

# General Privacy Policy

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# 1 General Privacy Policy

## 1.1 Purpose

Data protection is a question of trust, and your trust is important to us. We respect your private life and privacy. It is a major concern for NetGuardians SA (hereinafter referred to as "NetGuardians" or "we" or "us") that your personal data is treated in a responsible manner and in compliance with the legal requirements.

The present data protection declaration (hereinafter referred to as "this Declaration") describes how we process your personal data. This Declaration applies to and constitutes an integral part of a contract if it is listed in a contract document as an integral part thereof or referred to in the applicable General Terms & Conditions (GTCs). In the event of discrepancies between this Declaration and the GTCs, the provisions of this Declaration will have precedence. If you already use NetGuardians products and services, this Declaration will apply to personal data about you collected and stored by NetGuardians in the past, which we may connect to and process together with personal data collected in the future.

By accepting this Declaration, you consent to us processing your personal data in accordance with the relevant data protection and telecommunications legislation as well as the following provisions.

## 1.2 Data processing for service provision and contract execution

NetGuardians collects, stores and processes the personal data of its customers to the extent necessary to manage the customer relationship, provide its services, process orders and contracts, for billing, to answer questions, address concerns, provide support with technical issues and evaluate, improve and develop NetGuardians goods, services and functions. Personal data constitutes all information relating to an identified or identifiable person.

NetGuardians collects, stores and processes technical data during your use of our information and technology services. Technical usage data may be processed in a personally identifiable form for the following purposes where listed below in this Declaration or you have consented thereto by using a service.

## 1.3 Data processing for NetGuardians marketing purposes

We process your personal data for marketing purposes such as general customer communications and the personalization of offers from NetGuardians.



### 1.3.1 Data we process for marketing purposes

Data you provide in the context of our contractual relationship and data about our Web pages:

- Identification and contact data such as your first name and surname, telephone number, e-mail address, and profession;
- Customer activity data such as the type of our products and services that you use, the type and extent of your usage thereof, customer preferences, customer service information such as service requests;
- Online data such as the time and date on which our Web page was accessed, the name of the accessed Web page, the IP address of your computer or mobile device, the address of the Web page from which you accessed our Web page, information entered on forms, clicks on content on the Web page, NetGuardians pages on social networks, including the duration and frequency of the visits to these, as well as search terms, ratings and comments made. This data is procured in accordance with the online data protection declaration for our Web pages.

### 1.3.2 Customer segments and profiles

To enable us to provide you with advertising, communications and offers better tailored to your needs as a customer, we create customer segments and customer profiles. To this end, we combine and analyze the data relevant for our marketing purposes.

## 1.4 Right to object

You may at any time refuse the use of your data for marketing and communications purposes. In this case, we will not process data for this purpose.

You can always unsubscribe from our email communications, by clicking on the “Unsubscribe” link on the footer of the emails.

You may also request the removal of your data from our systems, by submitting a request on <https://info.netguardians.ch/data-removal-request>. Upon receiving the request, all data already stored for this purpose will be deleted within maximum two working days, and you will receive a confirmation by email. You may refuse the processing of online data according to the information provided on the NetGuardians Web. There is no right to refuse general advertisements on Web pages.



## 1.5 Data processing abroad by commissioned third parties

NetGuardians might rely on foreign suppliers and service providers to process marketing communications, that may be located in the United States or other countries whose data protection legislation provides less protection than that afforded in Switzerland. In this case, we ensure suitable protection in accordance with Swiss legislation, for example by concluding what are known as “EU model clauses” with the recipients of this data. These clauses are a series of provisions introduced by the European Commission to afford suitable protection to personal data when it is transferred across borders.

## 1.6 Your rights regarding your personal data

You have the right to obtain information in writing and free of charge about the personal data of yours that we process. Your request for information must be issued in writing, include a copy of your ID card or passport and be sent to our postal address.

You likewise have the right to request the correction of incorrect personal data. You may also demand the deletion of your personal data unless the applicable laws and regulations oblige us to store your personal data.

Lastly, you have the right to revoke your consent to the processing of your personal data at any time and/or refuse the processing and storage of your personal data by following the procedure detailed in the “Right to Object” point above.

## 1.7 Contact

If you have any questions or concerns, you can contact us as follows:

- By email: [info@netguardians.ch](mailto:info@netguardians.ch)
- By calling +41 24 425 97 60
- By writing to NetGuardians SA, Y-Parc, Avenue des Sciences 13, CH-1400 Yverdon-les-Bains

## 1.8 Applicability, duration and modification

We reserve the right to change or add to this Declaration at any time as we see fit. Should a change to this Declaration prove disadvantageous for you, we will notify you appropriately in advance and seek your consent. Your consent is granted voluntarily. Should you disagree with a specific change or addition, you may object to it. Should you fail to object by the aforementioned deadline, this will be deemed tacit acceptance on your part of the relevant change or addition. Changes or additions to the present Declaration shall not constitute grounds for extraordinary termination of service agreements.