

PRIVACY NOTICE - INTEGRAL

The website www.integral.swiss (hereinafter: Integral website) is operated by us, Integral Stiftung für die berufliche Vorsorge (hereinafter "Integral", "we" or "us").

When you contact Integral, whether by using this website or via e-mail or telephone, personal data is generally collected. This is information that you give us, such as your name or e-mail address, via the contact form. However, personal data also includes purely technical data, such as an IP address, which is automatically collected when you visit our website.

This privacy notice explains how we process personal data that we collect in the context of our relationship with you and how you can assert your rights. In doing so, we comply with the Swiss Federal Act on Data Protection (FADP) and any other applicable data protection regulations.

For the processing of personal data of our customers, business partners, insured persons and application users, please refer to the corresponding privacy notices below.

This privacy notice is not an exhaustive description, so that you can also be informed by other documents, such as declarations of consent, contractual conditions, forms, etc., if necessary.

The **controller responsible** for processing your personal data is the operator of the website www.integral.swiss:

IntegralStiftung
 Comercialstrasse 34
 P.O. Box 286
 CH-7007 Chur
 081 650 08 80
info@integral.swiss

Integral's data protection officer is FABIAN PRIVACY LEGAL GmbH (FPL), Bäumleingasse 10, 4051 Basel, mail@privacylegal.ch.

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COLLECTION AND PURPOSES OF PROCESSING OF PERSONAL DATA

Most of our services do not require registration, so you can visit our website without telling us who you are. However, some services and communications may require you to voluntarily provide us with personal data. This data may include identification and contact data, business-related data and professional data in connection with a job application. In addition, some website usage data is collected automatically when you visit our website. If you do not provide us with this data, we may not be able to provide you with services or information or enter into a business relationship with you.

Integral processes the personal data collected depending on the relationship you have with us. Unless the processing of your personal data is required or permitted by law, we may only process your personal data to the extent necessary to fulfil a contractual relationship with you or to carry out pre-contractual measures and to safeguard our legitimate business interests, such as responding to your enquiries and requests, providing our services, operating and maintaining our website, carrying out analyses of the use of our website, safeguarding our business interests and ensuring compliance with internal guidelines and applicable laws. In addition, we may anonymise the data collected through this website and aggregate it for statistical purposes in order to enhance and improve our services.

We may receive your personal data directly from you (e.g. by e-mail, through our contractual relationships or via our contact forms on our website) or indirectly from public sources or third parties.

1. Visits to our website

You can visit our website without providing any personal information. When you visit our website, we only collect information that your browser automatically transmits to our server (so-called log files). These log files may contain information such as:

- IP address of your end device,
- date and time,
- browser information,
- protocol information (e.g. protocol type, version, the desired action, status codes) and
- error messages.

This data is processed in our legitimate interest in order to enable the use of our website (establishment of a connection), to ensure long-term system security and stability, to solve technical problems, to ward off attacks on the infrastructure, to carry out analyses in the event of hacking attacks and to establish visitor statistics. After your visit to our website, we store your log files for the above-mentioned purposes for a maximum period of 10 weeks. Further information can be found in the section USE OF COOKIES AND ANALYTICAL TOOLS.

2. Contact form

You have the option of contacting us via our website using the contact form or by e-mail or telephone. In this case, the information you provide will be processed for correspondence with you and for the purpose of processing your enquiry and handling it. The legal basis for this is our legitimate interest in providing and using a modern information medium in order to respond to your enquiry in the best possible way.

If you contact us online using the contact form, you must provide your first name, surname and e-mail address and describe your request. If you write to us by e-mail or call us by telephone, we will process your e-mail address or telephone number.

3. Access to information requiring login

If you wish to access the protected area for insured persons or companies, you must register and log in with your user name. Further information on registration and data processing can be found in the [ePension Mobile](#) privacy notice.

4. Data of our job applicants

In connection with job applications, we may process your CV, including your application photo and letter of motivation, provided you make these documents available to us. We will request additional data, such as your AHV number and bank details, in order to process your employment contract.

We process this data in order to process your application and, if necessary, to take pre-contractual measures. Subject to your express consent, we may obtain information about you from third parties, such as previous employers. You can revoke your consent to this at any time. We also process your personal data with a view to the possible conclusion of an employment contract.

If your application is successful, we will store your personal data for as long as the employment relationship lasts and beyond that for as long as legally required (generally no longer than 10 years). If your application is unsuccessful, we will delete your data within 6 months.

USE OF COOKIES AND ANALYTICAL TOOLS

1. Cookies

To make your visit to the Integral website even more convenient, cookies are automatically installed on your computer to identify your browser or device. A cookie is a small text file that is sent to your computer or automatically stored on your computer or mobile device by the web browser you use when you visit our website.

These technically necessary cookies are required to make the website usable by enabling basic functions such as page navigation and remembering information such as your language selection. They are processed on the basis of our legitimate interest in the economic operation of this website and its optimisation.

You can deactivate this function yourself on your computer in the browser settings and delete the cookies stored there yourself. However, if you block cookies, certain functionalities may no longer be guaranteed. Further information about cookies, including how to manage, reject and delete cookies, can be found at www.allaboutcookies.org.

These cookies are only used during a session and are deleted after your visit to the website (so-called session cookies).

We only use other cookies with your express consent.

2. Matomo Analytics

With your consent (which you give by accepting the cookies), we use the open source software Matomo to analyse and statistically evaluate the use of the website. The provider is InnoCraft Ltd, 7 Waterloo Quay PO625, 6140 Wellington, New Zealand. Cookies are used for this purpose. The information obtained about website use is transmitted exclusively to servers in Germany and summarised in anonymous or at least pseudonymous user profiles. We use the data to analyse the use of the website. A backup of this data is created in Dublin, Ireland.

The IP addresses are anonymised (IP masking) so that they cannot be assigned to individual users.

You can revoke your consent at any time by deleting the cookies in your browser or changing your data protection settings.

3. Google Maps

Our website uses the Google Maps map service via an API. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. In order to use the functions of Google Maps, it is necessary to save your IP address. This information is usually transmitted to a Google server in the USA and stored there. Before you access Google Maps from our website, you will be asked to consent to the transfer of your personal data to the USA. Once you have closed the page with Google Maps, your personal data will no longer be transferred. Please note that we have no influence on how Google processes your personal data. To find out more, please read Google's [privacy policy](#).

LINKS TO OTHER WEBSITES

Our website may contain links to third-party websites that we consider useful and informative. However, we have no control over the privacy practices of the operators of these other websites. We encourage you to read the privacy notices of every website you visit.

DATA DISCLOSURE AND TRANSFER ABROAD

We only disclose your personal data, which is automatically collected when you visit the website or which you provide to us, to third parties for the purposes described in this privacy notice if we have a legitimate interest in doing so, if there is a legal obligation or permission, if the disclosure is necessary for the assertion, exercise or defence of legal claims or for the processing of contracts and business activities or with your consent. These third parties include in particular:

- Service providers, including IT service providers for hosting our website and IT support. We have concluded contracts with these service providers to ensure that your data is only processed for us as part of order processing.
- Law enforcement authorities in the event of legal measures or proceedings, as well as our tax advisors, auditors and lawyers to exercise our rights and fulfil our legal obligations.
- Third parties in the event of a change of ownership.

Most of these recipients are generally based in Switzerland or the EEA, in particular in Germany, Ireland and Liechtenstein or in an adequate country (New Zealand). If it is necessary to transfer personal data to a country outside Switzerland that does not guarantee adequate data protection, including the USA, such a transfer will only take place if it has been ensured that suitable measures have been taken to protect your personal data. These include, in particular, your express consent to data processing or the conclusion of EU standard contractual clauses that have been recognised by the Federal Data Protection and Information Commissioner, taking into account the necessary Swiss adaptations and additions. Please contact us if you would like a copy of these standard contracts.

YOUR DATA PROTECTION RIGHTS

Under applicable data protection law and under the conditions and within the limits laid down by law (e.g. for the protection of third parties), you have the right to

- request information from us as to whether and which of your personal data we process;
- demand that we correct your personal data if it is incorrect;

- object to data processing and to demand the restriction or deletion of personal data, unless we are obliged or authorised to continue processing;
- request that we provide you with certain personal data in a commonly used electronic format or to request the transfer of your personal data to another controller;
- withdraw your consent where our data processing is based on your consent; and
- where we inform you of an automated individual decision, express your point of view and to request that the decision be reviewed by a natural person.

You can further assert claims in accordance with Art. 32 and 41 FADP.

To exercise your rights, please contact us as described in the [CONTACT](#) section below.

DATA SECURITY

We take appropriate technical and organisational measures to protect personal data from unauthorised access and misuse. These include instructions to employees, access regulations and restrictions and the encryption of data storage media.

To protect the security of your data during transmission, we use state-of-the-art encryption methods (e.g. SSL) via HTTPS. You can recognise an encrypted connection by the fact that the address line of the browser changes from "http://" to "https://" and by the lock symbol in your browser line. SSL encryption means that the data you transmit to us cannot be read by third parties.

STORAGE OF PERSONAL DATA

We adhere to the principles of data avoidance and data minimisation. We therefore only store your personal data for as long as is necessary to fulfil the purposes stated here or for the various storage periods stipulated by law (generally 10 years). Once the respective purpose no longer applies or these periods have expired, the corresponding data is routinely anonymised or deleted in accordance with the statutory provisions.

CONTACT

If you have any questions about this privacy notice or wish to exercise your rights, you can contact your contact person at Integral, send an e-mail to info@integral.swiss or to the data protection officer (mail@privacylegal.ch).

AMENDMENT OF THIS PRIVACY NOTICE

We reserve the right to amend this privacy notice so that it always complies with current legal requirements or to implement changes to our services in the privacy notice, e.g. when introducing new services. The new privacy notice will then apply to your next visit.

APPLICABILITY OF THE GDPR

In our case, we assume that the EU General Data Protection Regulation (GDPR) is not applicable. Should this nevertheless be the case in exceptional cases for certain data processing, we base the processing of your personal data in particular on the fact that

- it is used for the establishment and conclusion of contracts and for the implementation of pre-contractual measures (Art. 6 para. 1 lit. b GDPR).
- it is necessary to fulfil 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. c GDPR).

- it is necessary in individual cases to protect your vital interests or those of other natural persons (Art. 6 para. 1 lit. d GDPR).
- it is necessary in individual cases for the performance of a task carried out in the public interest or in the exercise of official authority vested in us (Art. 6 para. 1 lit. e GDPR).
- where no other legal ground applies, it is necessary for the purposes of the overriding legitimate interests pursued by us or by third parties, in particular for communication with you or third parties, to operate our website, to improve our electronic offers and registration for certain offers and services, for security purposes, for compliance with Swiss law and internal regulations, for our risk management and corporate governance and for other purposes, such as training and education, administration, evidence and quality assurance, organisation (Art. 6 para. 1 lit. f GDPR).
- you have separately given your consent to the processing (Art. 6 para. 1 lit. a GDPR).