



As a leading provider of trust services in Europe, we facilitate the most innovative digital business models.

Online Privacy Policy Swisscom Trust Services

Swisscom Trust Services

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General

Privacy is a matter of trust, and your trust is important to us. We respect your privacy and your privacy rights. Handling personal data in a responsible and legally compliant matter is a priority to us at Swisscom Trust Services Ltd, Hardturmstrasse 3, 8005 Zurich, Switzerland (“we”, “us” or “STS”). This Online Privacy Statement (“Statement”) describes the ways in which we process personal data pertaining to you when you visit our website (in relation to the requirements of the Swiss Data Protection Act (DPA) and the EU General Data Protection Regulation (GDPR)).

1 Processing of personal data, categories

Personal data means any information relating to an identified or identifiable person. In addition to your contact data, such as name, telephone number, address or email address and other information that you provide to us, for example when registering, when placing an order or in relation to newsletter enquiries, participating in sweepstakes or surveys and the like, this may also include the IP address that we register when you visit our website, and we may combine it with other information, such as the pages accessed and responses to the offers displayed on our websites. In this regard, see Chapter 1 of the Comprehensive Statement.

Generally, there is no legal or contractual obligation to disclose personal data. However, we will have to collect and process personal data which is necessary for the initiation and processing of a contractual relationship. Otherwise, we will not be able to conclude or continue the relevant agreement. The processing of certain data when you use our websites is also unavoidable. For technical reasons, the logging of certain (but generally non-personal data) cannot be prevented.

In certain circumstances, you may want or need to provide us with personal data of third parties. Please note that, in such cases, you must inform the relevant persons of this Privacy Statement and ensure the accuracy of the personal data in question.

2 Purposes of processing

We process your personal data on our websites for purposes such as:

- performance of the contract, i.e. particularly
 - the initiation of a contract, including but not limited to enquiries concerning the initiation of the contract, price information, technical information about the range of services, etc.
 - ensuring customer support, e.g. queries regarding functional defects or missing features
- interest in conducting marketing: We receive your request for a newsletter or for registration for one of our webinars and training sessions and provide you with up-to-date information about our services.
- Further development of our services: Your requests are relevant to the further development of our products and thus also increase our customer satisfaction and competitiveness in general.

Further details regarding the purposes of processing can be found in Section 2 of the Comprehensive Statement set forth below.

3 Legal basis for processing

The processing of personal data requires a legal basis. The processing of your personal data generally relies on one or more of the following legal bases: The processing is necessary for

- performing a contract with you or processing your request for a contract (Art. 6(1)(b) GDPR; “contractual performance”), or Art. 13(2) FADP
- (ii) compliance with a legal obligation (Art. 6(1)(c) GDPR; “legal obligation”) or Art. 13(2) FADP
- (iii) or the safeguarding of a legitimate interest (Art. 6(1)(f) GDPR; “legitimate interest”) or Art. 13(2) FADP
- (iv) or you have expressly consented to the processing, e.g. in a newsletter order, sales request or webinar reservation (Art. 6(1)(a) GDPR “consent”).

4 Cookies

4.1 What are cookies?

STS websites use so-called cookies. These are small files that are stored on your computer or mobile end device whenever you visit or use one of our websites. Cookies store certain settings through your browser. They also store



data about how you interact with the website via your browser. Whenever a cookie is activated, it is allocated an identification number (cookie ID) through which your browser is identified and the information contained in the cookie can be used.

Most of the cookies used by us are temporary session cookies that are automatically deleted from your computer or mobile end device at the end of your browser session.

In addition, we also use permanent cookies. These cookies remain stored on your computer or mobile end device after the end of your browser session. These permanent cookies remain stored on your computer or mobile end device for a period between one month and ten years, depending on the type of cookie, and they are automatically deactivated at the end of the programmed time period.

4.2 Why do we use cookies?

The cookies used by us are intended to enable various functions on our websites. Cookies help, for example, to store your default country and language settings and your shopping basket across different pages during a web session.

By using cookies, we can also record and analyse the browsing patterns of visitors to our websites. This enables us to design our websites in a more effective and user-friendly manner, thereby making your visit to our websites as pleasant as possible. In addition, we can display information to you on the website that is specifically tailored to your interests.

4.3 What data is collected?

Cookies collect information relating to usage, such as the date and time of the visit to our websites, the name of the website visited, the IP address of your end device, as well as the operating system used. Cookies also provide information for instance on which of our websites you visit and from which webpage you have accessed our website.

Cookies also allow us to establish which issues you researched on our websites.

4.4 Third-party cookies

The cookies or similar technologies saved on your computer or mobile end device can also come from other companies within the Swisscom Group or independent third parties, such as advertising partners and internet service providers.

These cookies enable our partner companies to address you with individually tailored advertising and to measure its efficacy. Our partner companies' cookies remain stored on your computer or mobile end device for a period between one month and ten years and will be automatically deactivated at the end of the programmed time period. Our advertising partners only receive access to data based on an identification number (cookie ID). This data contains online usage information, such as our websites that you have visited and the content that you have used.

5 What web analysis tools do we use?

We use web analysis tools to obtain information about the usage of our websites and to improve our web presence. These tools are usually made available by a third-party provider. Website usage information captured with cookies for this purpose is normally sent to the third party's server. Depending on the third-party provider, this server may be located abroad.

Data is transmitted using truncated IP addresses, which prevents individual end devices from being identified. The IP address transmitted by your browser in connection with the usage of third-party tools is not combined with other data from these third-party providers.

A transfer of this information by third-party providers only occurs based on statutory provisions or as part of contract data processing.

We also use so called "re-targeting technologies" on our websites. This enables us to address users of our websites with advertising on third-party websites. Advertising is displayed on websites using the cookies contained in your browser, a cookie ID and an analysis of prior use.

When you use our website, we employ only the following third-party cookies and tracking technologies to detect traffic and control the use of tools, as well as to correct errors and optimise our website:

- Google Analytics
- Google Ads Conversion
- Google Dynamic Remarketing
- Google Maps – SRSIdent for map display



6 How can the use of cookies and web analysis tools be prevented?

Most internet browsers accept cookies automatically. However, you can instruct your browser not to accept cookies or to ask you each time before accepting a cookie from a website visited by you. You can also delete cookies on your computer or mobile end device by using the corresponding feature in your browser.

A list of the technologies used with details of the providers, the purpose of the respective technologies, the corresponding options for preventing or limiting their use, as well as further information of the respective providers can be found here:

<https://www.swisscom.ch/en/residential/legal-information/online-privacy.html#10>.

In addition, by clicking on the link “Cookies” in the footer of our site, you have the option to switch on or off a collection of the major cookies.

If you decide not to accept our cookies or the cookies and tools of our partner companies, you will not see certain information on our websites and will not be able to use certain features intended to improve your visit. However, the settings thus chosen apply only to the websites operated by STS (<https://trustservices.swisscom.com/en/>).

7 Categories of recipients and cross-border processing

We can make your data available to the following recipients in compliance with the applicable legal requirements:

- Swisscom Trust Services, which provide you with their services
- Service providers that assist us (e.g. service providers of the Swisscom Group) and
- Business partners (resellers) who conclude the commercial service agreement with you as a service recipient.

Further details regarding the disclosure of personal data to third parties can be found in Section 4 of the Comprehensive Statement set forth below.

8 Storage period and data erasure

Your personal data is stored at least until the purpose for processing has been achieved and is then erased or anonymised. Further information regarding the storage period and the erasure of data can be found in Section 5 of the Comprehensive Statement set forth below.

9 Your rights

You have several rights in relation to the processing of your personal data, subject to the conditions set out in applicable law, such as rights of access and the rights to rectification or erasure, unless there is a legal retention obligation. Further information concerning your rights can be found in Section 6 of the Comprehensive Statement set forth below.

10 Amendments

We reserve the right to change this Statement at any time. The most recent version published on our websites shall apply. We shall give you appropriate notice of these changes in accordance with applicable law. For this purpose, we use our website

<https://trustservices.swisscom.com/en/service-status/>

which you can also subscribe to e.g. via RSS.

11 Contact

If you have any questions or concerns regarding data protection, please contact us as follows:

- By telephone: +41 (0) 800 724 724, menu selection “Data Services”, keyword “Signing Service/ PRO Number: 005038814” or from Austria: +43 720 82 89 89
- By post: Swisscom Trust Services Ltd, Data Protection, Hardturmstrasse 3, 8005 Zürich, Switzerland
- By email: msc.support@swisscom.com

You can contact the Group Data Protection Officer of Swisscom Ltd as follows:



- By email: datenschutz@swisscom.com
- By post: Swisscom (Switzerland) Ltd, Dr Nicolas Passadelis, LL.M., Data Protection Officer Swisscom Ltd and Swisscom (Switzerland) Ltd, P.O. Box, 3050 Bern

In all cases, please quote the keyword “Swisscom Trust Services”.



COMPREHENSIVE STATEMENT

1 Categories of personal data as a visitor to our website

We process the following personal and sensitive data concerning you as a visitor to our website, data which you have provided to us as part of an expression of interest, a reservation, an inquiry or through your browser:

- Last name and first name
- Telephone number,
- Email address
- Name of the company
- Business address
- Web address
- Signature application used by you
- Your customer support number (PRO number)
- Interaction and usage data: IP address, date and time of connection, correspondence, device type, end device settings, operating system, software
- Website information: Cookie information, browser settings, frequency of visits to the website, duration of visits to the website, search terms, clicks on content and referring website.

We also store the following information about this data:

- Contact history
- Appointment/Conference/Meeting dates
- Data concerning goods or services purchased or supplied
- Use of our website

2 Purposes of processing

We process your personal data for the following purposes:

- Your consent: Exchange of information e.g. in response to requests on the website or by email.
- Contract initiation and processes: Dialogue regarding the contents of an intended contract with us, discussion and conclusion of a contract, e.g. a price request or a technical request.
- Safeguarding your legitimate interests in connection with the performance of the contract and the trust service provided to you: If you have instructed us to sell you a service provided by Swisscom (Switzerland) Ltd or Swisscom IT Services Finance S.E., we will transfer your data to the support staff of both companies in order to safeguard your legitimate interest in the uninterrupted provision of the service. For this purpose, you can also use a form on our website to contact Support.
In addition, Product Management will contact you to communicate news and changes to the range of products and services or to communicate necessary changes, e.g. to the terms of use, contract relationships, technical interfaces or other changes.
- Compliance with a legal obligation: Your support requests may give rise to indications of malfunctions that have a legal effect on the signing process. For this purpose, we need your data in order to further investigate these effects.

3 Legal basis

STS relies on the following legal bases when processing your personal data.

Processing purpose	Data categories	Legal basis for processing
Response to expressions of interest, information requests, initiation of contracts	Last name / first name, email address, business	<ul style="list-style-type: none"> • Overriding legitimate interest in obtaining information • Initiation of a contract



	address, organisation, telephone number	<ul style="list-style-type: none"> • Overriding legitimate interest in ensuring customer satisfaction and remaining competitive
Support purposes	Last name / first name, email address, business address, organisation, telephone number, customer support number, signature application	<ul style="list-style-type: none"> • Legitimate interest in the • Customer satisfaction, competitiveness and compliance with applicable Swiss and EU legislation
Marketing purposes, newsletters	Last name / first name, email address, business address, organisation, telephone number, interaction and usage data, website information	<ul style="list-style-type: none"> • Consent • Overriding legitimate interest in obtaining information
Compliance with legal requirements	Last name / first name, email address, business address, organisation, telephone number, interaction and usage data, website information	<ul style="list-style-type: none"> • Legal obligation and legitimate interest in compliance with applicable legislation

4 Categories of data recipients and cross-border processing

4.1 Categories of data recipients

Third parties in the context of compliance with legal obligations: We may transfer your personal data to third parties if this appears necessary or reasonable to comply with, or verify compliance with, applicable laws and regulations and to answer enquiries from competent authorities.

Service providers (within and outside the Swisscom Group): In order to provide the Trust Service, we use service providers that supply dedicated web services. Some of these services are operated by companies of the Swisscom Group. In addition, STS or the service providers of the Swisscom Group use third-party web services, e.g. a newsletter service, uses a web agency that has access to the data in case of support requests and has its website hosted by an EU web hosting service in a data centre in Germany.

Web hosting: Platform.sh, Ireland.

Web agency: OVAN, Berlin, Germany

The business partner who provided our Trust Service to you: Some of your personal data are transferred in the course of your enquiry concerning trust services to a suitable business partner that provides signature applications with our service. Our legal relationship with this business partner is governed by a separate agreement.

4.2 Cross-border processing in countries outside the EEA (third countries)

We only transfer your personal data to recipients within the European Economic Area and Switzerland. The EU Commission has acknowledged in a resolution that Switzerland provides an adequate level of data protection. As part of marketing and newsletter management, as well as CRM, we use tools from service providers that are based in the USA or in other countries in which the applicable data protection laws provide a lower level of protection than in Switzerland. In this case, we ensure adequate protection in accordance with the laws applicable in Switzerland and – if applicable – under the GDPR by, for example, concluding so-called EU Standard Contractual Clauses with the recipients, or these data importers have EU-recognised Binding Corporate Rules in place and conduct appropriate Transfer Impact Assessments. The EU Standard Contractual Clauses are a series of contractual clauses introduced by the European Commission to provide adequate protection for personal data in cross-border transfers.



5 Storage period and data erasure

We will store and process your personal data for as long as this is required for the purpose for which they were collected or for as long as this is legally required or permitted.

Data relating to the processing activities which come under customer, candidate and supplier management are reviewed every two years to determine whether further storage is necessary. If there is no need, the data will be erased. This does not apply to data that must be classified as data relevant to accounting purposes and as business documentation within the meaning of the Accounts Ordinance (AccO) legislation in Switzerland. Such data is subject to the statutory retention obligations.

6 Your rights

Based on the GDPR or FADP, you have the following rights in relation to your personal data:

6.1 Information

You have the right to obtain from us, free of charge, confirmation as to whether we are processing your personal data and, if so, to request information about the processing of your personal data. This information includes, in particular, details regarding the purpose of the processing, the categories of personal data and the recipients or categories of recipients to whom the personal data has been or is being made available.

6.2 Rectification

You have the right to have your personal data processed by us rectified and/or completed free of charge.

6.3 Erasure

To the extent that we are not required by applicable laws and regulations to store your personal data, you have the right to have your personal data erased if:

- your personal data is no longer required for the purposes pursued;
- you have validly objected to the processing (see below in this regard) or
- it has been unlawfully processed.

6.4 Restriction of processing

You may ask us to restrict the processing in the following cases:

- If you dispute the accuracy of the data, for the duration of our examination and subsequent rectification or refusal to rectify.
- If, in the case of unlawful processing, you refuse erasure and wish instead to have the processing restricted.
- If after the purpose has been achieved, you request that the data not be erased but that it instead continue to be retained for the purpose of asserting legal rights.

The affected personal data will be segregated or marked accordingly for the duration of the restriction. Aside from storage, any further processing of this personal data shall only occur with your consent or for the purpose of asserting, exercising or defending legal claims or to protect the rights of another natural person or legal entity.

6.5 Data portability

Subject to certain conditions, you have the right to receive the personal data provided by you in a structured, commonly used and machine-readable format. You are entitled to have this personal data transferred, without hindrance, to another company to the extent this is technically possible.

6.6 Right to object

You have the right, for reasons related to your particular situation, to object at any time to our processing of your personal data, and we may be requested to stop processing your personal data. If you have a right to object and you exercise it, we will no longer process your personal data for such purposes.



A right to object does not exist, in particular, if we have compelling legitimate grounds for the processing which outweigh your interests, rights and freedoms, or if the processing is for the purpose of asserting, exercising or defending legal claims or is necessary for concluding and performing a contract.

6.7 Contacts

You may assert your rights in connection with the processing of your personal data by contacting the following:

- By post: Swisscom Trust Services Ltd, Data Protection,
Hardturmstrasse 3, 8005 Zürich, Switzerland

- By email: msc.support@swisscom.com

You may contact the Data Protection Officer of Swisscom Ltd (Group) and Swisscom (Switzerland) Ltd as follows:

- By email: datenschutz@swisscom.com
- By post: Swisscom (Switzerland) Ltd, Dr Nicolas Passadelis, LL.M., Data Protection Officer Swisscom Ltd and Swisscom (Switzerland) Ltd, P.O. Box, 3050 Bern

In all cases, please quote the keyword “Swisscom Trust Services”.

You also have the right to file a complaint with the competent supervisory authority, in particular in the EU/EEA member state of your usual place of residence or the location of the suspected infringement, if you believe that the processing of your personal data violates the GDPR.

In Switzerland, suspected infringements are investigated by the FDPIC (Federal Data Protection and Information Commissioner).