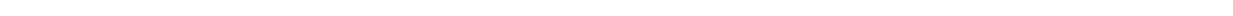


Privacy Policy – Website

Pension Fund of SR Technics Switzerland, Kloten

Version 2.0



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Privacy Policy – Website

Data protection is a high priority for the Pension Fund of SR Technics Switzerland (hereinafter called “**PF SR Technics**”, “**we**” or “**us**”). In this Privacy Policy, we explain how and for what purpose we collect and process (e.g. store, use, transmit, etc.) personal data from you in connection with your visit to our website <https://www.pk-srtechnics.ch> and our related services, to whom we disclose your personal data, as well as your rights arising in this context from data protection legislation or other legal bases.

The use of our website is generally possible without providing any personal data. However, if you want to access special services via our website, we may need to process your personal data.

We collect and process your data when you visit our website primarily in order to be able to provide you with an interesting, user-friendly, functional, stable and secure website and to deliver the content and services it includes. If you contact us via a corresponding feature (e.g. correspondence by e-mail, contact form, etc.), we record the communication between you and us as well as the personal data transmitted to us in this context for the purposes of this communication.

Personal data refers to all information about personal or factual circumstances that relate to an identified or identifiable natural person (e.g. name, address, e-mail address, etc.). In this Privacy Policy, we also use the terms “your data” or “your personal data”.

We are committed to handling your personal data responsibly. Therefore, we process personal data strictly in compliance with the Swiss Federal Act on Data Protection (FADP) (Datenschutzgesetz, DSG), as well as the associated ordinance and other Swiss data protection regulations that may be applicable.

In this Privacy Policy we explain:

- the type of personal data we collect and process;
- the purposes for which we use your personal data;
- who has access to your personal data;
- for how long we process your personal data;
- the rights you have with respect to your personal data; and
- how to contact us.

This Privacy Policy covers the collection of personal data online in connection with our business activities.

Please note that this Privacy Policy does not contain an exhaustive description of our data processing activities and that individual matters may be governed in whole or in part by specific privacy statements, general terms and conditions, fact sheets or similar documents (with or without reference in this Privacy Policy).

1 Controller

Responsibility for data processing according to data protection law lies with:

Pension Fund of SR Technics Switzerland
c/o SR Technics Switzerland
Flughofstrasse
8302 Kloten

If you have any concerns or queries related to the provision of our insurance services and other products or services or this Privacy Policy, please contact: dataprotection@srtechnics.com.

1.1 Data protection advisor

The contact details of our data protection advisor are:

SR Technics Switzerland Ltd.
Data protection advisor
G – Legal Department
8058 Zurich Airport

E-mail: dataprotection@srtechnics.com

2 Data protection in general

2.1 Personal data processed by us

The PF SR Technics processes a variety of personal data regardless of the means by which individuals contact us, e.g., by telephone, via a website, an app, a social network, at an event, etc. In particular, this involves personal data

- that we collect during the use of our websites;
- that we obtain when you contact us via e-mail / contact form / other forms;
- that we receive in the context of an authorisation;
- that we receive via our website in connection with our products or other services.

Depending on the nature of the relationship, we process personal data from you such as:

- **Contact data, inventory data and identification data**, for example, surname, first name, address, e-mail address, telephone number;
- **Marginal data** from telecommunications traffic such as telephone number, value-added service codes, date, time and duration of connection, type of connection, location data, IP address, and device identification numbers such as MAC address;
- **Interaction and usage data** such as correspondence, type of device, device settings, operating system, software, and information from assertion of rights.

2.2 How do we obtain personal data?

2.2.1 Personal data that you disclose to us

We obtain personal data from you when you submit data to us or when you contact us. This may occur through various channels, e.g. the means by which you communicate with us (e-mail, telephone, etc.) or through your use of our website, our products or other services which we offer via our website.

2.3 Purposes for which we process personal data

We process your personal data and those from other persons, to the extent permitted and deemed appropriate, for the following purposes, in which we (and sometimes third parties) have a legitimate interest corresponding to the purpose:

- communication and processing of requests (e.g. via e-mail or telephone),
- warranties concerning our operations, in particular IT, our website and other platforms.

2.4 Legal basis of the processing

We process your personal data based on:

- **consent**, to the extent you have given it to us, to process your personal data for specific purposes. We process your personal data within the scope of and based on this consent where we require such a legal basis in the absence of any other legal basis. Consent given can be revoked at any time, however this has no effect on data processing that has already taken place. You can send us a revocation by e-mail or by post to the (e-mail) address indicated in section 1.1.

3 Disclosure and transfer of personal data to third parties

If your personal data are not processed by us, but by processors or other responsible parties, we ensure full compliance with the legal requirements. As a rule, data are disclosed to third parties only:

- if the disclosure is necessary for the contractual arrangement with you,
- if the disclosure is permissible due to a balancing of interests,
- if the disclosure is necessary due to legal obligations, or
- with your explicit consent.

Within the scope of our business activities and for the above-mentioned purposes, we also disclose personal data to third parties, insofar as this is permitted and appropriate. This is the case either if such parties process the data for us (processing) or if they want to use it for their own purposes (data disclosure). This applies in particular to (all hereinafter referred to as “**Recipients**”):

- Service providers (such as external administrators or IT providers), including processors, for the processing and storage of your data, sending and receiving e-mails, offering and developing certain functions in connection with our website, as well as for research, analysis, maintenance and security in connection with our website.

Most of the Recipients are based in Switzerland, however, some of them are located abroad. In particular, you should expect your data to be transferred to other countries in Europe and the US where some of our IT service providers are located.

4 Duration of data processing

We process personal data for as long as it is necessary for the fulfilment of our contractual obligations or for other purposes pursued with the processing, often for the duration of the entire business relationship (from the initiation, to the processing and termination of a contract) and beyond in accordance with the statutory retention and documentation obligations. In this context, it is possible that personal data will be retained for the time during which claims can be asserted against us or we are otherwise legally obligated to do so, or as long as is necessary due to legitimate interests (e.g. for evidence and documentation purposes). As soon as your personal data are no longer required for the above-mentioned purposes, they will, as a principle, be deleted or anonymised.

5 Transmission of personal data abroad

Personal data are processed almost exclusively in Switzerland. An exception is the disclosure of personal data when we use IT services for which the transmission of personal data abroad is unavoidable.

Where we transmit personal data to a country without an adequate level of data protection, we safeguard the protection of these data in an adequate manner. One means of guaranteeing sufficient data

protection is the conclusion of data transfer agreements with the recipients of your personal data in third countries that ensure the necessary data protection. This may include, for example, contracts approved, issued or recognised by the European Commission and the Federal Data Protection and Information Commissioner, so-called standard contractual clauses, which are available [here](https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1687175827314&uri=CELEX%3A32021D0914) (https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1687175827314&uri=CELEX%3A32021D0914).

Please note that such contractual arrangements can partially compensate for weaker or missing legal protection, but cannot completely exclude all risks (e.g. from government access abroad). In exceptional cases, the transfer to countries without adequate protection may also be permitted in other cases, e.g. based on consent, in connection with legal proceedings abroad or if the transmission is necessary for the performance of a contract.

6 Visiting our web pages

In principle, our web pages can be used without providing any personal data. This does not apply to areas and services that require your name, address or other personal data by nature, e.g. completing an online form, registering for the newsletter or creating a profile when using our app, for the company portal or another application.

If you contact us via e-mail and online forms (contact form or quote form), personal data are collected and transmitted to us. It depends on the corresponding input mask which data are involved. If you use the corresponding functions, we also process your personal data

- to contact you (e.g. to arrange an appointment, etc.)
- for electronic mail dispatch (receiving information via e-mail when asking for it on our website);
- other specified uses.

6.1 Server log files

Each time you visit our website, our servers temporarily store your access in a log file, the so-called server log file.

In this context, the following data are recorded: browser type/version, operating system used, referrer URL (the previously visited page), host name of the accessing computer (IP address) and time of the server request as well as other information, which serves to avert risks in the event of attacks on our information technology systems. This data is not used in conjunction with data from other sources.

Before we save your IP address, it is anonymised and is not used in connection with other data. We will not analyse personal data in a traceable manner and your personal data in the server log files will not be linked to any other personal data that might be available from you.

The purpose of processing this information is to display our website, its content and services correctly; to ensure data traffic; to optimise our website, its content and services; to guarantee the stability and security of our website and systems on a permanent basis; and to enable the clarification, defence and prosecution of cyberattacks, spam and other unlawful acts in relation to our website and systems, and to enforce claims in this regard.

We delete your personal data as soon as they are no longer required to achieve the purpose for which they were collected. In the case of the collection of data for calling up our website, the deletion takes place when the respective session has ended.

For the hosting of the website, we may use services of third parties in Switzerland and abroad, which perform the above-mentioned processing on our behalf. Currently, our websites are hosted exclusively by Swiss hosting providers and on servers in Switzerland and the EU.

6.2 Contact

On our website, you have the option of contacting us by e-mail as well as by telephone. If we are contacted by you via e-mail or telephone, the personal data transmitted in the context of this contact (e.g. e-mail address, name, telephone number, etc.) will be collected, stored and used by us to respond to your request.

Your information will be stored for the purpose of processing your request, its handling and in case of follow-up questions with us and will not be disclosed to unauthorised third parties without your consent. Of course, this also applies to requests that you send to us by post.

Mandatory data are necessary to process your request. The voluntary provision of further data facilitates the processing of your inquiry and enables us to provide you with the information requested by you.

You can object to this data processing at any time. Please send your objection to the e-mail address indicated in section 1.1 and we will review your objection. In the event of an objection, your contact request will not be processed further.

Your personal data will be deleted as soon as the request you have made has been resolved, i.e. when the circumstances indicate that the matter in question has been conclusively clarified and the deletion does not conflict with any statutory retention obligations.

6.3 Online portal for active members

If you wish to use the benefits of our online portal for members, registration of a member account is required. Complete the registration process by entering the required data, such as e-mail address, first name and surname, date of birth, mobile phone number, and language. We require this information to provide you with password-protected direct access to your data stored with us (e.g. insurance policies, news and services offered) and to process your request.

Access to the online portal is achieved by means of the following identification features: login ID, personal password, and two-factor authentication. The two-factor authentication is generated for each login and is forwarded to you via text message or e-mail.

You may cancel your member account at any time by sending us an e-mail to the e-mail address indicated in section 1.1. If you cancel your member account, the associated data will be deleted, subject to legal retention obligations. It is your responsibility to back up your personal data when cancelling your account. We are entitled to irretrievably delete all data stored during the term of the contract.

6.4 Cookies

We use so-called cookies on our website. Cookies are small text files that are placed and stored on your device (laptop, tablet, smartphone, etc.) by your browser. They are used to make our website more user-friendly and effective and thus make your visit to our website as pleasant as possible. Cookies do not damage your end device. They cannot be used to run programs and they do not contain viruses.

Most of the cookies we use are so-called session cookies. They are automatically deleted when you log out or close the browser. Other cookies remain on your device beyond the respective usage process and enable us or our partner companies (third-party cookies) to recognise your browser on your next visit. If other cookies (such as those used to analyse your surfing behaviour) are stored, they will be treated separately in this Privacy Policy.

You can change the settings of your browser, so that it informs you prior to a cookie being stored on your device. You can also allow the use of cookies only in individual cases or generally deactivate the use of cookies via your browser settings. However, please note that in this case you may not be able to use all the features of our website.

6.5 Google services

On our website, we use various services provided by Google LLC, based in the U.S., or if your usual residence is in the European Economic Area (EEA) or Switzerland, Google Ireland Ltd, based in Ireland (“Google”).

We use the following Google services on our websites:

- Google Tag Manager
- Google Analytics

Further information on the individual services can be found below.

Google uses technologies such as cookies, web storage in the browser and tracking pixels, which enable us to analyse your use of our website. The resulting information about your use of our website may be transmitted to a Google server in the USA or in other countries and may be stored there. Information about Google’s data centre locations can be found [here](#).

We use tools provided by Google which, according to Google, may process personal data in countries where Google or its [sub-processors](#) maintain facilities. Google promises in its [Data Processing Addendum for Products where Google is a Data Processor](#) to ensure an adequate level of data protection by relying on the EU Standard Contractual Clauses.

For more information about Google’s processing and privacy settings, please refer to Google’s [Privacy & Terms](#) and the [Privacy Controls](#).

6.5.1 Google Tag Manager

Our website uses Google Tag Manager which provides an efficient tool to manage website tags. Website tags are placeholders stored in the website’s source code to record, for instance, the integration of frequently used website elements, such as code for web analytics services. The Google Tag Manager triggers other tags that may in turn collect data. The latter data is, however, not accessed by Google Tag Manager. A deactivation that has been applied at domain or cookie level remains in place for all tracking tags implemented with Google Tag Manager.

For more information, please refer to the [Google Tag Manager Terms of Service](#).

6.5.2 Google Analytics

For the purpose of analysing our website and its visitors, as well as for marketing and advertising purposes, we use the web analytics service Google Analytics 4.

Google Analytics deploys cookies, which are stored on your device (laptop, tablet, smartphone, etc.) to help us analyse your use of our website. This helps us to evaluate user behaviour on our website and improve our services based on the resulting statistics/reports.

In Google Analytics 4, the anonymisation of IP addresses is activated by default. This means that Google truncates your IP address in Switzerland or the EU/EEA prior to transmission. Only in exceptional cases will the full IP address be transferred to a Google server and be truncated there. Google states it may process personal data in any country where Google or Google’s [sub-processors](#) maintain facilities. In its [Data Processing Addendum for Products where Google is a Data Processor](#) Google promises to ensure an adequate level of data protection by relying on the EU Standard Contractual Clauses.

Google uses this information to evaluate your use of our website, create reports about activity on the website and provide other services related to the use of the website and the Internet. According to Google, the IP address transmitted by your browser in connection with Google Analytics will not be merged with other Google data. When you visit our website, your user behaviour is recorded in the form of events (such as page views, interaction with the website or your “click path”) as well as other data, such as your approximate location (country and city), technical information about your browser and the devices you use, or the referrer URL, i.e. via which website / advertising material you came to

our website.

You may prevent the collection and transfer of the data generated by the cookie and related to your use of our website (including your IP address) by Google and the processing of these data by Google by downloading and installing the [Google Analytics Opt-out Browser Add-on](#). If you wish to object to interest-based advertising by Google, you can use the settings and opt-out options provided by Google.

For an overview of data usage in Google Analytics and the measures Google has taken to protect your data, please see [Google Analytics Help](#).

For further information about the [Google Analytics Terms of Service](#) and Google's [Privacy & Terms](#), please refer to the respective documents.

7 Data security

To protect your personal data against unauthorised access, tampering, loss, destruction or disclosure by unauthorised persons, we have taken technical and organisational security measures that are state of the art.

Our security mechanisms include, among others, encryption of your personal data. All information that you enter online, for example, is transmitted via an encrypted transmission path, which means that this information cannot be viewed by unauthorised third parties at any time. Organisational security measures include, for example, directives to our employees, confidentiality agreements and regular monitoring. In addition, we require our processors to take appropriate technical and organisational security measures.

With the support of external experts, we continuously improve our security measures in line with the latest technological developments.

Our employees and external providers are subject to strict confidentiality and are obliged to comply with the provisions of data protection law. Furthermore, external providers are granted access to your personal data only to the extent necessary.

8 Your rights

You have the right

- to request information about your personal data stored with us;
- to have inaccurate or incomplete personal data corrected;
- to ask for your personal data to be deleted or rendered anonymous if they are not (or no longer) necessary for the provision of occupational benefits or the leasing of residential and commercial properties;
- to request a restriction to processing your personal data insofar as the processing is not (or no longer) necessary for the provision of occupational benefits;
- to receive certain personal data in a structured, common and machine-readable format;
- to revoke consent with effect for the future, insofar as processing is based on consent.

Please note that we reserve the right to enforce the restrictions provided for by law, for example if we are obliged to retain or process certain data, have an overriding interest in doing so (insofar as we are entitled to invoke such overriding interest), or require certain data for the assertion of claims.

Note that exercising these rights may conflict with contractual agreements and may have consequences such as early termination of the contract or resulting costs. We will inform you in advance where such consequences are not contractually regulated.

If you believe that the processing of your personal data breaches data protection law, or that your data protection rights have been breached in any other way, you may also complain to the competent

supervisory authority. In Switzerland, the competent authority is the Federal Data Protection and Information Commissioner (FDPIC; <https://www.edoeb.admin.ch/edoeb/en/home.html>).

The exercise of your rights under data protection law generally requires that you prove your identity (e.g. by means of a copy of your ID card, if your identity is not otherwise ascertained or cannot be verified). To assert your rights, please contact us by e-mail at the e-mail address specified in section 1.1.

9 Amendments to this Privacy Policy

This Privacy Policy may be amended over time, in particular to incorporate any changes to our data processing practices or any new legal requirements. In general, the version current at the start of the processing in question shall apply to the data processing in each case.