

Privacy Notice – Etude CLIVAZ, PRALONG & VARONE

1. What is this Privacy Notice about?

L'Etude CLIVAZ, PRALONG & VARONE (hereinafter also “**Etude**”, “**us**” or “**we**”) collects and process personal data (hereinafter also “**data**”), in particular personal data about our clients, associated persons, counterparties, courts and authorities, correspondent law firms, professional and other associations, visitors to our websites <https://www.cpv-law.ch/> (hereinafter the “**Website**”), participants in events, job applicants, recipients of newsletters, and other entities or, in each case, their contact persons and employees (hereinafter also “**you**”) in various ways and for different purposes.

The terms “personal data” and “processing” are rather broad concepts:

- “Personal data” means any information relating to an identified or identifiable individual (the “data subject”. An individual is identifiable if he or she can be identified, directly or indirectly, for example by associating information with an identifier such as a name, an identification number, a location, an online identifier or otherwise.
- “Processing” means any operation in relation to personal data, regardless of whether it is automated or manual.

If you disclose data to us about other persons (e.g., family members, representatives, counterparties, or other associated persons), we will assume that you are authorized to do so, that such data is accurate, and that you have ensured that such persons are aware of such disclosure to the extent that an information obligation applies (e.g., by bringing this Privacy Notice to their attention in advance (hereinafter the “**Notice**”).

Please take the time to read this Statement to understand how and why we process your personal data, how we protect your personal data and what your rights are in this respect. If you have any questions or require further information about our data processing, please do not hesitate to contact us (see Section 2).

2. Who is responsible for processing your data?

The data controller is the entity that determines which of your personal data is processed, for what purposes and in what way. For the processing operations described in this Declaration, the data controller is:

Etude CLIVAZ, PRALONG & VARONE
Route du Clovelli 10
3963 Crans-Montana
Switzerland

If you have any questions about data protection, you can contact us at the following address so that we can deal with your request as quickly as possible: office@cpv-law.ch.

3. What personal data do we process?

We process different categories of personal data depending on the circumstances and purposes, including the following:

- Your name and contact details (e.g. name, address, telephone number or e-mail address), information about the company you work for, your function or title and your relationship with a person, as well as other basic information;
- Technical information (e.g., your IP address, your device, your browser, the date and time of your visit, etc.);
- Information about your behaviour on our Website (e.g., the services you are looking for, information about your interaction with us, your requests or the pages you visit);
- Information relating to documents and communications that we send to you electronically (e.g., your use of e-mails for marketing purposes);
- Any other information about you relevant to the performance of our contractual obligations.

In general, the data we process is communicated to us by you (e.g., in connection with our services, your use of our Website, or communication with

us). Some of this data is also transmitted to us automatically by your end device. You are not required to disclose your data, with certain exceptions (e.g., legal obligations). However, please note that if you wish, for example, to conclude contracts with us or use our services or our Website, you must provide us with certain data.

We may collect data from publicly accessible sources (e.g., debt collection registers, land registers, commercial registers, media or the Internet, including social media) or receive such data from public authorities, your employer or mandator who has a business relationship with us or otherwise deals with us, as well as from other third parties (e.g., clients, counterparties, legal protection insurance companies, credit agencies, address brokers, associations, contractual partners, Internet analysis services).

We aim to ensure that your personal data is accurate, complete and up to date, but we expect you to update or correct your personal information whenever necessary.

4. For what purposes do process your personal data?

In particular, we process your personal data for the following purposes:

- **Communication purposes:** We process personal data so that we can communicate with you as well as with third parties (such as parties to proceedings, courts, or authorities) by e-mail, telephone, letter, or other means;
- **Prepare and conclude contracts;**
- **To manage and perform our contractual obligations:** This includes our contractual obligations towards our customers and other contractual partners (e.g. suppliers, service providers, corresponding law firms, project partners). This also includes data processing for the management of mandates, for the enforcement of contracts (debt collection, legal proceedings, etc.), for accounting and for public communication;
- **To operate and improve our Website;**
- **To improve our electric offerings;**

- **To guarantee IT securities and for prevention purposes:** We process personal data in order to guarantee and improve the performance and security of our operations, in particular with regard to IT, our Website and other platforms;
- **For the defence of rights:** In certain circumstances, we also process personal data to assert legal rights, before or outside legal proceedings and before the authorities in Switzerland and abroad, or to defend ourselves before the authorities;
- **To comply with laws, directives and recommendations from authorities as well as internal regulations;**
- **Job application purposes:** We process data relating to your job application for the purposes of reviewing and assessing the application, carrying out the application process, and, in the case of successful applications, preparing and concluding a contract. In addition to your contact data and the information from the corresponding communication, we also process in particular the data contained in your application documents and the data that we can additionally obtain about you, for example from job-related social networks, the Internet, the media and references (if you consent to obtaining references).
- **For other purposes:** This includes in particular company management, including organisation and development, other internal processes, administrative, training and educational purposes.

If we request your consent for certain processing operations, we will inform you separately of the specific purposes of the processing. You may withdraw your consent at any time by sending us a written message.

5. What tracking and online advertising techniques do we use?

5.1. Cookies

We may use technologies to improve the user experience and analyse visits to our Website. The main purpose is to enable us to distinguish access by you from access by other users so that we can ensure the functionality of the Website and carry out statistical analysis. We do not want to identify you in this process. The technology used is designed to recognise you as an individual visitor each time

you access the page, for example by causing the server to assign to you or your browser a specific identification number (“**cookie**”).

Cookies are small files stored on your device when you visit our Website. Session cookies are deleted when the browser is closed, whereas permanent cookies remain stored for some time after the browser is closed and are used to recognise visitors on a subsequent visit.

We use the following types of cookies:

- **Necessary cookies:** They are essentials to enable you to browse our Website and use its functions;
- **Statistical cookies:** They collect information on the use of our Website and make it possible to analyse, for instance, which pages are the most frequently visited or error messages;
- **Functional cookies:** They enable advanced features and can display personalised content.

You can configure your browser in the settings to block certain cookies or similar technologies, or delete existing cookies and other data stored in your browser. You can also enhance your browser with software (“plug-ins”) that blocks tracking by certain third parties. However, this may affect certain functionalities of our Website. You can find more information on this subject on your browser’s help pages.

5.2. Social medias plug-ins

We also use social media plug-ins, which are small pieces of software that establish a connection between your visit to our Website and a third-party provider. The social media plug-in tells the third-party provider that you have visited our Website and may send the third-party provider cookies that the third-party provider has previously placed on your browser. For more information about how these third-party providers use your personal data collected via their social media plug-ins, please refer to their respective privacy notices.]

5.3. Cookies from partners and third parties

We also use the services of third-party service providers and advertising partners to optimise our Website, to compile statistics or to distribute advertising. The respective third-party suppliers may record the use of our Website for this

purpose and combine their records with other information from other websites. This allows them to record user behaviour across multiple websites and end devices in order to provide us with statistical evaluations on this basis. The providers may also use this information for their own purposes, for example for personalised advertising on their own website or other websites. These third-party providers may be located outside Switzerland and the EU/EEA, provided that the protection of personal data is adequately ensured.

The main provider is **Google Analytics**, which is a service provided by Google LLC (Mountain View, CA, USA) and Google Ireland Ltd (Dublin, Ireland; together "**Google**"). Google uses cookies and similar technologies to collect information about your behaviour on our Website and the end device used and to provide us with evaluations on this basis, but also processes certain data for its own purposes. Information on Google Analytics data protection can be found [here](#).

We also use the **Google Maps** service to display interactive maps and provide geographical information. When you access a page that includes a Google Maps map, your browser establishes a direct connection with Google's servers. Google may store and process your IP address and other information about your use of Google Maps, including your approximate location. This data may be processed by Google in the USA and in other countries outside Switzerland and the EU/EEA. Google may use this information for its own purposes, in particular to improve its services or to deliver personalised advertising. For more information on how Google treats your data when you use Google Maps, please consult Google's privacy policy [here](#).

6. **Who do we disclose your personal data to?**

We may transfer your personal data with trusted third-parties, in particular:

- **Service providers** (such as IT providers);
- **Clients and other contractual partners:** This includes customers and other contractual partners for whom the transmission of your data is contractually required, but also organizations with which we cooperate directly or indirectly in the context of our mandates, such as other law firms or notaries, legal protection insurers, banks, administrations, public services and offices, condominium administrators, brokers and all other companies or corporations;

- **Authorities and tribunals:** We may disclose your personal data if this is necessary for the fulfilment of our contractual obligations and, in particular, to conduct our mandate, or if we are legally obligated or entitled to do so, or if this appears necessary to protect our interests.
- **Counterparties and persons involved;**
- **Other persons:** This refers to other cases where the inclusion of third parties results from the purposes according to Section 4.
- **Les autres personnes :** Il s'agit d'autres cas où l'implication de tiers découle des buts mentionnés à l'article **Erreur ! Source du renvoi introuvable.**

If necessary, we obtain your consent for this or will have the competent supervisory authorities release us from our professional obligation of confidentiality.

7. Is your personal data transferred cross-border?

We may also transfer your personal data outside Switzerland and the European Economic Area (EEA), potentially to any country in the world as appropriate - for instance through subcontractors of our service providers, or in proceedings before foreign courts or authorities or in the course of our activities for clients.

Some countries do not offer the same level of protection as Swiss law. Before transferring data, we will implement appropriate measures to protect your personal data, for example by contractually obliging the recipient to comply with an adequate level of data protection (for this purpose, we use the revised standard contractual clauses of the European Commission, which can be consulted [here](#)).

In certain cases we may have to transfer data in accordance with the legal provisions on data protection, even in the absence of such contracts, for example if you have consented or if it is not possible to obtain your consent within a reasonable period of time and the disclosure is necessary to protect your life or physical integrity or that of a third party, or if it concerns data you have publicly made available and the processing of which you have not objected to, if the disclosure is necessary for the performance of the contract, for the establishment, exercise or defence of legal claims abroad, or for overriding public interests.

8. For how long do we process your personal data?

We retain and process your personal data for as long as it is necessary for the purpose of the processing, for as long as we have a legitimate interest in retaining it (e.g., to assert or defend claims, or for archiving and IT security purposes) and for as long as the data is subject to a legal retention obligation.

9. How do we protect your personal data?

We implement technical and organisational measures to maintain confidentiality, integrity, and availability of your personal data, to protect it against unauthorized or unlawful processing, and to prevent the risks of loss, accidental alteration, disclosure, or unauthorized access. However, security risks generally cannot be completely eliminated; some residual risks remain inevitable.

10. What rights do you have?

In accordance with applicable data protection law, you have specific rights to obtain further information about our data processing and to influence it. These rights include, in particular:

- **Access:** You can request further information about our data processing. We are at your disposal for this. You can also submit an enquiry if you would like more information and a copy of your data.
- **Objection and deletion:** You have the right to object to the processing of your data and request that we delete it at any time if we are not required to continue processing or storing it, and if it is not necessary for the performance of the employment relationship.
- **Rectification:** You have the right to have inaccurate or incomplete personal data rectified or supplemented, or to have it supplemented with a mention of the contentious nature.
- **Transfer:** You have the right to receive the personal data you have provided to us in a structured, commonly used and machine-readable format, or to have it transferred to a third party, insofar as the corresponding data processing is based on your consent or is necessary for the performance of the contract.

- **Withdrawal:** Insofar as we process data based on your consent, you may withdraw it at any time. Withdrawal only applies to future processing, and we reserve the right, in the event of withdrawal, to continue processing data on another legal basis.

Please note that these rights are subject to legal conditions and restrictions and may not be available in full in all cases.

If you wish to exercise your rights against us, please contact us in writing (see Section 2). In principle, we must verify your identity (e.g., with a copy of your ID, if necessary).

You are also free to file a complaint against our processing of your data with the competent supervisory authority. The competent supervisory authority in Switzerland is the Federal Data Protection and Information Commissioner (FDPIC).

11. Can this Privacy be changed?

This Privacy can be updated at any time, particularly if we change the way we process your personal data or if new legislation comes into force. The version published on the Website is the current version.

Version Nr. 1