

Privacy statement

of Language Box GmbH - May 2018

Language Box takes the protection of your privacy and the security of your personal data very seriously and with this privacy statement strives to inform you about the collection, processing and utilization of your data in a comprehensive manner.

1. What types of personal data do we process?

We process the **technical data** of your visit to our website and of the device used for that visit. We moreover process your **contact details** and the **job-related data** that were provided to us as a result of business relations (e.g. e-mail signatures, the exchange of business cards) or by you making contact with us (e.g. contact form, newsletter signup) or that are publicly accessible (e.g. on websites).

1.1 Your technical data

- Your IP address
- The domain name of your internet provider
- Your operating system, web browser and user interface
- Date and time of your visit to our website
- The history of your visit to our website (including which web page you visited before you landed on our website and which web page you visited afterwards)

1.2 Your contact details

- Gender (form of address)
- Last name
- First name
- Address
- Phone number
- E-mail address

1.3 Your job-related data

- Professional title
- Place of employment
- Qualifications (education and training)
- Professional competencies
- Field of activity and industry

2. For what purpose do we process your personal data?

We record your **technical data** to ensure the smooth utilization of our website and to be able to statistically evaluate your surfing behavior in order to improve our range of services.

Your **contact details** serve us for the realization of pre-contractual measures on your request, the fulfillment of a contract, the maintenance of professional contacts, the acquisition of new clients and direct marketing while carrying our business activities.

Your **job-related data** is recorded in our database together with your contact details. No sensitive data is recorded in this process, nor do we create extensive personal profiles. This database is only used for realizing your contract with us, for the acquisition of new clients and for the maintenance of professional contacts.

3. For how long do we store your personal data?

We store your personal data for as long as we need it for the intended purpose or until we receive a message to the contrary from you. Then we delete your data. Any mandatory statutory provisions, especially those regarding mandatory data retention periods, remain unaffected by this. The data regarding your visit on our website is stored for a maximum of 14 months and then deleted automatically.

4. How do we record your visit on our website?

4.1 Server log files

During your visit on our website, we automatically collect the general technical data about your device and about the history of your visit using server log files. This data is evaluated statistically in order to optimize our web presence and the technology behind it as well as to analyze the system's security and stability.

This data processing takes place based on our rightful interest in information security and the optimization of our website (Art. 6 para. 1 lit. f EU-GDPR). The server log files are deleted automatically after 2 months.

4.2 Google Analytics

Our website uses features of the Google Analytics web analysis service by Google. Cookies are used for this that are stored on your device to allow for the analysis of your use of our website. As a rule, the data generated by the cookie is forwarded to a Google server in the USA and stored there. In this process, the IP addresses from Switzerland and the Member States of the European Economic Area (EEA) transmitted to Google are anonimyzed beforehand and not merged with other Google data.

The Google Analytics script has been extended by the ga('set', 'anonymizelp', true); code for the IP anonymization. Through this code, the last block of numbers of IP addresses within Switzerland and the EEA are replaced with zero. This means that only a rough localization of your device is possible anymore.

This data processing takes place based on our rightful interest in the improvement of our range of services and the optimization of our website (Art. 6 para. 1 lit. f EU-GDPR).

The transfer of data to the USA takes place based on an adequacy decision by the EU Commission (Art. 45 EU-GDPR).

The data regarding your website activities is stored for a maximum of 14 months and then deleted automatically.

▶ This is how you can disable Google Analytics:

You can prevent the future collection of data as well as its processing by Google by downloading and installing the browser plugin available at the following link:

http://tools.google.com/dlpage/gaoptout. This is not possible on mobile devices, which is why we recommend the deactivation of Google Analytics by clicking on the link "Click here to disable Google Analytics" (cf. web version) on mobile devices.

4.3 Web forms

There are different options on our website to get in contact with Language Box GmbH using forms. In the following you can find more information on the processing of data through the <u>Contact form</u>, the <u>Consultation form</u>, the <u>Newsletter form</u>, the <u>LSP application form</u> in the <u>LSP area</u>, and through <u>"The Box"</u>.

a) Contact form and consultation form

Contact details transmitted via the contact form or the consultation form as well as other data (e.g. message box) are stored in order to be able to process your inquiry as well as further follow-up issues.

The data entered in the contact form or the consultation form is processed based on your consent by clicking on "Send" (Art. 6 para. 1 lit. a EU-GDPR) and our rightful interest in maintaining contact and acquiring new clients (Art. 6 para. 1 lit. f EU-GDPR).

We will retain the data transmitted through the contact form or the consultation form until such time as you request its deletion or revoke your consent to its storage or the necessity for its storage no longer exists. Any mandatory statutory provisions, especially those regarding mandatory data retention periods, remain unaffected by this provision.

b) Newsletter form

Contact details transmitted via the newsletter form are stored and used exclusively for mailing our "Language Box News" newsletter. Additional data is not required for receiving the newsletter; providing additional data is voluntary.

The data entered in the newsletter form is processed based on your consent by clicking on "Send" (Art. 6 para. 1 lit. a EU-GDPR) and our rightful interest in direct marketing (Art. 6 para. 1 lit. f EU-GDPR).

Data entered to set up the subscription of the newsletter will be deleted once you unsubscribe. In case this data was transmitted to us for different purposes and in a different way, we will continue to retain the data until such time as you request its deletion or revoke your consent to its storage or the necessity for its storage no longer exists. Any mandatory statutory provisions, especially those regarding mandatory data retention periods, remain unaffected by this provision.

c) LSP application form

This offer by Language Box serves the professional and competent placement of language service providers (LSP) with our clients. We store the data entered in the LSP application form and use it as basis for the decision on the inclusion in our LSP database and the placement with our clients. The data transmitted to us will not be published and serves exclusively the purpose specified above as well as the transmission of important information on the part of Language Box GmbH. Your data will also not be used for advertising purposes or passed on to third parties.

We will retain the data transmitted through the LSP application form until such time as you request its deletion or revoke your consent to its storage or the necessity for its storage no longer exists. Any mandatory statutory provisions, especially those regarding mandatory data retention periods, remain unaffected by this provision.

d) "The Box"

Data you enter through the questionnaire on the "The Box" subpage is stored in CSV files and statistically analyzed in order for us to optimize our range of services. The data furthermore serves as basis for discussions when you contact us for a consultation.

The data entered in "The Box" is processed based on our rightful interest in continuously improving our range of services (Art. 6 para. 1 lit. f EU-GDPR).

The IP addresses collected in this process are automatically deleted after one year.

5. With whom do we share your personal data?

Your personal data is passed on to the following companies for processing:

Our website is hosted by **Metanet AG**. We use **Microsoft Office 365** for our day-to-day business; this data is stored exclusively in Germany. We use the **MailChimp** newsletter service for mailing our Language Box News. In addition, we use **Google Analytics** as a web tracking tool.

We have concluded contracts for data processing with these companies. This obligates them to process your data exclusively according to our instructions and to not use them for their own purposes or pass them on to third parties. These agreements were made based on Art. 10a of the Swiss Bundesgesetz über den Datenschutz (DSG) data protection act and Art. 28 para. 3 EU-GDPR.

You can find the privacy statements of <u>Metanet AG</u>, <u>Microsoft Office 365</u>, <u>MailChimp</u>, and <u>Google Analytics</u> here.

6. Where is your data being processed?

Your data is processed in Switzerland, Germany and the USA. Data storage outside of Switzerland and the EU takes place based on Art. 6 para. 1 and Art. 6 para. 2 lit. a DSG and an adequacy decision by the EU Commission according to Art. 45 EU-GDPR ("Privacy Shield").

7. What rights do you have?

You can exercise the following rights at any time:

- Request information on your data stored by us and its processing (Art. 8 DSG and Art. 15 EU-GDPR).
- Request the correction of incorrect personal data (Art. 5 para. 2 DSG and Art. 16 EU-GDPR).
- Request the deletion of your data stored by us (Art. 15 para. 1 DSG and Art. 17 EU-GDPR).
- Restrict the storing and processing of your data in case we may not yet delete your data due to legal obligations (Art. 15 para. 1 DSG and Art. 18 EU-GDPR).
- Raise an objection to the storing and processing of your data by us (Art. 21 EU-GDPR).
- Request to have the data that we process based on your consent or in fulfilment of a contract transmitted to yourself or to a third party; the transmission takes place in digital form (Art. 20 EU-GDPR).
- You moreover have the option to revoke already given consent to the processing of data on the part of Language Box GmbH at any time (Art. 15 DSG and Art. 7 para. 3 EU-GDPR).

▶ This is how you can exercise your rights:

An informal message via e-mail or regular mail to our data protection officer or to <u>info@languagebox.ch</u> together with a copy of your ID suffice to exercise the rights specified above. With the copy of your ID we can verify that you are authorized to make the respective request. You may blacken all information except your first and last names and your date of birth on the copy.

8. Which organizational and technical measures have we taken in order to protect your data?

We have created an internal policy for the protection of your privacy which our employees strictly observe. This policy comprises in particular data minimization, specific retention periods that are as short as possible, anonymization and pseudonymization, as well as password protection and restricted access to personal data.

9. Do you have any questions regarding your personal data?

You can reach our data protection officer, Patrizia Napoli, here:

patrizia.napoli@languagebox.ch

+41 44520 15 19

Language Box GmbH Buckhauserstrasse 24 8048 Zürich Switzerland

Link to the online version of our privacy statement:

https://www.languagebox.ch/en/privacy-statement/