



## Privacy Policy

Version 19.12.2023

CCCBusiness Service AG undertakes to process all personal data collected via the website <https://www.cccbbs.ch/> in accordance with Swiss data protection law and to implement appropriate security measures to protect such data from unauthorized access. In this data protection declaration, we inform you in particular about what personal data is collected and processed in connection with the use of the website, for what purposes it is used, to whom it may be disclosed and what your rights are in connection with the use of your personal data by CCCBusiness Service AG. Personal data is any information relating to an identified or identifiable natural or legal person, e.g. surname, first name, address, e-mail, date of birth or telephone number.

### 1 Responsible parties and contact persons

CCC Business Service AG  
Data Protection Officer  
Bäulerwissenstrasse 3  
8152 Glattbrugg

E-mail: [datenschutz@ccbbs.ch](mailto:datenschutz@ccbbs.ch)

For all questions regarding data protection in connection with our products/services or the use of our website, you can also contact our data protection officer at any time. He or she can be reached at the above postal address and at the e-mail address given above (keyword: "attn. data protection officer").

### 2 General notice

Based on Article 13 of the Swiss Federal Constitution and the data protection regulations of the Swiss Confederation (Data Protection Act, DSG), every person has the right to protection of their privacy as well as protection against misuse of their personal data. The operators of these pages take the protection of your personal data very seriously. We treat your personal data confidentially and in accordance with the legal data protection regulations and this privacy policy.

In cooperation with our hosting providers, we make every effort to protect the databases as well as possible from unauthorized access, loss, misuse or forgery.

We would like to point out that data transmission on the Internet (e.g. communication by e-mail) can have security gaps. A complete protection of data against access by third parties is not possible.

By using this website, you consent to the collection, processing and use of data in accordance with the following description. This website can generally be visited without registration. Data such as pages accessed or names of files accessed, date and time are stored on the server for statistical purposes without this data being directly related to your person. Personal data, in particular name, address or e-mail address are collected as far as possible on a voluntary basis. Without your consent, the data will not be passed on to third parties.



### **3 Processing of personal data**

Personal data is any information relating to an identified or identifiable person. A data subject is a person about whom personal data is processed. Processing includes any handling of personal data, regardless of the means and procedures used, in particular the storage, disclosure, acquisition, deletion, storage, modification, destruction and use of personal data.

We process personal data in accordance with Swiss data protection law. Furthermore, we process personal data - to the extent and insofar as the EU GDPR is applicable - in accordance with the following legal bases in connection with Art. 6 (1) GDPR:

- lit. a) Processing of personal data with the consent of the data subject.
- lit. b) Processing of personal data for the fulfillment of a contract with the data subject as well as for the implementation of corresponding pre-contractual measures.
- lit. c) Processing of personal data for the fulfillment of a legal obligation to which we are subject under any applicable law of the EU or under any applicable law of a country in which the GDPR is applicable in whole or in part.
- lit. d) Processing of personal data in order to protect the vital interests of the data subject or another natural person.
- lit. f) Processing of personal data to protect the legitimate interests of us or of third parties, unless the fundamental freedoms and rights and interests of the data subject are overridden. Legitimate interests include, in particular, our business interest in being able to provide our website, information security, the enforcement of our own legal claims and compliance with Swiss law.

We process personal data for the duration required for the respective purpose or purposes. In the case of longer-term retention obligations due to legal and other obligations to which we are subject, we restrict processing accordingly.

### **4 Privacy policy for cookies**

This website uses cookies. These are small text files that make it possible to store specific information related to the user on the user's terminal device while the user is using the website. Cookies make it possible, in particular, to determine the frequency of use and number of users of the pages, to analyze behavior patterns of page use, but also to make our offer more customer-friendly. Cookies remain stored beyond the end of a browser session and can be retrieved when you visit the site again. If you do not wish this, you should set your Internet browser to refuse the acceptance of cookies.

A general objection to the use of cookies used for online marketing purposes can be declared for a large number of the services, especially in the case of tracking, via the U.S. site <http://www.aboutads.info/choices/> or the EU site <http://www.youronlinechoices.com/>. Furthermore, the storage of cookies can be achieved by disabling them in the browser settings. Please note that in this case not all functions of this online offer can be used.

### **5 Privacy Policy for SSL/TLS Encryption**

This website uses SSL/TLS encryption for security reasons and to protect the transmission of confidential content, such as requests that you send to us as the site operator. You can recognize an encrypted connection by the fact that the address line of the browser changes from "http://" to "https://" and by the lock symbol in your browser line.



If SSL or TLS encryption is activated, the data 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 stores information in so-called server log files, which your browser automatically transmits to us. These are:

- browser type and browser version
- Operating system used
- referrer URL
- Host name of the accessing computer
- Time of the server request

This data cannot be assigned to specific persons. This data is not merged with other data sources. We reserve the right to check this data retrospectively if we become aware of specific indications of illegal use.

## **7 Third party services**

This website may use Google Maps for embedding maps, Google Invisible reCAPTCHA for protection against bots and spam, and YouTube for embedding videos.

These services of the American Google LLC use cookies, among other things, and as a result, data is transferred to Google in the USA, although we assume that no personal tracking takes place in this context solely through the use of our website.

Google has undertaken to ensure adequate data protection in accordance with the EU standard contractual clauses. (The EU-US Privacy Shield and the Switzerland-US Privacy Shield have been invalidated by the competent authorities in 2020).

Further information can be found in [Google's privacy policy](#).

## **8 Privacy policy for contact form**

If you send us inquiries via contact form, your data from the inquiry form, including the contact data you provided there, will be stored by us for the purpose of processing the inquiry and in case of follow-up questions. We do not pass on this data without your consent.

## **9 Rights of data subjects**

### **Right to confirmation**

Every data subject has the right to request confirmation from the website operator as to whether personal data concerning him or her are being processed. If you wish to exercise this right of confirmation, you may contact the data protection officer at any time.



## **Right to information**

Every person affected by the processing with personal data has the right to receive information free of charge from the operator of this website about the personal data stored about him or her and a copy of this information at any time. Furthermore, information may be provided about the following, if applicable:

- the purposes of processing
- the categories of personal data processed
- the recipients to whom the personal data have been or will be disclosed
- if possible, the planned duration for which the personal data will be stored or, if this is not possible, the criteria for determining this duration
- the existence of a right to obtain the rectification or erasure of personal data concerning him or her, or the restriction of processing by the controller, or a right to object to such processing
- the existence of a right of appeal to a supervisory authority
- if the personal data are not collected from the data subject: Any available information about the origin of the data.

Furthermore, the data subject shall have the right to be informed whether personal data have been transferred to a third country or to an international organization. If this is the case, the data subject also has the right to obtain information about the appropriate safeguards in connection 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 person affected by the processing of personal data has the right to demand that inaccurate personal data concerning him or her be corrected without delay. Furthermore, the data subject has the right, taking into account the purposes of the processing, to request that incomplete personal data be completed, including by means of a supplementary declaration.

If you wish to exercise this right of rectification, you may contact our data protection officer at any time.

## **Right to erasure (right to be forgotten)**

Any person concerned by the processing of personal data has the right to obtain from the controller of this website the erasure without delay of personal data concerning him or her, where one of the following grounds applies and insofar as the processing is no longer necessary:

- The personal data have been collected or otherwise processed for such purposes for which they are no longer necessary.
- The data subject revokes the consent on which the processing was based and there is no other legal basis for the processing
- The data subject objects to the processing on grounds relating to his or her 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 related profiling
- The personal data have been processed unlawfully



- The erasure of the personal data is necessary for compliance with a legal obligation under Union or Member State law to which the controller is subject
- The personal data has been collected in relation to information society services provided directly to a child

If one of the above reasons applies and you wish to arrange for the deletion of personal data stored by the operator of this website, you can contact our data protection officer at any time. The data protection officer of this website will arrange for the deletion request to be complied with immediately.

### **Right to restriction of processing**

Any person concerned by the processing of personal data has the right to obtain from the controller of this website the restriction of processing if one of the following conditions 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, the data subject objects to the erasure of the personal data and requests instead the restriction of the use of the personal data
- The controller no longer needs the personal data for the purposes of the processing, but the data subject needs it for the assertion, exercise or defense of legal claims
- The data subject has objected to the processing on grounds relating to his or her particular situation, and it is not yet clear whether the legitimate interests of the controller override those of the data subject

If one of the above conditions is met, you can request the restriction of personal data stored by the operator of this website at any time by contacting our data protection officer. The data protection officer of this website will arrange the restriction of the processing.

### **Right to data portability**

Every person affected by the processing of personal data has the right to receive the personal data concerning him or her in a structured, common and machine-readable format. He or she also has the right to have this data transferred to another controller if the legal requirements are met.

Furthermore, the data subject has the right to obtain that the personal data be transferred directly from one controller to another controller, insofar as this is technically feasible and insofar as this does not adversely affect the rights and freedoms of other persons.

In order to assert the right to data portability, you may at any time contact the data protection officer appointed by the operator of this website.

### **Right to object**

Any person affected by the processing of personal data has the right to object at any time, on grounds relating to his or her particular situation, to the processing of personal data concerning him or her.

The operator of this website shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or if the processing serves the purpose of asserting, exercising or defending legal claims.



To exercise the right to object, you may directly contact the Data Protection Officer of this website.

### **Right to revoke consent granted under data protection law**

Every person affected by the processing of personal data has the right to revoke a given consent to the processing of personal data at any time.

If you would like to exercise your right to revoke consent, you can contact our data protection officer at any time.

### **10 Privacy policy for contradiction advertising mails**

The use of contact data published within the framework of the imprint obligation for the purpose of sending unsolicited advertising and information material is hereby prohibited. The operators of the pages expressly reserve the right to take legal action in the event of the unsolicited sending of advertising information, such as spam e-mails.

### **11 Privacy policy for Google Analytics**

This website uses Google Analytics, a web analytics service provided by Google Ireland Limited. If the data controller on this website is located outside the European Economic Area or Switzerland, then Google Analytics data processing is carried out by Google LLC. Google LLC and Google Ireland Limited are hereinafter referred to as "Google".

The statistics obtained enable us to improve our offer and make it more interesting for you as a user. This website also uses Google Analytics for a cross-device analysis of visitor flows, which is carried out via a user ID. If you have a Google user account, you can deactivate the cross-device analysis of your usage in the settings there under "My data", "Personal data".

The legal basis for the use of Google Analytics is Art. 6 para. 1 p. 1 lit. f DS-GVO. The IP address transmitted by your browser as part of Google Analytics will not be merged with other data from Google. We would like to point out that on this website Google Analytics has been extended by the code "`_anonymizeIp();`" to ensure anonymized collection of IP addresses. This means that IP addresses are processed in abbreviated form, thus excluding the possibility of personal references. If the data collected about you is personally identifiable, this is immediately excluded and the personal data is deleted immediately.

Only in exceptional cases will the full IP address be transferred to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity and providing other services relating to website activity and internet usage to the website operator. For the exceptional cases in which personal data is transferred to the USA, Google has submitted to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

Google Analytics uses cookies. The information generated by the cookie about your use of this website is usually transmitted to a Google server in the USA and stored there. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) to Google and the processing of this data by



Google by downloading and installing the browser plugin available at the following link: [Disable Google Analytics](#).

In addition, you can also prevent the use of Google Analytics by clicking on this link: [Disable Google Analytics](#). This will save a so-called opt-out cookie on your data carrier, which prevents the processing of personal data by Google Analytics. Please note that if you delete all cookies on your terminal device, these opt-out cookies will also be deleted, i.e. you will have to set the opt-out cookies again if you wish to continue to prevent this form of data collection. The opt-out cookies are set 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 for the uniform display of fonts. When you call up a page, your browser loads the required web fonts into its browser cache in order to display texts and fonts correctly. If your browser does not support web fonts, a standard font is used by your computer.

You can find more information about 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 provided by Adobe Systems Incorporated, 345 Park Avenue, San Jose, CA 95110-2704, USA (Adobe), which gives us access to a font library. In order to integrate the fonts we use, your browser must establish a connection to an Adobe server in the USA and download the font required for our website. Adobe thereby receives the information that our website was accessed from your IP address. For more information on Adobe Fonts, please see Adobe's privacy policy, which you can access here: [Adobe Fonts](#)

## **14 Notice regarding data transfers to the USA (United States of America)**

For the sake of completeness, we would like to point out that for users domiciled in Switzerland, there are monitoring measures by US authorities which generally allow the storage of all personal data from Switzerland - which has been transferred to the USA.

This is done without any differentiation, limitation or exception based on the purposes pursued and without any objective criterion that would make it possible to limit the access of the US authorities to the data and their subsequent use to very specific, strictly limited purposes that could justify the interference associated with the access to this data as well as with its use. In addition, we would like to point out that in the USA there are no legal remedies available to data subjects from Switzerland that would allow them to gain access to the data concerning them and to obtain its correction or deletion, or that there is no effective judicial legal protection against general access rights of US authorities. We explicitly draw the attention of the data subject to this legal and factual situation so that he or she can make an appropriately informed decision to consent to the use of his or her data.

We would like to point out to users residing in a member state of the EU that the USA does not have a sufficient level of data protection from the perspective of the European Union.



## **15 General disclaimer**

All information on our website has been carefully checked. We make every effort to ensure that the information we provide is up-to-date, correct and complete. Nevertheless, the occurrence of errors cannot be completely ruled out, which means that we cannot guarantee the completeness, correctness and up-to-dateness of information, including journalistic and editorial information. Liability claims regarding damage caused by the use of any information provided, including any kind of information which is incomplete or incorrect, will therefore be rejected.

The publisher may change or delete texts at his own discretion and without notice and is not obliged to update the contents of this website. The use of or access to this website is at the sole risk of the visitor. The publisher, its principals or partners are not responsible for any damages, such as direct, indirect, incidental, consequential or special damages, alleged to have been caused by the visit of this website and consequently assume no liability for such damages.

The publisher also accepts no responsibility or liability for the content and availability of third-party websites that can be accessed via external links on this website. The operators of the linked sites are solely responsible for their content. The publisher thus expressly distances itself from all third-party content that may be relevant under criminal or liability law or that may offend common decency.

## **16 Changes**

We may amend this privacy policy at any time without prior notice. The current version published on our website shall apply. Insofar as the data protection declaration is part of an agreement with you, we will inform you of the change by e-mail or other suitable means in the event of an update.

## **17 Questions to the data protection officer**

If you have any questions about data protection, please write to us by e-mail or contact directly the responsible person in our organization listed for data protection at the beginning of the Privacy Policy.

Glattbrugg, 19.12.2023

Source: [SwissAnwalt](#) and CCCBS AG