



# Privacy Notice

Last updated: 28 November 2023

## 1. Introduction

Your privacy is important to us at SpinetiX SA and our affiliates (SpinetiX). Our registered address is Sonnenbergstrasse 9, 6052 Hergiswil, Switzerland.

This privacy notice details the personal information we collect, the purposes for which we use it, steps we take to protect it, and your rights regarding our use of your personal information. Please read this privacy notice carefully. Contact us at [privacy@spinetix.com](mailto:privacy@spinetix.com), or write to us at the above address, if you have any questions about this privacy notice and/or our use of your personal information.

We may change our privacy notice from time to time. We will post any changes to our privacy notice on our website with the effective date of the change. We encourage you to check back often for updates to this notice.

## 2. What personal information we collect

Personal information means any information that identifies an individual, such as name, phone number or email address. We collect personal information of our customers, people who are interested in our products, services and events and people who communicate with us.

The personal information we collect may include:

- Name, email address, telephone and other contact details
- Information about your company and job function
- Invoicing and financial information of clients
- Standard information your browser sends to our website, such as your IP address

Payment card details: To process credit card or debit card details you will be directed to a payment form operated by the companies listed in the table below. Their terms and conditions are available also in this table. SpinetiX does not process or store your credit card or debit card details directly.

Name of payment processing company	Terms of Service/Privacy Notice or Policy
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American Express Payment Services Limited
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<a href="#">Terms</a> & <a href="#">Privacy Policy</a>
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Datatrans AG
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<a href="#">Terms</a> & <a href="#">Privacy Policy</a>
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PayPal Inc.
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<a href="#">Terms</a> & <a href="#">Privacy Policy</a>
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Worldline Schweiz AG
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<a href="#">Terms</a> & <a href="#">Privacy Policy</a>
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### 3. How we collect personal information

We may collect personal information in a variety of ways:

- You provide the personal information to us directly e.g. through a form on our websites, through emailing us, in person at a seminar, workshop or conference
- We collect personal information automatically through our websites (e.g. through cookies as explained below)
- Voluntarily use of our support via chat or email
- SpinetiX may also receive your data indirectly from SpinetiX's distribution partners.  
A list of which you can find here - <https://www.spinetix.com/buy#where-to-buy>

### 4. Why we process information

We collect, use, and store personal information about you for the following purposes:

- To provide you with information on our products and services that you have requested from us
- To provide products and services to you and to fulfill our contractual obligations
- To send you support information
- To send you updates and news on our events, products, and services
- To set up your account
- To issue invoices and manage accounts and records
- To administer our website and help us improve our services
- To comply with legal obligations applicable to us
- To meet our internal and external audit requirements
- To improve the quality of our products and services
- To review a job application or inquiry you have sent us

## **5. When we share personal information and why**

We share or disclose personal information when necessary to provide you with our products, services, and events, and to provide updates and news on each of these. We also share or disclose personal information when necessary to conduct and administer our business operations.

SpinetiX sells and supports its products, software, and services through third-party channel distribution partners and resellers located in different countries. We share personal information with our third-party channel distribution partners and resellers to provide you products, software, and services, to follow-up on sales inquiries and to provide you with information that you have requested. Typically, we would provide this to a third-party channel distribution partner and/or reseller who is in the same country as you, or the nearest country in which a channel distribution partner and/or reseller is located who supports customers in your country. We require our third-party channel distribution partners and resellers to comply with applicable data protection and privacy laws.

We may share personal information with our third-party service providers to provide you our products, software, services, and events, or to provide you with information on each of them.

We may share personal information with other third parties, where required, such as to comply with requests from governmental authorities when such disclosure is necessary according to applicable law.

## **6. Where we store, process and transfer personal information**

We work with third party service providers for marketing automation purposes and for cloud hosting services. These providers host platforms where personal information may be stored and processed. Our major processors are listed in the table below. To review how these third-party service providers, use and process your personal information you should check their privacy notices and policies which we have detailed below.

At times, this processing may occur outside of your home country. For residents of the European Union we use reasonable efforts to ensure that such personal information stays in the European Economic Area, however some personal information we collect may be transferred within or outside the country or territory where it was collected for further processing in accordance with the purposes for which your personal information was originally collected or for purposes to which you have consented. In this situation, we take steps to ensure your personal information is processed and transferred according to applicable law, such as GDPR and the Swiss New Federal Act on Data Protection (nFADP) of September 25<sup>th</sup>, 2020, and take measures to ensure your rights are adequately protected by technical and contractual means.

Name of Processor	Purpose	Terms/Privacy Notice or Policy	Legal Base for Cross-Border Transfer
Airtable	Database	<a href="#">Terms &amp; Privacy Policy</a>	nFADP art. 16 al 2b., Standard contractual clauses
Amazon Web Services	Cloud Storage	<a href="#">Terms &amp; Privacy Policy</a>	nFADP art. 16 al. 1., art. 16 al 2b., and art. 17 al 1a, art. 17 al 1b, Safe list, Legitimate use
CookiePro / OneTrust	Cookie consent	<a href="#">Terms &amp; Privacy Policy</a>	nFADP art. 16 al 2b., Standard contractual clauses
GetSiteControl	Website buttons,newsletter & contact form	<a href="#">Terms &amp; Privacy Policy</a>	nFADP art. 16 al 2b., Standard contractual clauses
Google Analytics	Website statistics & analysis	<a href="#">Terms &amp; Privacy Policy</a>	nFADP art. 16 al 2b., Standard contractual clauses
Google Maps	Maps visualization service provided by Google that allows this Application to incorporate content of this kind on our website	<a href="#">Terms &amp; Privacy Policy</a>	nFADP art. 16 al 2b.,Standard

Name of Processor	Purpose	Terms/Privacy Notice or Policy	Legal Base for Cross-Border Transfer
			contractual clauses
Google Tag Manager	Tag Management	<a href="#">Terms</a> & <a href="#">Privacy Policy</a>	nFADP art. 16 al 2b., Standard contractual clauses
GoToWebinar / LogMeIn	Webinars	<a href="#">Terms</a> & <a href="#">Privacy Policy</a>	nFADP art. 16 al 2b., Standard contractual clauses
MailChimp/ Mandrill	Marketing automation platform	<a href="#">Terms</a> & <a href="#">Privacy Policy</a>	nFADP art. 16 al 2b., Standard contractual clauses
Microsoft	Storage, shared documents, website forms	<a href="#">Terms</a> & <a href="#">Privacy Policy</a>	nFADP art. 16 al 2b., Standard contractual clauses
OVH	Website hosting	<a href="#">Terms</a> & <a href="#">Privacy Policy</a>	nFADP art. 16 al. 1., Safe list
Vimeo	Display of embedded YouTube videos	<a href="#">Terms</a> & <a href="#">Privacy Policy</a>	nFADP art. 16 al 2b., Standard contractual clauses

Name of Processor	Purpose	Terms/Privacy Notice or Policy	Legal Base for Cross-Border Transfer
YouTube	Display of embedded YouTube videos	<a href="#">Terms &amp; Privacy Policy</a>	nFADP art. 16 al 2b., Standard contractual clauses
Zapier	Apps automation	<a href="#">Terms &amp; Privacy Policy</a>	nFADP art. 16 al 2b., Standard contractual clauses
ZenDesk	Live Chat service	<a href="#">Terms &amp; Privacy Policy</a>	nFADP art. 16 al 2b., Standard contractual clauses

## 7. How long we store the personal information

We keep personal information for the time necessary for us to complete the purposes for which it was collected, or as legally required (e.g. for accounting purposes). When we no longer need the personal information, it is deleted.

## 8. How we secure the personal information

We are committed to ensuring that your personal information is secure. We implement appropriate technologies and organizational measures to prevent unauthorized access or disclosure of the personal information. For example, we process the personal information you provide on computer systems with limited access. We also require our third-party service providers to comply with applicable data privacy and security requirements.

## 9. Links to other websites

Our websites may contain links to other websites not operated by us. We provide hyperlinks to these websites for your convenience, however, we are not responsible for the operation of these websites or their data protection and privacy practices. We recommend that you review these websites privacy notices and policies.

## **10. Unsubscribe**

We hope that you will enjoy the updates and news that we send to you electronically or by post. However, if you do not want to receive emails containing updates and news from us, or you wish to be removed from a posting list, you may unsubscribe at any time by using the unsubscribe button contained in each of our emails, emailing us at [privacy@spinetix.com](mailto:privacy@spinetix.com), or writing to us at the address below:

Sonnenbergstrasse 9  
CH - 6052 Hergiswil  
Switzerland

## **11. Your rights with respect to your personal information**

You have certain right with respect to the personal information we hold on you:

- Request a copy of the personal information we have about you
- Request us to correct or delete the personal information
- Request data portability
- Withdraw your consent to us processing your personal information
- Unsubscribe from a mailing list as described above

If you would like to exercise these rights or have any questions about this privacy notice, please contact us at [privacy@spinetix.com](mailto:privacy@spinetix.com) or write to us at our registered address: Sonnenbergstrasse 9, 6052 Hergiswil, Switzerland.

## **12. Cookies**

A cookie is a small piece of data (text file) that a website when visited by a user asks your browser to store on your device in order to remember information about you, such as your language preference or login information. Those cookies are set by us and called first party

cookies. We also use third party cookies which are cookies from a domain different than the domain of the website you are visiting for our promotional and marketing purposes. More specifically, we use cookies and other tracking technologies for the following purposes:

- Assisting you in navigation and language preference,
- Assisting in registration, login, and your ability to obtain support and provide feedback,
- Analyzing your use of our products, services or apps,
- Assisting with our promotional and marketing purposes.

SpinetiX websites are scanned with our cookie scanning tool regularly to maintain a list of cookies we use as accurate as possible. Find a detailed list of cookies we use on each of our websites' Cookie Notice.

We classify cookies in the following categories:

- **Strictly Necessary Cookies**  
These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work.
- **Analytics/Performance Cookies**  
These cookies allow us to count visits and traffic sources, so we can measure and improve the performance of our site. They help us know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous.
- **Functional Cookies**  
These cookies enable the website to provide enhanced functionality and personalization. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies then some or all of these services may not function properly.
- **Targeting Cookies**  
These cookies can be used to deliver marketing campaigns by SpinetiX and SpinetiX partners that are relevant to you, and can be used to chart the effectiveness of an ad campaign by tracking users' clicks.

### **How to manage cookies**

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our websites' features may not function as a result.

## **12. How to contact the appropriate authority**

Should you wish to report a complaint or if you feel that Our Company has not addressed your concern in a satisfactory manner, you may contact the Federal Data Protection and Information Commissioner (FDPIC), or your national data protection authority with regards to GDPR rights.

Website - <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/links/data-protection---switzerland.html>