

30<sup>th</sup> June Interlaken, Switzerland

## **Privacy Policy**

Winston Graf AG ("WGAG") collects personal data about you. WGAG as the controller processes your personal data in compliance with the provisions under the Swiss Data Protection Act ("DPA") and General Data Protection Regulation ("GDPR"), as amended from time to time (collectively "Regulation"). This Data Protection Policy ("Policy") explains how we use any personal data we collect about you.

### **What Personal Data do we collect?**

"Personal Data" is any information relating to you or that we can otherwise link to you. The Personal Data that we collect and use may include:

- basic information, such as your name, your employer, your title or position;
- contact information, such as your postal or physical address, email address and phone number(s);
- financial information, such as payment related information;
- technical information, such as your IP address and other information collected from your visits to our website or applications or in relation to materials and communications we send to you electronically;
- information you provide to us for the purpose of attending meetings and events;
- details of your visits to our offices;
- any other information which you may provide to us.

### **How do we obtain your Personal Data?**

We collect personal data that you voluntarily provide to us, for example when:

- you register as a member, subscriber, or partner on our website,
- you communicate with us via e-mail or other channels,
- when you sign up for newsletters or other materials and
- when you sign up for an event
- when you provide it to us, or interact with us directly, for instance engaging with our staff or registering on our webpage.

In some cases your Personal Data has been supplemented by information retrieved from other sources, including searches via publically available search engines, sector-specific newsletters, and social media, for the purpose of sharing relevant information with you about the Winston Graf AG ecosystem.

### **How do we use your Personal Data?**

We only use your Personal Data in connection with our ordinary professional activities. We use that information for communication purposes, including:

- to send you newsletters and other information
- to send you invitations to events, training sessions, conferences and lectures
- to manage and administer our relationship with you
- to maintain our list of contacts
- to fulfil our legal, regulatory obligations

- for any purpose related to the foregoing or for any purpose for which you provided the personal data to WGAG

In the case, when we share or transfer your Personal Data, we do so in accordance with applicable data protection laws and take appropriate safeguards to ensure its integrity and protection. If you have given us your express consent, we may process your Personal Data for additional purposes. You may withdraw your consent at any time.

### **Why do we process your Personal Data and on what legal basis?**

As set out above we process your Personal Data for communication purposes. We rely on our legitimate interests in maintaining business relationships and communicating with you as a business contact, about WGAG activities and events. We consider that our legitimate interests are in compliance with the applicable laws/Regulation and your legal rights and freedoms.

### **Where is your Personal Data stored?**

WGAG is a Swiss corporation and all your Personal Data is processed and stored on servers in Switzerland, except in cases where we work with data processing partners like MailChimp, which store information securely in accordance with Regulations. MailChimp is used for the management of newsletters, including the collection (e.g., via sign-up forms) and storage of personal data including email and name, and the transfer of personal data to certain of MailChimp's sub-processors (who, as described in MailChimp's Data Processing Agreement, perform some critical services, such as helping MailChimp prevent abuse and providing support to our customers).

### **How long do we keep your Personal Data?**

Your Personal Data will be saved for the specified purposes mentioned above for as long as you are a business contact to us. You can unsubscribe at any time, if you no longer wish to receive communications and invitations from WGAG. If you choose to unsubscribe, we will cease to send you such communication and invitations as mentioned above. We do not make your Personal Data available to any third party for commercial purposes. In any way.

### **Data Security**

WGAG has implemented appropriate technical and organisational security measures to help protect your Personal Data against loss and to safeguard against access by unauthorised or unlawful processing of your Personal Data and against accidental loss or destruction of, or damage to, your personal data in accordance with our internal security procedures covering its storage, access and destruction. Personal Data may be stored on our own technology systems or in paper files.

### **Your Rights**

The Regulation and other applicable data protection laws provide certain rights for data subjects. You are entitled to request details of the information we hold about you and how we process it. You may also request a copy. You are also entitled to have incorrect Personal Data about you corrected and you may in some cases ask us to delete your Personal Data. You can also object to certain Personal Data about you being processed and request that processing of your Personal Data be limited. Please note that the limitation or deletion of your Personal Data may mean we will be unable to provide the communications and invitations described above. You also have the right to receive your Personal Data in a machine-readable format and have the data transferred to another party responsible for data processing. If you disagree with how we process your Personal Data, you

are also entitled to report this to the Swiss Federal Data Protection and Information Commissioner (FDPIC) and/or to the competent supervisory authorities in the EU.

#### **How to contact us**

We must ensure that your personal information is accurate and up to date. Therefore, if you have any questions about how we process your Personal Data, please feel free to contact us at [info@winston-graf.ch](mailto:info@winston-graf.ch).

If you do not wish to receive further newsletters from WGAG, please **unsubscribe** here. Users of [www.winston-graf.ch](http://www.winston-graf.ch) can login to “My Account” using their registered email to update or remove their personal information.

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Winston Graf AG