

## CARTLY SÀRL

### PRIVACY STATEMENT – NOVEMBER 2022 EDITION

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## 1. Preamble

The CARTLY® platform is a web application presented in the form of a website (<https://www.cartlyapp.com>) operated by the sole proprietorship CARTLY SÀRL (CHE-312.542.611) (hereinafter also the "**Controller**"), whose registered office is located at Rue du Tilleul 1, 1700 Fribourg, Switzerland [hello@cartlyapp.com].

We take data protection very seriously and are committed to protecting your personal data. We comply with the legal requirements of the Swiss Federal Data Protection Act ("DPA") and other data protection provisions that may be applicable.

This privacy statement ("**Statement**") describes how we collect and use your personal data. Please note that we may change this Privacy Notice from time to time. For this reason, we recommend that you regularly consult this Declaration.

## 2. Purpose of processing and legal basis for processing

We process your data for the following purposes:

- a) Provide you with our services: the legal basis for processing your personal data for this purpose lies in pre-contractual actions and the execution of a contract.
- b) Improving our services: the legal basis for processing your personal data for this purpose lies in our legitimate interest. You can object to this data processing at any time.
- c) For marketing purposes: by accepting marketing communications, you consent to the processing of your personal data for marketing purposes (such as sending emails containing advertising or marketing content, sending invitations to events). You can revoke your consent at any time.

## 3. Categories of personal data

We process the following categories of data for the purposes described in Section 2:

- Contact information (such as your name, address, email address, etc.);
- Professional information (such as your title, employer, logo etc.) ;
- Device information (such as IP address, browser, etc.);
- Your photography, voice recording or/or video(s), Social Media Links etc.;
- Your purchase data such as order reference, payment method, delivery address and billing, etc.;

## 4. Cookies

When you access our website, we collect information by means of cookies and tracking.

Cookies are information files that your web browser automatically stores on your device's hard drive when you visit our website. Cookies do not damage the hard drive of your device and do not transmit your personal data to us.

In particular, cookies help us to make your visit to our websites easier, more pleasant and more meaningful.

Most internet browsers automatically accept cookies. However, you can configure your browser so that no cookies are stored on your device or a warning message is always displayed when a new cookie is created.

## 5. Monitoring tools

We use the following tracking tools:

- Google Analytics ;
- Google Tag Manager;
- DoubleClick de Google ;
- Hotjar ;
- Stonly ;
- Google Recaptcha ;
- Google Tag Manager ;
- Abstract API ;
- Leadfeeder ;

Further information can be found on the respective websites of the above-mentioned *Providers*.

## 6. Recipients of personal data

We will only pass on your personal data to third parties if there is a legal obligation to do so, if this is necessary to assert our rights, in particular to assert rights arising from the contractual relationship or if you have given your express consent.

In addition, we will transfer your data to third parties insofar as this is necessary for the sending of marketing communications and the analysis of your user behavior. For this processing, we rely on our legitimate interests.

Any disclosure of your personal data to third parties is strictly limited to the purposes indicated.

## 7. Cross-border transfer of personal data

We may transfer your data to third parties (contractual service providers) located abroad for the purposes of the data processing described in this data privacy policy.

These third-party companies are required to protect the privacy of individuals to the same extent as we do. If the level of data protection in a country does not correspond to the Swiss level, we will ensure that the protection of your personal data corresponds at all times to that of Switzerland.

## 8. Data retention

We only retain personal data for as long as necessary to provide you with the services you have requested, for the duration of our legitimate interest or for purposes for which you have given your consent.

Please note that specific statutory retention periods may apply to certain data. This data must be kept until the end of the legal retention period.

## 9. Your rights

Under applicable data protection law, you have the following rights:

**The right of access:** you have the right to demand access to your personal data stored with us at any time and free of charge if we process this data. You can check which personal data we process and whether we use it in compliance with the applicable data protection provisions.

**The right to rectification:** you have the right to have incorrect or incomplete personal data rectified and to be informed of the rectification. In this case, we inform the recipients of the data concerned of the corrections made, unless this is impossible or associated with a disproportionate effort.

**The right to erasure** (known as the "right to be forgotten"): you have the right to have your personal data erased in certain circumstances. In some cases, the right to erasure may be excluded.

**The right to restrict processing:** in certain circumstances, you have the right to demand the restriction of the processing of your personal data.

**Right to lodge a complaint with a supervisory authority:** you can address any questions relating to data protection to the Federal Data Protection and Information Commissioner.

## 10. interlocutor

You can contact CARTLY® at any time with any questions about data protection and the exercise of your rights at the following address: [help@cartlyapp.com](mailto:help@cartlyapp.com).