

# Privacy Policy

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The use of the Internet pages of the siproxd.net is possible without any indication of personal data; however, if a data subject wants to use special services via our website, processing of personal data could become necessary. If the processing of personal data is necessary and there is no statutory basis for such processing, we generally obtain consent from the data subject.

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject shall always be in line with the General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to siproxd.net. By means of this data protection declaration, our enterprise would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

## **1. Legal basis for the processing**

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services. Is our company subject to a legal obligation by which processing of personal data is required, such as for the fulfillment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a visitor were injured in our company and his name, age, health insurance data or other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on Art. 6(1) lit. d GDPR. Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. He considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR).

## **2. Collection of general data and information**

The website of the siproxd.net collects a series of general data and information when a data subject or automated system calls up the website. This general

data and information are stored in the server log files. Collected may be

- (1) the browser types and versions used,
- (2) the operating system used by the accessing system,
- (3) the website from which an accessing system reaches our website (so-called referrers),
- (4) the sub-websites,
- (5) the date and time of access to the Internet site,
- (6) an Internet protocol address (IP address),
- (7) the Internet service provider of the accessing system, and
- (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, siproxd.net does not draw any conclusions about the data subject. Rather, this information is needed to

- (1) deliver the content of our website correctly,
- (2) optimize the content of our website as well as its advertisement,
- (3) ensure the long-term viability of our information technology systems and website technology, and
- (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack.

Therefore, we analyze anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

### **3. Cookies**

Our website may use cookies. Cookies are text files that are stored in a computer system via an Internet browser.

Many Internet sites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string through which Internet pages and servers can be assigned to the specific Internet browser in which the cookie was stored. This allows visited Internet sites and servers to differentiate the individual browser of the data subject from other Internet browsers that contain other cookies. A specific Internet browser can be recognized and identified using the unique cookie ID. Through the use of cookies, we can provide the users of this website with more user-friendly services that would not be possible without the cookie setting. By means of a cookie, the information and offers on our website can be optimized with the user in mind. Cookies allow us, as previously mentioned, to recognize our website users. The purpose of this recognition is to make it easier for users to utilize our website. The website user that uses cookies, e.g. does not have to enter access data each time the website is accessed, because this is taken over by the website, and the cookie is thus stored on the user's computer system. Another example is the cookie of a shopping cart in an online shop. The online store remembers the articles that a customer has placed in the virtual shopping cart via a cookie.

The data subject may, at any time, prevent the setting of cookies through our

website by means of a corresponding setting of the Internet browser used, and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time via an Internet browser or other software programs. This is possible in all popular Internet browsers. If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of our website may be entirely usable.

#### **4. Collection of data for the purpose of a business relationship**

We clarify that the provision of personal data is partly required by law (e.g. tax regulations) or can also result from contractual provisions (e.g. information on the contractual partner). Sometimes it may be necessary to conclude a contract that the data subject provides us with personal data, which must subsequently be processed by us. The data subject is, for example, obliged to provide us with personal data when our company signs a contract with him or her. The non-provision of the personal data would have the consequence that the contract with the data subject could not be concluded. Before personal data is provided by the data subject, the data subject may contact us to clarify whether the provision of the personal data is required by law or contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and the consequences of non-provision of the personal data.

#### **5. Data security and safety**

We use appropriate technical and organizational security measures to protect your personal data stored by us against unintentional, unlawful or unauthorized manipulation, deletion, modification, access, disclosure or use and against partial or complete loss. Our safety measures are continuously adapted and improved in line with technological developments. Nevertheless, Internet-based data transmissions can generally have security holes, so that absolute protection can not be guaranteed. For this reason, every person concerned is free to provide us with personal data in alternative ways, for example by telephone or in writing. We assume no liability for the loss of data or their knowledge and use by third parties.

#### **6. Right to information, correction, cancellation or complaint**

You have the right to assert your privacy rights at any time and to request information about whether and which personal data about you are processed by us. You may also have your personal data rectified, blocked or deleted at any time by written notice and proof of your identity to the following address:

[info@siproxd.net](mailto:info@siproxd.net)

We reserve the right to correspond with you in this context.

Please note that even after your request for blocking or deletion of your personal data, we must retain them partially within the scope of our statutory or contractual retention obligations (for billing purposes, for example) and in this case only block your personal data for this purpose. Furthermore, deleting your personal data may mean that you can no longer obtain or use the services you have registered. Under certain circumstances, you (or a third party authorized by you) are entitled to receive your personal data in a common format. In addition, you have the right to file a complaint with the competent supervisory authority regarding data processing. You can do this with the regulator at your place of residence, workplace or the place of the alleged data breach.

## **7. Period for which the personal data will be stored**

The criteria used to determine the period of storage of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfillment of the contract or the initiation of a contract.

If we store data based on a contractual relationship with you, this data will be retained for at least as long as the contractual relationship exists and at the maximum as long as any limitation period for possible claims or legal or contractual retention obligations exist.

If the purpose of the storage expires or if there is a storage period prescribed by competent lawmakers, the personal data will be routinely blocked or deleted in accordance with the statutory provisions.

## **8. Point of contact for privacy policy related issues**

If you have questions about data protection on our website, want to request information or request the deletion of your data, please contact our contact for data protection law by sending an e-mail or in written form to the address below.

Thomas Ries  
Fliederweg 15  
CH-5035 Unterefelden  
Switzerland

E-Mail: [info@siproxd.net](mailto:info@siproxd.net)

## **9. Changes to the privacy policy**

Due to development of our website or the implementation of new technologies, it may become necessary to adapt this privacy policy. The current data protection declaration can be viewed and printed at any time on our website.

Last modified: May 25, 2018