

Privacy Notice

SWAN Group

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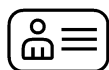
OPEN

privacy@swan.ch



Overview

Type of personal data



General Data

We process general personal data about you.

[Note: concerns Section 3: all categories of data].



Financial Data

We process your financial data.

[Note: concerns Section 3 : communication data, master data, contract data].



Location Data

We process your location data.

[Note: concerns Section 3: behavioral and preference data].

Source of personal data



Provided Data

We process personal data that you provide to us.

[Note: concerns Section 3: especially penultimate paragraph].



Collected Data

We process personal data that we collect about you.

[Note: concerns Section 3: especially last paragraph].



Received Data

We process personal data about you that we receive from third parties.

[Note: concerns Section 3, especially last paragraph].

Purpose of processing



Marketing

We use your personal data for marketing and advertising.

[Note: concerns Section 4: marketing purposes and relationship management (para. 4)].



Product Development

We use your personal data for the development and improvement of products and services.

[Note: concerns Section 4: market research, to improve our services and operations, and for product development (para. 5)].



Other Purposes

We use your personal data for other purposes without direct connection with the core service.

[Note: concerns Section 4: security purposes, etc. (para. 6 ff.)].

Passing on to third parties



Data Transfers

We transfer your personal data to other companies that decide themselves how to use the data.

[Note: concerns Section 7].

Place of processing



Worldwide

We also process your personal data outside of Switzerland and the EEA.

[Note: concerns Section 8].

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Document Revision

Version	Date	Author	Changes
1.0	31.08.2023	THOBUR / MICRUD	first release and publication

1. What is this Privacy Notice About?

The **SWAN** group (hereinafter also «**we**», «**us**») collects and processes personal data that concern you but also other individuals (so called «**third parties**»). We use the word «**data**» here interchangeably with «**personal data**».

The «**SWAN group**» means the **Swan Analytische Instrumente AG** and its subsidiaries and group companies. A list of these subsidiaries and group companies can be found here [Contact - Swan Analytical Instruments \(swaninstruments.ch\)](https://www.swan.ch/contact). However, this privacy policy does not apply to our distributors as they are independent companies and are completely separate from us.

«**Personal data**» refers to data relating to identified or identifiable individuals, which means that the relevant data, in combination with additional data, makes it possible to draw conclusions about the identity of these individuals. «**Sensitive personal data**» is a subset of personal data that is specially protected under applicable data protection law. This includes, for example, data revealing racial or ethnic origin, health data, religious or philosophical beliefs, biometric data for identification purposes, and information relating to trade union membership. In Section 3, you will find information about the data we process in accordance with this Privacy Notice. «**Processing**» means any operation that is performed on personal data, such as collection, storage, use, alteration, disclosure and erasure.

In this Privacy Notice, we describe what we do with your data when you use <https://www.swan.ch>, our other websites or apps (collectively «**website**»), obtain services or products from us, interact with us in relation to a contract, communicate with us or otherwise deal with us. When appropriate we will provide a just-in-time notice to cover any additional processing activities not mentioned in this Privacy Notice. In addition, we may inform you about the processing of your data separately, for example in consent forms, terms and conditions, additional privacy notices, forms and other notices.

If you disclose data to us or share data with us about other individuals, such as family members, co-workers, etc., we assume that you are authorized to do so and that the relevant data is accurate. When you share data about others with us, you confirm that. Please make sure that these individuals have been informed about this Privacy Notice.

This Privacy Notice is aligned with the EU General Data Protection Regulation («**GDPR**»), the Swiss Data Protection Act («**DPA**») and the revised Swiss Data Protection («**revDPA**»). However, the application of these laws depends on each individual case.

2. Who Is The Controller For Processing Your Data?

Swan Analytische Instrumente AG, Switzerland (the "**Swan**"), is responsible for the data processing of the SWAN Group described in this privacy policy, unless otherwise communicated in individual cases, e.g. in further privacy policies of subsidiaries, on forms or in contracts. However, unless otherwise communicated, this Privacy Policy also applies to cases in which not Swan, but a group company of the **SWAN Group** is the responsible party. This applies, in particular, where your data is processed by a group company in connection with its own legal obligations or contracts or where you share data with such a group company. In these cases, this group company is the controller and only if it shares your data with other group companies for their own processing (see section **Error! Reference source not found.**), will these other group companies also become controllers.

You may contact us for data protection concerns and to exercise your rights under Section 11 as follows:

Swan Analytische Instrumente AG
Studbachstrasse 13
CH-8340 Hinwil
privacy@swan.ch

3. What Data Do We Process?

We process various categories of data about you. The main categories of data are the following:

- **Technical data:** When you use our website or other online offerings (for example free Wi-Fi), we collect the IP address of your terminal device and other technical data in order to ensure the functionality and security of these offerings. This data includes logs with records of the use of our systems. We generally keep technical data for 6 months. In order to ensure the functionality of these offerings, we may also assign an individual code to you or your terminal device (for example as a cookie, see Section 12). Technical data as such does not permit us to draw conclusions about your identity. However, technical data may be linked with other categories of data (and potentially with your person) in relation to user accounts, registrations, access controls or the performance of a contract.
- **Registration data:** Certain offerings, for example competitions, and services (such as login areas of our website, newsletters, free WLAN access, etc.) can only be used with a user account or registration, which can happen directly with us or through our third-party login service providers. In this regard you must provide us with certain data, and we collect data about the use of the offering or service. Registration data may be required in relation to access control to certain facilities, potentially including biometric data, depending on the control system. We usually keep registration data for 12 months after the end of the use of the service or the termination of the user account.
- **Communication data:** When you are in contact with us via the contact form, by e-mail, telephone or chat, or by letter or other means of communication, we collect the data exchanged between you and us, including your contact details and the metadata of the communication. If we record or listen in on telephone conversations or video conferences, for example for training and quality assurance purposes, we will tell you specifically. Such recordings may only be made and used in accordance with our internal policies. You will be informed if and when such recordings take place, for example by an indication during the video conference in question. If you do not want to be recorded, please notify us or leave the (video) conference. If you simply do not want your image to be recorded, please turn off your camera. If we have to determine your identity, for example in relation to a request for information, a request for press access, etc., we collect data to identify you (for example a copy of an ID document). We generally keep this data for 12 months from the last exchange between us. This period may be longer where required for evidentiary purposes, to comply with legal or contractual requirements, or for technical reasons. E-mails in personal mailboxes and written correspondence are generally kept for at least 10 years. Recordings of (video) conferences we will usually keep for 24 months. Chats are generally stored for 2 years.
- **Master data:** With master data we refer to the basic data that we need, in addition to contract data (see below), for the performance of our contractual and other business relationships or for marketing and promotional purposes, such as name and contact details, and information about, for example, your role and function, your bank details, your date of birth, customer history, powers of attorney, signature authorizations and declarations of consent. We process your master data if you are a customer or other business contact or work for one (for example as a contact person of the business partner), or because we wish to address you for our own purposes or for the purposes of a contractual partner (for example as part of marketing and advertising, with invitations to events, with vouchers, with newsletters, etc.). We receive master data from you (for example when you make a purchase or as part of a registration), from parties you work for, or from third parties such as contractual partners, associations and address brokers, and from public sources such as public registers or the internet (websites, social media, etc.). We may also process health data and information about third parties as part of master data. We may also collect master data from our shareholders and investors. We generally keep master data for 10 years from the last exchange between us or from the end of the contract. This period may be longer if required for evidentiary purposes, to comply with legal or contractual requirements, or for technical reasons. For contacts used only for marketing and

advertising, the retention period is usually much shorter, usually no more than 2 years from the last contact.

- **Contract data:** This means data that is collected in relation to the conclusion or performance of a contract, for example information about the contracts and the services provided or to be provided, as well as data from the period leading up to the conclusion of a contract, information required or used for performing a contract, and information about feedback (for example complaints, feedback about satisfaction, etc.). We generally collect this data from you, from contractual partners and from third parties involved in the performance of the contract, but also from third-party sources (for example credit information providers) and from public sources. We generally keep this data for 10 years from the last contract activity or from the end of the contract. This period may be longer where necessary for evidentiary purposes, to comply with legal or contractual requirements, or for technical reasons.
- **Behavioral and preference data:** Depending on our relationship with you, we try to get to know you better and to tailor our products, services and offers to you. For this purpose, we collect and process data about your behavior and preferences. We do so by evaluating information about your behavior in our domain, and we may also supplement this information with third-party information, including from public sources. Based on this data, we can for example determine the likelihood that you will use certain services or behave in a certain way. The data processed for this purpose is already known to us (for example where and when you use our services), or we collect it by recording your behavior (for example how you navigate our website). We anonymize or delete this data when it is no longer relevant for the purposes pursued, which may be – depending on the nature of the data – between 2-3 weeks and 24 months (for product and service preferences). This period may be longer where necessary for evidentiary purposes, to comply with legal or contractual requirements, or for technical reasons. We describe how tracking works on our website in Section 12.
- **Sonstige Daten:** We also collect data from you in other situations. For example, data that may relate to you (such as files, evidence, etc.) is processed in relation to administrative or judicial proceedings. We may also collect data for health protection (for example as part of health protection concepts). We may obtain or create photos, videos and sound recordings in which you may be identifiable (for example at events, with security cameras, etc.). We may also collect data about who enters certain buildings, and when or who has access rights (including in relation to access controls, based on registration data or lists of visitors, etc.), who participates in events or campaigns (for example competitions) and who uses our infrastructure and systems and when. Moreover, we collect and process data about our shareholders and other investors, in addition to master data, including information for registers, in relation to the exercise of their rights and events (for example general meetings). The retention period for this data depends on the processing purpose and is limited to what is necessary. This ranges from a few days for many security cameras, to a few weeks for contact tracing and visitor data, which is usually kept for 3 months, to several years or more for reports about events with images. Data relating to you as a shareholder or investor is kept in accordance with corporate law, but in any case, for as long as you are invested.

Much of the data set out in this Section 3 is provided to us by you (through forms, when you communicate with us, in relation to contracts, when you use the website, etc.). You are not obliged or required to disclose data to us except in certain cases, for example within the framework of binding health protection concepts (legal obligations). If you wish to enter into contracts with us or use our services, you must also provide us with certain data, in particular master data, contract data and registration data, as part of your contractual obligation under the relevant contract. When using our website, the processing of technical data cannot be avoided. If you wish to gain access to certain systems or buildings, you must also provide us with registration data. However, in the case of behavioral and preference data, you generally have the option of objecting or not giving consent.

As far as it is not unlawful we also collect data from public sources (for example debt collection registers, land registers, commercial registers, the media, or the internet including social media) or receive data from other companies within our group, from public authorities and from other third parties (such as credit agencies, address brokers, associations, contractual partners, internet analytics services, etc.).

4. For What Purposes Do We Process Your Data?

We process your data for the purposes explained below. Further information is set out in Sections 12 and 13 for online services. These purposes and their objectives represent interests of us and potentially of third parties. You can find further information on the legal basis of our processing in Section 5.

We process your data for purposes related to **communication** with you, in particular in relation to responding to **inquiries** and the **exercise of your rights** (Section 11) and to enable us to **contact** you in case of queries. For this purpose, we use in particular communication data and master data, and registration data in relation to offers and services that you use. We keep this data to document our communication with you, for training purposes, for quality assurance and for follow-up inquiries.

The above includes all purposes in relation to which we communicate with you, whether in the context of customer service or consulting, authentication in case the website is used, and for training and quality assurance (for example in customer service). We further process communication data to enable us to communicate with you by e-mail and telephone, as well as through messenger services, chats, social media, and by letter and fax. Communication with you usually takes place in relation to other processing purposes, for example so that we can provide services or respond to an access request. Our processing also serves to document the communication and its content.

We process data for the conclusion, administration and performance of **contractual relationships**.

We process data for **marketing purposes** and **relationship management**. This may happen in the form of newsletters and other regular contacts (electronically, by e-mail or by telephone), through other channels for which we have contact information from you, but also as part of marketing campaigns (for example events, contests, etc.) and may also include free services (for example invitations, vouchers, etc.). You can object to such contacts at any time (see at the end of this Section 0) or refuse or withdraw consent to be contacted for marketing purposes.

In the context of relationship management, we may also operate a customer relationship management system («CRM») in which we keep the data of customers, suppliers and other business partners that is required for relationship management, for example data about contact persons, relationship history (for example information about products and services purchased or supplied, interactions, etc.), interests, marketing measures (newsletters, invitations to events, etc.) and other information.

We further process your data for **market research**, to **improve our services and operations**, and for **product development**.

We may also process your data for **security** and **access control purposes**.

We process personal data to **comply with laws, directives and recommendations from authorities and internal regulations** («Compliance»).

We also process data for the purposes of our **risk management** and as part of our **corporate governance**, including business organization and development.

We may process your data for **further purposes**, for example as part of our internal processes and administration or for quality assurance purposes and trainings.

These further purposes include, for example, training and educational purposes, administrative purposes (such as managing master data, accounting and data archiving, and testing, managing and continuously improving IT infrastructure), protecting our rights (for example to enforce claims in or out of court, and before authorities in Switzerland and abroad, or to defend ourselves against claims, for example by preserving evidence, conducting legal assessments and participating in court or administrative proceedings) and evaluating and improving internal processes. We may use recordings of (video) conferences for quality assurance purposes and trainings. These further purposes also include safeguarding other legitimate interests that cannot be named exhaustively.

5. On What Basis Do We Process Your Data?

Where we ask for your **consent** for certain processing activities (for example for the processing of sensitive personal data, for marketing mailings, for personalized motion profiles and for advertising management and behavior analysis on the website), we will inform you separately about the relevant processing purposes. You may withdraw your consent at any time with effect for the future by providing us written notice (by mail) or, unless otherwise noted or agreed, by sending an e-mail to us; see our contact details in Section 2. For withdrawing consent for online tracking, see Section 12. Where you have a user account, you may also withdraw consent or contact us also through the relevant website or other service, as applicable. Once we have received notification of withdrawal of consent, we will no longer process your information for the purpose(s) you consented to, unless we have another legal basis to do so. Withdrawal of consent does not, however, affect the lawfulness of the processing based on the consent prior to withdrawal.

Where we do not ask for consent for processing, the processing of your personal data relies on the requirement of the processing for **initiating or performing a contract** with you (or the entity you represent) or on our or a third-party **legitimate interest** in the particular processing, in particular in pursuing the purposes and objectives set out in Section 0 and in implementing related measures. Our legitimate interests also include compliance with **legal regulations**, insofar as this is not already recognized as a legal basis by applicable data protection law (for example in the case of the GDPR, the laws in the EEA and in the case of the DPA, Swiss law). This also includes the marketing of our products and services, the interest in better understanding our markets and in managing and further developing our company, including its operations, safely and efficiently.

Where we receive sensitive personal data (for example health data, data about political opinions, religious or philosophical beliefs, and biometric data for identification purposes), we may process your data on other legal basis, for example, in the event of a dispute, as required in relation to a potential litigation or for the enforcement or defense of **legal claims**. In some cases, other legal basis may apply, which we will communicate to you separately as necessary.

6. What Applies In Case Of Profiling And Automated Individual Decisions?

We may automatically evaluate personal aspects relating to you («**profiling**») based on your data (Section **Error! Reference source not found.**) for the purposes set out in Section 0, where we wish to determine preference data, but also in order to detect misuse and security risks, to perform statistical analysis or for operational planning.

We do not make automated discretionary decisions.

7. With Whom Do We Share Your Data?

In relation to our contracts, the website, our services and products, our legal obligations or otherwise with protecting our legitimate interests and the other purposes set out in Section 0, we may disclose your personal data to third parties, in particular to the following categories of recipients:

- **Group companies:** A list of our group companies (Swan Subsidiaries) can be found here [Contact - Swan Analytical Instruments \(swaninstruments.ch\)](#). These group companies may use the data according to this Privacy Notice for the same purposes as we use it (see Section 0). We may also disclose health data to our group companies.
- **Service providers:** We work with service providers in Switzerland and abroad who process your data on our behalf or as joint controllers with us or who receive data about you from us as separate controllers (for example IT providers, shipping companies, advertising service providers, login service providers, cleaning companies, security companies, banks, insurance companies, debt collection companies, credit information agencies, or address verification providers). This may include health data. For the service providers used for the website, see Section 12.
We process most of our master, contract and communication data in our ERP system which is operated by the manufacturer in a Microsoft data center in Europe. The ERP is provided and operated by IFS in Europe.

To be able to deliver our products and services efficiently and focus on our core competencies, we procure services from third parties in various areas. To be able to deliver our products and services efficiently and focus on our core competencies, we procure services from third parties in various areas. These include, for example, IT services, information transmission, marketing, sales, communication or printing services, facility management, security and cleaning, organizing and holding events and receptions, debt collection, credit agencies, address verification provider (for example to update address lists in case of relocations), fraud prevention measures and services from consulting companies, lawyers, banks, insurers and telecommunication companies. In each case, we disclose the data these providers require for their services, which may also concern you. These providers may also use such data for their own purposes, for example information about overdue claims and your payment history in case of credit information agencies or anonymized data to improve their services. In addition, we enter into contracts with these providers that include provisions to protect data, where such protection does not follow from the law. In some cases, our service providers may also process data on how their services are used and other data that is generated in the course of using their services as independent data controllers for their own legitimate interests (e.g., for statistical analysis or billing purposes). Service providers inform about their independent data processing activities in their own privacy statements.

- **Contractual partners including customers:** This refers to customers (for example service recipients) and our other contractual partners as this data disclosure results from these contracts. If you work for one of these contractual partners, we may also disclose data about you to that partner in this regard. This may include health data. These recipients also include contractual partners with whom we cooperate.
- **Authorities:** We may disclose personal data to agencies, courts and other authorities in Switzerland and abroad if we are legally obliged or entitled to make such disclosures or if it appears necessary to protect our interests. This may include health data. These authorities act as separate controllers.
- **Other persons:** This means other cases where interactions with third parties follow from the purposes set out in Section 0, for example service recipients, the media and associations in which we participate or if you are included in one of our publications.

All these categories of recipients may involve third parties, so that your data may also be disclosed to them. We can restrict the processing by certain third parties (for example IT providers), but not by others (for example authorities, banks, etc.).

We reserve the right to make such disclosures even of **secret data** (unless we have expressly agreed with you that we will not disclose such data to certain third parties, except if we are required to do so by law). Notwithstanding the foregoing, your data will continue to be subject to adequate data protection in Switzerland and the rest of Europe, even after disclosure. For disclosure to other countries, the provisions of Section **Error!**

Reference source not found. apply. If you do not wish certain data to be disclosed, please let us know so that we can review if and to what extent we can accommodate your concern (Section 2).

In many cases, the disclosure of secret data is necessary in order to perform contracts or provide other services. Likewise, non-disclosure agreements generally do not exclude such disclosures of data nor disclosures to service providers. However, depending on the sensitivity of the data and on other circumstances, we ensure that these third parties handle the data appropriately. We cannot comply with your objection to the disclosure of data where the disclosure in question is necessary for our activities.

In addition, we enable **certain third parties** to collect **personal data from you** on our website and at events organized by us (for example press photographers, providers of tools on our website, etc.). Where we have no control over these data collections, these third parties are sole controllers. If you have concerns or wish to exercise your data protection rights, please contact these third parties directly. See Section 12 for the website.

8. Does Your Personal Data also End up Abroad?

As explained in section **Error! Reference source not found.**, we disclose data to other parties. These are not all located in Switzerland. Your data may therefore be processed both in Europe and in America, in exceptional cases, in any country in the world.

If a recipient is located in a country without adequate statutory data protection, we require the recipient to undertake to comply with data protection (for this purpose, we use the revised European Commission's standard contractual clauses, which can be accessed here: https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?), unless the recipient is subject to a legally accepted set of rules to ensure data protection or unless we cannot rely on an exception. An exception may apply for example in case of legal proceedings abroad, but also in cases of overriding public interest or if the performance of a contract requires disclosure, if you have consented or if data has been made available generally by you and you have not objected against the processing.

Many countries outside of Switzerland or the EEA currently do not have laws that ensure an adequate level of data protection under the DPA or the GDPR. The contractual arrangements mentioned compensate to some extent for this weaker or missing legal protection. However, contractual precautions cannot eliminate all risks (namely of government access abroad). You should be aware of these remaining risks, even though they may be low in an individual case, and we take further measures (for example pseudonymization or anonymization) to minimize them.

Please note that data exchanged via the internet is often routed through third countries. Your data may therefore be sent abroad even if the sender and recipient are in the same country.

9. How Long Do We Process Your Data?

We process your data for as long as our processing purposes, the legal retention periods and our legitimate interests in documentation and keeping evidence require it or storage is a technical requirement. You will find further information on the respective storage and processing periods for the individual data categories in Section **Error! Reference source not found.**, and for cookies in Section 12. If there are no contrary legal or contractual obligations, we will delete or anonymize your data once the storage or processing period has expired as part of our usual processes.

10. How Do We Protect Your Data?

We take appropriate security measures in order to maintain the required security of your personal data and ensure its confidentiality, integrity and availability, and to protect it against unauthorized or unlawful processing, and to mitigate the risk of loss, accidental alteration, unauthorized disclosure or access.

11. What are your rights?

Applicable data protection laws grant you the right to object to the processing of your data in some circumstances, in particular for direct marketing purposes, for profiling carried out for direct marketing purposes and for other legitimate interests in processing.

To help you control the processing of your personal data, you have the following rights in relation to our data processing, depending on the applicable data protection law:

- The right to request information from us as to whether and what data we process from you;
- The right to have us correct data if it is inaccurate;
- The right to request erasure of data;
- The right to request that we provide certain personal data in a commonly used electronic format or transfer it to another controller;
- The right to withdraw consent, where our processing is based on your consent;
- The right to receive, upon request, further information that is helpful for the exercise of these rights;
- The right to express your point of view in case of automated individual decisions (Section 6) and to request that the decision be reviewed by a human.

If you wish to exercise the above-mentioned rights in relation to us (or with one of our group companies), please contact us in writing, at our premises or, unless otherwise specified or agreed, by e-mail; you will find our contact details in Section 2. In order for us to be able to prevent misuse, we need to identify you (for example by means of a copy of your ID card, unless identification is not possible otherwise).

You also have these rights in relation to other parties that cooperate with us as separate controllers – please contact them directly if you wish to exercise your rights in relation to their processing. You will find information on our key partners and service providers in Section **Error! Reference source not found.** and additional information in Section 12.

Please note that conditions, exceptions or restrictions apply to these rights under applicable data protection law (for example to protect third parties or trade secrets). We will inform you accordingly where applicable.

If you do not agree with the way we handle your rights or with our data protection practices, please let us know (Section 2). If you are located in the EEA, the United Kingdom or in Switzerland, you also have the right to lodge a complaint with the competent data protection supervisory authority in your country. You can find a list of authorities in the EEA here: https://edpb.europa.eu/about-edpb/board/members_en. You can reach the UK supervisory authority here: <https://ico.org.uk/global/contact-us/>. You can reach the Swiss supervisory authority here: <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html>.

12. Do We Use Online Tracking?

We use various techniques on our website that allow us and third parties engaged by us to recognize you during your use of our website, and possibly to track you across several visits. This section will inform you about this.

In essence, this is so that we can distinguish accesses by you (via your system) from accesses by other users, so that we can ensure the functionality of the website and carry out analysis and personalization. We do not intend to determine your identity, even if that is possible where we or third parties engaged by us can identify you by combination with registration data. However, even without registration data, the technologies we use are designed in such a way that you are recognized as an individual visitor each time you access the website, for example by our server (or third-party servers) that assign a specific identification number to you or your browser (so-called «cookie»).

We use these technologies on our website and may allow certain third parties to do so as well. However, depending on the purpose of these technologies, we may ask for consent before they are used. You can

access your current settings here. You can also set your browser to block or deceive certain types of cookies or alternative technologies, or to delete existing cookies. You can also add software to your browser that blocks certain third-party tracking. You can find more information on the help pages of your browser (usually with the keyword «Privacy») or on the websites of the third parties set out below.

We distinguish the following categories of «cookies» (including other technologies such as fingerprinting):

- **Necessary cookies:** Some cookies are necessary for the functioning of the website or for certain features. For example, they ensure that you can move between pages without losing information that was entered in a form. They also ensure that you stay logged in. These cookies exist temporarily only («session cookies»). If you block them, the website may not work properly. Other cookies are necessary for the server to store options or information (which you have entered) beyond a session (i.e. a visit to the website) if you use this function (for example language settings, consents, automatic login functionality, etc.). These cookies have an expiration date of up to 24 months.
- **Performance cookies:** In order to optimize our website and related offers and to better adapt them to the needs of the users, we use cookies to record and analyze the use of our website, potentially beyond one session. We use third-party analytics services for this purpose. We have listed them below. Before we use such cookies, we ask for your consent. You can withdraw consent at any time through the cookie settings. Performance cookies also have an expiration date of up to 24 months. Details can be found on the websites of the third-party providers.

We may also integrate additional third-party offers on our website, in particular from social media providers. These offers are deactivated by default. As soon as you activate them (for example by clicking a button), these providers can determine that you are using our website. If you have an account with that social media provider, it can assign this information to you and thereby track your use of online offers. These social media providers process this data as separate controllers.

We currently use offers from the following service providers and advertising partners (where they use data from you or cookies set on your computer for advertising purposes):

- **Google Analytics:** Google Ireland Ltd. (located in Ireland) is the provider of the service «Google Analytics» and acts as our processor. Google Ireland relies on Google LLC (located in the United States) as its sub-processor (both «Google»). Google collects information about the behavior of visitors to our website (duration, page views, geographic region of access, etc.) through performance cookies (see above) and on this basis creates reports for us about the use of our website. We have configured the service so that the IP addresses of visitors are truncated by Google in Europe before forwarding them to the United States and cannot be traced back. We have turned off the «Data sharing» option and the «Signals option». Although we can assume that the information we share with Google is not personal data for Google, it may be possible that Google may be able to draw conclusions about the identity of visitors based on the data collected, create personal profiles and link this data with the Google accounts of these individuals for its own purposes. In any event, if you consent to the use of Google Analytics, you expressly consent to any such processing, including the transfer of your personal data (in particular website and app usage, device information and unique IDs) to the United States and other countries. Information about data protection with Google Analytics can be found here <https://support.google.com/analytics/answer/6004245> and if you have a Google account, you can find more details about Google's processing here <https://policies.google.com/technologies/partner-sites?hl=en>.
- **reCAPTCHA:** To protect your requests via internet form, we use the service reCAPTCHA of the company Google Inc (Google). The query serves to distinguish whether the input is made by a human being or abusively by automated, machine processing. The query includes the sending of the IP address and possibly other data required by Google for the reCAPTCHA service to Google. For this purpose, your input is transmitted to Google and used there. However, your IP address will be shortened beforehand by Google within member states of the European Union or in other contracting states of the Agreement on the European Economic Area. 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 this service. The IP address transmitted by your browser as part of reCaptcha will not be merged with other data from Google. The deviating data

protection regulations of the Google company apply to this data. You can find more information about Google's privacy policy at: <https://policies.google.com/privacy?hl=en>.

13. What Data Do We Process On Our Social Network Pages?

We may operate pages and other online presences («fan pages», «channels», «profiles», etc.) on social networks and other platforms operated by third parties and collect the data about you described in Section **Error! Reference source not found.** and below. We receive this data from you and from the platforms when you interact with us through our online presence (for example when you communicate with us, comment on our content or visit our online presence). At the same time, the platforms analyze your use of our online presences and combine this data with other data they have about you (for example about your behavior and preferences). They also process this data for their own purposes, in particular for marketing and market research purposes (for example to personalize advertising) and to manage their platforms (for example what content they show you) and, to that end, they act as separate controllers.

We process this data for the purposes set out in Section 0, in particular for communication, for marketing purposes (including advertising on these platforms, see Section 12) and for market research. You will find information about the applicable legal basis in Section 5. We may disseminate content published by you (for example comments on an announcement), for example as part of our advertising on the platform or elsewhere. We or the operators of the platforms may also delete or restrict content from or about you in accordance with their terms of use (for example inappropriate comments).

For further information on the processing of the platform operators, please refer to the privacy information of the relevant platforms. There you can also find out about the countries where they process your data, your rights of access and erasure of data and other data subjects rights and how you can exercise them or obtain further information. We currently use the following platforms:

Facebook: On Facebook (www.facebook.com) we operate several pages. The controller for the operation of the platform for users from Europe is Facebook Ireland Ltd., Dublin, Ireland. Their privacy notice is available at www.facebook.com/policy. Some of your data will be transferred to the United States. You can object to advertising here: www.facebook.com/settings?tab=ads. With regard to the data collected and processed when visiting our site for «page insights», we are joint controllers with Facebook Ireland Ltd., Dublin, Ireland. As part of page insights, statistics are created about the actions visitors perform on our site (comment on posts, share content, etc.). This is explained at www.facebook.com/legal/terms/information_about_page_insights_data. It helps us understand how our page is used and how to improve it. We receive only anonymous, aggregated data.

We have agreed our data protection responsibilities according to the information on www.facebook.com/legal/terms/page_controller_addendum.

- **LinkedIn:** The Swan Group uses the technical platform and services of LinkedIn Ireland Unlimited Community, Wilton Place, Dublin 2, Ireland, for the information service offered.

We would like to point out that you use these LinkedIn pages and their functions on your own responsibility. This applies in particular to the use of the interactive functions (for example, commenting or rating). Information about which data is processed by LinkedIn and for which purposes can be found in the LinkedIn privacy policy: <https://www.linkedin.com/legal/privacy-policy>

When you visit our LinkedIn company page, LinkedIn collects, among other things, your IP address and other information that is present on your PC in the form of cookies. This information is used to provide us, as the operator of the LinkedIn pages, with statistical information about the use of the LinkedIn page.

The data collected about you in this context will be processed by LinkedIn Ireland Unlimited Community and, where applicable, transferred to countries outside the European Union (<https://www.linkedin.com/help/linkedin/answer/62533>). LinkedIn describes in general terms what information it receives and how it is used in its privacy policy. There you will also find information about how to contact LinkedIn.

In which way LinkedIn uses the data from the visit of LinkedIn pages for its own purposes, to what extent activities on the LinkedIn page are assigned to individual users, how long LinkedIn stores this data and

whether data from a visit of the LinkedIn page is passed on to third parties, is not conclusively and clearly stated by LinkedIn and is not known to us.

We, as a provider of a LinkedIn company page, do not collect and process any data from your use of our service beyond that.

- **Youtube:** We have embedded YouTube videos in our online offer, which are stored on <http://www.YouTube.com> and can be played directly from our website. In principle, when you call up a page with embedded videos, your IP address is already sent to YouTube/Google and cookies are installed on your computer. However, we have embedded our videos in "extended data protection mode", i.e. no data about you as a user will be transmitted to YouTube/Google if you do not play the videos. Only when you click on the video to play it, the following data will be transferred:

- IP address
- Date and time of the request
- Time zone difference from Greenwich Mean Time (GMT)
- Content of the request (specific page)
- Access status/HTTP status code
- Amount of data transferred in each case
- Website from which the request comes
- browser
- Operating system and its interface
- Language and version of the browser software.
- Hardware used (PC, smartphone, etc.)
- Location (if Google Maps is enabled)

We have no influence on this data transmission.

By visiting our website and playing the videos, YouTube/Google receives the information that you have accessed the corresponding subpage of our website. If you are logged into Google, this data is directly assigned to your account. If you do not want the assignment with your profile at YouTube, you must log out before activating the button. In addition, YouTube/Google also stores data if you do not have a Google user account, these are in particular: IP address, search queries, browser and operating system version.

YouTube/Google stores the aforementioned data as usage profiles and uses them for the purposes of advertising, market research and/or demand-oriented design of its website. Such evaluation is carried out in particular (even for users who are not logged in or users without a corresponding account) for the provision of needs-based advertising and to inform other users of the social network about your activities on our website. You have a right to object to the creation of these user profiles, whereby you must contact YouTube to exercise this right.

Third party information:

YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066, USA:

<https://policies.google.com/technologies/product-privacy?hl=en> und <https://www.google.de/intl/en/policies/privacy>.

The information collected by the cookies of this provider is usually sent to a server in the USA and stored there. In the case of the transfer of data to the USA, the data transfer is based on the existence of standard contractual clauses.

14. Newsletter mailing

The newsletter is sent using "MailChimp", a newsletter sending platform of the US provider Rocket Science Group, LLC, 675 Ponce De Leon Ave NE #5000, Atlanta, GA 30308, USA..

The email addresses of our newsletter recipients, as well as their other data described in the context of these notes, are stored on the servers of MailChimp in the USA. MailChimp uses this information to send and evaluate the newsletter on our behalf. Furthermore, according to its own information, MailChimp may use this data to optimize or improve its own services, e.g. to technically optimize the dispatch and display of the newsletters or for economic purposes to determine from which countries the recipients come. However, MailChimp does not use the data of our newsletter recipients to write to them itself or to pass them on to third parties..

We trust in the reliability and IT and data security of MailChimp. MailChimp is certified under the US-EU data protection agreement "Privacy Shield" and thus undertakes to comply with the EU data protection regulations. Furthermore, we have concluded a "Data Processing Agreement" with MailChimp. This is a contract in which MailChimp undertakes to protect the data of our users, to process it on our behalf in accordance with its data protection provisions and, in particular, not to pass it on to third parties. You can view the privacy policy of MailChimp here: [Global Privacy Statement | Intuit](#).

15. Can We Update This Privacy Notice?

This Privacy Notice is not part of a contract with you. We can change this Privacy Notice at any time. The version published on this website is the current version.

Last updated: 31.08.2023