

Privacy Policy

This **privacy statement** informs you which personal data we process in connection with our activities and operations, including our **zanuco-treuhand.ch** website. In particular, we provide information on **what personal data** we process, for **what purpose**, how and where. We also inform you about the rights of persons whose data we process.

Further data protection statements and other legal documents such as general terms and conditions (GTC), terms of use or conditions of participation may apply to individual or additional activities and operations.

1. contact addresses

Responsibility for the processing of personal data:

Zanuco Treuhand AG
Neuhofstrasse 14
8834 Schindellegi Switzerland

info@zanuco-treuhand.ch

We point out if there are other persons responsible for the processing of personal data in individual cases.

2 Terms and legal basis

2.1 Terms

Personal data is any information relating to an identified or identifiable natural person. A data subject **is a person** about whom we process personal data.

Processing includes any handling of personal data, regardless of the means and procedures used, for example querying, comparing, adapting, archiving, storing, reading out, disclosing, procuring, recording, collecting, deleting, disclosing, arranging,

2.2 Legal basis

We process personal data in accordance with [Swiss data protection law](#), in particular the Federal Data Protection Act (FADP) and the [Ordinance on Data Protection](#) (FADP).

3 Nature, scope and purpose

We process those personal data that are *necessary* to be able to carry out our activities and operations in a permanent, user-friendly, secure and reliable manner. Such personal data may in particular fall into the categories of inventory and contact data, browser and device data, content data, meta or marginal data and usage data, location data, sales data as well as

contract and payment data.

We process personal data *for the period of time* required for the respective purpose(s) or as required by law. Personal data whose processing is no longer required is anonymised or deleted.

We may have personal data processed *by third parties*. We may process personal data jointly with third parties or transmit it to third parties. Such third parties are, in particular, specialised providers whose services we use. We also guarantee data protection with such third parties.

We only process personal data with the consent of the person concerned, unless the processing is permitted for other legal reasons. Processing without consent may be permissible, for example, for the fulfilment of a contract with the data subject and for corresponding pre-contractual measures, in order to protect our overriding legitimate interests, because the processing is evident from the circumstances or after prior information.

In this context, we process in particular information that a data subject *voluntarily* provides to us when contacting us - for example, by letter, email, instant messaging, contact form, social media or telephone - or when registering for a user account. We may store such information, for example, in an address book, in a customer relationship management system (CRM system) or with comparable tools. If we receive information about other individuals, the individuals providing the information are

If we receive data about other persons, the persons providing the data are obliged to guarantee data protection vis-à-vis these persons and to ensure the accuracy of this personal data. We also process personal data that we receive from third parties, obtain from publicly accessible sources or collect in the course of our activities and operations, if and to the extent that such processing is permitted for legal reasons.

4. applications

We process personal data about applicants to the extent that it is necessary for assessing their suitability for an employment relationship or for the subsequent performance of an employment contract. The necessary personal data results in particular from the information requested, for example in the context of a job advertisement. We also process personal data that applicants provide or publish *voluntarily*, in particular as part of cover letters, CVs and other application documents as well as online profiles.

We may allow applicants to store their details in our **talent pool** in order to consider them for future vacancies. We may also use such information to maintain contact and provide updates. If we believe that an applicant is eligible for a vacancy based on the information provided, we may inform the applicant accordingly.

5 Personal data abroad

We process personal data in Switzerland. However, we may also disclose or export personal data to other countries, in particular in order to process it or have it processed there.

We may disclose personal data to all [states and territories](#) in the world and elsewhere in the [universe](#), provided that the law in those countries guarantees adequate data protection in accordance with a resolution of the [Swiss Federal Council](#).

We may disclose personal data to countries whose law does not guarantee adequate data protection, provided that adequate data protection is guaranteed for other reasons.

6. rights of data subjects

6.1 Data protection rights

We grant data subjects all rights in accordance with the applicable data protection law. In particular, data subjects have the following rights:

- **Information:** Data subjects may request information as to whether we process personal data about them and, if so, what personal data is involved. Data subjects also receive the information necessary to assert their rights under data protection law and to ensure transparency. This includes the personal data processed as such, but also, among other things, information on the purpose of processing, the duration of storage, any disclosure or export of data to other countries and the origin of the personal data.

- **Correction and restriction:** Data subjects may correct inaccurate personal data, complete incomplete data and restrict the processing of their data.

- **Deletion and objection:** Data subjects can have personal data deleted ("right to be forgotten") and object to the processing of their data with effect for the future.

- **Data release and data transfer:** Data subjects may request the surrender of personal data or the transfer of their data to another data controller. Appropriate data protection can, for example, be guaranteed by contractual agreements, on the basis of standard data protection clauses or with other suitable guarantees.

We may suspend, restrict or refuse the exercise of the rights of data subjects to the extent permitted by law. We can draw the attention of data subjects to any requirements that must be met in order to exercise their rights under data protection law. For example, we may refuse to provide information in whole or in part with reference to business secrets or the protection of other persons. We can also, for example refuse to delete personal data in whole or in part with reference to legal obligations to retain data.

We may exceptionally provide for costs for the exercise of rights. We inform affected persons in advance of any costs.

We are obliged to take appropriate measures to identify data subjects who request information or assert other rights. The persons concerned are obliged to cooperate.

6.2 Right of appeal

Data subjects have the right to enforce their data protection rights by legal means or to lodge a complaint with a competent data protection supervisory authority.

The data protection supervisory authority for private data controllers and federal bodies in Switzerland is the [Federal Data Protection and Information Commissioner](#) (FDPIC).

7. Data security

We take suitable technical and organisational measures to ensure data security appropriate to the risk involved. However, we cannot guarantee absolute data security.

Access to our website is via transport encryption (SSL / TLS, in particular with the Hypertext Transfer Protocol Secure, abbreviated HTTPS). Most browsers indicate transport encryption with a padlock in the address bar.

Our digital communication - like all digital communication - is subject to mass surveillance without cause or suspicion as well as other surveillance by security authorities in Switzerland, the rest of Europe, the United States of America (USA) and other countries. We cannot directly influence the corresponding processing of personal data by secret services, police agencies and other security authorities.

8 Use of the website

8.1 Cookies

We may use cookies. Cookies - our own cookies (first-party cookies) and cookies from third parties whose services we use (third-party cookies) - are data that are stored in the browser. Such stored data need not be limited to traditional cookies in text form.

Cookies can be stored in the browser temporarily as "session cookies" or for a certain period of time as so-called permanent cookies. "Session cookies are automatically deleted when the browser is closed. Permanent cookies have a certain storage period. Cookies make it possible in particular to recognise a browser the next time it visits our website and thus, for example, to measure the reach of our website. Permanent cookies can also be used for online branding, for example.

Cookies can be completely or partially deactivated and deleted in the browser settings at any time. Without cookies, our website may no longer be fully available. We actively request your express consent to the use of cookies, at least if and to the extent necessary.

In the case of cookies that are used for performance and reach measurement or for advertising, a general objection ("opt-out") is possible for numerous services via [AdChoices](#) (Digital Advertising Alliance of Canada), the [Network Advertising Initiative](#) (NAI), [YourAd-Choices](#) (Digital Advertising Alliance) or [Your Online Choices](#) (European Interactive Digital Advertising Alliance, EDAA).

8.2 Server log files

We may collect the following information for each access to our website, provided that this information is transmitted by your browser to our server infrastructure or can be determined by our web server: Date and time including time zone, Internet Protocol (IP) address, access status (HTTP status code), operating system including user interface and version, browser including language and version, individual sub-page of our website accessed including the amount of data transferred, website last accessed in the same browser window (referrer or referrer).

We store such information, which may also constitute personal data, in server log files. This information is necessary in order to provide our website in a permanent, user-friendly and reliable manner and to ensure data security and, in particular, the protection of personal data - also by third parties or with the help of third parties.

8.3 Tracking pixels

We may use tracking pixels on our website. Tracking pixels are also known as web beacons. Tracking pixels - also from third parties whose services we use - are small, usually invisible images that are automatically retrieved when you visit our website. With pixel counters, the same information can be collected as in server log files.

9. Notifications and communications

We send notifications and communications by email and other communication channels such as instant messaging or SMS.

9.1 Performance and reach measurement

Notifications and messages may contain web links or tracking pixels that record whether an individual message was opened and which web links were clicked on. Such web links and tracking pixels may also record the use of notifications and messages on a personal basis. We need this statistical recording of usage for performance and reach measurement in order to be able to send notifications and messages effectively and in a user-friendly

manner based on the needs and reading habits of the recipients, as well as permanently, securely and reliably.

9.2 Consent and objection

In principle, you must expressly consent to the use of your e-mail address and other contact addresses, unless the use is permitted for other legal reasons. If possible, we will use the "double opt-in" procedure for any consent, i.e. you will receive an e-mail with a web link which you must click to confirm, so that no misuse by unauthorised third parties can take place. We may log such consents, including Internet Protocol (IP) address, date and time, for evidence and security purposes.

In principle, you can object to receiving notifications and communications such as newsletters at any time. With such an objection, you can at the same time object to the statistical recording of use for performance and reach measurement. This is without prejudice to any notifications and communications required in connection with our activities and operations.

10 Social Media

We are present on social media platforms and other online platforms in order to communicate with interested persons and to inform them about our activities and operations. In connection with such platforms, personal data may also be processed outside Switzerland.

The General Terms and Conditions (GTC) and terms of use as well as data protection declarations and other provisions of the individual operators of such platforms also apply in each case. These provisions inform in particular about the rights of affected persons directly vis-à-vis the respective platform, which includes, for example, the right to information.

11. Services of third parties

We use the services of specialised third parties in order to carry out our activities and operations in a durable, user-friendly, secure and reliable manner. With such services we can, among other things, embed functions and content into our website. In the case of such embedding, the services used record the Internet Protocol (IP) addresses of the users at least temporarily for technically compelling reasons.

For necessary security-related, statistical and technical purposes, third parties whose services we use may process data in connection with our activities and operations in aggregated, anonymised or pseudonymised form. This is, for example, performance or usage data in order to be able to offer the respective service.

We use in particular:

- **Services of Google:** Providers: Google LLC (USA) / Google Ireland Limited (Ireland) for users in the European Economic Area (EEA) and Switzerland; General information on data protection: ["Privacy and Security Principles"](#), ["Privacy Statement"](#), ["Google is committed to complying with applicable data protection laws"](#), ["Privacy Policy in Google Products"](#), ["How we use data from websites or apps on which our services are used"](#) (information from Google). ["Types of cookies and other technologies used by Google"](#), ["Personalised advertising"](#) (activation / deactivation / settings).

11.1 Digital infrastructure

We use the services of specialised third parties to provide the digital infrastructure required in connection with our activities and operations. These include, for example, hosting and storage services from selected providers. In particular, we use:

- **StackPath CDN:** Content Delivery Network (CDN); Provider: StackPath LLC (USA) / Highwinds Network Group Inc. (USA); Data protection information: [Privacy policy](#).

11.2 Automation and integration of apps and services

We use specialised platforms to integrate and connect existing third party apps and services. We can also use such "no-code" platforms to automate processes and activities with third-party apps and services. In particular, we use:

- **Zapier:** automation and integration of apps and services; provider: Zapier Inc. (USA); data protection information: [privacy policy](#), ["Data Privacy at Zapier"](#), ["Data Privacy & Security FAQ"](#), ["Security and Compliance"](#).

11.3 Contact options

We use services from selected providers in order to be able to communicate better with third parties such as potential and existing customers.

We use in particular:

- **bexio:** Customer Relationship Management (CRM); Provider: bexio AG (Switzerland); Information on data protection: [Data protection declaration](#), ["Cloud and data security"](#), ["Data security - definition and measures for companies"](#).

11.4 Scheduling

We use the services of specialised third parties to schedule appointments online, for example for meetings. In addition to this data protection declaration, any directly visible conditions of the services used, such as terms of use or data protection declarations, also apply.

We use in particular:

- Calenso: Online appointment scheduling; Provider: Calenso AG (Switzerland); Information on data protection: "[Data protection](#)", [Data protection declaration](#).

11.5 Audio and Video Conferencing

We use specialised audio and video conferencing services to communicate online. For example, we can use them to hold virtual meetings or to conduct online lessons and webinars. For participation in audio and video conferences, the legal texts of the individual services, such as data protection declarations and terms of use, also apply.

We recommend that, depending on the life situation, the microphone be muted by default when participating in audio or video conferences and that the background be blurred or a virtual background be superimposed.

We use in particular:

- Facebook Messenger: video conferencing; Providers: Meta Platforms Ireland Limited (Ireland) and [other Meta companies](#) (including in the USA); privacy information: "[Communicating with confidence](#)", "[Data protection and security in Messenger](#)", "[Privacy Center](#)" (Meta), [data protection statement](#) (Meta).

- Zoom: Video conferencing; provider: Zoom Video Communications Inc. (USA); information on data protection: [data protection declaration](#), "[Data protection at Zoom](#)", "[Legal compliance centre](#)".

11.6 Online collaboration

We use the services of third parties to enable online collaboration. In addition to this data protection declaration, any directly visible conditions of the services used also apply. of the services used, such as terms of use or data protection declarations.

11.7 Maps

We use third-party services to embed maps in our website.

We use in particular:

- [Google Maps](#) including [Google Maps Platform](#): map service; provider: Google; Google Maps-specific information: "[How Google uses location information](#)".

11.8 Fonts

We use third party services to embed selected fonts as well as icons, logos and symbols into our website.

In particular, we use:

- [Google Fonts](#): Fonts; Provider: Google; Google Fonts-specific information: "[Privacy and Google Fonts](#)", "[Data protection and data collection](#)".

11.9 Advertising

We use the possibility of displaying targeted advertising for our activities and operations on third parties such as social media platforms and search engines.

With such advertising, we would like to reach in particular people who are already interested in our activities and operations or who could be interested in them (remarketing and targeting). For this purpose, we may transmit corresponding - possibly also personal - information to third parties who enable such advertising. We may also determine whether our advertising is successful, i.e. in particular whether it leads to visits to our website (conversion tracking).

Third parties with whom we advertise and where you are registered as a user may be able to assign the use of our online offer to your profile there.

In particular, we use:

- [Facebook advertising](#) (Facebook Ads): Social media advertising; Providers: Meta Platforms Ireland Limited (Ireland) and [other Meta companies](#) (including in the USA); data protection information: remarketing and targeting, in particular with the Facebook Pixel and Custom Audiences including Lookalike Audiences, [data protection statement](#), "[advertising preferences](#)" (user registration required).

- [Instagram Ads](#): Social media advertising; Provider: Meta Platforms Ireland Limited (Ireland) and [other Meta companies](#) (including in the USA); data protection information: remarketing and targeting, in particular with Facebook Pixel as well as Custom Audiences including Lookalike Audiences, [data protection declaration \(Instagram\)](#), [data protection declaration \(Facebook\)](#), "advertising preferences" (Instagram) (user registration required), "[advertising preferences](#)" (Facebook) (user registration required).

- [LinkedIn Ads](#): Social media advertising; Provider: LinkedIn Corporation (USA) / Linke- dln Ireland Unlimited Company (Ireland); Data protection information: Remarketing and Tar- geting in particular with the LinkedIn Insight Tag, "[Data](#)

[Protection](#)", [Privacy Policy](#), [Cookie Policy](#), [Objection to personalised advertising](#).

12. Extensions for the website

We use extensions for our website in order to be able to use additional functions.

In particular, we use:

- **[Google reCAPTCHA](#)**: spam protection (distinguishing between wanted comments from humans and unwanted comments from bots as well as spam); provider: Google; Google reCAPTCHA-specific information: "[What is reCAPTCHA?](#)".
- **[jQuery \(OpenJS Foundation\)](#)**: Free JavaScript library; provider: OpenJS Foundation (USA) using StackPath CDN; data protection information: [privacy statement](#) (OpenJS Foundation), [cookie policy](#)" (OpenJS Foundation).
- **[ShortPixel](#)**: Hosting and optimisation of images; Provider: ID SCOUT SRL (Romania); Data protection information: [Privacy policy](#), "[Legal & Privacy](#)".

13. Success and reach measurement

We try to determine how our online offer is used. In this context, we can, for example, measure the success and reach of our activities and operations as well as the effect of third-party links to our website. We can also, for example, test and compare how different parts or versions of our online offer are used ("A/B test" method). Based on the results of the success and reach measurement, we can in particular correct errors, strengthen popular content or make improvements to our online offer.

In most cases, the Internet Protocol (IP) addresses of individual users are stored for the purpose of measuring success and reach. In this case, IP addresses are always shortened ("IP masking") in order to follow the principle of data economy through the corresponding pseudonymisation.

Cookies may be used and user profiles may be created when measuring success and reach. Any user profiles created include, for example, the individual pages visited or content viewed on our website, information on the size of the screen or browser window and the - at least approximate - location. In principle, any user profiles are created exclusively in pseudonymised form and are not used to identify individual users. Individual services of third parties with which users are registered may be able to assign the use of our online services to the user account or user profile of the respective service.

14. Final provisions

We have created this data protection declaration with the [data protection generator](#) of Datenschutzpartner.

We can adapt and supplement this data protection declaration at any time. We will inform about such adaptations and additions in an appropriate form, in particular by publishing the respective current data protection declaration on our website.