

## Privacy Statement

### 1. Scope

This privacy policy governs the processing by papilio ltd., Bellerivestrasse 16, 8008 Zurich (hereinafter 'papilio', or 'we') of the personal data of visitors to its website (hereinafter 'you').

The handling of data relating to our interactions with contractors and assessment participants is regulated separately.

### 2. Contact

You can contact us at the following address:

papilio ltd.  
Bellerivestrasse 16  
8008 Zurich  
info@papilio.ch

papilio is represented by Dr Mirjam Cécile Britsch Lehmann.

### 3. General Terms and Conditions

papilio complies with the legal provisions for data protection. All personal data, protected under the Swiss Federal Data Protection Act (hereinafter 'DPA') or the European General Data Protection Regulation (hereinafter 'EU GDPR'), which are collected during the registration process or during the visits to the website, are exclusively used as stated in the contract, unless there is express consent otherwise given by the user, especially with regards to this privacy policy, and if the applicable law allows further use of the data. Our employees are required to keep personal information confidential.

### 4. What personal data is collected, and for what purpose

We collect surfing and usage data from visitors to our website.

For example, we collect information about the type and version of the browsers used by our website visitors, the time of the visit, which operating system is installed on the visiting device, from which website and link the visitor came to our website, and which elements of our website visitors use and how. This personal data is stored along with the IP address of the visitor, and is used to optimise the display of our website, and to protect it against attacks or other infringements. We do not link any usage data to individual users, and evaluate the personal data anonymously, except in cases when personal data is needed to address infringements.

In addition, we collect the personal data that you submit via the e-mail addresses stated on the website and in this privacy policy.

### 5. Retention period

papilio stores personal data only for as long as it is necessary for its purpose, or as required by law.

In the case of misuses (e.g. attacks to our IT systems, etc.), we retain relevant personal data for up to ten years.

### 6. Processing by third parties

papilio may also let third parties process personal data for the aforementioned purposes. These are companies commissioned by us for the technical operations of our information technology infrastructure (including but not limited to outsourcing, hosting, etc).

### **7. Analytics Services**

papilio uses third-party services to analyse surfing behaviour, including content from other websites.

Personal data collected through analytics services will be transmitted anonymously to third-party servers abroad, including the USA.

### **8. Inclusion of third party elements on the papilio website**

papilio's website integrates content from various third-party vendors, e.g. videos from video sharing platforms such as YouTube, or buttons from social media platforms such as Facebook or Twitter. This content allows visitors to access content from the aforementioned platforms directly on our website, or to simply share our content through specific social networks.

When browsing our site, if such content appears as part of the site, it automatically connects to the third-party servers. In the process, personal data about your visit to our website, in particular your IP address, will be transmitted to the third-party provider. Therefore, should you be logged on the servers of the third-party vendors at the time of your visit (for example, with a Facebook or Google Account), it is possible that the third party will be able to determine that you have visited our website.

All information regarding the purpose and scope of the data collected by the third-party vendors, including information about your rights and options, will be provided to you by the third-party vendors themselves.

### **9. Cookies**

papilio uses cookies on its website, which are small parcels of information stored on computers and which can be sent to your browser by papilio's web server, stored on your computer and retrieved by the web server at a later visit. Cookies store information about the visitor's online preferences and allow papilio to enhance the user experience.

You can delete existing cookies at any time in your internet browser, and block additional cookies in your browser settings. However, blocking cookies may interfere with some of the features on papilio's website.

### **10. Legal basis for data storage**

The legal basis for the processing of personal data by papilio is given by Article 13 (2) (a) of the DPA (processing personal data in direct connection with the conclusion or the performance of a contract), which corresponds to Article 6 (1) (b) of the EU GDPR, and by Article 13 (1) of the DPA (consent of the data subject or an obligation to process the data by law), which corresponds to Article 6 (1) (a) of the EU GDPR.

In cases of misuse (such as attacks on our IT systems), we reserve the right to store the corresponding personal data to protect our own interests, based on Article 13 (1) of the DPA, which corresponds to Article 6 (1) (f) of the EU GDPR.

## 11. Your rights

Upon request, papilio will provide information to individuals as to which parts of their personal data, if any, is being processed (right to obtain confirmation, right of access).

Upon your request:

- we will forgo all or part of the processing of personal data (right to withdraw consent to the processing of non-essential personal data, right to be forgotten). We will also communicate your request to be forgotten to third parties to whom we may have forwarded your personal data;
- we will amend the relevant personal data (right to rectification);
- we will restrict the processing of the relevant personal data (right to restriction of processing; in such cases we will only store the personal data or use it to protect potential legal claims or third-party rights);
- you will receive the relevant personal data in a structured, common and machine-readable format (right to data portability).

To submit an application to exercise one of the rights described in this section (for example, if you no longer wish to receive e-mail newsletters from us or if you wish to cancel your account), you can use the relevant functionality on our website or contact our data protection officer or a member of staff, according to the information shown above under 'Contact' (Chapter 2).

Should we decide not to comply with a request, we will inform you about our reasons not to do so. For example, we are legally entitled to deny deletion of your personal data if they are still needed for the original purpose, if the processing of the data is based on compelling legitimate grounds or if we have overriding personal interests (for example, in a lawsuit against the requestor).

Should we assert our overriding interests against your request, you still have the right to object to the processing of your personal data, provided that your particular situation may result in a different outcome compared to other data subjects (right to object). For example, this could be the case if you are a person with a public profile, or if the processing of the data could put you at risk of being harmed by a third party.

Should you not be satisfied with our response to your request, you have the right to lodge a complaint with a supervisory authority in your country of residence or in Switzerland (right to lodge a complaint).

## 12. Applicable law and place of jurisdiction

This privacy statement and the contracts concluded on the basis of this privacy statement shall be governed by Swiss law, unless the law of another country is compulsorily applicable. Place of jurisdiction shall be Zurich, unless another jurisdiction has been stipulated.