

## **Privacy policy**

### **Introduction**

Our core competence is the Swiss real estate industry. We take you, our customer, seriously, and therefore we take your rights and your need for truth and data security seriously. That's why we have decided, even before the revision of the Swiss Data Protection Act comes into force, to apply the Data Protection Act. The processing of your data will comply with the strict requirements of the European Data Protection Regulation.

The term "user" used hereinafter refers to users. For the sake of simplicity, we use the masculine form to facilitate reading.

### **Data protection information**

This data protection information is valid from September 1, 2023.

IMMOBILIEN SARBACH REAL ESTATE & CONSULTING GMBH as the responsible company (hereinafter also referred to as "IMMOBILIEN SARBACH REAL ESTATE & CONSULTING GMBH") informs its users that their personal data will be processed:

- personal data (e.g. e-mail address, first name, last name, title, address, telephone number - hereinafter referred to as "data" or "personal data") provided by users when registering on the website (e.g. as part of contact requests and newsletter mailings);
- personal data transmitted by users' Internet browsers each time they access the website, and as part of log files, also known as server files log files, are recorded. This data includes: IP address (Internet Protocol address) of the accessing computer; name of the page accessed; date and time of access; name of the page accessed; date and time of access. Time of access; reference URL from which the user accessed the page; number of data transmissions; date and time of transmission. Transmitted data; status message for successful access; session identification number.

### **Purpose of processing**

IMMOBILIEN SARBACH REAL ESTATE & CONSULTING GMBH, as the data controller, processes the following data:

- responding to user requests (e.g. management of contact requests, management of contact orders for regular electronic newsletters containing advertising information on real estate offers from IMMOBILIEN SARBACH REAL ESTATE & CONSULTING GMBH)
  - to enable user registration on the website;
  - for the technical management of the website and its operational functions, including the resolution of technical problems, statistical analysis, testing and research;
- to prevent fraudulent activity or abuse on or in connection with the website;
- to comply with the requirements of applicable laws, to protect the safety of an individual and the rights and property of IMMOBILIEN SARBACH REAL

ESTATE & CONSULTING GMBH and to prevent deception or security or technical problems.

The legal basis for the processing of personal data is Article 6 of the DPA. The processing of personal data for direct advertising purposes is in the legitimate interest of IMMOBILIEN SARBACH REAL ESTATE & CONSULTING GMBH.

### **Method of providing personal data and consequences of refusal**

The provision of personal data by users is voluntary. Users are free to choose whether they wish to provide personal data to IMMOBILIEN SARBACH REAL ESTATE & CONSULTING GMBH, and they may withdraw their consent to data processing and subsequently revoke personal data that has already been made available. Revocation may mean that the IMMOBILIEN SARBACH REAL ESTATE & CONSULTING GMBH website can no longer be used by the user concerned. By providing personal data, users consent to the processing, storage and use of such data.

Users' personal data is processed only when necessary and exclusively by electronic means, and in particular by: Collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, access and communication, blocking, deletion and destruction of data. Processing operations may be carried out electronically or non-electronically.

### **Data access**

Personal data are processed by IMMOBILIEN SARBACH REAL ESTATE & CONSULTING GMBH, and more specifically by

- employees and consultants authorized to manage the website and provide related services provide related services;
- third-party companies (e.g. IT service providers, hosting providers, etc.) to which IMMOBILIEN SARBACH REAL ESTATE & CONSULTING GMBH has outsourced services including processing operations as part of order processing.

### **Data information**

IMMOBILIEN SARBACH REAL ESTATE & CONSULTING GMBH may provide information about users' personal data. However, this information may only be provided for the following reasons:

- In the event of the fulfilment of legal obligations or obligations arising from regulations and directives of national or European legislation;
- To defend ourselves in court in the event of litigation.

## **Data transfer**

IMMOBILIEN SARBACH REAL ESTATE & CONSULTING GMBH forwards user data to the order processing company YYY. In addition, user data is forwarded exclusively for the purpose of executing the contractual relationship; in particular, data is forwarded to users' contractual partners, notaries and land registry offices. The servers used by IMMOBILIEN SARBACH REAL ESTATE & CONSULTING GMBH are located in Switzerland/European Union.

## **Data storage**

IMMOBILIEN SARBACH REAL ESTATE & CONSULTING GMBH retains personal data for the period necessary to achieve the purposes for which it was collected and subsequently processed, including any retention period required by applicable legislation (e.g. retention of accounting documents).

## **Use of cookies**

IMMOBILIEN SARBACH REAL ESTATE & CONSULTING GMBH uses so-called cookies to improve navigation on its website. Cookies are small text files, usually consisting of letters and numbers, which are stored by the user's web browser on their computer and contain pseudo-anonymous data. Cookies enable a website to recognize users' computers, track browsing on multiple pages of a website and identify users who return to a website. There are cookies for technical, analytical and profiling purposes.

The website uses the following technical cookies:

- To remember your choice of language
- To save the selection of units of measurement
- To save last searches
- To record the tracking list ID
- To save test assignment for AB tests
- To record assignment to distributed systems in the case of Loadbalancer

IMMOBILIEN SARBACH REAL ESTATE & CONSULTING GMBH informs users that they can disable or delete cookies from their web browser by following the instructions on the following links:

- Internet Explorer ( <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>).
- Mozilla Firefox (<https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>).
- Safari ([https://support.apple.com/kb/PH19214?viewlocale=en\\_US&locale=de\\_DE](https://support.apple.com/kb/PH19214?viewlocale=en_US&locale=de_DE)).

The website also uses analytics cookies set by third-party providers, for example Google (see also the provisions on the use of analytics programs and tracking

tools) and Adroll (<https://www.adroll.com/de-DE/about/Privacy>) as well as Haufe (<https://de.onlinehelp.umantis.com/index.php/Cookies>).

In particular, this concerns:

- a) Google Analytics
- b) Universal Analytics
- c) Google Remarketing and Retargeting
- d) Facebook Remarketing and Retargeting

This website does not use profiling cookies.

### **Social media plug-ins**

This website uses social media plug-ins offered by the major social networks (e.g. Facebook and Twitter). When visiting the website, browser data may be transmitted directly to the relevant social networks, even without direct user interaction. Users confirm and accept that the operation of social network plug-ins is managed directly by the company offering the corresponding plug-in. When users use plug-ins via the website (for example, by logging in to a social network with their access data or by linking their accounts) or by clicking on the corresponding button (such as "Like" or "Share" for Facebook), a connection is established with the servers of the relevant social network, which then sends the plug-in content directly to the users' browser.

IMMOBILIEN SARBACH REAL ESTATE & CONSULTING GMBH may therefore receive data relating to users, in accordance with the terms of use and privacy policy of the social network concerned and may add personal data of users already collected via its own services. If the User chooses to share information with social networks, the User also communicates to IMMOBILIEN SARBACH REAL ESTATE & CONSULTING GMBH data concerning, for example, his/her preferences. In order to prevent social networks from collecting the User's personal information, Users are referred to the relevant conditions on the social networks' websites.

### **Rights of data subjects**

Users have the right to be informed about the processing of their personal data (e.g. origin of data, purpose of processing, data processing methods). In addition, users have the right at any time to object to the processing of their data for the future, to restrict it or to demand the deletion of the data. Finally, they may at any time object to the sending of advertising material or the carrying out of market research or commercial communications.

In summary, users have the right to:

- information,
- rectification,
- erasure (or the right to be forgotten),
- limitation of processing,
- data portability,
- opposition to the processing of their personal data,

- notification to the supervisory authority.

In order to exercise the aforementioned rights and request information, users should contact the data controller.

### **Contacts**

The person responsible is IMMOBILIEN SARBACH REAL ESTATE & CONSULTING GMBH.