

Privacy Policy

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1 What is this Privacy Policy about?

This Policy sets out how we collect information relating to you (“**Personal Data**”), for what purposes we may use your Personal Data, to whom your Personal Data may be disclosed by us, how long your Personal Data is kept and how we protect your Personal Data.

This Privacy Policy also includes important information regarding your rights with respect to the processing of your Personal Data.

If you disclose Personal Data to us about other persons, we will assume that you are authorized to do so and that such data is correct, and that you have ensured that the affected persons have been informed about this disclosure.

This Policy is available on our website <https://mitrelli.com/privacy-policy/> and the separate websites of the companies being part of the Mitrelli Group.

2 Your privacy is important to us

We value your right to privacy and strive to protect your Personal Data in accordance with applicable data protection legislation in each relevant country including in particular the EU General Data Protection Regulation (“GDPR”).

We consider that the correct treatment of your Personal Data is integral to our successful operations and to maintaining your trust. We fully appreciate the underlying principles of the GDPR and support and adhere to its provisions.

We will comply with the data protection principles by making sure that all your Personal Data is:

- Fairly and lawfully processed in a transparent manner.
- Processed for specific and limited purposes.
- Adequate, relevant and not excessive and limited to purpose for which we use your Personal Data.

- Accurate and kept up to date.
- Not kept longer than necessary.
- Processed in accordance with your rights to information, correction or deletion.
- Protected by technical and organisational safeguards to ensure the security of your Personal Data.
- Not transferred to countries outside the European Economic area unless the country to which your Personal Data is to be transferred has adequate protection for you.

3 What Personal Data do we collect and for which purpose?

a) Information that you provide to us voluntarily

- Contact requests, client support or feedback

For inquiries via our contact form, you must provide your name, postal address, e-mail address, telephone number, the reason for contacting you and your message. You may provide your social media profile information including name, email address, contact details, comments and reactions when you interact with us on social media platforms or using your social media login credentials to authenticate on our website.

We process and save the Personal Data provided in the contact request only to process and answer your request regarding our products and services and to get in touch with you.

The legal basis for processing your Personal Data is the fulfilment of our contractual obligations to communicate any relevant concerns about which you have contacted us.

- Newsletters and Marketing Communications

When subscribing for our newsletter and/or marketing communication service, you will need to provide your name, email address and/or postal address.

Insofar as you have given us your consent to data processing when registering for the newsletter service, we process and save the Personal Data provided when subscribing for the newsletter only to provide the newsletter service and you in accordance with the newsletter service you have subscribed to inform about Mitrelli events, webinars, conferences, products, services and / or promotions.

If you have consented to this when subscribing for the newsletter, we can also analyse your user behaviour when opening the relevant newsletter and process the data collected for the personalization of future newsletters and other promotional communication.

The legal basis for the processing of your Personal Data is your consent.

- Invitations to webinars and conferences

When participating in webinars and/or conferences organized by us, you will need to provide your name, email address, contact information (such as telephone number) and if applicable, information about your current profession.

We process and save the Personal Data to improve the experience at such webinars and/or conferences. The legal basis for processing your Personal Data is your consent.

In case recordings (video and/or audio) takes place at webinar and/or conference, your consent to such recording and the use thereof for our business purposes (e.g. media reports, social media campaign) is obtained separately in the course of your registration to the webinar and/or conference.

- Social Media

When you interact with us on social media (e.g., comments, likes, pictures, or messages), your Personal Data is managed by the social media platform. We do not process it for other purposes but reserve the right to delete content if necessary.

We may share your public posts on our website or other social media channels as permitted by the platform. If you send us a query via social media, we'll guide you to more secure

communication options if needed. For confidential inquiries, you can always contact us using the details in our legal notice.

Social media platforms may provide us with general statistics about page interactions. We have limited control over these but ensure we do not request additional optional data. Processing this information helps us improve our content and engage effectively with our audience.

We may also use social media for advertising based on anonymous target group criteria (e.g., demographics, interests, or behaviours) provided by the platform. Sensitive data is never used, and we do not share Personal Data with the platform. If you wish to revoke advertising-related consent, please use the options provided by the social media platform.

The legal basis for the processing of your Personal Data are our legitimate business interests and your consent.

- Contractual Relationships

We process Personal Data necessary for managing contractual relationships with clients, suppliers, and partners. This includes identification data (e.g., name, job title), contact details, and records of communication. We process this data to fulfil contracts, comply with legal obligations, and maintain business operations.

The legal basis for the processing of your Personal Data is the performance of a contract, our legitimate business interests and your consent.

- Applying for jobs:

If you apply for a job with us, we process in particular data contained in your application documents and any data we are able to procure about you from other sources (e.g. job-related social networks, the internet, the media) for the purpose of reviewing your application, carrying out the application process and, in the case of successful applications, for preparing and concluding a corresponding contract.

The legal basis for processing your Personal Data is your consent.

- Compliance:

We procure and process personal data (in particular name, nationality, ownership data, contractual and financial data) to comply with applicable laws; e.g. to combat money laundering or meet sanctions requirements.

The legal basis for the processing of your Personal Data are our legitimate business interests and regulatory requirements.

b) Information that is collected automatically

- Social Media Listening

We may also collect Personal Data that you made publicly available on public social media platforms (including blogs, forums etc.), related to Mitrelli, Mitrelli services and Mitrelli projects. This activity, called “social media listening”, is based on our legitimate business interests, for example to (i) have a better understanding of Mitrelli’s reputation as well as other market trends, and (ii) identify key-stakeholders, in particular bloggers and social media influencers, and to initiate contact with them. This may include your Personal Data in form of comments, messages, blogs, photos and videos, although we will take steps to limit this Personal Data to the minimum necessary and keep it for no longer than necessary for the social media listening activity. If you want to limit further who can see your information, we recommend that you use the privacy settings available to you on such platforms.

When you share your personal information on a public social media platform, we suggest you also familiarize yourself with the privacy policy of that specific platform as these platforms are not owned and managed by Mitrelli.

- Website usage analytics

We may also collect and process Personal Data about your visit to this website, such as the pages you visit, the website you came from and the searches you perform. We may use such information to help improve the contents of the site and to compile aggregate statistics about people using our site for our internal usage statistics and market research purposes. In doing this, we may install "cookies" or similar technologies that collect information such as the domain name of the user, your internet service provider, your operating system, and the date and time of access.

Certain of our Services, including websites, may use the web analysis services from third parties to optimize them. Please consult section 4 for detailed information about which third parties are used for this.

The legal basis for the processing of your Personal Data when we do website analytics is your consent or our legitimate business interests.

- Other tracking technologies

We may use cookies or other tracking technologies (also known as action tags, single-pixel GIFs, clear GIFs, invisible GIFs and 1-by-1 GIFs) provided by third party advertisement companies to provide relevant advertisements (interactive or non-interactive) to you based on your interests or browsing history. Typically, we use the services of social media companies and other third-party advertisement companies to collect information like your browser details, unique client ID etc. so that we may serve you ads on our websites and on other websites you may use.

Please consult section 4 for detailed information about which third parties are used for this.

The legal basis for the processing of your Personal Data when we use tracking technologies is your consent or our legitimate business interests.

- Website preferences and security

We may collect certain information about you like your IP address, unique device identifiers like Media Access Control (MAC) address, computer type (Windows or Mac), browser type and version, screen resolution, operating system name and version. We may also derive your location information from your IP address. We use this information to secure our websites and network systems and to improve our services by recording your preferences, maintaining service levels, diagnosing and troubleshooting technical issues.

The legal basis for the processing of your Personal Data is our legitimate business interests.

4 Website Analytics, Cookies and Tracking Technologies

When using our website (including newsletter and other digital offers), information is generated which is stored in logs (especially technical data). In addition, we may use cookies and similar technologies (e.g. pixel tags or fingerprints) to recognise website visitors, evaluate their behaviour and identify preferences. A cookie is a small file that is transferred between the server and your system and allows recognition of a particular device or browser.

Both, the technical data we collect and any cookies, generally do not contain any Personal Data. However, Personal Data that we or third-party providers, commissioned by us, store from you (e.g. if you have a user account with us or with these providers) may be linked to the technical data or to the information stored in and obtained from cookies, and thus could potentially be associated with your person.

We also use social media plug-ins, which are small pieces of software that create a connection between your visit to our website and a third-party provider. The social media plug-in tells the third-party provider that you have visited our website and may transmit cookies to the third-party provider that they have previously placed on your web browser. For more information on how these third-party providers use your Personal Data collected via their social media plug-ins, please refer to their respective privacy policies.

In addition, on our website we use our own tools as well as third-party services (which may in turn use cookies), in particular to improve the functionality or content of our website (e.g. integration of videos or maps), to compile statistics and to target advertisements.

The offerings we currently use include the following main service providers and advertising partners; their contact details and further information on individual data processing can be found in the respective privacy policies:

- **Adobe Analytics** (tracking advanced metrics):
Provider: Adobe Inc., USA
Privacy Policy: <https://www.adobe.com/privacy.html>
- **Cookiebot** (manage cookie consent):
Provider: Usercentrics GmbH, Germany
Privacy Policy: <https://usercentrics.com/privacy-policy/>
- **Crazy Egg** (collecting anonymized behavioral data):
Provider: Crazy Egg Inc., USA
Privacy Policy: <https://www.crazyegg.com/privacy>
- **Google Analytics** (tracking website traffic)
Provider: Google LLC, a subsidiary of Alphabet Inc., USA
Privacy Policy: <https://policies.google.com/>
- **Hotjar** (collecting anonymized behavioral data):
Provider: Hotjar Ltd., Malta
Privacy Policy: <https://www.hotjar.com/privacy/>
- **Mixpanel** (tracking advanced metrics):
Provider: Mixpanel Inc., USA
Privacy Policy: <https://mixpanel.com/legal/privacy-policy/>

5 How do we use automated individual decision-making and profiling?

We are currently not using automated individual decision-making processes and do not compile profiles with any Personal Data.

6 How long will your Personal Data be stored for?

We will only retain your Personal Data for as long as necessary to fulfil the purpose for which they were collected or to comply with legal or regulatory requirements.

7 What rights do you have in connection with your Personal Data?

Whenever we process Personal Data, we take reasonable steps to keep your Personal Data accurate and up to date for the purposes for which they were collected. We will provide you with the ability to exercise the following rights under the conditions and within the limits set forth in the law.

- the right to be informed about what Personal Data we have about you and how we process your Personal Data;
- the right to access your Personal Data as processed by us and, if you believe that any information relating to you is incorrect, obsolete or incomplete, to request its correction or updating;
- the right to request the erasure of your Personal Data or the restriction thereof to specific categories of processing;
- the right to withdraw your consent at any time, without affecting the lawfulness of the processing before such withdrawal;

- the right to object, in whole or in part, to the processing of your Personal Data. With certain exceptions, this includes the right to object to direct marketing and the right to object to your Personal Data being used for research;
- the right to request data portability, i.e. that the Personal Data you have provided to us be returned to you or transferred to the person of your choice, in a structured, commonly used and machine-readable format without hindrance from us and subject to your confidentiality obligations; and
- the right to object to automated decision-making, including profiling, resulting in a significant or legal effect, i.e. you can request a human intervention in any automated decision making process related to processing of your data resulting in a significant or legal effect, and where such processing is not based on your consent, authorized by law or necessary for the performance of a contract. However, we do not currently make decisions using automated processes only that result in significant or legal effects on individuals.

If you are not satisfied with how we process your Personal Data, you may address your request to our data protection officer at data-privacy@Mitrelli.com, who will investigate your concern.

8 How is your Personal Data protected?

We have implemented appropriate technical and organisational measures designed to provide an adequate level of security and confidentiality to your Personal Data. These measures shall include the following:

- Prevention of unauthorised persons from gaining access;
- Prevention of unauthorised use or disclosure;
- Ensuring that persons entitled to use your Personal Data gain access only to such Personal Data as they are entitled to access in accordance with their access rights;
- Ensuring that your Personal Data cannot be read, copied, modified or deleted by persons not having the right authorisation to do so;
- Ensuring that your Personal Data are processed solely in accordance with the purposes for which your Personal Data is collected;
- Protection against alteration;
- Protections against accidental destruction or loss;
- Data recovery procedures;
- Anti-malware controls;
- Security updates.

We will require compliance with behavioural guidelines from our staff, contractors and data processors where we work with to ensure maximum protection of your Personal Data.

9 Who do we disclose your information to?

In connection with the purposes listed in sections 3 and 4, we may transfer your Personal Data in particular to the following categories of recipients:

- **Group companies:** Companies belonging to the Mitrelli Group may use your data for the same purposes as we do, as described in this Privacy Policy (see section 3).
- **Service providers:** We work with service providers in Switzerland and abroad who (i) process data on our behalf (e.g. IT providers), (ii) process data jointly with us or (iii) process data under their own responsibility that they have received from us or collected for us. These service providers include, for example, IT providers, advertising and media agencies, banks, insurance and reinsurance companies, debt collection companies, credit agencies, address checkers, travel agencies, consulting firms and lawyers. We enter into agreements with these third parties

regarding the use and protection of Personal Data, depending on the nature of our relationship, the law and other circumstances.

- **Authorities:** We may disclose Personal Data to administrative bodies, courts and other authorities and social insurers in Switzerland and abroad if we are legally obliged or entitled to do so or if this appears necessary or expedient to protect our interests. These recipients process the data under their own responsibility.

10 Is your Personal Data transmitted abroad?

We have offices in Angola, Côte d'Ivoire, Cyprus, Israel, Mozambique, Portugal, Senegal, Switzerland, United Kingdom, and The Netherlands. However, we may transfer Personal Data to affiliates and third parties acting on our behalf, potentially in any country of the world.

If Personal Data is transmitted to recipients in another country and outside of Mitrelli Group, we generally contractually oblige the recipient to comply with an adequate level of data protection (using standard contractual clauses), unless the recipient is already subject to a legally recognized set of rules to ensure data protection. Exceptions may apply specifically in the case of legal proceedings abroad, but also if there is an overriding public interest, if the performance of a contract that is in your interest requires such disclosure, if you have provided your consent or if obtaining your consent within a reasonable period of time is not possible and the disclosure is necessary to protect your life or physical integrity or that of a third party, or if the data concerned have been made generally accessible by you and you have not objected to the processing of such data

11 Contact Us

If you wish to contact us regarding how we use your Personal Data or if you wish to exercise your data privacy rights, please email us at data-privacy@Mitrelli.com or write us to the following address:

Mitrelli Group Services AG
Data Protection Officer
Maurerstrasse 8
8500 Frauenfeld
Switzerland

In order to facilitate the most efficient answer, please provide the following information:

- the name of the website you are referring to;
- your relationship and interaction with us; and
- a description of the information you would like to receive from us.

12 Can this Policy be changed?

This Privacy Policy does not constitute part of any contract with you. We may amend this Privacy Policy at any time. The version published on this website is the current version. It was last amended in December 2024.