

**Media Focus Schweiz  
GmbH**

**Privacy Statement**

*As of: June 2020*

## 1 General information

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This website was created and published by Media Focus Schweiz GmbH, headquartered at Stauffacherstrasse 28, 8004 Zürich, Switzerland, entered in the commercial register of the Canton of Zürich under number CHE-440.348.635.

We are responsible for collecting, processing and using your personal data in accordance with the law. Your trust is important to us. For this reason, the protection of your data is one of our particular concerns.

We undertake to manage your personal data responsibly. As a result, we naturally comply with the statutory requirements of the Swiss Data Protection Act (DSG), the Ordinance to the Swiss Federal Data Protection Act (VDSG) and the EU General Data Protection Regulation (GDPR). The address of our data protection officer is:

- Ueli Weber
- CEO Media Focus

We will inform you in the following of how we treat your personal data. Please be aware that the information below may be checked and altered from time to time. We therefore recommend that you re-read this Privacy Statement regularly.

## 2 Data processing on the website

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### 2.1 Scope and purpose of the collection, processing and use of personal data

#### 2.1.1 When visiting our website

When you visit our website, our servers temporarily save each access in a log file.

In these cases, the following data is collected by us without any action on your part and is saved until automatic erasure by us after a maximum of twelve months:

- IP address of the accessing computer
- Date and time of the access
- Name and URL of the accessed data
- Website from which our domain was accessed

- Operating system and browser on your computer
- Name of your Internet service provider

The collection and processing of this data takes place for the purpose of enabling use of the website (establishment of a connection), ensuring permanent system security and stability and optimising the Internet service, as well as for internal statistical purposes. The information referred to above will not be associated with personal data or saved with it.

Only in cases of an attack against the network infrastructure of the website or in cases of suspicion of other unauthorised or abusive website use will the IP address be used for clarification and defence and, if applicable, for the initiation of criminal proceedings in order to identify and bring civil and criminal action against the user concerned.

The purposes described above represent our legitimate interest in data processing in accordance with Article 6 paragraph 1 point f) GDPR.

### 2.1.2 When using the contact form

Should you contact us with the assistance of the contact form on the website, we collect the following data from you:

- Company name
- First name and surname\*
- Title\*
- Function\*
- Road, town or city, postcode\*
- Country\*
- Email address\*
- Telephone number\*
- Website\*
- Language\*
- Your query\*
- Message

The information marked with \* is mandatory.

We use this data in order to respond to your queries or to provide the services requested by you and, where necessary, to contact you by telephone. The telephone number will never be used for marketing purposes. The processing of your query represents our legitimate interest in accordance with Article 6 paragraph 1 point f) GDPR. You can object to this data processing at any time (see below for contact details).

### **2.1.3 When using the service**

Should you make a request by means of the relevant form, we collect the following data:

- Company name\*
- Surname and first name\*
- Title\*
- Function
- Road, town or city, postcode\*
- Country\*
- Telephone number\*
- Email address\*
- Requested test account type
- Language\*
- Message

The information marked with \* is mandatory.

We use this data in order to activate the subscription requested by you and, where necessary, to contact you by telephone. The telephone number will never be used for marketing purposes. The processing of your contact request represents our legitimate interest in accordance with Article 6 paragraph 1 point f) GDPR. You can object to this data processing at any time (see below for contact details). However in such a case, you will no longer receive access to the subscription.

## **2.2 Registering for the newsletter**

On our website, you have the option of subscribing to our newsletter. In order to do so, it is necessary to register. During the registration process, the following data must be

provided:

- First name and surname
- Company name
- Function
- Email address

The above data is necessary for the data processing. In addition, you can provide further data voluntarily. This data is only processed by us in order to personalise the information and offers sent to you and in order to ensure that they reflect your interests.

We are entitled to commission third parties with the technical management of marketing campaigns and therefore have the right to provide your personal data to third parties for this purpose. When sending our newsletter, we use the email marketing service Superoffice AS, P.B 1884 Vika 0124 Oslo, Norway.

At the end of the newsletter, you will find a link which you can use to cancel the newsletter subscription at any time. During the unsubscribe process, you can voluntarily notify us of the reason for the cancellation. Following unsubscription, your personal data will be erased. Continued processing only takes place in an anonymous form in order to optimise our newsletter.

Our newsletter may contain a so-called web beacon (number pixel) or similar technical tools. A web beacon is a single-pixel, hidden graphic which is associated with the user ID of the respective newsletter subscriber.

For each newsletter that is sent, it collects information concerning the address file used, the subject and the number of newsletters sent. In addition, it is possible to see which addresses have not yet received the newsletter, to which address it has been sent and to which addresses the newsletter was not sent successfully. This also includes the opening rate, including information on which addresses opened the newsletter. Finally, it also provides information on which addresses unsubscribed. We use this data for statistical purposes and in order to optimise the newsletter in terms of content and structure. This enables us to ensure that the information and offers in our newsletter reflect the individual interests of the recipients. The counting pixel is erased when you delete the newsletter.

In order to prevent the use of the web beacon in our newsletter, please adjust your email program in such a way that no HTML is displayed in messages, should this not already be the default setting. On the pages below, you will find explanations on how to adjust these settings in the most common email programs.

- Microsoft Outlook
- Mail for Mac (“load removed content in messages”)

By registering, you issue us with your consent to the processing of the provided data for

the regular sending of the newsletter to the address stated by you and to the statistical evaluation of usage behaviour and the optimisation of the newsletter. This consent represents our legal basis for the processing of the data for the newsletter in accordance with Article 6 paragraph 1 point a) GDPR.

### 2.3 Cookies

Cookies help make your visit to our website easier, more pleasant and more meaningful in several ways. Cookies are information files which your web browser automatically saves on the hard drive of your computer when you visit our Internet site.

For example, we use cookies in order to temporarily save your selected service and information when you fill in a form on our website, so you do not need to repeat the entry when accessing a different sub-page. Cookies may also be used in order to be able to recognise you as a registered user following registration on the website, without you needing to log in again when accessing a different sub-page.

Most Internet browsers accept cookies automatically. However, you can configure your browser in such a way that no cookies are saved on your computer or you are alerted when you receive a new cookie. On the pages below, you will find explanations as to how you can configure the processing of cookies in the most common browsers.

- [Microsoft's Windows Internet Explorer](#)
- [Microsoft's Windows Internet Explorer Mobile](#)
- [Mozilla Firefox](#)
- [Google Chrome for Desktop](#)
- [Google Chrome for Mobile](#)
- [Apple Safari for Desktop](#)
- [Apple Safari for Mobile](#)

You may be unable to use all the functions of our website if you disable cookies.

### 2.4 Tracking tools

We use the web analysis service Google Analytics for the tailored design and continuous optimisation of our website. In this context, pseudonymised usage profiles are created and small text files that are saved on your computer ("cookies") are used. The information concerning your use of the website which is generated by the cookie, such as

- browser type / version
- operating system
- referrer URL (previous site visited)

- host name of the accessing computer (IP address)
- time of the server access
- device

is transferred to servers of Google Inc., a subsidiary of the holding company Alphabet Inc. in the United States, and saved there. During this process, the IP address is truncated by enabling IP anonymisation (“anonymizeIP”) on this website prior to transfer within the Member States of the European Union or in other signatory states to the European Economic Area and Switzerland. Google will not associate the anonymised IP address transferred by your browser by means of Google Analytics with other data. Only in exceptional cases is the full IP address transferred to a Google server in the United States and truncated there. In these cases, we have entered into contractual undertakings with Google Inc. to ensure that it affords an adequate level of data protection.

The information is used in order to evaluate the use of the website, to compile reports concerning the website activities and to provide additional services connected to the use of the website and the use of the Internet for market research purposes and in order to design these Internet sites in accordance with user requirements. This information may also be transferred to third parties, should this be required for compliance with a legal obligation or should such third parties process the data as contract processors. Google Inc. has stated that the IP address will never be associated with other data relating to the user.

Users can prevent the collection of data generated by the cookie and the data which relates to the use of the website by the user concerned (including the IP address) by Google, as well as the processing of this data by Google, by downloading and installing the browser plugin which can be obtained at the following address:

<http://tools.google.com/dlpage/gaoptout?hl=de>

As an alternative to the browser link, users can click on this [link](#) in order to prevent the collection of data by Google Analytics on the website, effective for the future. In these cases, an opt-out cookie will be placed on the end device of the user. Should the user delete cookies (see “cookies” above), the link must be clicked on again.

For the purposes of full disclosure, we wish to point out that the US authorities carry out monitoring measures in accordance with US legislation, in the course of which blanket storage of all data transferred to the United States from the European Union is possible. This takes place without any differentiation, restriction or exception in accordance with the purpose at hand and without objective criteria that would enable restrictions of access by the US authorities to personal data and its subsequent use to certain, strictly limited purposes which would justify access to this data.

Users whose habitual place of residence is in a Member State of the EU are duly informed that from the point of view of the European Union, the USA does not offer an adequate level of data protection due to the issues raised above. Where we have pointed out in this Privacy Statement that recipients of data (such as Google) maintain their place of business in the

USA, we will ensure either by means of contractual undertakings with these companies or by assuring that these companies are certified under the EU-US Privacy Shield that your data is protected to an adequate extent by our partners.

## **2.5 Re-targeting**

We use so-called re-targeting technologies. We use them to analyse your usage behaviour on our website as a means of showing you advertising that is tailored to your personal interests, also on partner websites. Your usage behaviour will be pseudonymised in this context.

Most re-targeting technologies use cookies (see section 2.3 above).

This website uses DoubleClick by Google, a service of Google Inc. (“Google”), in order to display adverts which are based on the websites that you have visited in the past. For this purpose, Google uses the so-called DoubleClick cookie which enables your browser to be recognised when you visit other websites. The information concerning the visit to these websites (including your IP address) which is generated by the cookie is transferred to a Google server in the United States and saved there (see the additional information in section 2.4 above concerning transfers of personal data to the United States).

Google will use this information in order to evaluate your use of the website and to determine which advertisements will be shown, to compile reports concerning the website activities and adverts for the website operators and to provide additional services connected to the use of the website and the use of the Internet. Google may also transfer this information to third parties, should this be required for compliance with a legal obligation or should such third parties process the data on behalf of Google. However, Google will never associate your IP address with other Google data.

You can prevent the re-targeting at any time by rejecting and deactivating the relevant cookies in the menu bar of your web browser (see section 2.3 above).

## **2.6 Links to our social media presence**

On our website, we have incorporated links to our social media profiles with the following social networks:

- Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA and
- LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland
- XING SE, Dammtorstrasse 30, 20354 Hamburg
- Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

Should you click on the matching icons of the social networks, you are automatically

redirected to our profile on the social network concerned. In order to use the functions of the social network concerned, you may be required to log into your user account on this social network.

Where you access a link to one of our social media profiles, a direct connection is established between your browser and the server of the social network concerned. The social network is therefore informed that you have visited our website with your IP address and have accessed the link. Should you access a link to a network whilst you are logged into your account with the network concerned, the contents of our website can be linked to your profile on the network, which means that the network can directly associate your visit to our website with your user account. Should you wish to prevent this, you should log out before clicking on the relevant links. Association will always take place if you log into the social network concerned after clicking on the link.

### 3 Other processing of customer data

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We collect data which relates to our customers. The collection of customer data takes place offline. In this regard, we collect the details of the contact persons for these customers in particular. We collect the following data for each customer:

- company name
- company address, postcode, town or city
- first name and surname of the contact person
- business telephone number of the contact person
- email address of the contact person
- function and title of the contact person (if available)
- contractual terms
- history of the customer relationship
- email address to inform the customer
- group email address for technical notifications
- requested payment method
- requested currencies

We store the customer data is either as a hardcopy at our premises or in a digital form in our CRM system, which runs on a proprietary server at our location.

The aforementioned data that is stored in our CRM system is generally used to manage the customer relationship, to record the history, to bill for commercial services, to send the customer automatic notifications, to disseminate alerts concerning technical problems or necessary technical modifications and occasionally to send invitations to professional functions or events. The legal basis for the processing of your data for these purposes is the performance of a contract in accordance with Article 6 paragraph 1 point b) GDPR.

## **4 General provisions**

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### **4.1 Transfer of data to third parties**

We only transfer personal data if you have provided your explicit consent, if we are obliged to do so for compliance with a legal obligation or to exercise our rights, in particular to bring claims in connection with the contractual relationship.

In addition, we transfer data to third parties where it is necessary within the framework of the use of the website and the performance of the contract, namely the provision of the services requested by you and in order to analyse your user behaviour. Use of the data by the receiving third party is strictly limited to the named purposes.

Various third party service providers are explicitly named in this Privacy Statement (for example in the sections “tracking tools”, “re-targeting” and “newsletter”).

A service provider to which personal data collected on the website is transferred or which has or may have access to this data is our web hoster, METANET AG, Josefstrasse 218, CH-8005 Zürich. The website is hosted on servers in Switzerland. The data is transferred in order to provide and maintain the functions of our website. This represents our legitimate interest in accordance with Article 6 paragraph 1 point f) GDPR.

### **4.2 Transfer of personal data to foreign countries**

We are entitled to transfer your data to third party companies abroad, should this be necessary in order to respond to your queries, provide services and carry out marketing campaigns. These third party companies are obliged to safeguard user privacy in the same way as the provider itself. Where a country’s data protection standards are considered inadequate when compared to Swiss law or the GDPR, we will enter into a contract to ensure that your personal data is protected at all times in accordance with Swiss regulations or the GDPR.

Various third party providers and their registered addresses have been named in the section above (“disclosure of data to third parties”). Certain third party providers named in this Privacy Statement have registered addresses in the United States (see “tracking tools”, “re-targeting”). For additional information on the transfer of data to the United States, refer to “tracking tools”.

### **4.3 Storage of the data in a central database**

We store the data referred to in sections 2-3 above in a central, electronic data processing system. In this regard, the data relating to you is systematically collected and associated in order to process your bookings and perform the contractual services. We use software by Superoffice AS, P.B 1884 Vika 0124 Oslo, Norway for this purpose. We base processing of this data using the software on our legitimate interest in maintaining good customer relationships and efficient management of customer data in accordance with Article 6 paragraph 1 point f) GDPR. Moreover, we base the processing of this data on the performance of a contract in accordance with Article 6 paragraph 1 point b) GDPR.

#### **4.4 Right to information, rectification, erasure and restriction of processing; right to data portability; right to lodge a complaint with a supervisory authority**

On request, you have the right to obtain information concerning the personal data that we have stored about you at no cost. You also have the right to obtain rectification of incorrect data and erasure of your personal data, except where this would contravene statutory retention obligations or we are authorised to continue storing your data.

Moreover, you have the right to return of the data that you submitted to us (right to data portability). On request, we will also transfer the data to a third party of your choice. You have the right to obtain the data in a standard file format.

You can contact us at the following email address for the purposes stated above: [mediafocus@mediafocus.ch](mailto:mediafocus@mediafocus.ch) We are entitled at our own discretion to request proof of identity for the processing of your requests.

You also have the right to lodge a complaint with a supervisory authority at any time.

#### **4.5 Retention of data**

We only save personal data for as long as is necessary to use the tracking services named above and the subsequent processing within the framework of our legitimate interest. Contractual data will be retained by us for longer, as it is necessary for compliance with legal obligations. Retention obligations which require us to store data are based on accounting regulations and tax laws. In accordance with these regulations, business correspondence, contractual agreements and accounting records must be retained for up to 10 years. Should we no longer require this data in order to provide the services for you, the data will be blocked. This means that continued use of this data is only permitted for accounting and tax purposes.

#### **4.6 Data security**

We take reasonable technical and organisational security measures which we consider necessary in order to protect your data which is saved by us against manipulation, full or partial loss and unauthorised third party access. Our security measures are continually adjusted in line with technical developments.

We also take our internal data protection extremely seriously. Our employees and the service companies engaged by us are obliged to maintain secrecy and to comply with the

provisions under data protection laws. Furthermore, they are only granted access to personal data to the extent which is necessary.

#### 4.7 Contact

Should you have any questions concerning data protection and our website, require information or wish for your data to be erased, please contact us by sending an email to [mediafocus@mediafocus.ch](mailto:mediafocus@mediafocus.ch)

Send any postal correspondence to the following address:

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Media Focus Schweiz GmbH

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Stauffacherstrasse 28

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8004 Zürich

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*As of: June 2020*