the GDPR.

The supervisory authority to which the complaint has been lodged shall inform the complainant of the status and the results of the complaint, including the possibility of a judicial remedy under Art. 78 of the GDPR.

7.10. Right of objection

You have the right to object at any time, for reasons arising from your particular situation, to the processing of personal data concerning you which is carried out on the basis of Art. 6 (1) (e) or (f) of the GDPR, including profiling based on these provisions.

The controller will no longer process the personal data concerning you unless he or she can demonstrate compelling legitimate reasons for such processing, which outweigh your interests, rights and freedoms, or unless the processing is for the purpose of asserting, exercising or defending legal claims.

If the personal data concerning you is processed for the purpose of direct marketing, you have the right to object at any time to the processing of personal data concerning you for the purpose of such marketing, including profiling, insofar as it is linked to such direct marketing.

If you object to processing for the purposes of direct marketing, the personal data concerning you will no longer be processed for those purposes.

You have the possibility to exercise your right of objection in relation to the use of information society services, without prejudice to Directive 2002/58/EC, by using automated procedures involving technical specifications. The objection can be made without any formality and should be sent, if possible, to the above-mentioned e-mail of the person responsible.

8. Web analysis by Google-Analytics

8.1. Scope of the processing of personal data

This website uses the “Google Analytics” service, which is provided by Google Inc. (1600 Amphitheatre Parkway Mountain View, CA 94043, USA) to analyse the use of the website by users. The service uses “cookies”, i.e. text files, which are stored on your end device. The information collected by the cookies is usually sent to a Google server in the USA and stored there.

IP anonymisation is used on this website. The IP address of users is shortened within the member states of the EU and the European Economic Area. Due to this shortening, the personal reference of your IP address is no longer necessary.

Within the framework of the agreement on commissioned data, which the website operators have concluded with Google Inc., the latter uses the information collected to create an evaluation of website use and website activity and provides services associated with Internet use.

8.2. Legal basis for the processing of personal data

The legal basis for the processing of personal data using Google Analytics is Art. 6 (1) (a) of the GDPR, if the user has given his/her consent to this.

8.3. Purpose of the data processing

The processing of users' personal data enables us to analyse the surfing behaviour of our users. By evaluating the data obtained, we are able to compile information on the use of the individual components of our website. This helps us to constantly improve our website and its user-friendliness. For these purposes, we have a legitimate interest in processing the data in accordance with Art. 6 (1) (f) of the GDPR. By making the IP address anonymous, the interest of the users in their protection of personal data is sufficiently taken into account.

8.4. Duration of storage

The data is deleted as soon as it is no longer required for our recording purposes.

In our case, this is after 14 months.

8.5. Possibility of objection and removal

Cookies are stored on the user's computer and transmitted by the user to our site. Therefore, you as a user have full control over the use of cookies. By changing the settings in your Internet browser, you can deactivate or restrict the transmission of cookies. Cookies that are already stored may be deleted at any time. This can also be done automatically. If cookies for our website are deactivated, it may not be possible to use all the functions of the website to their full extent.

Furthermore, you can use a browser plugin to prevent the information collected by cookies (including your IP address) from being sent to Google Inc. and used by Google Inc. The following link will take you to the corresponding plugin:
<https://tools.google.com/dlpage/gaoptout?hl=de>

When accessing our website, the user will be informed in advance about the use of cookies for analysis purposes and his/her consent to the processing of the personal data used in this context will be obtained. In this context, reference is also made to this data protection declaration.

Here you will find further information on the use of data by Google Inc.:

<https://support.google.com/analytics/answer/6004245?hl=de>