

# Privacy Policy

With this **privacy policy**, we inform which personal data we process in connection with our **activities and operations**, including our iverslee.com website. In particular, we provide information about what personal data we process, for what purpose, how and where. We also inform about the rights of persons whose data we process.

Individual or additional activities and operations may be subject to additional privacy statements as well as other legal documents such as General Terms and Conditions (GTC), Terms of Use or Conditions of Participation.

We are subject to Swiss data protection law as well as any applicable foreign data protection law such as, in particular, that of the European Union (EU) with the General Data Protection Regulation (GDPR). The European Commission recognizes that Swiss data protection law ensures adequate data protection.

## 1. Contact Addresses

Responsibility for the processing of personal data:

Ivers-Lee AG  
Kirchbergstrasse 160  
3400 Burgdorf

[info@iverslee.com](mailto:info@iverslee.com)

## 2. Terms and Legal Basis

### 2.1 Terms

**Personal data** is *any* information relating to an identified or identifiable person. A **data subject** is a person about whom personal data is processed.

**Processing** includes *any* handling of personal data, *regardless* of the means and procedures used, in particular the storage, disclosure, acquisition, collection, deletion, storage, modification, destruction and use of personal data.

The **European Economic Area (EEA)** comprises the member states of the European Union (EU) as well as the Principality of Liechtenstein, Iceland and Norway. The General Data Protection Regulation (GDPR) refers to the processing of personal data as processing of personal data.

## 2.2 Legal Basis

We process personal data in accordance with Swiss data protection law such as, in particular, the Federal Data Protection Act (FADP) and the Ordinance to the Federal Data Protection Act (FDPA).

We process - if and to the extent that the General Data Protection Regulation (GDPR) is applicable - personal data in accordance with *at least* one of the following legal bases:

- Art. 6 para. 1 lit. b DSGVO for the necessary processing of personal data for the performance of a contract with the data subject as well as for the implementation of pre-contractual measures.
- 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, in particular, our interest in being able to carry out our activities and operations in a permanently user-friendly, secure and reliable manner and to communicate about them, the guarantee of information security, protection against misuse, the enforcement of our own legal claims and compliance with Swiss law.
- 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 in accordance with any applicable law of Member States in the European Economic Area (EEA).
- Art. 6 para. 1 lit. e DSGVO for the necessary processing of personal data for the performance of a task that is in the public interest.
- 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. d DSGVO for the necessary processing of personal data to protect vital interests of the data subject or another natural person.

### **3. Nature, Scope and Purpose**

We process the personal data that is *required* to carry out our activities and operations in a permanently user-friendly, secure and reliable manner. In particular, such personal data may fall into the categories of inventory and contact data, browser and device data, content data, meta or marginal data and usage data, location data, sales data and contract and payment data.

We process personal data for the *duration that is* required for the respective purpose(s) or by law. Personal data whose processing is no longer required is anonymized or deleted.

We may have personal data processed *by third parties*. We may process personal data together with third parties or transfer it to third parties. Such third parties are, in particular, specialized providers whose services we use. We also guarantee data protection for such third parties.

We process personal data only with the consent of the data subject, unless the processing is permitted for other legal reasons. Processing without consent may be permissible, for example, for the performance of a contract with the data subject and for corresponding pre-contractual measures, in order 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 *voluntarily provides* to us when contacting us - for example, by letter, e-mail, instant messaging, contact form, social media or telephone - or when registering for a user account. We may store such information, for example, in an address book or with comparable tools. If we receive data transmitted via other persons, the transmitting persons are obligated to ensure data protection with respect to these persons as well as to ensure the accuracy of this personal data.

We also process personal data that we receive from third parties, obtain from publicly available sources or collect in the course of our activities and operations, if and to the extent that such processing is permitted for legal reasons.

## 4. Personal Data Abroad

We *process* personal data in Switzerland and in the **European Economic Area (EEA)**. However, we may also export or transfer personal data to other countries, in particular to process it or have it processed there.

We may export personal data to all states and territories on Earth as well as elsewhere in the universe, provided that the law there ensures adequate data protection according to the assessment of the Swiss Federal Data Protection and Information Commissioner (FDPIC) or according to the decision of the Swiss Federal Council and - if and to the extent that the General Data Protection Regulation (GDPR) is applicable - according to the decision of the European Commission.

We may transfer personal data to countries whose laws do not ensure adequate data protection, provided that data protection is ensured for other reasons, in particular on the basis of standard data protection clauses or with other appropriate safeguards. By way of exception, we may export personal data to countries without adequate or appropriate data protection if the special data protection law requirements for this are met, for example, the express consent of the data subjects or a direct connection with the conclusion or performance of a contract. We will be happy to provide data subjects with information about any guarantees or provide a copy of any guarantees upon request.

## 5. Rights of Data Subjects

Data subjects about whom we process personal data 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 processed personal data.

Data subjects whose personal data we process may - if and to the extent that the General Data Protection Regulation (GDPR) is applicable - request confirmation free of charge as to whether we are processing personal data relating to them. In this case, data subjects may request 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"), blocked or completed.

Data subjects whose personal data we process may - if and insofar as the GDPR is applicable - revoke any consent they have given at any time with effect for the future and object to the processing of their personal data at any time.

Data subjects about whom we process personal data 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).

## **6. Data Security**

We take suitable technical and organizational measures to ensure data security appropriate to the respective risk. However, we cannot guarantee absolute data security.

Access to our website is via transport encryption (SSL / TLS, in particular with the Hypertext Transfer Protocol Secure, abbreviated HTTPS). Most browsers mark transport encryption with a padlock in the address bar.

Our digital communications - like all digital communications in *principle* - are subject to mass surveillance without cause or suspicion and other monitoring by security authorities in Switzerland, the rest of Europe, 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.

## **7. Website Use**

### **7.1 Cookies**

We may use cookies. Cookies - our own cookies (first-party cookies) as well as cookies from third parties whose services we use (third-party cookies) - are data that are stored in the browser. Such stored data need not be limited to traditional cookies in text form.

Cookies can be stored in the browser temporarily as "session cookies" or for a certain period of time as so-called permanent cookies. "Session cookies" are automatically deleted when the browser is closed. Permanent cookies have a specific storage period. In particular, cookies enable a browser to be restarted the next time it is used.

To recognize searches of our website and thus, for example, to measure the reach of our website. Permanent cookies can also be used for online marketing, for example.

Cookies can be completely or partially deactivated and deleted in the browser settings at any time. Without cookies, our website may no longer be fully available. We actively request - at least if and to the extent necessary - the express consent to the use of cookies.

## **7.2 Server Log Files**

We may collect the following information for each access to our website, provided that this information is transmitted by your browser to our server infrastructure or can be determined by our web server: 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 sub-page of our website accessed including amount of data transferred, website last accessed in the same browser window (referer or referrer).

We store such information, which may also constitute personal data, in server log files. The information is necessary to provide our website permanently, user-friendly 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.

## **7.3 Tracking Pixel**

We may use tracking pixels on our website. Tracking pixels are also known as web beacons. Tracking pixels - also from third parties whose services we use - are small, usually invisible images that are automatically retrieved when you visit our website. With pixel counters, the same information can be collected as in server log files.

## **8. Social Media**

We are present on social media platforms and other online platforms in order to communicate with interested persons and to provide information about our activities and operations. In connection with such platforms, personal data may also be processed outside Switzerland and the European Economic Area (EEA).

The General Terms and Conditions (GTC) and Terms of Use as well as data protection declarations and other provisions of the individual operators of such platforms also apply in each case. These provisions inform in particular about the rights of data subjects directly vis-à-vis the respective platform, which includes, for example, the right to information.

For our **social media presence on Facebook**, including the so-called Page Insights, we are - if and to the extent that the General Data Protection Regulation (GDPR) is applicable - jointly responsible with Meta Platforms Ireland Limited (Ireland). Meta Platforms Ireland Limited is part of the Meta companies (including in the USA). Page Insights provide information about how visitors interact with our Facebook presence. We use Page Insights to provide our social media presence on Facebook in an effective and user-friendly manner.

Further information about the nature, scope and purpose of data processing, information about the rights of data subjects and the contact details of Facebook as well as the Facebook data protection officer can be found in the Facebook privacy policy. We have concluded the so-called "Responsible Party Addendum" with Facebook and thus agreed in particular that Facebook is responsible for ensuring the rights of data subjects. For the so-called Page Insights, the corresponding information can be found on the page "Information on Page Insights" including "Information on Page Insights Data".

## **9. Services from Third Parties**

We use services of specialized third parties in order to carry out our activities and operations in a permanently user-friendly, secure and reliable manner. With such services, we can, among other things, embed functions and content into our website. In the case of such embedding, the services used record the Internet Protocol (IP) addresses of the users at least temporarily for technically compelling reasons.

For necessary security-related, statistical and technical purposes, third parties whose services we use may process data in connection with our activities and operations in aggregated, anonymized or pseudonymized form. This is, for example, performance or usage data in order to be able to offer the respective service.

We use in particular:

- **Google services:** Provider: Google LLC (USA) / Google Ireland Limited (Ireland) for users in the European Economic Area (EEA) and Switzerland; General information on data protection: "Privacy and Security Principles", Privacy Policy, "Google is committed to complying with applicable data protection laws", "Privacy Policy Guide in Google Products", "How we use data from websites or apps where our services are used" (information provided by Google), "Types of cookies and other technologies used by Google", "Personalized advertising" (activation / deactivation / settings).
- **Services provided by Microsoft:** Provider: Microsoft Corporation (USA) / Microsoft Ireland Operations Limited (Ireland) for users in the European Economic Area (EEA), the United Kingdom and Switzerland; General information on data protection: "Data protection at Microsoft", "Data protection (Trust Center)", data protection declaration.

## 9.1 Digital Infrastructure

We use services from specialized third parties to make use of required digital infrastructure in connection with our activities and operations. These include, for example, hosting and storage services from selected providers.

We use in particular:

- **METANET:** Hosting; Provider: METANET AG (Switzerland); Data protection information: Privacy policy, "Technical-organizational measures".
- **StackPath CDN:** Content Delivery Network (CDN); Provider: StackPath LLC (USA) / Highwinds Network Group Inc. (USA); privacy information: privacy policy.

## 9.2 Audio and Video Conferences

We use specialized audio and video conferencing services to communicate online. We can use them, for example, to hold virtual meetings or conduct online lessons and webinars. For participation in audio and video conferences, the legal texts of the individual services such as data protection declarations and terms of use apply in addition.



Depending on the life situation, we recommend muting the microphone by default when participating in audio or video conferences, as well as blurring the background or fading in a virtual background.

We use in particular:

- **Microsoft Teams:** Platform for audio and video conferencing, among other things; Provider: Microsoft: Teams-specific information: "Privacy and Microsoft Teams".

### 9.3 Digital Audio and Video Content

We use services of specialized third parties to enable the direct playback of digital audio and video content such as music or podcasts.

We use in particular:

- **YouTube:** Video platform; Provider: Google; YouTube-specific information: "Privacy and Security Center", "My Data on YouTube".

### 9.4 Fonts

We use third party services to embed selected fonts as well as icons, logos and symbols into our website.

We use in particular:

- **Google Fonts:** Fonts; Provider: Google; Google Fonts-specific information: "Privacy and Google Fonts" ("Privacy and Google Fonts"), "Privacy and Data Collection".

## 10. Extensions for the Website

We use extensions for our website in order to be able to use additional functions.

We use in particular:

- **jQuery (OpenJS Foundation):** Free JavaScript library; provider: OpenJS Foundation (USA) using StackPath CDN; privacy information: privacy policy (OpenJS Foundation), cookie policy (OpenJS Foundation).

## **11. Final provisions**

We have created this privacy policy with the data protection generator of Datenschutzpartner.

We can adapt and supplement this data protection declaration at any time. We will inform about such adaptations and additions in an appropriate form, in particular by publishing the respective current data protection declaration on our website.