

## Privacy policy website

*This English version of the Privacy Policy is a translation provided for your convenience. The German version is the sole legally binding document. You can find the German version [here](#).*

This privacy policy relates to the website [www.findependent.ch](http://www.findependent.ch) (hereinafter referred to as "website") and describes which personal data Findependent AG, Kasernenstrasse 26, 5000 Aarau, Switzerland (hereinafter referred to as "findependent" or "we") as the responsible party collects, processes and uses when you visit this website. For the purposes of this privacy policy, personal data means any information relating to an identified or identifiable natural person.

findependent is obliged to protect your privacy and confidentiality on the basis of business secrecy and for this reason takes a large number of technical and organisational data protection precautions for all processing of personal data.

Within the framework of our business relationships, we depend on processing personal data that is required for the establishment and implementation of business relationships and the fulfilment of the associated legal or contractual obligations, as well as for the provision of services or the execution of orders.

This privacy policy may be updated at any time. It is therefore recommended that you regularly read the latest version of this page. The header of the privacy policy provides information about the time of the last update. The current and valid version of the data protection declaration is available on our website at [www.findependent.ch/en/privacy-policy-website](http://www.findependent.ch/en/privacy-policy-website).

### 1. Area of application

This privacy policy only applies to the use of the website [www.findependent.ch](http://www.findependent.ch) and thus in particular not to:

- the use of the findependent app. Further information on privacy policy in connection with the use of the findependent app can be found in a separate privacy policy at <https://www.findependent.ch/en/privacy-policy>
- other websites to which you are redirected via a link.

### 2. Categories of personal data

The following categories of personal data may be collected, processed and used by findependent in connection with the use of the website:

- IP address, operating system, browser type, browser version, browser configuration, name of the Internet provider and other types of information related to the devices used by users to access our website and the connection relevant to identify the type of terminal device of the user, to connect to the

website, to enable data exchange with the user and the user's device and to ensure a comfortable use of the website,

- URL and IP address of the website from which users visit our website or refer users to our website, including date and time,
- sub-pages that users visit during their stay on our website and links they click on the website, including date and time, and
- the content of any communication through the website, including any information users share on the website with findependent and/or other users or, for example, the content of applications for vacancies.

### **3. Legal basis and purposes for data processing**

We collect, process and use this personal data lawfully and in good faith. Depending on the purpose of the respective data processing, findependent processes your personal data on the basis of the following legal bases and, if necessary, for the following purposes:

#### **3.1. Contractual duties**

First and foremost, findependent processes personal data in the context of the initiation or execution of contracts, in particular in order to

- to administer, operate, maintain and improve the website and the services offered on it,
- to help us improve the website and our services,
- to answer users' questions and address users' concerns,
- to be able to display information and advertising about our products to users, and,
- to prevent illegal use of our website.

#### **3.2. Legal duties**

findependent must comply with the applicable laws and may be obliged to disclose, report and surrender your personal data on the basis of a legal obligation or an official order.

#### **3.3. To protect legitimate interests**

We use your personal data to improve, develop, and expand our services and products. Our legitimate interest arises from the intention to ensure the functionality of our website with regard to our services, to operate our website in a user-friendly manner, to keep information constantly updated, and to meet the needs of our customers and website visitors. In no case do we use the collected data for the purpose of drawing conclusions about your person.

#### **3.4. Agreement**

For further processing purposes beyond the actual fulfilment of the contract, the processing of your personal data may be based on your consent, which you can revoke at any time.

### 3.5. Data security and retention

Access to personal information is limited to those employees, contractors and third parties who need to know that information with a view to providing products and services or in connection with the website. We use both physical, electronic and procedural safeguards to protect personal information. These include, for example, the use of firewalls, personal passwords and encryption and authentication technologies. We use personal data about our clients or former clients solely for the purposes mentioned above and only disclose this data to third parties with the client's consent or, where permitted by law, at their request.

### 3.6. Duration of processing

We store your personal data in accordance with the relevant data protection laws. In particular, personal data is only stored for as long as it is required to achieve the purposes pursued by the processing, on the basis of our legitimate interests for documentation, or for a maximum of as long as permitted by law, i.e., for example for the duration of the entire business relationship (from the initiation and processing to the termination of the customer relationship) as well as beyond this in accordance with the statutory storage and documentation obligations.

It is therefore possible that personal data will be retained for the period in which claims can be asserted against findependent and insofar as we are otherwise legally obliged to do so or justified business interests require this (e.g., for evidence and documentation purposes).

As soon as your personal data is no longer required for the above-mentioned purposes, it will be deleted or anonymised as far as possible.

## 4. Cookies

The website sometimes uses so-called cookies. Cookies do not cause any damage to your computer and do not contain viruses. Cookies are used to make our website more user-friendly, effective and secure. We use them for statistical purposes and to improve the user experience and online advertising campaigns. Cookies are small (text) files that are stored in your browser or on your device when you visit the website. You can prevent the storage of cookies by setting your browser accordingly or only allow them in individual cases. However, we would like to point out that in this case you may not be able to use all the functions of this website to their full extent. By using this website, you agree to the use of cookies for this purpose.

Most of the cookies we use are so-called "session cookies". They are automatically deleted at the end of your visit. Other cookies remain stored on your terminal device

until you delete them. These cookies enable us to recognise your browser on your next visit.

Within the framework of the website, findependent uses the following cookies:

- Language selection cookie. This cookie saves your language selection in order to be able to display the website in the selected language on future visits.
- Tracking the number and type of visits to the website and its pages so that we can determine which parts of the website are working well and which need improvement.
- Storage of user preferences for screen layout, including preferred language and country.
- Collect statistical data on the number of users and their usage habits, improve the speed and performance of website pages.
- Third party and partner cookies. Occasionally, we use third-party plug-ins and components to enhance the user experience and our online advertising campaigns. These components may also use cookies for similar purposes. Neither these third parties nor findependent have access to the data collected by the other via cookies.

We use cookies to serve advertisements from findependent when you visit third party websites with which we have marketing relationships. These third parties may collect anonymised information about your use of our and other websites and provide us with this anonymised data, including but not limited to geographic information, your user behaviour on a website, or the names of websites where you have been shown advertisements.

#### 4.1. Google Analytics and other comparable services

We use tracking technologies and web analytics services such as Google Analytics and Google Tag Manager to understand how our website is used. The information generated by these cookies about the use of this website is usually transferred to a Google server in the USA and stored there. However, due to the activation of IP anonymisation on this website, your IP address will be truncated beforehand by Google within member states of the European Union or in other contracting states to 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. Google will use this information on our behalf for the purpose of evaluating your use of the website, compiling reports on website activity and providing other services relating to website activity and internet usage to the website operator. The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data. Further information can be found at <https://policies.google.com/privacy?hl=en>

**Browser Plugin:** You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) by Google, as well as the processing of this data by Google, by downloading

and installing the browser plugin available at the following link:  
<https://tools.google.com/dlpage/gaoptout?hl=en>

**Objection to data collection:** You can prevent the collection of your data by Google Analytics by clicking on the following link:  
<https://tools.google.com/dlpage/gaoptout?hl=en>. An opt-out cookie will be set, which will prevent the collection of your data during future visits to this website.

**Google AdWords Remarketing:** This cookie can link your visit to the website with the advertisements on Google. You can find more information on the Google website.

We use third-party retargeting and remarketing features on our website. These technologies make it possible to address internet users who have previously visited our websites with personalised advertising on our partners' websites. For this purpose, the respective retargeting or remarketing provider stores a cookie on your hard drive. Based on the cookie technology, usage information is stored in pseudonymised form, e.g. which advertisements you have received from us or clicked on and which advertising content you have viewed. The pseudonymised data is never merged with your personal data and is only used to enable advertising based on your interests.

You can object to the use of the following retargeting or remarketing providers by clicking on the corresponding [link](#) to access the page for deactivating cookies.

## 4.2. Appsflyer

We use tracking technologies and web analytics services such as Appsflyer to understand where visitors to our website come from. If you click on a button on our website that links to the Google Play Store or the App Store (e.g. to start a registration for findependent), we also transmit the visitor source data to the Google Play Store or the App Store in order to understand the source of our app downloads.

## 4.3. Delete cookies

You can always decline the use of cookies (and this website) by deleting the cookies that have been set by the website. This is possible via the settings in your internet browser and by deleting all cookies.

## 5. Recipients of personal data

Third parties contracted by us to perform technical or organisational services on our behalf and in accordance with our instructions, which we require to fulfil the purposes set out in this privacy policy or our other business activities (e.g. customer support and technical support services, hosting of our systems), may have access to users' personal data. Our service providers are contractually obliged to process the personal data exclusively on our behalf and in accordance with our instructions. We also oblige our service providers to comply with technical and organisational measures that ensure the protection of personal data.

## 6. Location of data processing

Your personal data may be transferred abroad if this is necessary for the provision of our services or is required by law (e.g. within the framework of the automatic exchange of information) or on the basis of your consent. We ensure in each case (e.g. by concluding appropriate contracts) that the service providers concerned guarantee an appropriate level of data protection comparable to that in Switzerland.

If processing takes place in countries with legislation that does not provide an adequate level of data protection, the protection of your personal data will be ensured by means of the precautions provided for by law, such as in particular the conclusion of contractual agreements (revised standard contractual clauses of the European Commission, which can be found at [https://eur-lex.europa.eu/eli/dec\\_impl/2021/914/oj](https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj) as well as appropriate technical and organisational measures.

## 7. Use of the chat function and appointment booking on our website

If you use the chat function offered on our website, we advise you not to enter any sensitive or particularly sensitive data (e.g. information on your creditworthiness, incoming payments or changes of address). Personal data may only be changed in the findependent app, sensitive or particularly sensitive data and issues may only be clarified via customer support by telephone.

The chat widget is provided by the third-party provider Freshworks Inc ("Freshworks") to enable interaction with you on our website. As a data processor acting on our behalf, Freshworks automatically receives and stores the chat conversation, the date of your request, your device model, your IP address, technical data about your internet browser and your usage behaviour through cookies. Freshworks analyzes this data on our behalf so that we can improve our service for you. You can find out which cookies Freshworks sets in the Freshworks cookie policy.

For scheduling appointments, we use Zoho, Google Calendar, or a comparable provider (Calendar Service Provider). For the purpose of recording the date and time of the appointment, your name, your email address, and possibly your mobile number (if you provide it during booking) are transmitted to the Calendar Service Provider.

You can read Zoho's privacy policy at <https://www.zoho.com/gdpr.html>, and Google's at <https://policies.google.com/privacy?hl=en>.

For Freshworks as well as for the Calendar Service Provider, the mentioned data is transmitted abroad but remains within the European Economic Area.

## 8. Newsletter Registration

If you subscribe to the newsletter on our website, findependent stores your email address with our service provider for sending emails. The service provider is Idea 2 Collective GmbH, resident and active in Switzerland, operating under the brand name

“aivie” (hereinafter referred to as the "Dispatch Service Provider"). In this process, personal data is transferred to the Dispatch Service Provider, specifically:

- Contact details: e.g., email address, name, phone number.
- Usage data/metadata: For marketing communications, we may record whether a message was opened and which links were clicked (tracking). This helps us to improve our communication and make it more relevant.

The Dispatch Service Provider is used so that we can send you newsletters tailored to you and prevent you from receiving information multiple times.

The jointly shared data is stored in a data center in Switzerland in compliance with applicable data protection regulations. You can find the Dispatch Service Provider's data protection agreement at <https://aivie.ch/privacy-policy/>.

You have the option to unsubscribe from the newsletter in every email we send. You can either do this directly in the footer of the email or, if this function is not available, by contacting our customer support.

## 9. Risks in data transfers

Data transmitted over an open network such as the Internet or an e-mail service is available for anyone to view. Information transmitted over the Internet and content received online may be transmitted over third-party networks. findependent cannot guarantee the confidentiality of communications or documents transmitted over such open networks or third-party networks.

If you disclose personal information over an open or third-party network, you should be aware that your personal information may be lost. Third parties may also be able to access this information and consequently collect and use the personal data without your consent. Although in many cases the individual data packets are transmitted in encrypted form, the names of the sender and recipient are not. Third parties could thus draw conclusions about existing or yet to be established accounts and business relationships. Even if the sender and the recipient live in the same country, the data transfer via such networks often takes place without controls via third countries, i.e. also via countries that do not offer the same level of data protection as your country of domicile. We assume no responsibility for the security of your data during transmission via the Internet and disclaim any liability for direct or indirect losses. The use of other means of communication is permitted should you consider it necessary or reasonable for security reasons.

Data that you provide in chat functions may be passed on to commissioned third-party companies for the purpose of order processing and processed by them. For certain services, your data is transmitted with strong encryption.

## **10. Right to information about and deletion, blocking or correction of personal data**

Upon written request, findependent will provide you with information about all personal data stored about you, its origin, the recipients or categories of recipients who have received personal data about you from us, and the purpose of the storage or data processing. Furthermore, you have the right to have this data corrected, blocked or deleted. Consent given can be revoked at any time by providing written notice to findependent.. Moreover, you can object to any data processing at any time, request the disclosure of specific personal data in a commonly used electronic format, or demand its transfer to other data controllers. Furthermore, in case of violations of data protection regulations, you have the right to file a complaint with the competent data protection authority or enforce your rights through legal action before the appropriate court.

You can contact us about your data protection rights and other questions on the subject of personal data as follows:

- By e-mail: [service@findependent.ch](mailto:service@findependent.ch)
- By mail: Findependent AG, Kasernenstrasse 26, 5000 Aarau, Switzerland

## **11. Entry into force**

This privacy policy is effective immediately. findependent reserves the right to change the privacy policy at any time. You can find the latest version on our website at [www.findependent.ch/en/privacy-policy-website](http://www.findependent.ch/en/privacy-policy-website).