

## Privacy Policy

Taking into consideration the provisions of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of persons of these data and repealing Directive 95/46/EC (“GDPR”), ENFISO GmbH (“ENFISO” and/or “Company” and/or “we”) wishes to ensure full observance of the legislation applicable to the data protection domain so as you continue to trust us with your personal data.

This Privacy Notice describes how and what personal data we collect, hold and use when you visit our website, when you send us your personal information by means of the website or have any kind of interaction with us, the conditions under which we may disclose the personal data and the manner in which we safely keep such personal data.

For any queries or additional information on how ENFISO processes your personal data, as well as for exercising your data protection rights, you may contact the appointed Data Protection Officer at the following contact data:

[info@enfiso.ch](mailto:info@enfiso.ch).

### Obtaining your personal data directly from you

As a rule, we obtain personal data (meaning any information relating to an identified or identifiable natural person) directly from you.

As a rule, we will obtain your personal data (such as name, surname and e-mail address) if you wish to be a ENFISO collaborator or employee, customer or supplier and, thus, send us your information via any type of channel.

### Obtaining your personal data automatically or from other sources

There may be cases where we obtain your personal data from other sources. Hence, we may obtain your personal data following mergers or as a result of their disclosure by other persons that contacted ENFISO. In the latter case, we will consider that you authorized the disclosure of your personal data.

### Using your personal data only for identified purposes of processing

Depending on our relationship, we process your personal data, if necessary for the performance of a contract, if necessary for us to comply with the legal obligations or in order for us to satisfy certain legitimate interests that do not prevail over your rights and fundamental freedoms.

If we process your personal data based on your consent (for example, in those cases where you accept to receive technical materials from us), you will have the possibility to withdraw your consent.

Additionally, we may process your personal data for the performance of the contract concluded between us as well as for us to comply with our legal obligations or in order to cooperate with competent authorities.

Without prejudice to your rights and fundamental freedoms, we may also process your personal data in order for us to satisfy certain legitimate interests such as infraction prevention, detection and investigations, including fraud and money laundering or financing of terrorist acts, analysis and administration of commercial risks, in relation with any claim, action or procedure (including, but not limited to, drafting and reviewing documents, drafting necessary documents for the conclusion of a transaction, obtaining legal advice and facilitating settlements) and/or protection or exercise of contractual and legal rights and obligations, cooperation with public authorities.

### What we do with your data

Since this website is operated by ENFISO and its affiliates (“We” and/or “ENFISO”), we will disclose your personal data to our affiliates.

Furthermore, we may disclose your personal data to our collaborators or partners, such as IT partners, auditors or legal consultants, public authorities or bodies.

Any transfer of personal data outside the European Economic Area will be conducted with the observance of the legal provisions, by applying appropriate safeguards, such as standard contractual clauses approved by the European Commission, and notifying you, as the case may be.

Our Website does not collect or compile personally identifying information for sale to non-ENFISO parties for consumer marketing purposes.

## Privacy Statement for Children

Our website is directed at an adult audience. We do not purposely process any personal data from anyone we know to be under the age of 16. Personal data of persons under the age of 16 will be processed only with prior consent of the parent or holder of parental responsibility. Such legal representative has the right, upon request, to view the information provided by the child and/or to require that it be deleted.

## Security of your personal data

ENFISO processes personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

## Your rights

With regards to your personal data processed by ENFISO, you have following rights:

- right of access, meaning the right to obtain a confirmation from our part as to whether your personal data is processed, as well as access to personal data and information on the processing.
- right to rectification, meaning the right to have, without undue delay, the rectification of inaccurate personal data and/or the completion of incomplete personal data.
- right to erasure/right to be forgotten, meaning the right to erase personal data without undue delay if these data are no longer necessary in relation to the purposes of processing for which they were collected and there is no other legal ground for processing, if personal data were unlawfully collected or they must be erased for compliance with a legal obligation;
- right to restriction of processing applicable if (i) the accuracy of the personal data is contested by you, (ii) processing is unlawful and you oppose the erasure of the personal data, requesting in exchange the restriction of their use, (iii) we do not longer need the personal data, but you require them for the establishment, exercise or defense of legal claims, (iv) you objected to the processing pending the verification whether our legitimate grounds override yours;
- right to object to the processing, except for the cases where we prove that we have legitimate reasons for the processing of your personal data, reasons that override your interests, rights and freedoms or for the ascertaining, exercise or defense of a right in front of a court of law;
- right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- right to data portability, meaning the right to receive your personal data that you provided us with for the purposes stated in the hereby notice, in a structure, commonly used and machine-readable format, as well as the right to transmit these data to another controller;
- right to lodge a complaint with with the European controller of data protection (CEPD) <https://EDPS.europa.eu>
- right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or similarly affects you, except for the case where such processing is necessary for the performance of a contract or authorized by law.

With the exception of the case where you exercise your right to lodge a complaint with the supervisory authority as shown above, you may exercise any right by sending a request: by e-mail at: [info@enfiso.ch](mailto:info@enfiso.ch).

## **For how long we will keep your personal data**

Depending on our relationship, we will store your personal data for the period of time necessary for us to comply with the specific legal obligations in our business area or in accordance with the applicable statute of limitation (for example, 10 years from the termination of the contractual relationship) or for the observance of the archiving obligations imposed by the applicable legislation (for example, the legislation specific to financial area).

## **Changes to privacy notice**

We keep our Privacy Notice under regular review and we will place any updates on this page, without prior notice. However, processing of your personal data shall follow the directions notified within the applicable Privacy Notice, in effect upon the collection date.