

Effectivus is well aware of the value of your personal data and that of your customers. Below you will find information about our handling of personal data and your rights in this area. By data, we mean all the data concerning any identified or identifiable person.

We publish this data protection policy in anticipation of the forthcoming revision of the Federal Act on Data Protection (**FADP**) and the current General Data Protection Regulation (**GDPR**) of the European Union (EU). Although the GDPR is a regulation of the EU and the European Economic Area (EEA), it may also be partly relevant to us for a variety of reasons;

- i) The Swiss Data Protection Law has historically been closely aligned with European regulation, so amendments to the Swiss Data Protection Law to be expected will be strongly influenced by the GDPR.
- ii) Due to their extra-territorial effect the high data protection standards under the GDPR are in some circumstances applicable outside the EU/EEA.

Data Controller

The controller of your data is

Effectivus

c/o Data Protection Officer
Rue de la Gare 49
CH-2502 Biel/Bienne
Switzerland

You can contact our data protection officer by email at privacy@effectivus.ch or by post at the address above.

Data Processing

We deal primarily with personal data received from customers, from people involved in business relations, or those collected from users of our website.

This includes, for example, the name, e-mail address, as well as data related to the use of the website (e.g. the anonymized IP address, the MAC address of the smartphone or the computer, data on the search engine, the operating system, cookies, the date, time and duration of the visit, the pages and contents

consulted, the functions used, the referring website and location data).

Purpose & Legal Basis

We comply with all relevant provisions of data protection law when processing your personal data. Here below we provide more detailed general information on how we process your data.

If a request for services is made, we need the information provided for the conclusion of the offer. If the contract is concluded, we process this data to execute the relationships, for example billing. In the case of extended or special services, we might need to process data from third parties. We can also use data from public sources (web pages, social media, etc.)

In addition, the processing of your personal data goes beyond the scope of actually performing the service, enabling us to protect our own legitimate interests and those of third parties. This may be necessary (for example):

- to ensure IT security and operations and protect our employees and assets;
- determine the solvency and default risks;
- management of the company.

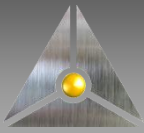
In addition, we need your personal data to meet legal obligations such as supervisory requirements, retention obligations under commercial and tax law, or our obligation of advice.

If we wish to process your data for a purpose not listed above or on another legal basis, we will inform you when required.

As part of the business relationship you must provide the data needed to initiate and execute our contractual relationship or the data required by law. Without this data we are generally not able to conclude or pursue a contract with you.

Recipients' Categories

The complexity of the modern data processing means that we sometimes use service providers and appoint them to process your data or give them access to it. Some of these service providers (for example,



automated payments) may be outside Switzerland even outside European Union, or anywhere in the world. When we use service providers we always ensure that the relevant data protection provisions and data security standards continue to be observed.

Involvement of intermediaries

The intermediary collects and processes personal or contractual data to ensure proper execution of their services. We also transfer the mentioned data, to the extent that it is needed.

Forwarding to supervisory authorities, courts and other third parties

As a service company, we are subject to the Swiss Law regulatory requirements. For this reason, we may have to disclose personal data to authorities, auditors, etc. at their request, as part of their legal duties. In all cases, we always ensure compliance within the legal basis.

Transfer abroad to certain third countries

When data is transferred to a country that does not have an appropriate data protection regime, we ensure appropriate protection by using sufficient contractual warranties, specifically on the basis of the EU standard contractual clauses or binding corporate rules, or we rely on the derogation of consent, exercise or enforcement of legal claims, overwhelming public interest, the fact that the data is public or that it is needed to protect the integrity of the data subject. You can obtain a copy of the contractual warranties from the contact addresses mentioned above, or you will be told where copies can be obtained. We reserve the right to blacken such copies for reasons of data protection or confidentiality.

Retention Period

We process and save your personal data for as long as it is required to perform our contractual and legal obligations, or for the purposes for which it is processed, for example for the duration of the entire business relationship (from initiation, execution, to the end of the contract), and beyond that in line with the legal obligations concerning retention and documentation. Personal data may be retained for the period during which claims may be raised against our company (e.g. the limitation period) and where

we are under a different obligation to do so, or our legitimate interests require it (e.g. for the purposes of evidence and documentation). Once your personal data is no longer needed for the listed purposes, it will be deleted.

Security

We take the appropriate technical and organizational security measures to protect stored personal data from unauthorized access and misuse, i.e. from unlawful or unauthorized manipulation, deletion, modification, access, transmission, use, partial or total loss. Security measures are continually adapted and improved as technology advances. We are not responsible for any loss of data or their knowledge and use by third parties. You must always treat access codes confidentially and close the browser window when you have finished communicating with us, especially if you share a computer with other users.

Data Subjects' Rights

You can request information about the data held on you at the address given above. Subject to certain conditions, you can also request that your data is rectified or erased. You also have a right to restrict or oppose the processing of your data and a right to be given the data you have provided. If you have given us your consent to process the data you can withdraw this at any time with future effect.

If you have any questions, please contact us at the address mentioned above. Please always provide proof of your identity, for example by sending a scan of your identity card.

You have the right to file a complaint with the relevant data protection authority. In Switzerland, this is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).