

The VC999 Data Protection Policy dated May 22, 2018

Data Protection Policy

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1.0 Data controller

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Data Protection Policy

Protecting your personal data is important to us. You can expect us to handle your data sensitively and carefully and to ensure a high level of data security.

This Data Protection Policy applies to personal data that we receive from individuals through various sources (websites, mobile apps, social media, customers, suppliers, business partners).

We collect, store, and process your personal data – i.e., data that relates to you personally – in order to provide services, to establish and maintain the customer relationship, to ensure high service quality, to safeguard operations and infrastructure, for invoicing, and for marketing purposes. We store and process personal data at our own datacenters in Switzerland.

2.0 Your consent

By using a VC999 website or providing your personal information to us in any other way (either directly to us or through third parties acting on our behalf), you tacitly consent and agree to the terms of this Data Protection Policy. As soon as you supply your data, you consent to the collection, use, and disclosure of that information in accordance with this Data Protection Policy.

3.0 Scope and purpose of the collection, processing and use of personal data

We process personal data to fulfill our contractual obligations and to ensure a high service quality, for invoicing, to maintain our customer relationship, to further develop our services, to safeguard the security of our operations and infrastructure, and to contact you. The data in question pertains to our customers, suppliers, and prospective customers and their employees. We also store information on potential suppliers, potential customers, event organizers, and other business partners based on our business interests. The information is stored in a Customer Relationship Management system ("CRM system") and, if there is an order involved, also in our Enterprise Resource Planning system ("ERP system") and financial accounting.

The purpose of data processing is, among other things, taking on new business, e.g., establishing contact with prospective customers; maintaining our relationships with existing customers, suppliers, and other business partners; providing contractual services; providing maintenance and support services; and billing for our services.

The legal basis for processing your data is the performance of a contract to which you are a party or the implementation of pre-contractual measures. If we store the data on the basis of a contractual relationship with you, this data will be stored for at least as long as the contractual relationship exists and for the length of the limitation periods for possible claims by us, or for the periods specified by legal or contractual storage obligations.

4.0 Transfer of data to third parties

We will only pass on your personal data if you have expressly consented to this, if we are obliged to do so by law, or if this is necessary for you to be able to use our website or for the potential provision of services requested by you.

If we use subcontractors to provide our services, we will take appropriate legal precautions as well as undertaking the necessary technical and organizational measures to ensure the protection of your personal data in accordance with the relevant legal provisions.

5.0 Retention and deletion of data

We will process and store your personal data only for the period of time necessary to achieve the storage purpose or if required by the laws or regulations to which we are subject. If the storage purpose no longer applies or if a prescribed retention period expires, your data will be routinely blocked or deleted in accordance with the legal provisions.

In addition, we will delete your data if you request us to do so by writing us at privacy@vc999.eu and if we have no legal or contractual obligation to store or otherwise safeguard this data.

6.0 Visiting the website

You can visit the VC999 websites without telling us who you are and without revealing any personal information that would allow you to be directly identified.

When you visit our website, our servers temporarily store the following data in so-called server log files:

- IP address of the accessing computer
- Date and time of access/retrieval
- Name and URL of the retrieved data
- Your computer's operating system and the browser you are using
- Country from which our website is accessed
- Name of your internet access provider
- Time zone difference to Greenwich Mean Time (GMT)
- Content of the request (specific page)
- Access status/ HTTP status code
- Amount of data transferred in each case
- Website last visited
- Browser settings
- Language and version of the browser software
- Activated browser plugins

The legal basis for the temporary storage of personal data and log files is the existence of a legitimate interest. We have a legitimate interest in:

- delivering the content of our website correctly
- optimizing the content of our website and the advertising for it
- providing law enforcement authorities with the necessary information in the event of a cyber attack
- further improving our offerings and our internet presence
- collecting statistical data

The data listed above will not be stored together with other personal data. The data will be deleted as soon as they are no longer necessary to achieve the purpose for which they were collected.

7.0 Contacting us

You have the possibility to contact us via our website using a contact form or email. If you would like to contact us, the following information (*mandatory) is required. Other information is voluntary:

- Last name*
- First name*
- Company
- Street*
- Postal code*
- Town*
- Country*
- Email address*
- Message

The information in the fields marked "mandatory" is needed to process your request. In order to provide you with targeted information, we also ask for voluntarily provided details.

These personal data provided by you will not be stored together with other data.

The legal basis for processing your personal data is the existence of a legitimate interest on our part in providing the respective service. If the contact is made for the purpose of fulfilling a contract to which you are a party or for the implementation of pre-contractual measures, then this represents an additional legal basis for processing your personal data.

You can object to this data processing at any time. Please send your objection to the following email address: privacy@vc999.eu.

Your personal data will be deleted as soon as they are no longer necessary to achieve the purpose for which they were collected.

In addition, we will ask you for personal information if you apply for a job at VC999 through our websites. Which information we collect from you in this case will be obvious when you submit your application, and we will only use that information to evaluate your application for employment. With your application you grant us the right to store these documents while we search for a suitable candidate. Once a candidate is found, the data will be deleted.

8.0 Marketing purposes

In addition to processing your personal data in the context of your offer or order, we also use your data on the basis of a legitimate interest for the following purposes:

- to continuously improve your shopping experience, making it more customer-friendly and tailoring it to your needs
- to communicate with you about your orders
- as well as about certain products or marketing promotions
- to recommend products or services that may be of interest to you

9.0 Cookies

Based on legitimate interests, we use so-called cookies on our website. These are small text files that are stored on your end device with the help of the browser. When you visit a website, a cookie may be stored in your operating system. This cookie contains a characteristic string of characters that enables the browser to be identified when the website is called up again.

Cookies are used to optimize the information and offerings on our website for you individually. Cookies enable us to recognize visitors when they return to the website. The purpose of this recognition is to make it easier for you to use our website.

Only anonymized data is stored in the cookies we use. When the cookie is activated, it is assigned an identification number. We do not associate your personal data with this identification number. Your name, IP address, or similar data that would allow the cookie to be directly associated with you are not stored in the cookie.

We use temporary cookies. These cookies store a so-called session ID, which can be used to associate various requests from your browser with the shared session. This allows your computer to be recognized when you return to the website. We use this type of cookie to ensure the operation and functionality of our website.

In addition, we use permanent cookies that are stored on your computer after the respective visit. When you visit the website again, it can then automatically recognize that you have been there before and which entries and settings you prefer. These cookies are stored on your hard drive for a period of 1 month to 10 years and delete themselves after the specified time. The exclusive purpose of these cookies is to optimally adapt our offerings to our customers' wishes and to make surfing on our website as convenient as possible for you.

Accepting cookies is not a prerequisite for visiting our website.

Most internet browsers automatically accept cookies. If you do not want to accept cookies, you can set your browser to inform you every time a cookie is about to be stored so that you can decide each time whether or not to allow it. You can also set your browser to not permit any cookies to be stored on your computer or to send you a warning message when a new cookie arrives. Some browsers offer you the ability to accept first-party cookies but block third-party cookies.

Furthermore, cookies that have already been set can be deleted at any time via an internet browser or other software programs. This is possible in all common internet browsers. You can also use your browser's settings to reject all cookies.

10.0 Analysis tools

Our website uses functions of the following web analysis services:

- Google Universal Analytics

11.0 Google Universal Analytics

Based on legitimate interests, we use Google Analytics, a web analysis service from Google Inc. ("Google") (1600 Amphitheatre Parkway Mountain View, CA 94043, USA). Google uses cookies.

We use Google's Universal Analytics functions. Universal Analytics allows us to analyze the activities on our websites across all devices (e.g., when they are accessed with a laptop and later with a tablet). This makes it possible to associate data, sessions, and interactions across multiple devices with an anonymized user ID and thus analyze the activities of a user across devices.

The information generated by the cookie about your use of this website (including your IP address) is transmitted to and stored by Google on servers in the USA. Google is certified under the EU-US Privacy Shield Frameworks, providing a guarantee of compliance with European data protection law.

<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>

Google uses this information on our behalf to evaluate your use of our website, to compile reports on website activity, and to provide us with other services relating to website activity and internet usage. The IP address transmitted by your browser as part of Google Analytics is not associated with other data available to Google.

We only use Google Analytics with IP anonymization enabled. This means that Google shortens the IP address of the user within member states of the European Union or in other states that are part of the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and then shortened there.

You can prevent the collection and transmission to Google of the data generated by the cookie and relating to your use of the website (including your IP address) and the processing of this data by Google by downloading and installing the browser plug-in available at the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>. An opt-out cookie will be set to prevent your data from being collected when you visit this website in the future. However, we would like to point out that in this case you may not be able to use all the functions of this website to their full extent. To prevent Universal Analytics from collecting data across multiple devices, you must opt out on all systems you use. For further information on Universal Analytics see:

https://support.google.com/analytics/answer/2838718?hl=de&ref_topic=6010376

For more information on terms of use and privacy, go to www.google.com/analytics/terms/de.html or www.google.de/intl/de/policies/. We would like to point out that on this website Google Analytics has been extended by the code "gat._anonymizelp();" in order to guarantee an anonymous recording of IP addresses (so-called IP masking).

12.0 Social networking plug-ins

Social plug-ins can only be integrated through links.

Our websites do not contain links to social plug-ins.

13.0 Your rights as data subject

With regard to your personal data, you in general have the rights to information, correction, deletion, restriction, data portability, objection, and revocation. If you believe that the processing of your data violates data protection law or that your data privacy rights have otherwise been violated in any way, you can contact the Swiss Federal Data Protection and Information Commissioner (FDPIC).

If you have any questions, suggestions, or requests, please contact privacy@vc999.eu.

14.0 Use of the website by minors

The websites are addressed to an adult audience. It is forbidden for minors, in particular children under the age of 16, to transmit personal data about themselves to us or to register for a service. If we discover that such data has been transmitted to us, it will be deleted from our database. The parent (or legal guardian) of the child may contact us and request deletion or unsubscription. We will need a copy of an official document that identifies you as the parent or guardian of the child.

15.0 Data security

We take technical and organizational security precautions to protect your personal data against manipulation, loss, destruction, or access by unauthorized persons and to safeguard your rights and ensure compliance with the applicable data protection regulations.

The measures taken are intended to guarantee the confidentiality and integrity of your data and to ensure the long-term availability and resilience of our systems and services when processing your data. They are also designed to ensure the rapid restoration of the availability of your data and access to it in the event of a physical or technical incident.

Our security measures also include encryption of your data. When your data is transferred to us, it is encrypted by Transport Layer Security (TLS) and Https encryption. All information that you enter online is transmitted via an encrypted transmission path. This means that this information cannot be accessed by unauthorized third parties at any time.

Our data processing and security measures are continuously improved in line with technological advances.

We also take our own internal data protection very seriously. Our employees and the service companies we hire are bound to confidentiality and to compliance with data protection regulations. Furthermore, they are granted access to personal data only to the extent necessary.

16.0 Changes to the Data Protection Policy

We reserve the right to undertake changes or modifications to this Data Protection Policy at any time. Any changes or additions are at the sole discretion of the company. Last updated May 22, 2018.