

# Privacy Policy

Johnsenskillz AG ("Johnsenskillz" or "we") is committed to protecting your privacy and data. In this Privacy Policy, we therefore want to inform you about the collection and use of individual data about personal or factual circumstances of an identified or identifiable natural person ("personal data") in the context of the use of our website.

This Privacy Policy applies to our website (<https://www.sheskillzglobal.com/>) and all subdomains (each hereinafter the "website" or "sheskillzglobal"). We assume no responsibility and disclaim any liability for links that lead from our Website to Internet sites of third parties. Clicking on an external link is solely your own responsibility.

This Privacy Policy is governed primarily by the Swiss Federal Act on Data Protection ("FADP") and takes the European General Data Protection Regulation ("GDPR") into best consideration.

## 1. Consent to use the Website

Please note that by visiting and using our website, you give your consent to the processing of your personal data within the framework of this declaration and the applicable data protection principles, in so far as such consent is required by data protection law.

In addition, the information in this privacy policy fulfills our obligation to inform you transparently and completely about the collection and processing of your personal data, even if your explicit consent is not required due to legal justification (overriding business interest, legal processing obligations, etc.).

## 2. Use of personal data

### 2.1. Our aspiration

The vision of Johnsenskillz is a world where talent has no gender. With our website we empower women (hereafter "you", "women" or "users") by offering a platform where women can match with potential employers. The employers can be companies from all around the world (hereafter "you" or "companies"), which are looking for qualified women for a job opening.

Our goal is to provide our users with Tools that may help promote their skills, competences and experiences and we offer many tips and advice for interviews, salary negotiations, etc. The users can also profit from our mentoring program, where users may connect with experienced mentors (women and men), which will mentor the users to the best of their knowledge, ability and experience.

Our aspiration is to provide an intuitive platform where women can accelerate their career and boost their competences. In order to do so we make great efforts to meet the data protection requirements to protect the personal data of the users to the best of our ability.

You decide what kind of information you upload on your profile. The more complete your profile is, the better or more accurate the match with a company may be. Additionally, the information provided by your personal data may be beneficial for a potential mentor program.

## 3. Contact for data protection questions

If you have any questions or comments regarding your personal data, please do not hesitate to contact us. You can reach us as follows:

Johnsenskillz AG  
c/o B&P tax and legal AG  
Bahnhofstrasse 23  
6300 Zug

If we are not the processor of the request we will gladly forward the request to the competent processor.

## **4. Anonymous data collection**

You can visit our website without providing any personal information. We do not store any personal data in this context. In order to improve our offer, we only evaluate statistical data, which do not allow any conclusion on your person.

## **5. Consent for the processing of particularly sensitive personal data**

Personal data requiring special protection is subject to stricter data protection regulations. Therefore, we need your explicit consent to be able to use them. We ask you for your consent in advance. This means that you must explicitly and unambiguously inform us that you agree that we process this personal data.

We obtain your consent with your subscription to our platform by creating a company/user account and when you upload your personal data to the website. You receive appropriate references to this Privacy Policy when creating your account. As long as you send us personal data in the knowledge of our privacy policy without any declaration to the contrary, we assume that you have given us your consent to process it accordingly.

We treat your accounts a whole as well as individual pieces of information that need to be treated more sensitively due to their privacy, such as your curriculum vitae, education, certificates and diplomas, test results, work experience, references, your past salary and salary expectations, skills, hobbies, emergency contacts, residence status or financial data, as particularly sensitive personal data.

In addition, the categories of particularly sensitive data defined by law also apply if we collect or receive them from you, such as data revealing racial or ethnic origin, political opinions, religious or ideological beliefs, or trade union membership, as well as genetic data, biometric data for unique identification, health data or data concerning sexual life or sexual orientation, and data concerning criminal convictions and criminal offenses.

Particularly sensitive personal data will only be collected by Johnsenskillz AG with your explicit consent.

## **6. Personal data**

Personal data can include "particularly sensitive personal data" within the meaning of data protection legislation, both on its own and in combination with other, inherently general personal data in a profile. Particularly sensitive personal data enjoys special discretion and confidentiality.

### **6.1. Personal data collected directly through the use of the website**

In the course of your visit to our website and any enquiry you may have made, we collect the following data:

- a) All information that you explicitly provide in the context of your profile (name, address, age, gender, contact details, etc.);
- b) IP address;

- c) browser version and browser type used;
- d) date and time of the visit or request;
- e) the password created by you (in encrypted format);
- f) any affiliation identity or link identity and link track (with this we can determine from what page you came to us and can assess to which page you are directed when leaving the website).

The processing of your personal data on the website takes place exclusively in the factual context:

- a) of an inquiry, order or use of a system service submitted by you;
- b) to correct errors or improve our website and to improve efficiency and functions of the website;
- c) to keep a physical archive of the data;
- d) to deliver targeted advertising and marketing, such as but not limited to newsletters, invitation to webinars, promoting events, mentorship programs;
- e) to manage customer-relationship, e.g. to enable user-to-user communication on the website and to facilitate networking by interests or networking by sponsors;
- f) to manage and fulfill customer contracts (e.g. mentorships programs, payments for tools and / or services rendered on the website);
- g) for market research, e.g. internal statistical purposes.

Unless further processing is explicitly mentioned in this Privacy Policy, the above list is exhaustive. It is also possible that we do not collect all of the afore mentioned data.

## **6.2. Profile data: Candidates and mentors**

We do not add any data to the user profiles without a corresponding request and do not make any changes to the data record without an explicit request from the user concerned. The data relevant under data protection law is collected by the user herself and the processing operations relevant under data protection law (adding personal information to the user profile, sending application dossiers to a company, carrying out matching procedures, selecting a mentorship program) are triggered by the user herself. This also includes the addition and uploading of any diplomas, curriculums, current employer details, personal contact details (phone number, address, email), personal preferences (career related, hobbies), bank data, criminal records, personal identifiers (social security number, tax numbers, company identification number, etc.) or other information and/or documents as well as personal photos and/ or videos to the user profile.

The assignment or addition of documents and/or any type of information to the profile takes place exclusively on the initiative of the user, whether through independent addition by the user herself or an automated assignment, e.g. by assigning any tests completed by the user on the Website directly to the profile and making them accessible to the user via her profile.

We reserve the right to collect the necessary login and profile data so that we can track changes to a profile and generate the history provided to the user. The data collection is necessary for the provision of our service or in our legitimate interest.

### **6.3. Profile data: companies**

The company creates a profile in which we collect personal data from the company and employees of the company, that are in any way relevant for the use of the profile.

We do not add any data to the company profiles without a corresponding request and do not make any changes to the data record without an explicit request from the company concerned. The data relevant under data protection law is collected by the company itself and the processing operations relevant under data protection law (adding personal information to the company profile, carrying out matching procedures) are triggered by the company itself.

We reserve the right to collect the necessary login and profile data so that we can track changes to a profile and generate the history provided to the user. The data collection is necessary for the provision of our service or in our legitimate interest.

## **7. Disclosure to third parties**

### **7.1. General**

Your data will not be passed on to other third parties via the website without your express consent. Exceptions to this are our service partners that we need to process the contractual relationship (e.g. financial institutions to process payments, the postal service, courier services or freight forwarders to ship material, tools to provide our services in the areas of accounting, advertisement management or general order management, etc.). In these cases, we strictly comply with the requirements of the applicable data protection laws. The scope of data transfer is limited to a minimum.

If we use service partners abroad, we ensure that they have their registered office or processing site in a country with a level of data protection equivalent to that of Switzerland, or otherwise that such an equivalent level of data protection is achieved by means of suitable contractual guarantees. A data transfer to a country with an insufficient level of data protection without sufficient contractual guarantees is excluded.

### **7.2. Data from a user profile**

Any data is only sent to a company by you. Through the privacy settings you are further more able to manage the level of disclosure of your data on your profile. You can organize and manage what data shall be displayed and to whom (other platform users, the public, nobody) on your user profile. Otherwise, neither general profile data nor profile content is published on the platform. Your data is therefore not visible to third parties, regardless of whether these third parties have a platform login or not.

Even if a company uses the platform's active sourcing technology to find suitable candidates for a position, the company will only receive general raw data with which it cannot identify you. Data is only released to the company if you have expressly consented to this.

The platform is meant to serve as a connector between users, and is therefore its tools and functions are designed to have contents disclosed. 100% anonymity cannot be guaranteed by us. If you wish to be fully anonymous, please do not use this platform as it is not suitable for such purposes.

### **7.3. Data from a company profile**

Your company and correspondent job offers stored in the profile are always publicly visible on the platform for everyone. Messages, active sourcing requests and results, dossiers, evaluation criteria and general profile settings are not publicly displayed.

## 8. Messages, notifications and updates

### 8.1. General information

Promotional Communications: You may receive marketing content about our website, services and products, as well as products we offer with our partners as well as third party products and services, through various communication channels such as email, SMS, pop-ups, push notifications and messaging or videoconferencing applications. You may opt out of these advertisements by following the instructions included in the communications you receive from us. You may also opt out of receiving future communications at any time by notifying us at [info@sheskillzglobal.com](mailto:info@sheskillzglobal.com).

Communications for Informational and Other Purposes: We will send you information that is required or necessary for all customers, notices that contain important information, and other communications requested by you. For this type of communication, you cannot opt out. However, you can customize the media and format through which you receive these notifications.

### 8.2. MailChimp

To provide our news we use MailChimp, which provides online tools that can be used to create, send, and manage emails. MailChimp may collect personal information, such as distribution lists which contain email addresses, and other information relating to those email addresses. For further information about the type of personal information MailChimp collects, refer to the MailChimp Privacy Policy here: <https://www.intuit.com/privacy/statement/>.

We will only use this information to:

- create, send and manage emails relating to the website
- measure email campaign performance
- improve the features for specific segments of customers
- evaluate your use of our website
- compile reports on website activity for website operators, and
- provide other services relating to website activity and internet usage.

MailChimp may transfer this information to third parties where required to do so by law, or where such third parties process the information on MailChimp's behalf. MailChimp collects information about when you visit the website, when you use the services, your browser type and version, your operating system, and other similar information.

MailChimp is based in the United States of America (USA) and the information collected about your use of the website (including your IP address) will be transmitted to and stored by MailChimp on servers located outside of Switzerland and/or the European Economic Area. We are required to inform you that by subscribing to our eNewsletter:

You consent to your personal information being collected, used, disclosed and stored as set out in Mail Chimp's Privacy Policy and agree to abide by Mail Chimp's Terms of Use.

You understand and acknowledge that this service utilises a MailChimp platform, which is located in the United States of America (USA) and relevant legislation of the USA will apply.

You can opt out of our mailing list if you choose the 'unsubscribe' service provided by MailChimp in every email, or contact us. You can also disable or refuse cookies or disable Flash player; however, you may not be able to use the services provided by MailChimp if cookies are disabled.

MailChimp has the endorsement of TRUSTe's Privacy Seal, which means this privacy policy has been reviewed by TRUSTe for compliance with their program requirements including transparency, accountability, and choice related to the collection and use of your personal information. TRUSTe is an independent third party that operates a globally-recognised privacy trust mark.

## 9. Cookies

### 9.1. General information concerning cookies

Cookies are small text files or bits of information that are stored on your computer or mobile device (such as smart phone or tablet) when you use our services. A cookie commonly contains the name of the website/application from which it originates, the duration of the cookie (i.e. how long the cookie will remain on your device) and a figure, which is normally a randomly generated, unique number.

We use cookies in order to make our services more user friendly and to tailor our services and products to match your interests and needs. Cookies are able to do this because our services can read these files. This enables our services to identify you and remind you about important information, which makes your use of our services more user friendly (e.g. by remembering preference settings). Cookies may also be utilized in order to help speed up your future activities and your future user experience with our services. We also use cookies in order to compile anonymous, aggregated statistics that enable us to understand how users use our services and that help us to improve the structure and content of our digital media.

The maximum storage period of cookies after they have been placed on the user's terminal for the first time is measured in the manner required by applicable law.

### 9.2. Types of cookies

The types of cookies that we use are session cookies, resident cookies, first-party cookies and third-party cookies.

**Resident cookies** are used in order to store your login information and remember your settings for future logins to our services. A resident cookie is a cookie that is stored on your computer as a file and remains there when you close your web browser. The cookie can be read by the services that created it when you revisit these services.

**Session ID cookies** are utilized in order to enable certain features on our services, to better understand how you interact with our services and to monitor aggregated user data and web traffic routing. In contrast to resident cookies, session cookies are removed from your computer when you close your browser. Session ID cookies typically store an anonymous session identifier on your computer that allows you to use a service without having to log back in after each click.

**First-party cookies** are our own cookies that we utilize in order to improve your user experience. They are linked with a user's personal information. Third parties do not have access to the information that we collect with our own cookies.

**Third-party cookies** are cookies that are placed in our services by third-party companies in order to provide services, including advertising cookies. Third-party companies place third-party cookies on your device on our behalf when you visit our services in order to make it possible for these third-party companies to perform the services that they provide. In addition to the remarks in this Data Protection Policy, you can find further information concerning these third-party cookies in the data protection policies of these third-party companies.

The following provides a list of the various types of cookies that we utilise in our services.

### 9.3. Essential cookies

Essential cookies are cookies that are absolutely necessary so that our services work and in order to use their features. Without such essential cookies, our services would not function as smoothly as you wish, and it could be that we would not be capable of offering the website or certain services or features that you request.

We also use technical cookies, which for customisation and personalisation purposes allow our services to remember selections that you made (such as your username, language or region in which you are located). These cookies do not collect any information about you that is used for advertising purposes, and they also do not remember the websites that you were on.

The following first-party cookies are set by us (all resident cookies):

Data protection viewability cookies: We install cookies on your computer that indicate whether you were informed through a displayed banner notice about the use of cookies, as well as the treatment of your data and your rights in connection with them, and then whether you gave your consent to the use of cookies so that the banner does not reappear each time you visit a website.

Device identifier cookie: We install cookies on your computer that identify you and notify the website or service that you are logged in.

User local cookie: We install cookies that are used in order to remember certain local selections that you made, such as language selection.

These cookies are necessary for the operation of our services. Therefore, you cannot object to the use of these cookies.

#### **9.4. Social media plug-in cookies**

##### YouTube (resident and session third-party cookies)

Our websites use plug-ins of YouTube, a site operated by Google. The operator of the site is YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA. When you visit one of our pages that is equipped with a YouTube plug-in, a connection is established with YouTube servers. In the process, the YouTube server is notified about which of our pages you visited.

If you are logged in to your YouTube account, you enable YouTube to directly allocate your surfing behaviour to your personal profile. You can prevent this by logging out of your YouTube account.

Further information about the treatment of user data can be found in YouTube's privacy policy at: [www.google.de/intl/de/policies/privacy](http://www.google.de/intl/de/policies/privacy)

#### **9.5. Analytical cookies**

##### Google Analytics incl. remarketing (resident third-party cookies)

The service Google Analytics serves to analyse user behaviour on our website. Our legitimate interest consists of the analysis, optimisation and economic operation of our website.

Use and user-related information that is collected includes, for example, IP address, location, time or frequency of the visit to our website. We have resorted to IP anonymisation for the use of Google tools. Through this add-on, the last digits of your IP address are shortened prior to definitive storage on Google servers. As a result, technical and analytical Google services continue to be reasonably usable, but you are no longer completely traceable and thus have a higher degree of anonymity with respect to your surfing behaviour than without IP anonymisation.

We also use the remarketing function in connection with Google Analytics. This allows us to serve you personalised advertising on appropriate advertising spaces on other websites based on the interests you have shown on our website. This is limited to a maximum of 18 months. Remarketing allows us to place advertising that is as relevant to you as possible and to measure the efficiency and reach of the advertising media, but also to check the billing of our advertising partners for campaigns served.

The data collected in this way are in turn used by Google in order to provide us with an analysis of the visit to our website, as well as of the use activities there. These data may also be used in order to provide additional services related to the use of our website and the use of the internet.

Google states that it does not link your IP address with other data. In addition, Google provides further information for you relating to data protection law at [www.google.com/intl/de/policies/privacy/partners](http://www.google.com/intl/de/policies/privacy/partners), such as options for preventing data use.

Moreover, Google offers a so-called deactivation add-on, along with further information about this, at [tools.google.com/dlpage/gaoptout?hl=de](http://tools.google.com/dlpage/gaoptout?hl=de). This add-on can be installed on popular internet browsers and offers you greater ability to control the data that Google collects when you visit our website. In the process, the add-on notifies the JavaScript (ga.js) of Google Analytics that information concerning the visit to our website should not be transmitted to

Google Analytics. However, this does not prevent information from being transmitted to us or to other web analysis services. You can of course also learn in this Data Protection Policy about whether other web analysis are utilised by us and, if so, which ones.

Alternatively, future analysis of your website visit by Google Analytics can be deactivated by clicking on the link below. Clicking on the link sets a so-called opt-out cookie, which prevents the analysis of your visit to our website in the future.

[Google Analytics deaktivieren](javascript:gaOptout())

Please be aware that if you delete the cookies in your browser settings, this can also result in the opt-out cookie being deleted and your having to reactivate it, if desired.

Google will in no case link your IP address with other data stored by Google. You can prevent the installation of cookies. To do so, you must select “do not accept cookies” in your browser settings. Please be aware that in this case, you may not be able to use all features of these websites in full. By using these websites, you declare that you consent to the processing of the data collected about you by Google in the aforementioned manner and for the aforementioned purpose.

#### Hotjar (resident third-party cookie)

We use the Hotjar web analytics service provided by Hotjar Ltd ("Hotjar") for our website. Hotjar is a European company based in Malta (Hotjar Ltd, Level 2, St Julians Business Centre, 3, Elia Zammit Street, St Julians STJ 1000, Malta). This tool tracks movements on our website (so-called heat maps). For example, it is possible to see how far users scroll and which buttons users click on and how often. Furthermore, the tool also makes it possible to obtain feedback directly from users of the website. In this way, we obtain valuable information to make our website even faster and more customer-friendly.

We pay particular attention to the protection of your personal data when using this tool. For example, we can only track which buttons are clicked, mouse history, how far scrolled, device screen size, device type and browser information, location (country only) and preferred language to display our website.

Hotjar offers each user the possibility to prevent the use of the tool by means of a "Do Not Track header", so that no data about the visit to the respective website is recorded. Detailed instructions with information about your browser can be found at <https://www.hotjar.com/opt-out>.

## **9.6. Marketing, profiling and retargeting cookies**

### Google AdWords with conversion tracking (resident third-party cookies)

We use conversion tracking for the targeted promotion of our website. Our legitimate interest consists of the analysis, optimization and economic operation of our website.

If you click on an advertisement placed by Google, the conversion tracking we utilise stores a cookie on your end device. These so-called conversion tracking cookies lose their validity after 30 days and in addition do not serve to identify you personally. If the cookie is still valid and you visit a certain page on our website, we as well as Google can determine that you clicked on one of our advertisements placed by Google and that you were then redirected to our website.

The information obtained in this way is used by Google to create statistics for us about the visit to our website. In addition, we receive information from this about the number of users that clicked on our advertisement(s), as well as about the pages of our website that were subsequently visited. However, this does not enable us or third parties that also utilise Google AdWords to identify you in this manner.

### Google AdSense (resident third-party cookies)

Google AdSense stores cookies and so-called web beacons on your end device via your internet browser. Through this, Google enables us to analyse your use of our website. The information collected in this way, together with your IP address and the advertising formats



displayed to you, is transferred to Google in the USA and stored there. In addition, Google can forward this information to contractual partners. However, Google states that your IP address will not be combined with other data about you.

Our legitimate interest consists of the analysis, optimization and economic operation of our website.

We have resorted to IP anonymization for the use of Google tools. Through this add-on, the last digits of your IP address are shortened prior to definitive storage on Google servers. As a result, technical and analytical Google services continue to be reasonably usable, but you are no longer completely traceable and thus have a higher degree of anonymity with respect to your surfing behavior than without IP anonymization.

Moreover, you can prevent or limit the installation of cookies by adjusting the settings of your internet browser. You can also at any time delete cookies that have already been stored. However, the steps and measures required for this purpose depend on the specific internet browser you are using. Therefore, if you have questions, please use the help feature or documentation of your internet browser or contact its manufacturer or support.

In addition, Google also offers further information on this topic at:

[services.google.com/sitestats/de.html](https://services.google.com/sitestats/de.html)

[www.google.com/policies/technologies/ads](https://www.google.com/policies/technologies/ads)

[www.google.de/policies/privacy](https://www.google.de/policies/privacy)

including about the options for preventing the use of data.

## 10. Transmission of data

The transmission of the data entered via forms on our website from your computer to the cloud is encrypted. The data entered in the contact form is not stored on your computer (no cookie or similar). Despite encryption, absolute security is not possible. The server forwards your data entered in the contact form by email for processing. These emails are not encrypted. The use of emails is technically not secure; it may happen that emails are not delivered. When emails are transmitted, they can leave national borders, even if the sender and recipient are in the same country. The confidentiality of emails cannot be guaranteed if encryption is missing or insufficient. Accordingly, we strive to minimize the amount of personal data in email traffic.

By using the forms or sending an email, you consent to communication via email with knowledge of the risks described.

## 11. Storage of your personal data

Our website is hosted by Amazon Technologies Inc. through Amazon Web Services, ("AWS"). Your personal data collected in the course of activities on the website are hosted on AWS servers in Germany. According to AWS, the servers are protected against unauthorized third-party access as much as possible. Backups are made regularly to prevent data loss as far as possible.

As far as your personal data which we collect directly and process internally as well as in the database of our platform and merge in your profile, we use cloud-based solutions with data host location in Switzerland or the European Economic Area. Data storage in and transfers to other countries are limited to what is strictly necessary to provide our services, and subject to data protection measures as stated in clause 7 above.

## 12. Your rights

### 12.1. Data retention and updating

Generally, you have the sovereignty over your data. We do not process neither independently your personal data with an external effect for you nor independently pass it on to third parties

(companies, etc.) nor publicly publish it on the platform in any way or otherwise make it accessible to third parties, we are not obliged to delete or update your data. Any transmission of your data will incur with your consent.

We retain your data only for as long as is legally required or necessary in accordance with the purpose of processing. In the case of analyses, we store your data until such time as the analysis is completed. If we store data based on a contractual relationship with you, these data remain stored, at a minimum, for as long as the contractual relationship is in effect and, at a maximum, for as long as the prescription period for possible claims by us are running or statutory or contractual retention obligations exist. However, we reserve the right at any time and without giving reasons to block or delete your profile after prior notice to the email address you have provided. We consider such a deletion in particular, but not conclusively, in case of longer inactivity of a profile.

### **12.2. Information and change or correction of data**

You have the right to free information about your stored data and the right to correction at any time. Please contact us for this purpose. You can find our contact details under clause 3 of this Privacy Policy.

### **12.3. Portability**

You further more have the right to demand that your electronic personal data be transmitted to you or another controller at no charge. However, please be aware that we will not be able to adapt your data protection to conform to any special format requirements that another controller may have, and under no circumstances will we transmit your business history or passwords.

### **12.4. Revocation and cancellation**

You can revoke your consent to this Privacy Policy at any time and request the cancellation of your personal data. You can independently deactivate your data in your profile as well as your profile itself. A deactivated profile can neither be further processed by you nor by us. By notifying us, you can either reactivate your profile or have it permanently and irrevocably deleted. You will find our contact details under clause 3 of this data protection declaration

Other personal data that we have necessarily processed outside of your platform profile may be deleted at your request. We are also available to assist you if you are unable to delete your personal data or profile. Please contact us for this purpose. You will find our contact details under clause 3 of this Privacy Policy.

In the event of a cancellation request, we will block and delete your profile. Please note, however, that there may be legal obligations to retain certain data (e.g., due to accounting or tax law), which prohibit us from deleting the data for a certain period of time, or that our legitimate interests may conflict with the cancellation (e.g., performance records for the duration of the statutory limitation periods). To this extent, your deletion request therefore only applies to future processing. Furthermore, please note that, due to technical reasons, some personal data stored in backups may be impossible to be deleted - however, we confirm that your backup data will not longer be processed any further.

If a contractual relationship is still pending at the time of receipt of your revocation and cancellation request, your personal data will continue to be processed until the contract has been fully processed. Your revocation under data protection law expressly has no influence on the processing of existing contractual relationships and is not considered an extraordinary reason for termination.

### **12.5. Complaints to the supervisory authority**

In the event of violations of the FADP, data subjects will have a right of appeal to the Federal Data Protection and Information Commissioner (FDPIC) from the entry into force of the revised

Act (expected from September 2023). The right of appeal is without prejudice to other administrative or judicial remedies.

“You have the right to lodge a complaint with the competent supervisory authority at the registered office of the controller if you are of the opinion that we have violated a provision of the FADP. The Federal Data Protection and Information Commissioner ([www.edoeb.admin.ch](http://www.edoeb.admin.ch)) is responsible for such complaints.”

### **13. Adjustment to this Privacy Policy**

Changes to this privacy policy apply from the time of their publication on our website. The processing of personal data collected under an older privacy policy will be carried out in accordance with this privacy policy.

We reserve the right to change this Privacy Policy at any time and to inform customers of the changes in an appropriate manner.

As of: 17 October, 2023