

## Privacy policy

This policy reflects our general practices and applicable standards in relation to the processing of personal data. It is valid as of 01.07.2022. It applies in cases where we act as the data controller in relation to the processing of the personal data of our customers, employees, partners or visitors to our website.

### Who are we?

This site is the property of and operated by Gammadia SA, a public limited company under Swiss law, entered in the commercial register (number IDE CHE-108.806.266) with place of business at Avenue de Sévelin 32, 1004 Lausanne, Switzerland.

Gammadia develops web applications in order to facilitate better collaboration and sharing of information.

### What are our values?

Our internal culture is based on humanity and confidence. In general terms, we value flexibility, exchange and collective intelligence.

On the other hand, we know how to be rigorous and uncompromising when necessary. This includes the protection of our data and that of our customers. Confidentiality, sustainability, integrity and high availability are essential when processing personal data that may sometimes be sensitive, which is the case with our applications.

The persons who entrust their data to us count on us. And we take this commitment extremely seriously.

### What personal data do we process and why?

The personal data that we process depends on the type of relationship we have with you. We define personal data as any information which allows you to be identified or makes you identifiable.

### If you are a customer, partner or service provider or express an interest in our products

We process the **contact data** which you provide to us, for example your first name and surname, address (email and postal) and telephone number. This data is processed in order to provide you with the service that has been requested and so that we can communicate with you. The legal basis is the performance of the contract between us or the steps towards its eventual realisation.

As well as the data referred to above, we may also process other personal data which is provided to us within the framework of the use of our services. This may include: transaction data, history of the use of our services and authentication logs. The legal basis may differ depending on the means of processing, namely: the performance of a contract, our legitimate interest or the legal obligations that are incumbent on us.

### If you visit our Internet sites or access any other information that is available on our social networks

We may process **usage data**, including your IP address, geographical location, browser type and version, operating system, reference source, duration of your visit, pages accessed, browsing history and use frequency. The source of the usage data is our tracking systems provided by external service providers, specifically:

Internet sites: WordPress, Unbounce

Social networks: LinkedIn, Instagram, Facebook

Cookies: Facebook Pixel, Google Analytics, Calendly, Zoho

In this context, your information may be transferred to third-parties subject to other laws and different commercial practices (in particular the United States).

The purpose of this processing is to provide our services and to analyse the use of our online services. It is based on our legitimate interest in operating, securing and improving the content of our services.

### If you are an applicant, employee or ex-employee

If you are applying for a job, we will process the personal data that you provide to us in relation to your **professional experience**, educational background, professional qualifications, contact information, nationality, marital status and any other information contained in your CV. The processing is based on the consent you have implicitly provided us with by applying or which you have granted to a service provider which we use within the framework of the recruitment process.

As an employee at Gammadia, we process the personal data referred to above, as well as information concerning your remuneration, social security, your ID document, photograph and bank details, your personal evaluations, development plan, correspondence, user account and system logs and your professional and personal telephone numbers.

The processing is based either on the contract between us or on our legal obligations in the capacity of an employer.

If your employment contract is terminated, we will process the information that is necessary to terminate the said contract. Your personal file is then removed and archived in accordance with the legal provisions in force.

### **Who do we share your data with?**

We may share some of your personal data with our associated companies to the extent that is necessary in compliance with the legal basis and objectives mentioned in this policy.

We may transfer certain information relating to you to subcontractors and partners for the purpose of obtaining or maintaining insurance coverage, in order to manage risks, in order to subcontract certain technical, administrative or financial tasks, as well as in order to comply with our legal obligations.

We are obliged to only process your data for the purposes referred to above and to not sell this or share it with third-parties.

### **What are your rights?**

You are entitled to basic rights in relation to the data concerning you that is processed by us. No costs will be incurred by you when claiming these rights and we are obliged to process your request within 30 days. We will respond to your request in accordance with the legal requirements, which may mean that in certain cases, we will be unable to comply with specific requests. In general terms, you have the following rights:

- To access information that relates to you.
- To request that we correct any incorrect personal information.
- To request that your personal data be destroyed.
- To temporarily or permanently restrict the processing of your data.
- To revoke your agreement or to object to the processing in cases where this is based either on your consent or on our legitimate interest.
- To receive the data that you have provided to us in a structured format.

You can exercise your rights or raise any questions in relation to this policy by sending an email to us at [privacy@gammadia.ch](mailto:privacy@gammadia.ch) or by writing to our data protection officer.

Should you be of the opinion that the processing of your personal data carried out by us is unlawful, you have the option of submitting a complaint to the [Federal Data Protection Officer](#).

### **For how long do we retain your data?**

All personal data that is processed by us is retained for as long as is necessary in order to attain the purpose specified within the framework of its processing. Should we have a contract with you, we will apply the legal retention periods that are in force for this type of contract. We may retain certain data or maintain certain records for longer periods of time for legal or financial compliance reasons or for other statistical reporting purposes.

### **How is your data protected?**

We take appropriate security measures in order to protect your personal data against theft, unauthorised use, accidental disclosure or destruction. We have also implemented measures in order to guarantee the confidentiality of your data, both in our processes and in relation to the technical systems that process your data.

### **Who is our data protection officer?**

The contact details for our data protection officer are as follows:

DP&S Sàrl – Data Privacy & Security

A l'att du DPO de Gammadia SA

Ch. de la Clé des Champs 8

CH – 2022 Bevaix