

# Data protection declaration

Version 2023.0

## 1. Basics of data processing

This data protection declaration describes how we (SwissNeutronics AG) process personal data, in particular which personal data is collected and for what purpose. It also regulates data transfer, the retention period, and the rights of the affected persons.

Personal data (hereinafter also referred to as data) refers to all information that relates to a specific or identifiable natural person. The term “data processing” is to be understood situationally and includes any handling of personal data, regardless of the means and procedures used, in particular the acquisition, storage, use, modification, disclosure, archiving or destruction of data.

We collect and process personal data to fulfill our business tasks, within the framework regulated by law and contract. The collection, processing and use of personal data are subject to the applicable Swiss [1] and, if applicable, European [2] legal regulations.

[1] Bundesgesetz vom 25. September 2020 über den Datenschutz

[2] EU-Datenschutz-Grundverordnung (DSGVO oder DS-GVO)

We collect personal data in a transparent manner and in compliance with the principles of proportionality and purpose limitation. The data will only be processed to the extent and for as long as is necessary for our tasks and obligations.

## 2. Purpose of collecting and processing personal data

We process the personal data that is necessary to ensure our offering is permanent, secure, and reliable. This includes in particular:

- *Processing and managing contractual relationships with customers, employees, suppliers, etc.;*
- *Maintaining contacts and communication in connection with the provision of services;*
- *Operation of the website and authentication of registered users for certain areas of our website;*
- *Ensuring security, fulfilling legal obligations, enforcing claims;*
- *Sending invitations and conducting events and webinars;*
- *Marketing campaigns and sending newsletters.*

## 3. Which personal data do we process?

### 3.1. General contact and basic data

Depending on the purpose of data processing, customer segment and service areas, we collect different types of personal data, including possibly particularly sensitive personal data.

We process at least the following personal data from all contact, dialogue, and contractual partners as well as customers:

- Last name, first name, email address, address, telephone number, title; if necessary: date of birth, nationality, occupation, information about the employer, AHV number.

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- Email and written correspondence (post).

In addition, depending on the purpose of data processing, customer segment and service area, we collect and process additional data as described in the following paragraphs.

### **3.2. Data for processing the services**

We process the following personal data to provide and manage our services and to communicate with our customers:

- *General contact and basic data in accordance with Section 3.1.*

This data is primarily processed in connection with services for the delivery of our products and services. This primarily concerns data from our customers. However, they can also be from third parties, such as employees, contact persons or people who have a (contractual) relationship with our customers. Our customers can therefore also refer to this data protection declaration but must also take measures themselves to comply with data protection legislation.

Data processing serves to execute and manage the business relationship, to avoid conflicts of interest and to assure quality. It also meets legal and contractual requirements.

The data is usually communicated and made available directly by the customers. Depending on the type and scope of the mandate, they can also come from authorities, courts or third parties. Under certain circumstances, data can also be collected directly from the employer of the person concerned.

### **3.3. Data for mailings and newsletters**

For the purpose of sending information about events, publications, etc. (marketing purposes) and for sending newsletters, we process the following personal data:

- *General contact and basic data in accordance with Section 3.1.*

This data is necessary for the provision of the service, for communication or to maintain our customer base. In order to improve our services, information relating to marketing, mailings and newsletters may also be statistically evaluated.

You can object to the use of your personal data for marketing purposes or unsubscribe from receiving the newsletter at any time.

### **3.4. Data for the organization and implementation of events**

The following personal data is processed for the organization and implementation of events:

- *General contact and basic data in accordance with Section 3.1;*
- *Information about the employer (such as company, address, email address), participants and speakers;*
- *Information about participation in further training;*
- *Payment information;*
- *Possibly images or videos.*

For online events, the data in accordance with Section 3.5 will also be processed.

First name, last name, address if applicable, email address and employer can be disclosed to the other participants. You may also be photographed or filmed at events.

This data is processed to carry out the event as well as for networking and marketing purposes. We need the images for internal documentation of the event, for embedding in a newsletter or on our website and social media channels, for creating reports and, if necessary, to inform our members about the event. Participants can inform the photographer before or during the recording that they do not want to appear in the relevant images.

### **3.5. Data related to direct communication (telephone, email or chat, online meetings, video conferences and/or webinars, etc.)**

The online meetings, video conferences and/or webinars we organize are carried out using Microsoft Teams / Zoom / Skype etc. For direct communication via telephone, email, collaboration solution or chat, we and our corresponding service providers can process the following personal data as necessary:

- *General contact and basic data in accordance with Section 3.1;*
- *Other personal information contained in email communications;*
- *Communication data such as IP address, time and duration of communication;*
- *Recordings of video conference if necessary.*

We process this personal data to provide and improve our services to our customers and other interested third parties.

### **3.6. Data about personnel**

The following data is processed for employee management:

- *General contact and basic data in accordance with Section 3.1;*
- *Social security details/AHV number;*
- *Information about children;*
- *Information about the position within our company such as date of employment, function, salary, employment contract;*
- *Application information such as letters of motivation, CV, job references, diplomas, evaluation of job interviews, assessments, reference information;*
- *Financial information and bank details;*
- *For employees subject to withholding tax: religious denomination, immigration card, information about other employment, replacement income and partner information;*
- *Information about periodic appraisal meetings;*
- *Time and holiday recording;*
- *Information about illnesses, accidents, maternity or paternity leave, military or civil defense;*
- *Criminal and/or debt collection register extracts.*

Application documents that do not lead to employment will be deleted/destroyed after completion of the application process unless we receive consent for storage.

The data is used to ensure correct processing in human resources, to fulfill the contractual relationship (employment contract) and is mainly submitted by employees.

### 3.7. Suppliers and other contractual partners

We process the following personal data from business partners who provide services or supplies for us:

- *General contact and basic data in accordance with Section 3.1;*
- *Financial information such as bank details;*
- *Information contained in the contract (such as data on the responsible employees, consultants, information about the service provided, etc.).*

We process this data in fulfillment of a contract and in application of the statutory retention periods of commercial and tax law. Do our contractual partners have access to our personal data [e.g. IT companies], we conclude a corresponding order processing contract with them.

### 3.8. Operation, control and improvement of the website and other electronic channels

Our website can be used without having to disclose extensive personal data. However, the server collects user information with each call. These are temporarily stored in the server's log files. However, there is no assignment to a specific person. Log files contain the following information:

- *Date, time of access and amount of data,*
- *the browser used and the operating system,*
- *the domain name of the provider,*
- *the page from which you came to our site (referred URL),*
- *the search query,*
- *the IP address.*

The collection of this data is technically necessary: the data collected serves to ensure the stability and security of the website and is used to analyze the use of the website and improve it. They also enable a precise check if there is suspicion of illegal use of our website.

### 3.9. Ensuring security, fulfilling legal obligations, enforcing claims

We can process the aforementioned personal data to ensure security and enforce your rights, if necessary, and also forward it to third parties, such as courts or authorities.

## 4. Data collection, retention period, security measures

### 4.1. Data collection

As a rule, we receive the personal data mentioned in section 3.1 directly from you (or from your employer) when you use one of the services.

For business partners, depending on the type and scope of the partnership, the data can also come from authorities, courts or third parties.

We also collect publicly available information from the media and the Internet, as far as this is appropriate in the specific case (e.g. in the context of an application, when selecting lecturers and speakers), as well as data in connection with the use of the website (see section 3.8).

#### 4.2. Retention period

We retain personal data for as long as it is needed for the purpose for which it was collected, or for a period as required by applicable laws, regulations, or contractual agreements and for as long as we have an overriding interest in the data have storage. The data will then be deleted.

#### 4.3. Data security

We take appropriate technical and organizational security measures to protect personal data from unauthorized access and misuse. This includes IT and network security solutions, access restrictions, encryption of data carriers and transmissions, instructions, training and controls.

The data is stored in the applications and software we use.

If third parties have access to our data, special measures will be taken that are regulated in the order processing contract (see Section 7).

### 5. Social media channels

We refer to our respective social media channels via links. This is simply a static reference to the respective channel. If you connect to our social media channels, we receive information stored in your profile (contact information) and any information about profiles you are friends with.

The purpose and scope of data collection and the further processing of your data by the provider as well as your related rights and setting options to protect your privacy can be found in the provider's data protection information. LinkedIn is relevant for SwissNeutronics:

- *LinkedIn Corporation: <https://www.linkedin.com/legal/privacy-policy>*

### 6. Third-party tracking technology and IT tools

#### 6.1. Google Analytics

This website uses the Google web analysis service "Google Analytics", provided by Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland. Google Analytics uses so-called "cookies", text files that are stored on your computer and enable analysis of the use of the website. The information generated by the cookies about your use of our website is usually transmitted to a Google server in the USA and saved there. We would like to point out that on this website Google Analytics is supplemented by the code "anonymizeIP ();" has been expanded to ensure anonymized collection of IP addresses (so-called IP masking).

However, if IP anonymization is activated on this website, your IP address will be shortened beforehand by Google in Switzerland, within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. This means that no conclusions can be drawn about your identity. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activity and to provide us with other services related to website and Internet usage.

You can prevent the storage of cookies by setting your browser software accordingly. However, we would like to point out that in this case you may not be able to use all functions of this website to their full extent.

Dateiname Version	Data Protection Declaration_SNAG 2023.0 - EN.docx 2023.0 SwissNeutronics AG, Bruehlstrasse 28, CH-5313 Klingnau, Switzerland phone: +41 56 245 0202, fax: +41 56 245 0204, website: www. swissneutronics.ch	Datum Seite	18-Dez-23 5 (7)
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You can also prevent Google from collecting the data generated by the cookie and relating to your use of the website (including your IP address) and from processing this data by downloading the available [Browser-Plug-In](#) to install. You can also prevent collection by Google Analytics by setting an opt-out cookie that prevents future collection of your data when you visit this website: deactivate Google Analytics.

You can find further information about this at <https://marketingplatform.google.com/about/analytics/terms/de/> and about data protection at <http://www.google.com/intl/de/analytics/privacyoverview.html>.

## 6.2. Newsletter dispatch

Newsletters are only made available for viewing/downloading via appropriate links. No further user data will be explicitly processed, with the exception of data processing in accordance with Section 6.1.

## 7. Data sharing and data transmission

We may pass on personal data to third parties if you have given your consent to do so or if this is necessary to provide the relevant service or to fulfill the purpose of the contract or to protect our legitimate interests, or if we are legally obliged to do so.

The following categories of recipients may receive personal data from us:

- *Service providers (e.g. IT service providers, hosting providers, suppliers, consultants, lawyers, insurance companies).*
- *Third parties within the scope of our legal or contractual obligations, government institutions, courts.*

The third parties commissioned by us are contractually obliged to comply with data protection and to only process the data for the purpose specified by us.

## 8. Rights of data subjects

Every person can request information about the data processed about them as well as the origin, the recipient and the purpose of data collection and data processing. You also have the right to request the correction, blocking, deletion, or transfer of your data.

Data that is retained due to legal regulations or is required for business transactions cannot or may not be deleted. If data is not collected by a legal archiving obligation or our overriding interest in retention, we will delete your data at your request. If the archiving requirement applies, we will block your data.

You can also assert your claims in court or file a complaint with the relevant data protection authority.

## 9. Final provisions

We have created this data protection declaration in accordance with the „[LEITFADEN Neues Datenschutzgesetz Umsetzungshilfe von EXPERTsuisse](#)“.

### **9.1. Responsible body and contact**

We are responsible for data processing in accordance with this data protection declaration unless otherwise regulated.

The data protection officer is Dr. Christian Schanzer.

General data protection inquiries can be sent to SwissNeutronics by post or email:  
SwissNeutronics AG, Brühlstrasse 28, 5313 Klingnau; [christian.schanzer@swissneutronics.ch](mailto:christian.schanzer@swissneutronics.ch).

In the case of questions regarding a specific person, a request for correction or a request for deletion, a copy of the user's ID or passport must also be enclosed to identify the user.

### **9.2. Adjustments to the data protection declaration**

We may adjust our privacy policy at any time by posting it on the website.