

# **Privacy policy**

With this privacy policy we inform you about the processing of personal data in connection with our offer.

Our offer is subject to Swiss data protection law and any applicable foreign data protection law, such as that of the European Union (EU) with the General Data Protection Regulation (GDPR). The EU recognizes that Swiss data protection law ensures adequate data protection.

Special, supplementary or additional data protection declarations may exist for individual and additional offers and services.

### 1. processing of personal data

1.1 Personal data is any information relating to an identified or identifiable person. A data subject is a person about whom personal data are processed. Processing includes any handling of personal data, regardless of the means and procedures used, in particular the storage, disclosure, procurement, deletion, storage, modification, destruction and use of personal data.

1.2 We process personal data that is required to provide our service effectively and in a user-friendly manner, as well as permanently, securely and reliably.

1.3 As a matter of principle, we process personal data only with the consent of the data subject, unless the processing is permissible for other reasons, for example, to fulfill a contract with the data subject and for corresponding pre-contractual measures, to protect our overriding legitimate interests, because the processing is evident from the circumstances, or after prior information. In this context, we process in particular information that a data subject provides to us when contacting us - for example, by mail, e-mail, contact form, telephone or social media - or when voluntarily registering for a user account itself. We may store such information in an address book, in a customer relationship management system (CRM system), in online store software or with comparable tools.

1.4 We process personal data for the period of time required for the respective purpose or purposes. In the case of longer-term storage obligations due to legal and other obligations to which we are subject, we restrict the processing accordingly.

1.5 We may have personal data processed by third parties - also abroad. Such order processors process personal data on our behalf. We may further process personal data with the help of third parties - also abroad. We ensure in each case that such third parties guarantee appropriate data protection.

1.6 We are present on social media platforms and other online platforms in order to communicate with customers and interested persons and to provide information about our offerings. The General Terms and Conditions (GTC), data protection declarations and other provisions of the individual operators apply in each case.

### 2. legal basis for the processing of personal data

2.1 We process personal data in accordance with Swiss data protection law, such as the Data Protection Act (DSG) in particular. https://www.admin.ch/opc/de/classified-compilation/ 19920153/index.html

2.2 We process personal data - if and to the extent that the GDPR is applicable - in accordance with the following legal bases:

Art. 6 para. 1 lit. a DSGVO for the processing of personal data with the consent of the data subject.

Art. 6 para. 1 lit. b DSGVO for the necessary processing of personal data for the fulfillment of a contract with the data subject as well as for the implementation of pre-contractual measures.

Art. 6 para. 1 lit. c DSGVO for the necessary processing of personal data for the fulfillment of a legal obligation to which we are subject pursuant to any applicable law of the EU or pursuant to any applicable law of a country in which the DSGVO is applicable in whole or in part.

Article 6(1)(d) of the GDPR for the necessary processing of personal data to protect the vital interests of the data subject or another natural person.

Art. 6 para. 1 lit. f DSGVO for the necessary processing of personal data to protect the legitimate interests of us or of third parties, unless the fundamental freedoms and rights and interests of the data subject prevail. Legitimate interests are our business interest in being able to provide and advertise the offer, information security and protection against misuse and unauthorized use, the enforcement of our own legal claims and compliance with Swiss law.

#### 3. organizational and technical measures

3.1 We take appropriate and suitable organizational and technical measures to ensure data protection and data security.

3.2 Access to our offer takes place via transport encryption (SSL / TLS).

3.3 The processing of personal data on the Internet can always have security gaps despite appropriate and suitable organizational and technical measures. We can therefore not guarantee absolute data security.

3.4 Access to our offer is subject - as is basically any use of the Internet - to mass surveillance without cause or suspicion and other monitoring by security authorities in Switzerland, the EU, the United States of America (USA) and other countries. We cannot directly influence the corresponding processing of personal data by secret services, police agencies and other security authorities.

#### 4. cookies, log files and tracking pixels

4.1 For each visit to our website, we collect the following data, if transmitted by your browser to our server infrastructure, and store this data in log files:

Date and time including time zone

- Internet Protocol (IP) address
- Access status (HTTP status code)
- Operating system including user interface and version
- Browser including language and version
- individual page accessed and amount of data transferred
- last visited web page (referer)

Such data may constitute personal data. The data is necessary to provide our offer permanently, securely and reliably as well as to ensure data security and thus in particular the protection of personal data - also by third parties or with the help of third parties.

4.2 We use cookies on our website. Cookies - also from third parties whose services we use (third-party cookies) - are text files that are stored in your browser. Cookies can be stored in your browser when you visit our website. In particular, cookies enable us to recognize your browser the next time you visit our website. Cookies cannot execute programs or transmit malware such as Trojans and viruses. Cookies are necessary to provide our offer including our website effectively and user-friendly as well as permanently, safely and reliably, in particular by analyzing the usage with regard to troubleshooting and improvements.

You can disable cookies in your browser settings at any time in whole or in part, as well as delete them. Without cookies, our offer may no longer be fully available. We inform - if and where necessary - directly about the use of cookies or ask you directly for the consent of cookies.

4.3 We use tracking pixels on our website. Tracking pixels - also from third parties whose services we use - are small images that are retrieved when you visit our website. Tracking pixels can be used to collect the same data that is transmitted from your browser to our server infrastructure. Tracking pixels are necessary to provide our offer, including our website, effectively and in a user-friendly manner, as well as permanently, securely and reliably, in particular by analyzing usage with a view to troubleshooting and improvements.

#### 5. notifications and newsletter

5.1 We may send notifications and newsletters by e-mail as well as via other communication channels. Unless and to the extent that the sending is necessary to fulfill a contract with the data subject or to protect our overriding legitimate interests, you must expressly consent to the use of your e-mail address and other contact addresses to prevent misuse by unauthorized third parties ("double opt-in"). We may have notifications and newsletters sent by third parties or send them with the help of third parties.

5.2 Notifications and newsletters may contain tracking pixels or web links that record whether an individual notification or newsletter was opened and which web links were clicked. Such tracking pixels and web links record the usage of notifications and newsletters. We need this statistical recording of usage, including performance and reach measurement, in order to be able to offer notifications and newsletters effectively and in a user-friendly manner based on the reading habits of the recipients, as well as permanently, securely and reliably.

5.3 You can unsubscribe from notifications and newsletters at any time and thereby object in particular to the aforementioned collection of usage.

#### 6. services from third parties

6.1 We use services of third parties - also abroad including the United States of America (USA) - in order to be able to provide our offer effectively and user-friendly as well as permanently, securely and reliably. Such services - including hosting and storage services - require your Internet Protocol (IP) address, otherwise the corresponding content cannot be delivered or made available. Such services may also process further data in connection with our offer and in connection with information from other sources for their own statistical and technical purposes, including cookies, log files and counting pixels.

6.2 We use Google Analytics to analyze the use of our offer. Google Analytics also uses cookies.

Google Analytics is a service of the American Google LLC. We need this service to be able to provide our offer, including our website, effectively and in a user-friendly manner, as well as permanently, securely and reliably, in particular by analyzing usage, including success and reach measurement with regard to troubleshooting and improvements. You can object to the statistical collection by Google Analytics with the "Browser Add-on to disable Google Analytics

#### https://tools.google.com/dlpage/gaoptout

Google is subject to both the EU-US and the Swiss-US Privacy Shield (https:// www.privacyshield.gov/), whereby

Google undertakes to ensure adequate data protection. In particular, Google has published the following information on the nature, scope and purpose of data processing in connection with Google Analytics: Google Analytics Terms of Service, Privacy Policy and Terms of Use, entry in the Privacy Shield list.

https://www.google.com/analytics/terms/ https://policies.google.com/

https://www.privacyshield.gov/participant?id=a2zt00000001L5AAI

6.3 We use Google Fonts to embed selected fonts on our website. Google Fonts is a service of the American Google LLC. Google is subject to both the EU-American and the Swiss-American Privacy Shield (https://www.privacyshield.gov/), whereby Google undertakes to ensure appropriate data protection. In particular, Google has published the following information on the nature, scope and purpose of data processing in connection with Google Fonts: Data protection at Google Fonts, Privacy Policy and Terms of Use, entry in the Privacy Shield list.

https://developers.google.com/fonts/

faq#what\_does\_using\_the\_google\_fonts\_api\_mean\_for\_the\_privacy\_of\_my\_users https://policies.google.com/

https://www.privacyshield.gov/participant?id=a2zt00000001L5AAI

6.4 We use Google Maps to embed maps on our website. Google Maps is a service of the American Google LLC. Google is subject to both the EU-American and the Swiss-American Privacy Shield (https://www.privacyshield.gov/), whereby Google undertakes to ensure appropriate data protection. In particular, Google has published the following information on the nature, scope and purpose of data processing in connection with Google Maps: Privacy of Google products including Google Maps, Privacy Policy and Terms of Use, entry in the Privacy Shield list.

https://policies.google.com/technologies/product-privacy https://policies.google.com/

https://www.privacyshield.gov/participant?id=a2zt00000001L5AAI

6.5 We use YouTube to embed videos on our website. YouTube is a service of the American Google LLC. Google is subject to both the EU-American and the Swiss-American Privacy

Shield (https://www.privacyshield.gov/), whereby Google undertakes to ensure appropriate data protection. In particular, Google has published the following information on the nature, scope and purpose of data processing in connection with YouTube: Data protection for Google-products including YouTube, privacy policy and terms of use, entry in the Privacy Shield list.

https://policies.google.com/technologies/product-privacy https://policies.google.com/ https://www.privacyshield.gov/participant?id=a2zt00000001L5AAI

## 7. rights of data subjects

7.1 Data subjects whose personal data we process have the rights under Swiss data protection law. These include the right to information as well as the right to correction, deletion or blocking of the personal data processed.

7.2 Data subjects whose personal data we process, if and to the extent that the GDPR applies, may request free of charge confirmation as to whether we are processing their personal data and, if so, information about the processing of their personal data, have the processing of their personal data restricted, exercise their right to data portability, and have their personal data corrected, deleted ("right to be forgotten") or blocked.

7.3 Data subjects whose personal data we process, if and to the extent that the GDPR is applicable, may revoke consent given at any time and object to the processing of their personal data at any time.

7.4 Data subjects whose personal data we process have a right of appeal to a competent supervisory authority. The supervisory authority for data protection in Switzerland is the Federal Data Protection and Information Commissioner (FDPIC). https://www.edoeb.admin.ch/

#### 8. contact addresses

8.1 Inquiries from supervisory authorities and data subjects usually reach us by e-mail, but are also possible by letter post:

My Digital Twin Room 1002, 10/F The Workstation 43 Lyndhurst Terrace, Central Hong Kong, SAR P.R.C. privacy@mdtwin.com

#### 9. final provisions

We may change our privacy policy at any time. We will inform affected persons about such changes in a suitable form on our website.