



1 Privacy Policy

The Controller in the sense of data protection law, in particular the EU General Data Protection Regulation (GDPR), is:

CCCBusiness Service AG
Felix Kuster
Bäulerwissenstrasse 3
8152 Glattbrugg

Tel.: 044 809 44 66
E-mail: felix.kuster@cccbs.ch
Website: <https://www.cccbs.ch/>

2 General

On the basis of Art. 13 Swiss Constitution and the data law provisions of the Confederation (Swiss Data Protection Act; Datenschutzgesetz), every person has the right to protection of their personal sphere, and protection against misuse of their personal data. The operator of this website takes the protection of your personal data very seriously. We process your personal data confidentially and according to the legal data protection regulations and this Privacy Policy.

In collaboration with our hosting provider, we take every effort to protect our databases as best as possible against third-party access, loss, misuse, or falsification.

Please note that the transmission of data via the internet (e.g. when communicating via e-mail) may be subject to gaps in security. Complete protection of data against access by third parties is not possible.

By using this website, you declare your consent to the collection, processing and use of data pursuant to the following description. In principle, this website can be visited without registering. When you visit this website, data such as pages accessed or the names of files accessed, as well as the date and time are saved on the server for statistical purposes without it being possible to trace such data directly back to your person. Personal data, in particular your name, address or e-mail address are collected on a voluntary basis as far as possible. Data are not forwarded to third parties without your consent.

3 Processing personal data

CCC Credit Card Center AG

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Personal data means all information which relates to a specific or definable person. A data subject is a person, concerning whom personal data are processed. Processing means any handling of personal data regardless of the tools and processes used, in particular the storage, disclosure, obtaining, erasure, saving, amendment, destruction and use of personal data.

We process personal data in accordance with Swiss data protection law. We furthermore process personal data – if and insofar as the GDPR is applicable – pursuant to the following legal basis with respect to Art. 6(1) GDPR):

- a) processing personal data with the consent of the data subject;
- b) processing personal data for performance of a contract with the data subject, and in order to take steps prior to entering into a contract;
- c) processing personal data to comply with a legal obligation which we are subject to pursuant to applicable EU law or pursuant to applicable law of another country where the GDPR is wholly or partially applicable;
- d) processing personal data in order to protect the vital interests of the data subject or another natural person;
- f) processing personal data for the purposes of the legitimate interests of us or third parties, unless overridden by the fundamental rights and freedoms or interests of the data subject. Legitimate interests are in particular our commercial interest in being able to make our website available, information security, enforcing our own legal claims, and complying with Swiss law.

We process personal data for as long as is required for the respective purpose or purposes. In the event of longer retention obligations on the grounds of legal or other obligations which we are subject to, we restrict this processing accordingly.

4 Privacy Policy for cookies

This website uses cookies. These are small text files which allow specific information related to the user to be stored on the end device of the user whilst he uses this website. Cookies allow us in particular to assess the frequency of use and number of users on the website, to analyse behaviour in website usage, and also to make our website more customer-friendly. Cookies are not erased after the end of a browser session and may be retrieved when you visit the website again. If you do not want this, you should change your browser settings to not accept cookies.

You can generally object to the use of cookies used for online marketing purposes using a number of services, especially in the case of tracking, via the USA-based website <http://www.aboutads.info/choices/> or the EU-based website <http://www.youronlinechoices.com/>. Cookies storage can also be reached by turning them off in your browser settings. Please note that in this case you may not be able to use all functions of our online presence.



5 Privacy Policy for SSL/TLS encryption

For reasons of security and in order to protect transfers of confidential content, such as enquiries which you send to us as the website operator, this website uses SSL/TLS encryption. You can recognise an encrypted connection in that the address bar in the browser changes from “http://” to “https://” and a padlock symbol is displayed in the browser bar.

If SSL or TLS encryption is activated, the data which you transmit to us cannot be read by third parties.

6 Privacy Policy for server log files

The provider of this website automatically collects and saves information in so-called server log files which your browser automatically sends to us. The information transmitted is:

- browser type and version;
- OS used;
- referrer URL;
- host name of accessing computer;
- time of server query.

These data cannot be assigned to specific persons. These data are not collated with other sources of data. We reserve the right to review these data retroactively if we identify concrete evidence of unlawful use.

7 Third-party services

This website uses Google Maps to embed maps, Google Invisible for reCAPTCHA to protect against spam and bots, and YouTube to embed videos.

These services, from the American company Google LLC, use amongst other things, cookies, meaning that data are transmitted to Google in the USA, whereby we assume that no personal tracking is performed in this regard if you use our website.

Google has undertaken to guarantee appropriate data protection pursuant EU standard contractual clauses. (The EU-US privacy shield and Swiss-US privacy shield have been ruled to be invalid by the respective authorities in 2020.)



More information can be found in [Google's Privacy Policy](#).

8 Privacy Policy for contact forms

If you submit enquiries to us through the contact form, we save the information you provide in this enquiry form, including the contact details you provide through such, for the purposes of processing your enquiry and in the case of questions relating to the enquiry. We do not forward these data without your consent.

9 Rights of data subjects

Right to confirmation

Every data subject has the right to demand confirmation from the operator of a website as to whether personal data relating to the data subject are being processed. If you would like to exercise this right to confirmation, you can contact the Data Protection Officer at any time.

Right to information

Every data subject affected by the processing of personal data has the right to receive information from the operator of this website at any time free of charge concerning what personal data concerning their person have been saved and to receive a copy of this information. Details can also be provided on the following information where applicable:

- the purpose of processing;
- the categories of personal data being processed;
- the recipients to whom personal data have been or will be disclosed;
- where possible, the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
- the existence of a right to rectification or erasure of personal data concerning your person, or to restriction of processing by the Controller, or to object to this processing;
- the existence of a right to complain to a supervisory authority;
- where the personal data have not been obtained from the data subject: all available information on the source of the data.

The data subject furthermore has a right to information concerning whether personal data have been transferred to a third country or international organisation. Where this is the



case, the data subject also has a right to receive information concerning the appropriate guarantees associated with the transfer.

If you would like to exercise this right to information, you can contact our Data Protection Officer at any time.

Right to rectification

Every data subject affected by the processing of personal data has the right to demand immediate rectification of incorrect personal data concerning them. The data subject furthermore has a right to demand that incomplete personal data be completed, including by means of a supplementary statement - taking into account the purposes of the processing.

If you would like to exercise this right to rectification, you can contact our Data Protection Officer at any time.

Right to erasure (right to be forgotten)

Every data subject affected by the processing of personal data has the right to demand from the Controller of this website that the personal data concerning them be erased insofar as one of the following grounds is applicable, and so long as the processing is not necessary:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- The data subject withdraws consent on which the processing is based, and where there is no other legal ground for the processing;
- The data subject objects to the processing for reasons arising from their particular situation, and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing in the case of direct marketing and the associated profiling;
- The personal data have been unlawfully processed;
- The personal data have to be erased for compliance with a legal obligation in Union or Member State law which the Controller is subject to;
- The personal data were collected with regards to services of the information society which were offered directly to a child.

Insofar as one of the aforementioned grounds is applicable and you would like to have personal data which has been saved by the operator of this website erased, you can contact our Data Protection Officer at any time. The Data Protection Officer for this website will arrange for your request for erasure to be executed immediately.



Right to restriction of processing

Every data subject affected by the processing of personal data has the right to demand restriction of processing from the Controller of this website provided one of the following prerequisites is met:

- The accuracy of the personal data is contested by the data subject, for a period enabling the Controller to verify the accuracy of the personal data;
- The processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- The Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- The data subject has objected to processing for reasons arising from their personal situation pending the verification of whether the legitimate grounds of the Controller override those of the data subject.

Insofar as one of the aforementioned prerequisites is met and you would like to have personal data which has been saved by the operator of this website restricted, you can contact our Data Protection Officer at any time. The Data Protection Officer for this website will arrange for restriction of processing.

Right to data portability

Every data subject affected by the processing of personal data has the right to receive the personal data concerning them in a structured, commonly used and machine-readable format. They also have the right to have these data transmitted to another controller provided the legal requirements are met.

The data subject furthermore has the right to have the personal data transmitted directly from one controller to another insofar as such is technically feasible, and provided the rights and freedoms of other persons are not adversely affected by such.

You can contact the Data Protection Officer appointed by the operator of this website at any time to enforce your right to data portability.

Right to object

Every data subject affected by the processing of personal data has the right to object to the processing of personal data concerning them for reasons which arise from their particular situation.



In the event of an objection, the operator of this website will no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or if processing serves the establishment, exercise or defence of legal claims.

You can contact the Data Protection Officer for this website at any time to exercise your right to object.

Right to withdraw consent given under data protection law

Every data subject affected by the processing of personal data has the right to withdraw consent given to process personal data at any time.

If you would like to enforce your right to withdraw consent, you can contact our Data Protection Officer at any time.

10 Privacy Policy for objecting to marketing e-mails

The use of the contact details published as part of the obligation to provide a legal notice for sending marketing and informational materials not explicitly requested is hereby rejected. The operator of this website explicitly reserves the right to take legal steps in the event of the unsolicited sending of marketing information, such as through spam e-mails.

11 Privacy Policy for Google Analytics

This website uses Google Analytics, a web analysis service from Google Ireland Limited. If the Controller responsible for processing data on this website resides outside of the European Economic Area or Switzerland, then Google Analytics data processing is performed by Google LLC. Google LLC and Google Ireland Limited are hereinafter referred to as “Google”.

We can use the statistics obtained to improve our service and make it more interesting for you as a user. This website also uses Google Analytics to perform a cross-device analysis of user streams which is conducted using a User ID. If you have a Google user account, you can deactivate this cross-device analysis of your usage by going into your settings and then to “My data”, “Personal data”.

The legal basis for the use of Google Analytics is Art. 6(1)(1) lit. f GDPR. The IP address transmitted by your browser as part of Google Analytics is not collated with other data from Google. Please note that Google Analytics has been expanded on this website to



include the code “_anonymizeIp();” in order to guarantee that IP addresses are captured anonymously. As a result, IP addresses are abbreviated before being processed, hence it can be excluded that such can be traced back to a person. Insofar as the data collected concerning you acquires a personal reference, this is immediately excluded and thus the personal data erased straight away.

The full IP address will only be transmitted to a Google server in the USA and abbreviated there in exceptional cases. Google will use this information on behalf of the operator of this website to evaluate your use of the website, to prepare reports on website activities, and to render other services for the website operator relating to website and internet usage. For those exceptional cases where personal data are transmitted to the USA, Google has undertaken to observe the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

Google Analytics uses cookies. The information generated by the cookie concerning your use of this website is generally transmitted to a Google server in the USA and saved there. You can prevent cookies being saved by making the corresponding changes in your browser settings; however, please note that in this case you may not be able to use all the functions of this website to the full extent. You can also prevent the data generated by the cookie concerning your use of the website (including your IP address) being sent to and processed by Google by downloading and installing the browser plug-in available at the following link: [deactivate Google Analytics](#).

You can also prevent the use of Google Analytics by clicking this link: [deactivate Google Analytics](#). This will save a so-called opt-out cookie on your computer which prevents Google Analytics from processing personal data. Please note that if you erase all cookies on your end device, these opt-out cookies will also be erased, i.e. you will have to apply these opt-out cookies again if you still wish to prevent this type of data collection. The opt-out cookies are placed per browser and computer/end device and must therefore be activated separately for each browser, computer or other end device.

12 Privacy Policy for the use of Google Web Fonts

This website uses so-called web fonts provided by Google to display fonts in a uniform manner. When you access a website, your browser loads the necessary web fonts in your browser cache in order to display texts and fonts correctly. If your browser does not support web fonts, a standard font from your computer will be used.

You can find more information on Google Web Fonts at <https://developers.google.com/fonts/faq> and in Google’s Privacy Policy: <https://www.google.com/policies/privacy/>



13 Use of Adobe Fonts

We use Adobe Fonts for the visual design of our website. Adobe Fonts is a service from Adobe Systems Incorporated, 345 Park Avenue, San Jose, CA 95110-2704, USA (Adobe) which grants us access to a library of fonts. In order to integrate the fonts we use, your browser must establish a connection with an Adobe server in the USA and download the font required for our website. As a result, Adobe is informed that our website was accessed from your IP address. You can find more information on Adobe Fonts in the Adobe Privacy Policy which you can access here: [Adobe Fonts](#)

14 Information on transmissions of data to the USA (United States of America)

For reasons of completeness, please note that the US authorities conduct supervisory measures for users residing in Switzerland which generally allows all personal data from Switzerland - which has been transmitted to the USA - to be saved.

This is performed without differentiation, restriction or exception based on the aims being pursued and without any objective criterion which facilitates a restriction of the US authorities' access and subsequent usage of data for quite specific, strictly limited purposes which might justify interventions associated with access to these data and with the non-usage of such. Please also note that data subjects from Switzerland have no legal remedies in the USA which would allow them to gain access to the data concerning them and to rectify or erase such, nor do they have any legal protection against general rights of access of the US authorities. We refer the data subject explicitly to this legal situation in order that they may make an appropriately informed decision to consent to the use of their data.

Users residing in a member state of the EU should note that in the opinion of the European Union, the USA does not have a sufficient level of data protection.

15 General disclaimer

All information on our online presence has been carefully checked. We make every effort to provide information that is up-to-date, factually correct and complete. Nevertheless, the occurrence of errors cannot be fully excluded, hence we cannot assume any guarantee for the completeness, correctness and up-to-dateness of information, including journalistic/editorial information. Liability claims due to tangible or intangible damages which are caused by using the information provided are excluded unless it can be demonstrated that wilful intent or gross negligence has been committed.



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The author furthermore assumes no responsibility or liability for the content and availability of third-party websites which can be accessed through external links on this website. The operators of these linked pages alone are responsible for the content thereof. The author hereby explicitly distances himself from all third-party content which may be subject to criminal or liability law or offend good moral.

16 Amendments

We can adapt this Privacy Policy at any time without prior notice. The most recent version published on our website is applicable. Insofar as the Privacy Policy constitutes part of an agreement with you, we shall inform you of the amendment, in the case of an update, via e-mail or another suitable manner.

17 Questions for the Data Protection Officer

If you have questions for the Data Protection Officer, please send us an e-mail or contact the person within our organisation stated at the top of this Privacy Policy as being responsible for data protection directly.

Glattbrugg, 13/01/2021

Source: [SwissAnwalt](#)