

### **Privacy Policy**

#### 1 Who is responsible for the data processing?

The controller of your personal data is Gianni Fröhlich-Bleuler, Attorney-at-Law, Rütistrasse 4, 8032 Zurich, Switzerland, gianni.fröhlich@jurpm.ch.

#### 2 Who are the data subjects?

This Privacy Policy applies to all natural persons ("you") whose personal data we process. The processing may include personal data of in particular the following categories of persons:

• Private or contact persons of clients, of counterparties, or who are otherwise involved in contract negotiations, in the assertion of claims, or in legal proceedings;

- People who visit our website;
- Visitors to our premises at Rütistrasse 4 in Zurich;

• Persons who receive general information from us about our services;

Contact persons of our suppliers and service providers;

People who apply for jobs with us.

#### 3 What personal data do we process?

We process the following personal data in particular:

#### 3.1 Master data

The master data are basic personal data such as:

- name
- address

 contact data (e-mail address and postal address) and bank account(s)

We process this personal data, for example, during the processing of mandates.

#### 3.2 Contract data

In addition to the master data, contract data is generated in the run-up to the conclusion of the contract (mandate), when the contract is concluded and when the contract is processed, e.g.

in the case of inquiries about our services;

• the personal data processed by us during the provision of the mandate services, in particular the personal data provided to us by you, e.g. that is necessary for the assertion of a claim;

- with regard to the services provided by us;
- for job applications.

In the case of job applications, in addition to the personal data resulting from the documents submitted by you, we also process references obtained.

#### 3.3 Communication data and other technical data

When you get in touch with us, we collect

the master data;

• the content of the communication (e.g. letter, e-mail, telephone conversation);

• meta data of the communication (e.g. information on the type, time or, if applicable, location of the communication).

In addition to the communication data we collect the following personal data when using the website:

- IP address
- Date and time of the request
- Time zone
- Content of the request (specific page)
- Access status/HTTP status code
- Amount of data transferred in each case
- Website from which the request comes
- Operating system
- Language and version of the browser software

We do not use cookies when you visit our website.

# 4 For what purposes do we process personal data?

#### 4.1 Contract execution

We process the personal data, such as in particular the master data, in order to fulfill a mandate relationship existing between you and us or to initiate such a relationship.

#### 4.2 Communication

In particular, we use the master data, communication data and contract data to communicate with you (e.g. in the fulfillment of the mandate relationship, to respond to inquiries or for customer relationship management).

#### 4.3 Security

We further process personal data for security purposes, whether for IT security or to prevent theft or fraud and for the purpose of keeping evidence. This includes, for example, monitoring the IT infrastructure to prevent and defend against cyber-attacks, for which we process communications data.

## 4.4 Compliance with legal requirements and for the protection of rights

We also process personal data for the fulfillment of legal obligations, e.g. regarding the retention of business records or for tax purposes. For this purpose, we use contract data in particular.

# 5 What measures do we take with regard to data security?

We have taken appropriate technical and organizational security measures to protect the personal data from unauthorized access and misuse such as IT and network security solutions, access controls and restrictions, encryption of data carriers and transmissions, pseudonymisation and inspections.

#### 6 How long do we store personal data?

We process your personal data as long as it is necessary for the fulfillment of our contractual and legal obligations or otherwise for the purposes pursued with the processing, in particular for the duration of the entire client relationship and beyond that in accordance with the statutory retention and documentation obligations. If personal data is no longer required for the purposes for which it was collected, it will be deleted or anonymized as far as possible.

#### 7 To whom do we disclose personal data?

We pass on personal data to third parties in particular if this is necessary for the processing of the contract with the third party:

• to credit institutions entrusted with the processing of payments;

• to a fiduciary company for the provision of administrative services (such as bookkeeping);

 to IT contractors for the provision of IT support, ITrelated services and to companies operating in the field of telephony;

• to the hoster of the website and the e-mail system as a data processor.

#### 8 Do we transfer the personal data abroad?

Your personal data is processed in Switzerland. In the context of data processing by a processor (see section 7), the personal data may be transferred in the EEA area or to a third country that does not ensure appropriate data protection. In the latter case, we or the commissioned data processor will ensure that the recipient complies with appropriate data protection, usually by agreeing to EU standard contractual clauses.

## 9 What rights do you have with regard to the processing of personal data?

In particular, you have the right to obtain information about your processed personal data, to correct it or to request its deletion, provided that the legal requirements for this are met. You can submit a request to us for this purpose (see section 1 for contact).

#### 10 Can we adjust the Privacy Policy?

We can adapt this Privacy Policy at any time without prior notice. The current version published on our website applies.

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