

## Data protection declaration of SAVAG Services AG, 8807 Freienbach

### I. 1. Name and address of the person responsible

The following data protection provisions apply to the company:

*SAVAG Services AG, Pfarrmatte 6, 8807 Freienbach, Switzerland  
Tel.: +41 44 586 33 93, email: [information\(at\)savag.ch](mailto:information(at)savag.ch), website: [savag.ch](http://savag.ch)*

### II. Name and address of the data protection officer

*Thomas Burkart, c/o SAVAG Services AG, Pfarrmatte 6, 8807 Freienbach, Switzerland  
Tel.: +41 44 586 33 93, email: [information\(at\)savag.ch](mailto:information(at)savag.ch), website: [savag.ch](http://savag.ch)*

### III. Contact for objections and requests for deletion in accordance with this data protection policy

*Email: [information\(at\)savag.ch](mailto:information(at)savag.ch)*

### IV. General information on data processing

#### 1. scope of processing of personal data

We generally only process our users' personal data to the extent that this is necessary to provide a functional website and our content and services. Our users' personal data is generally only processed with the user's consent. An exception applies in cases where prior consent cannot be obtained for actual reasons and the processing of the data is permitted by law.

#### 2. legal basis for the processing of personal data

If we obtain consent from the data subject for processing personal data, Art. 6 (1) lit. a of the EU General Data Protection Regulation (GDPR) serves as the legal basis. If personal data is required to fulfill a contract to which the data subject is a party, Art. 6 (1) lit. b of the GDPR serves as the legal basis. This also applies to processing operations that are necessary to carry out pre-contractual measures.

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

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

#### 3. data deletion and storage period

The personal data of the data subject will be erased or blocked as soon as the purpose for which they were stored no longer applies. Data may also be stored if this has been provided for by the European or national legislator in Union regulations, laws or other provisions to which the controller is subject. Data will also be blocked or erased if a storage period prescribed by the

forementioned standards expires, unless there is a need to continue storing the data for the conclusion or fulfillment of a contract.

## V. Provision of the website and creation of log files

### 1. Description and scope of data processing

Every time our website is accessed, our system automatically records data and information from the computer system of the accessing computer. The following data may be collected:

- (1) Information about the browser type and version used
- (2) The user's operating system
- (3) The user's Internet service provider
- (4) The user's IP address
- (5) date and time of access
- (6) Websites from which the user's system accesses our website
- (7) Websites accessed by the user's system via our website

The data is also stored in the log files of our system. This data is not stored together with other personal data of the user.

### 2. legal basis for data processing

The legal basis for the temporary storage of data and log files is Art. 6 (1) lit. f GDPR.

### 3. purpose of data processing

The temporary storage of the IP address by the system is necessary to enable the website to be delivered to the user's computer. For this purpose, the user's IP address must be stored for the duration of the session. The data is stored in log files to ensure the functionality of the website. In addition, we use the data to optimize the website and to ensure the security of our information technology systems. The data is not evaluated for marketing purposes in this context. Our legitimate interest in data processing in accordance with Art. 6 (1) ( f) GDPR also lies in these purposes.

### 4. duration of storage

The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. If the data is collected to provide the website, this is the case when the respective session has ended. If the data is stored in log files, this is the case after seven days at the latest. Storage beyond this is possible. In this case, the users' IP addresses are deleted or altered so that it is no longer possible to assign the calling client.

### 5. possibility of objection and removal

The collection of data to provide the website and the storage of data in log files is essential for the operation of the website. Consequently, the user has no option to object.

## VI. use of cookies

### **a) 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. When a user visits a website, a cookie can be stored on the user's operating system. This cookie contains a characteristic string that enables the browser to be uniquely identified when the website is visited again.

We use cookies to make our website more user-friendly. Some elements of our website require that the browser that is accessing the website can be identified even after a page change. The following data is stored and transmitted in the cookies:

- (1) language settings
- (2) items in a shopping cart
- (3) log-in information

We also use cookies on our website that enable us to analyse the surfing behaviour of users. In this way, the following data can be transmitted:

- (1) Search terms entered
- (2) frequency of page views
- (3) use of website functions

## **b) Legal basis for data processing**

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

## **c) Purpose of 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 recognized even after changing pages. We need cookies for the following applications:

- (1) shopping cart
- (2) Adoption of language settings
- (3) remembering search terms

The user data collected by technically necessary cookies is not used to create user profiles. The analysis cookies are used to improve the quality of our website and its content. The analysis cookies tell us how the website is used and enable us to continually optimize our offering.

Our legitimate interest in processing personal data for these purposes also lies in accordance with Art. 6 (1) ( f ) GDPR.

## **e) Duration of storage, possibility of objection and removal**

Cookies are stored on the user's computer and transmitted from there to our site. Therefore, you as the user have full control over the use of cookies. You can deactivate or restrict the transmission of cookies by changing the settings in your Internet browser. Cookies that have already been stored can be deleted at any time. This can also be done automatically. If cookies are deactivated for our website, it may no longer be possible to fully use all of the website's functions.

## VII. newsletter

### 1. Description and scope of data processing

If our website offers the option to subscribe to a free newsletter, the data from the input mask will be sent to us when you register for the newsletter. In addition to the data entered by the user, the following data will be sent to us:

- (1) IP address of the accessing computer
- (2) date and time of registration

Your consent to the processing of data will be obtained during the registration process and reference will be made to this privacy policy.

If you purchase goods or services on our website and provide your email address, we may subsequently use this to send you a newsletter. In such a case, the newsletter will only be used to send direct advertising for our own similar goods or services.

In connection with data processing for sending newsletters, no data will be passed on to third parties. The data will be used exclusively for sending the newsletter.

## 2. legal basis for data processing

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

## 3. purpose of data processing

The purpose of collecting the user's email address is to deliver the newsletter. The collection of other personal data during the registration process serves to prevent misuse of the services or the email address used.

## 4. duration of storage

The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. The user's email address is therefore stored as long as the newsletter subscription is active. The other personal data collected during the registration process is usually deleted after a period of seven days.

## 5. possibility of objection and removal

The user can cancel the newsletter subscription at any time. For this purpose, there is a corresponding link in every newsletter. This also makes it possible to revoke the consent to the storage of the personal data collected during the registration process.

## VIII.registration

### 1. Description and scope of data processing

On our website, we offer users the opportunity to register by providing personal data. The data is entered into an input mask and transmitted to us and stored. The data is not passed on to third parties. In addition to the data provided by the user during the registration process, the following data is stored:

- (1) The user's IP address
- (2) date and time of registration

As part of the registration process, the user's consent to process this data is obtained.

### 2. legal basis for data processing

lit. a GDPR if the user has given their consent .

### 3. purpose of data processing

Registration of the user is necessary for the provision of certain content and services on our website or is necessary for the performance of a contract with the user or for the implementation of pre-contractual measures.

### 4. duration of storage

The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. This is the case for the data collected during the registration process if the registration on our website is canceled or changed, or for the data collected during the registration process for the performance of a contract or for the implementation of pre-contractual measures if the data is no longer required for the implementation of the contract. Even after the contract has been concluded, it may be necessary to store the contractual partner's personal data in order to comply with contractual or legal obligations.

## 5. possibility of objection and removal

As a user, you have the option of canceling your registration at any time. You can have the data stored about you changed at any time. Please contact us using the contact options provided in this privacy policy. If the data is required to fulfill a contract or to carry out pre-contractual measures, early deletion of the data is only possible if there are no contractual or legal obligations that prevent deletion.

## IX. contact form and email contact

### 1. Description and scope of data processing

There is a contact form on our website that can be used to contact us electronically. If a user takes advantage of this option, the data entered in the input mask is transmitted to us and stored. In addition to the data provided by the user, this data includes the following:

- (1) The user's IP address
- (2) date and time of registration

to the processing of the data is obtained during the sending process and reference is made to this privacy policy. Alternatively, you can contact us using the email address provided. In this case, the user's personal data transmitted with the email will be stored. The data will not be passed on to third parties in this context. The data will be used exclusively for processing the conversation.

### 2. legal basis for data processing

The legal basis for processing the data if the user has given their consent is Art. 6 (1) lit. a GDPR. The legal basis for processing the data transmitted when sending an email is Art. 6 (1) lit. f GDPR. If the email contact is aimed at concluding a contract, the additional legal basis for processing is Art. 6 (1) lit. b GDPR.

### 3. purpose of data processing

The processing of personal data from the input mask serves us solely to process the contact. In the case of contact via email, this also represents the necessary legitimate interest in processing the data. The other personal data processed during the sending process serve to prevent misuse of the contact form and to ensure the security of our information technology systems.

### 4. duration of storage

The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. For the personal data from the input mask of the contact form and those that were sent by email, this is the case when the respective conversation with the user has ended. The conversation is ended when it can be inferred from the circumstances that the matter in question has been conclusively clarified.

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

### 5. possibility of objection and removal

The user has the option to revoke his consent to the processing of personal data at any time. If the user contacts us by email, he can object to the storage of his personal data at any time. In such a case, the conversation cannot be continued. To revoke the storage of this data, the user can request this from us using the contact options provided in this privacy policy. In this case, all personal data stored in the course of contacting us will be deleted.

## X. rights of the data subject

### 1. right to information

You can request confirmation from the controller as to whether personal data concerning you is being processed by us. If such processing is taking place, you can request the following information from the controller:

- (1) the purposes for which the personal data are processed;
- (2) the categories of personal data being processed;
- (3) the recipients or categories of recipients to whom the personal data concerning you have been or will be disclosed;
- (4) the planned duration for which the personal data concerning you will be stored or, if specific information is not possible, the criteria for determining that period;
- (5) the existence of a right to rectification or erasure of personal data concerning you, a right to restriction of processing by the controller or a right to object to such processing;
- (6) the existence of a right to lodge a complaint with a supervisory authority;
- (7) all available information as to their source, where the personal data are not collected from the data subject;
- (8) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

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

### 2. right to rectification

You have the right to request rectification and/or completion from the controller if the personal data concerning you that are processed are incorrect or incomplete. The controller must carry out the rectification immediately.

### 3. right to restriction of processing

You can request the restriction of the processing of personal data concerning you under the following conditions:

- (1) if you contest the accuracy of the personal data concerning you for a period enabling the controller to verify the accuracy of the personal data;
- (2) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of the use of the personal data instead;
- (3) the controller no longer needs the personal data for the purposes of the processing, but you require them to assert, exercise or defend legal claims, or
- (4) if you have objected to processing pursuant to Art. 21 Para. 1 GDPR and it has not yet been determined whether the legitimate reasons of the controller outweigh your reasons.

If the processing of personal data concerning you has been restricted, these data may – with the exception of storage – only be processed with your consent or for the establishment, exercise or defence of legal claims or to protect the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

If the restriction of processing has been restricted in accordance with the above-mentioned requirements, you will be informed by the controller before the restriction is lifted.

### 4. right to erasure

#### a) obligation to delete

You may request that the controller delete the personal data concerning you immediately, and the controller is obliged to delete this data immediately if one of the following reasons applies:

- (1) The personal data concerning you are no longer necessary for the purposes for which they were collected or otherwise processed.
- (2) You withdraw your consent on which the processing is based according to Art. 6 Para. 1 lit. a or Art. 9 Para. 2 lit. a GDPR, and there is no other legal basis for the processing.
- (3) You object to the processing pursuant to Art. 21 Para. 1 GDPR and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Art. 21 Para. 2 GDPR.
- (4) The personal data concerning you have been processed unlawfully.
- (5) The erasure of personal data concerning you is necessary to fulfil a legal obligation under Union or Member State law to which the controller is subject.
- (6) The personal data concerning you were collected in relation to information society services offered in accordance with Art. 8 (1) GDPR.

#### b) information to third parties

If the controller has made the personal data concerning you public and is obliged to erase them pursuant to Art. 17 Para. 1 GDPR, the controller shall take appropriate measures, including technical ones, taking into account the available technology and the implementation costs, to inform data controllers which process the personal data that you, as the data subject, have requested that they erase all links to these personal data or copies or replications of these personal data.

#### c) exceptions

The right to erasure does not exist if the processing is necessary

- (1) to exercise the right to freedom of expression and information;
- (2) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- (3) for reasons of public interest in the area of public health pursuant to Art. 9 (2) ( h) and (i) and Art. 9 (3) GDPR;
- (4) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes pursuant to Art. 89 (1) GDPR, insofar as the right referred to in section a) is likely to render the achievement of the objectives of that processing impossible or seriously compromises it, or
- (5) to assert, exercise or defend legal claims.

#### 5. right to information

If you have asserted your right to rectification, erasure or restriction of processing vis-à-vis the controller, this controller is obliged to inform all recipients to whom the personal data concerning you were disclosed of said rectification, erasure or restriction of processing, unless doing so should prove impossible or involve disproportionate expenditure. You have the right to be informed by the controller about these recipients.

#### 6. right to data portability

You have the right to receive the personal data concerning you that you have made available to the controller in a structured, common and machine-readable format. In addition, you have the right to transmit this data to another controller without hindrance from the controller to whom the personal data was made available, provided that

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

In exercising this right, you also have the right to have the personal data concerning you transmitted directly from one controller to another, where technically feasible. This must not affect the freedoms and rights of other persons.

The right to data portability does 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. right of objection

(1) (e) or (f) GDPR, for reasons related to your particular situation ; this also applies to profiling based on these provisions . The controller will no longer process the personal data concerning you unless he can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or unless the processing serves to assert, exercise or defend legal claims.

If the personal data concerning you is processed in order to conduct direct advertising, you have the right to object at any time to the processing of the personal data concerning you for the purposes of such advertising; this also applies to profiling insofar as it is related to such direct advertising.

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

In connection with the use of information society services, you have the option of exercising your right of objection by means of automated procedures that use technical specifications, notwithstanding Directive 2002/58/EC.

## 8. Right to revoke the declaration of consent under data protection law

You have the right to revoke your consent to data protection at any time. The revocation of the consent does not affect the legality of the processing carried out on the basis of the consent until the revocation.

## 9. Automated decision in individual cases including profiling

to be subjected to a decision based solely on automated processing – including profiling – which produces legal effects concerning you or similarly significantly affects you. This does not apply if the decision

- (1) is necessary for the conclusion or performance of a contract between you and the controller,
- (2) is permitted by Union or Member State law to which the controller is subject, and this law contains appropriate measures to safeguard your rights and freedoms as well as your legitimate interests, or
- (3) with your express consent.

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

In the cases referred to in (1) and (3), the controller shall implement appropriate measures to safeguard your rights and freedoms and legitimate interests, including at least the right to obtain human intervention on the part of the controller, to express your point of view and to contest the decision.

## 10. Right to lodge a complaint with a supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your residence, place of work or place of the alleged infringement, if you consider that the processing of personal data concerning you infringes the GDPR and the respective Member State provides for this possibility of lodging a complaint. The supervisory authority to which the complaint was submitted shall inform the complainant of the status and outcome of the complaint, including the possibility of a judicial remedy under Art. 78 GDPR.