



Privacy Policy

Eugster / Frismag AG

*Juni 2018, Swiss Infosec AG, MIB/EUR
Rev: Léonard Lipp, 28.11.2018, Amriswil
Version 1, Eugster Frismag AG - Privacy Policy.docx*

Table of contents

1	Privacy Policy	3
2	Contacts	3
2.1	Name and Address of the Controller	3
2.2	Name and Address of the EU-Representative	3
3	Scope and Purpose of the Processing of Personal Data	3
3.1	Visiting the Website	3
3.2	Enquiries and Contact Form	4
4	Web Shop (Partner Area)	5
4.1	In General	5
4.2	Customer Account	5
4.3	Ordering	6
5	Job Applications by Email	6
6	Erasure	6
7	Disclosure to Third Parties	7
8	Cookies.....	7
9	Analysis Tools	8
	Google Analytics	8
10	Social Plugins	8
11	Social Media Presence	9
12	Your Rights	9
13	Data Protection Coordinator	10
14	Use of the Website by Minors	10
15	Data Security.....	10
16	Links to Websites of other Providers.....	11
17	Changes of the Privacy Policy.....	11

1 Privacy Policy

The protection of your personal data and your privacy are important to us. You can therefore expect from us a sensitive and careful handling of your data and high data security standards.

In this Privacy Policy, we inform you about your rights and the most important aspects of data processing within the framework of our website, our web shop and in connection with job applications.

2 Contacts

2.1 Name and Address of the Controller

The controller in respect of data protection matters is:

Eugster / Frismag AG
Fehlweisstrasse 14
8580 Amriswil
Switzerland
Telephone: 0041 71 466 2211
Email: it-support@eugster.ch
Website: www.eugster.ch

2.2 Name and Address of the EU-Representative

The controller in respect of data protection matters is:

EUGSTER / FRISMAG AG
Electrodomesticos, Lda.
Add note: "Data Protection Switzerland"
Rua Francisco Pombo Sobrinho
2560-112 - Ponte do Rol
Portugal
Telephone: 00351 261 310781
Email: it-support@eugster.pt
Website: www.eugster.ch

3 Scope and Purpose of the Processing of Personal Data

We collect, process and use your personal data for the following purposes:

- Display and optimization of our website
- Answering to your enquiries via the contact form
- Communication of our contact data
- Processing orders of the web shop (Partner Area)
- Handling of job applications
- Social media presence
- Defence and recording of hacker attacks
- Preparation of usage statistics

3.1 Visiting the Website

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

- IP address of the enquiring computer
- Date and time of the access/retrieval
- Name and URL of the retrieved data
- Operating system of your computer and the browser you use
- Country from which the access to our website takes place
- Name of your Internet access provider
- Time zone difference to Greenwich Mean Time (GMT)
- Contents of the request (concrete site)

- Access status/HTTP status code
- Volume of data transmitted respectively
- Last visited website
- Browser settings
- Language and version of the browser software
- Activated browser plugins

The legal basis for the temporary storage of personal data and the logfiles is the legitimate interest. Legitimate interest exists, to

- deliver the contents of our website correctly
- optimise our services and the contents of our website
- collect statistical data
- processing your orders in our web shop
- protection against misuse and other unauthorized use

This personal data is not stored together with other personal data. The personal data is being deleted as soon as it is no longer serving the purpose it was collected for. In case of collecting your personal through the website this occurs when the respective sessions ends.

3.2 Enquiries and Contact Form

On our website, you have the opportunity to contact us via a contact form. In this case, the information you provide will be processed for the purpose of processing your request and handling it.

If you wish to contact us, the following information (* mandatory) is required. The other information is voluntary:

- Title
- First name*
- Surname*
- Company
- Street/Nr.
- Postcode/Location
- Telephone
- Fax
- Email address*
- Webage
- Text of your enquiry*

The communication of data in fields marked as mandatory serves to process your inquiry. The voluntary provision of further data makes it easier for us to process your inquiry and enables us to provide you with more detailed information through your preferred channel.

The legal basis for processing your personal data is our common legitimate interest in processing your request. If the contacting serves the performance of a contract to which you are a contractual party, or in order to take steps prior to entering into a contract, this is an additional legal basis for processing the data.

Your personal data is being deleted as soon as it is no longer required for serving the purpose of its collection. This is the case for personal data received through the contact form when the communication with you ends. The communication is deemed to be ended if the specific circumstances indicate that all facts are at hand or you oppose to continuing the communication.

4 Web Shop (Partner Area)

4.1 In General

The legal basis for processing your personal data through our web shop is our common legitimate interest to processing your order. If the order serves the performance of a contract to which you are a contractual party, or in order to take steps prior to entering into a contract, this is an additional legal basis for processing the personal data.

The purpose of processing your personal data in the online shop is to provide you with the requested goods and services and to handle the respective payment.

In order to avoid unauthorized access of your personal data, data transfer is encrypted through TLS/HTTPS.

4.2 Customer Account

With the setting up of a customer account you receive a password-protected direct access to your data stored with us. The customer account serves you to login to our webshop (Partner Area) which requires the entry of your email address and your password. You can view your completed, open and recently shipped order in the customer account (Save/load shopping carts), upload shopping carts through file or manage your personal data.

To set up a customer account, you must provide the following information mandatorily:

- Email address*
- Password*
- First name*
- Surname*

The customer accounts are not public and cannot be indexed by the search engines. When users have cancelled their customer account, the data regarding the customer account is deleted, subject to legal retention requirements. Its storage is necessary for commercial or tax laws. In the case of cancellation, it is your responsibility to secure your personal data before the end of the contract. We are entitled to irretrievably delete all data stored during the contractual period.

As long as you do not log out from your customer account, you remain logged in. This aspect allows you to use certain features of our services (e.g. wish list) without logging in again. For security reasons you will be requested to enter again your password if for example personal data is being changed or you submit an order.

4.3 Ordering

For the processing of your order we require additional information, and specifically your correct name, address and payment data. We require your e-mail address so that we can confirm receipt of your order and its dispatch, as well as generally so that we can communicate with you.

Within the scope of order processing, the service providers engaged by us (carriers, logistics providers, as well as payment service providers) receive the necessary data for order taking and processing. This data also comprises, among others, your e-mail address and telephone number, to be able to, e.g. agree an individual delivery date with you. The responsibility for your payment data is in the hands of the payment service provider you have selected respectively. You can find more information about the data protection from these providers on their websites.

5 Job Applications by Email

When you apply for a job with us, we process your personal data to evaluate your application. During the application process, in addition to your personal details, education, work experience and skills, postal and contact addresses as well as the documents belonging to the application, such as letter of motivation, CV and certificates, will be processed. This data is stored, evaluated, processed or forwarded internally exclusively within the scope of your application. They may also be edited for statistical purposes (e.g. reporting). In this case, it is not possible to draw any conclusions about individual persons.

The legal basis for processing your personal data is our common legitimate interest in processing your application. If your application serves the performance of a contract to which you are a contractual party, or in order to take steps prior to entering into a contract, this is an additional legal basis for processing the personal data.

If we conclude an employment contract with you, the transmitted data will be stored for the purpose of processing the employment relationship in compliance with the legal regulations. If the application procedure ends without employment, your application data will be stored for six months for documentation purposes and then deleted, unless you have given us your consent to use your data for further application procedures with us and to contact you again in connection therewith.

Notwithstanding the foregoing, you have the option of having your electronic data erased at any time. You can send your request for erasure to the contact person on the job advertisement or to the following e-mail address:
it-support@eugster.ch.

6 Erasure

We process and store your personal data only for the period which is required to achieve the storage purpose or the laws or provisions which we are subject to, provide for. If the storage purpose lapses or if a prescribed storage period expires, the personal data are erased routinely and corresponding to the legal provisions. As long as your personal is not being erased, as it may be used for permissible purposes, processing will be restricted as far as possible.

In addition, we erase your data when you request us to do so via it-support@eugster.ch insofar as we do not have any statutory or other retention or security obligations or rights for this data.

7 Disclosure to Third Parties

We treat your personal data confidentially and only pass them on if you have expressly consented to this, if we are legally obliged to do so or if this is necessary for the enforcement of our rights, in particular for the enforcement of claims arising from the contractual relationship. Furthermore, we pass your personal data on to third parties as far as this is necessary in the context of the use of the website or for the possible provision of services requested by you or in the context of data processing in the sense of Article 28 GDPR. The use of the data forwarded for this purpose by third parties is strictly limited to the aforementioned purposes.

We disclose your personal data to the following category of recipients:

- IT service providers
- Transport and logistic partners
- Provider of online payment services
- Governmental authorities

Furthermore, they are obligated to process your personal data corresponding to our instructions and to comply with the required level of data protection. If the level of data protection in a country is regarded as not equal to Swiss or EU standards, we ensure, with the help of a contract or other suitable means, that your personal data is protected at any time in accordance with Swiss standards, resp. (if applicable) the GDPR.

If we engage processors that help us provide our services, we will ensure through suitable technical and organization means that your personal data remains protected.

8 Cookies

Our website uses so called cookies on the basis of our legitimate interest. Cookies are information, which transfer from our webserver to the web browser of the user - yours - and are stored there for later retrieval. Cookies can be small files or other types of information storage.

With the help of a cookie, information and offers on our website can be optimised to your needs. Cookies allow us to recognize the visitors. The purpose of this recognition is to simplify the use of our website for you.

We use temporary cookies. These are deleted automatically when you log out or close the browser. These include, in particular, the session cookies. They store a so-called session ID, with which various enquiries of your browser can be assigned to the joint sessions. Thus, your computer can be recognized when you return to the website. By means of such a cookie, the contents of a shopping cart in the online shop or a login status is saved. We use this type of cookies to ensure the operation and functionality of our website.

If other cookies (such as cookies for analyzing your surfing behavior) are stored, they will be treated separately in this Privacy Policy.

Most internet browsers accept cookies automatically. If you do not want this, you can set up your browser so that it informs you about the setting of cookies and you allow such only in individual cases and exclude cookies in certain cases or in general. Furthermore, already set cookies can be deleted at any time via an internet browser or other software.

The procedure for controlling and deleting cookies depends on the browser you are using. Information can be found in the Help menu of your browser.

9 Analysis Tools

Google Analytics

On the basis of our legitimate interests we use Google Analytics, a web analysis service of Google Inc. (1600 Amphitheatre Parkway Mountain View, CA 94043, USA; "Google"). Google uses cookies.

The information about your use of this website (including your IP address) generated by the cookie is transmitted to a Google server in the USA and stored there. Google is certified under the Privacy Shield Agreement and because of this, provides a guarantee of complying with the European data protection law.

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

For Google users in the European Economic Area (EEA) and in Switzerland, the controller is Google Limited Ireland (Gordon House, Barrow Street, Dublin 4, Ireland)

Google uses this information for our order to evaluate your use of our website, to compile reports about the website activities and to provide further services for us linked with the website use and Internet use. The IP address transmitted from your browser within the scope of Google Analytics, is not combined with further data from Google.

We use Google Analytics only with activated IP anonymization. This means that the IP address of the users is abbreviated by Google within the member states of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in cases of exception will the full IP address be transmitted to a Google server in the USA and then abbreviated there.

You can prevent the acquisition and transmission of the data created by the cookie and related to your use of the website (incl. your IP address) to Google as well as the processing of this data by Google, by downloading and installing the browser plugin available at the following link (<http://tools.google.com/dlpage/gaoptout?hl=en>). An Opt-Out cookie is set, which prevents the future acquisition of your data when visiting this website. However, we would like to point out to you, that you may not be able to use all functions of this website in full in this case.

You can find more information about the terms of use and data protection at www.google.com/analytics/terms/us.html, resp. at <https://policies.google.com/?hl=en&gl=de>.

10 Social Plugins

We use social plugins on our website. These are little programs or program packages with which software can be adapted and expanded according to own requirements. Many programs, such as graphic programs, media players or Internet browsers support the functions which the normal user requires in their basic version.

On our website we have links installed to our social media profiles with the following social networks:

- LinkedIn Inc., 2029 Stierlin Ct, Mountain View, CA 94043, USA
- Xing SE, Dammtorstrasse 30, 20354 Hamburg, Germany

When you visit our website and use one of the Social Plugins listed on the website, a direct connection will be established between your browser and the server of the social network concerned. Through this, the network receives the information, that you visited our website with your IP address and called up the link. When you call up a link to a network while you are logged in to your account with the concerned network, the contents of our page can be linked with your profile in the network, which means that the network can assign your visit to our website directly to your user account and we receive data such as name, e-mail, place, list of friends and profile image. Through this data we can offer certain functions on the pages. If you wish to prevent this, you should log out before confirming corresponding links. An assignment takes place in any case when you log in to the corresponding network after operating the link.

If you are logged in to a user account while you visit our website, the respective provider can also assign the visit to the page to your user account. If you interact with a plug-in, the corresponding information is also transmitted directly to a server of the respective provider in the USA and is stored there. The information is also published in the respective social network via your user account and is shown to your contacts there.

Even if you are not logged in with the providers of the plug-ins while visiting our website, the data collected by the plug-ins can possibly be assigned to your respective user account. Through a plug-in, a cookie is set with an identifier every time

the website is called up. As your browser sends this cookie unmasked during every connection with a server of the respective provider, he could, in principle, prepare a profile of which website the user belonging to the identifier, visits.

If necessary, it would then be possible to again assign this identifier to a person at a later point of time - for example when logging in with the provider.

In addition, you can select the function «Block cookies from third-party providers» in your browser settings, then your browser does not send cookies to the respective service of the social network. With this setting it is possible that, apart from the plug-ins, other cross-page functions of other providers do not function any longer.

Please see the data protection notice of the respective provider for further information about the purpose and scope of data collection, as well as the further processing and use of the data: there you can also find further information about your corresponding rights and setting options to protect your private sphere as well as your right to object to the establishment of user profiles.

11 Social Media Presence

The data entered by you on our social media profiles are published by the social media platform and are never used or processed by us for any other purpose. However, we reserve the right to delete content if necessary. If necessary, we communicate with you via the social media platform. The legal basis for processing is our common legitimate interest in communicating with each other in this way.

Be aware that the operator of the social media platform may use web tracking methods. The web tracking, on which we have no influence, can also take place regardless of whether you are logged in or registered with the social media platform.

More details about the data processing by the provider of the social media platform can be found in the privacy policies of the respective providers:

Linkedin: <https://www.linkedin.com/legal/privacy-policy>

Xing: <https://privacy.xing.com/en/privacy-policy>

12 Your Rights

Please contact us via the following email address if you have concerns regarding the rights below: it-support@eugster.ch.

12.1 Right to access

You have the right to request information from us as to whether and which of your personal data we process.

12.2 Right to rectification

You have the right to request the rectification of your inaccurate personal data and, if necessary, the completion of incomplete personal data in our systems.

12.3 Right to erasure

You have the right to request that your personal data be erased, e.g. if the data is no longer needed for the purposes pursued. However, we may be obliged or may have the right to retain your data due to a suitable legal or contractual basis.

12.4 Right to restriction of processing

You have the right to ask us to restrict the processing of your personal data.

12.5 Right to data portability

If applicable, you have the right to receive your personal data in a structured, common and machine-readable format or to request the transmission of this data to a third party.

12.6 Right to object

You have the right to **object** to the processing of your personal data based on a **legitimate interest** at any time in accordance with the statutory provisions. In such a case, the conversation with contact enquiries, or orders with the web shop or job applications can not be continued.

12.7 Withdrawal of consent

You have the right to withdraw your consent to the processing of your personal data at any time, in principle with effect for the future.

12.8 Right to complaint

If applicable, you have the right of appeal to a competent supervisory authority if you believe that the processing of your personal data violates data protection regulations.

For questions regarding our privacy policy and for information regarding your rights under sections 12.1 - 12.8 and for assertion of these rights, please contact us or our Data Protection Coordinator at the contact details given in section 13 of this Privacy Policy or send us an email to it-support@eugster.ch.

13 Data Protection Coordinator

You reach us as follows:

Eugster / Frismag AG
IT-Department
Fehlweisstrasse 14
8580 Amriswil
Switzerland
Telephone: 0041 71 466 2211
Email: it-support@eugster.ch

If necessary, we reserve the right to ask for your identification in a suitable manner for the processing of inquiries.

14 Use of the Website by Minors

The website is directed at an adult audience. Minors, in particular children below the age of 16 years without the consent of their parents or legal guardians, are prohibited from transmitting their data to us, or to register for a service. If we discover that such data has been transmitted to us, this data will be deleted from our database. The parents (or legal representative) of the child can contact us and apply for the deletion or cancellation/deregistration.

15 Data Security

We undertake technical and organizational safety precautions to protect your personal data against manipulation, losses, destruction or against the access of unauthorized persons and to guarantee the protection of their rights and the compliance with the applicable data protection provisions.

The undertaken measures shall guarantee the confidentiality and integrity of your data as well as the availability and capacity of our systems and services when processing your data permanently. They should also reinstate rapid restoration of the availability of data and the access to them in the case of a physical or technical incident.

Our security measures also include the encryption of your data in the framework of this website. The data traffic takes place encrypted via HTTPS. That means that all information that you enter online, are transmitted via an encrypted transmission route. As a result, this information cannot be accessed by unauthorized third parties at any time.

Our data processing and our security measures are continuously improved according to the technological development.

We also take our own, in-house data protection very seriously. Our employees and the service providers ordered by us are obligated to secrecy and compliance with the data protection provisions. Moreover, access to the data is granted them only as far as it is necessary.

16 Links to Websites of other Providers

Our website also contains links to the websites of third parties not covered by this Privacy Policy. As a result, this information cannot be viewed by unauthorized third parties at any time. After clicking on the link, we no longer have any influence on the processing of any data transmitted to third parties by clicking on the link (such as the IP address or the URL on which the link is located), as the conduct of third parties is naturally beyond our control. We cannot therefore accept any responsibility for the processing of your personal data by third parties. If the use of other providers' websites involves the collection, processing or use of your personal data, please observe the data protection information of the respective providers.

17 Changes of the Privacy Policy

We reserve the right to change this Privacy Policy at any time with consideration of the applicable data protection provisions. The current status is 23 November 2018.

Date: 28.11.2018



Name: Léonard Lipp
Funktion: Security Officer



Name: Hans Peter Gfeller
Funktion: CFO



Name: Jörg Christian Merten
Funktion: CIO
Datum: 28.11.2018