

# GB GestionBâle SA

## PRIVACY POLICY

<https://www.gestionbale.ch/rechtliche-hinweise.html>

### 1. General

GB GestionBâle SA attaches great importance on data protection and therefore observes the legal provisions of the Federal Act on Data Protection (FADP) and the Data Protection Ordinance (DPO). This data protection declaration contains information on how GB GestionBâle SA collects and processes personal data and informs the persons concerned of their rights under the data protection regulations.

- "Personal data" means any information relating to an identified or identifiable natural person;
- "Processing" means: any handling of personal data, irrespective of the means and procedures used, in particular the acquisition, storage, use, modification, disclosure, archiving, deletion or destruction of personal data.

With this information GB GestionBâle SA fulfils its duty to provide information in the context of the collection and processing of personal data from data subjects.

### 2. Origin of personal data

#### 2.1. General

GB GestionBâle SA processes the personal data that GB GestionBâle SA receives from the persons concerned. It also obtains data from service providers (e.g. public registers) which the Company requires for the provision of the business service and/or for legal or regulatory reasons.

#### 2.2. Contact form

Using the contact form, the data fields specified there (name, surname, if applicable telephone number, e-mail, message) as well as information on the time of use are collected and processed for processing and replying. The data is transmitted to GB GestionBâle SA, which is named and identified in the respective contact form.

The processing of the data is necessary to contact you.

#### 2.3. Newsletter

For the purpose of sending a newsletter and inclusion in the distribution list, the contact data to be entered on the registration page as well as information on the subject and time of dispatch are processed. The data will be stored until you unsubscribe.

The data processing is necessary for the newsletter dispatch/receiving distribution list.

### **3. Scope of the personal data processed**

GB GestionBâle SA processes as little personal data as necessary. These are mainly related to the services you have requested or agreed with us.

The categories of personal data processed by GB GestionBâle SA, include data relating to business relationships with clients or potential clients, employer data, supplier data and data when using the website.

### **4. Purposes of the processing**

GB GestionBâle SA only processes data that is necessary to achieve a specific purpose. Personal data is processed for the following purposes:

- in connection with the provision of the customer business or the products and services offered (e.g. to open and maintain a customer relationship)
- To comply with legal or regulatory obligations
- Marketing activities (e.g. sending out a newsletter)

### **5. Data protection principles**

#### **5.1. Principles**

GB GestionBâle SA edits

- personal data, taking into account the Federal Act on Data Protection (FADP) and the Ordinance on Data Protection (DPO);
- data lawfully, in good faith and relatively. GB GestionBâle SA also ensures that the data is correct and complete.

The data is only processed for the identifiable purpose.

#### **5.2. Data security**

GB GestionBâle SA attaches great importance on data security. In addition to complying with the legal requirements, GB GestionBâle SA takes precautions to protect your privacy (such as implementing technical and organisational security measures). With technical and organisational measures, GB GestionBâle SA (or the commissioned service providers) ensures that personal data is protected against unauthorised access and

- is only accessible to authorised persons;
- is available when they are needed;
- will not be changed unauthorised and unintentionally, and
- be processed in a comprehensible manner.

## **6. Basics for data processing**

Data processing depends on the services and products that GB GestionBâle SA may provide to you or the purpose for which the personal data is processed and is based on the following:

### **6.1. Business fulfilment**

- Entering into, concluding or performing a contract or business relationship with you or to fulfil the obligations of GB GestionBâle SA arising from such a contract or business relationship.

if necessary

- to safeguard the legitimate interests of GB GestionBâle SA (such as statistics, planning or product development, business decisions, monitoring and managing risks, ensuring IT security, IT operations and buildings as well as plant security, business auditing, marketing, comprehensive support, advice and information on the range of services, preparation and provision of customised services – as far as no objection has been made)
- Safeguarding of interests and securing the claims of GB GestionBâle SA, customers and employees

### **6.2. Legal**

- to fulfil legal or regulatory obligations of GB GestionBâle SA or the performance of tasks in the public interest

### **6.3. Consent**

If the processing of personal data requires consent by law, GB GestionBâle SA obtains this consent from the data subject. The consent given may be revoked at any time. Such a revocation is only effective from the date of receipt by GB GestionBâle SA and does not affect the lawfulness of the processing of personal data until revocation. There may be reasons (e.g. due to a law) which make it necessary to process the personal data despite revocation. A revocation may lead to the restriction of certain services or to the termination of the business relationship.

## **7. Duration of the storage of personal data**

The duration of the storage of personal data is determined by legal retention obligations or the purpose of the respective data processing. In principle, GB GestionBâle SA stores personal data for the duration of the business relationship or contract period and subsequently for at least a further ten years. This corresponds to the period during which legal claims can be asserted against GB GestionBâle SA. Ongoing or anticipated legal, tax or supervisory proceedings may result in storage beyond this period.

## **8. Profiling and automated individual decision-making**

GB GestionBâle SA does not engage in profiling and does not apply automated individual decisions.

## **9. Intended recipients of personal data**

At GB GestionBâle SA, only those persons who need to process your personal data in order to fulfil contractual or legal obligations will do so.

GB GestionBâle SA only discloses client data to service providers and third parties in the following cases (depending on the type of products and services purchased):

- for the execution of orders, use of products or services
- due to legal obligations, legal justification or official orders

Service providers and third parties as recipients of personal data may be, for example:

- Order processors and other service providers who process personal data on behalf of and for the purposes of GB GestionBâle SA
- Public bodies (e.g. public authorities), as far as this is required by law or by public authorities.

## **10. Data transmission abroad**

As a matter of principle, data is not transferred abroad. Should personal data be transferred abroad, this will take place in compliance with the legally prescribed provisions and where this is necessary for the fulfilment of the contract.

## **11. Your rights**

### **11.1. Information, deletion, correction, restriction**

You have the right, provided there is no legal obligation to the contrary, to information, correction, publication, transfer, prohibition of certain personal data processing, restriction, deletion, prohibition of disclosure to third parties, revocation of consent and objection to your personal data.

Requests for information must be sent together with a clearly legible copy of a valid official form of identification (e.g. passport, identity card) to the address given under point 14.

Deletion and objection rights are not unrestricted rights. Overriding interests may make further processing necessary. GB GestionBâle SA examines each individual case and informs you of the result.

If the provision of information, data output or data transmission involves disproportionate effort, GB GestionBâle SA may insist on a contribution to costs up to a maximum of CHF 300.

---

## **12. Data relating to the internet presence**

### **12.1. General**

The following information explains how the company processes data on the occasion of its Internet presence.

### **12.2. Cookies**

The Internet pages of GB GestionBâle SA use cookies. Cookies are data that are filed and stored on a computer system via an Internet browser.

Numerous websites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a string of characters by which internet pages and servers can be assigned to the specific internet browser in which the cookie was stored. This enables the websites and internet services visited to distinguish the individual browser of the data subject from other internet browsers that contain other cookies. A specific internet browser can be recognised and identified via the unique cookie ID.

Through the use of cookies, the GB GestionBâle SA can provide the users of this website with more user-friendly services that would not be possible without the cookie setting. A cookie enables the information and offers on the GB GestionBâle SA website to be optimised for the user's benefit. Cookies enable GB GestionBâle SA (as explained above) to recognise the users of its website. The purpose of this recognition is to make it easier for users to use the GB GestionBâle SA website. For example, the user of a website that uses cookies does not have to re-enter his or her access data each time he or she visits the website, because this is done by the website and the cookie stored on the user's computer system. A data subject can deactivate the use of cookies by our website at any time by means of an appropriate setting in the internet browser and thus object to the use of cookies. Furthermore, cookies that have already been set can be deleted at any time via an internet browser or other software programmes. This is possible in all common internet browsers. If the data subject deactivates cookies, Internet pages may only be used to a limited extent.

### **12.3. Collection of general data and information in connection with the internet presence**

The website of the GB GestionBâle SA collects general data and information whenever a data subject or automated system calls up the website. This general data and information is stored in the log files of the server. The following data may be collected:

- Browser types and versions used
- the operating system used by the accessing system
- the website from which an accessing system arrives at our website (so-called referrer)
- Sub-websites which are accessed via an accessing system on our website
- Date and time of access to the website
- Internet protocol address (IP address)
- Internet service provider of the accessing system
- other similar data and information that serve to avert danger in the event of attacks on the information technology systems of GB GestionBâle SA

When using these general data and information, GB GestionBâle SA does not draw any conclusions about the data subject. Rather, this information is required in order to

- Contents of the website of GB GestionBâle SA
  - to be delivered correctly;
  - optimise for advertising;
- to ensure the permanent functionality of the information technology systems and technology of the website of GB GestionBâle SA;
- in the event of a cyber-attack, to provide law enforcement authorities with the information necessary for prosecution.

The data and information collected anonymously are analysed statistically by GB GestionBâle SA with the aim of increasing the data protection and data security of the GB GestionBâle SA , and thus ensuring an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from any personal data provided by a data subject.

#### **12.4. Use of Google Analytics**

The website of GB GestionBâle SA uses Google Analytics, a web analytics service provided by Google Ireland Limited. If the data controller on this website is located outside the European Economic Area or Switzerland, the Google Analytics data processing is carried out by Google LLC. Google LLC and Google Ireland Limited are hereinafter referred to as "Google".

Google Analytics uses "cookies", which are text files placed on the computer of the website visitor, to help the website analyse how users use the site. The information generated by the cookie about the use of this website by the site visitor (including the shortened IP address) is usually transmitted to a Google server and stored there.

Google Analytics is used exclusively with the extension "anonymizelp()" on this website. This extension ensures anonymisation of the IP address by shortening it and excludes direct personal reference. Through the extension, the IP address is shortened beforehand by Google within member states of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. The IP address transmitted by the corresponding browser within the scope of Google Analytics will not be merged with other Google data.

On behalf of the site operator, Google will use the information collected to evaluate the use of the website, compile reports on website activity and provide other services relating to website activity and internet usage to the site operator. The legitimate interest in the data processing lies in the optimisation of this website, the analysis of the use of the website and the adaptation of the contents. The interests of the users are sufficiently protected by the pseudonymisation.

Google LLC offers a guarantee to maintain an adequate level of data protection on the basis of the standard contractual clauses. The data sent and linked to cookies, user IDs (e.g. user ID) or advertising IDs are automatically deleted after 50 months. The deletion of data whose retention period has been reached takes place automatically once a month.

The collection by Google Analytics can be prevented by the site visitor adjusting the cookie settings for this website. The collection and storage of the IP address and the data generated by cookies can also be objected to at any time with effect for the future. The corresponding browser plugin can be downloaded and installed under the following link: <https://tools.google.com/dlpage/gaoptout>.

The site visitor can prevent the collection by Google Analytics on this website by clicking on the following link. An opt-out cookie will be set, which prevents the future collection of data when visiting this website.

Further information on the use of data by Google, setting and objection options can be found in Google's privacy policy (<https://policies.google.com/privacy>) and in the settings for the display of advertisements by Google (<https://adssettings.google.com/authenticated>).

#### **12.5. Use of social media plugins**

The GB GestionBâle SA website may use so-called "social bookmarks" or "social media plugins" from third-party companies (e.g. Facebook, Twitter, Xing, LinkedIn, etc.). The processing of data by third-party companies is not accessible to GB GestionBâle SA. The third-party companies receive the information that the corresponding page of the website has been accessed by clicking on the plugin. GB GestionBâle SA has no influence on the data processing by the third-party companies. If the use of the plugins is to be prevented, it is necessary to log out of existing accounts of the third-party companies in advance.

Further information (e.g. on the purpose and scope of data collection by third-party companies) can be found directly on the website of the third-party companies.

### **13. Subject to change**

This privacy statement was drawn up in August 2023 and generally covers the processing of personal data by GB GestionBâle SA.

GB GestionBâle SA reserves the right to adapt the data protection declaration at any time in compliance with data protection law. The current version of this data protection declaration is available on the website of GB GestionBâle SA.

### **14. Contact details**

The office responsible for data protection issues is:

GB GestionBâle SA  
Contact point for data protection  
Rittergasse 33  
4051 Basel  
Switzerland

Tel.: +41 (0)61 225 91 81

E-mail: [info\(at\)gestionbale.ch](mailto:info@gestionbale.ch)

Website: <http://www.gestionbale.ch>

Data protection concerns can be addressed in writing to the above contact address.

If you are not satisfied with GB GestionBâle SA's response, you have the right to lodge a complaint with the Swiss data protection authority:

(<https://www.edoeb.admin.ch/edoeb/de/home/meldeportale.html>)