

## PRIVACY POLICY

### INFORMATION ON THE PROCESSING OF PERSONAL DATA

In compliance with the Swiss Federal Data Protection Act (FADP) and EU Regulation 2016/679 (GDPR), we provide you with the following information regarding the processing of personal data collected when browsing the website of the Data Controller: <https://www.sipsa.ch/it/>.

Please note that, depending on your location or that of the company you represent, your personal data will be processed in accordance with the applicable regulation, either the FADP or the GDPR.

This information notice does not apply to other websites, pages, or online services accessible through hyperlinks that may be published on this website, including social media pages such as Facebook and Twitter. With regard to those services, please consult their respective privacy and cookie policies.

#### 1. Website User.

This refers to you, the individual accessing our website to whom this privacy notice is addressed, also referred to as the "Data Subject."

#### 2. Data Controller.

The Data Controller responsible for the processing of your personal data is **SIP Swiss Industrial Promotion SA** (hereinafter, "SIP"), with registered office at Strada Cantonale 171, 6534 San Vittore, Switzerland, phone +41 (0)91 820 10 44, contactable at the following email address: [info@sipsa.ch](mailto:info@sipsa.ch)

#### 3. Representative in the European Union.

Pursuant to Article 27 of EU Regulation 2016/679, the Controller has appointed **INDO SRLS**, with registered office at Viale Giacomo Mancini 156, 87100 Cosenza (CS), VAT No. 03510180783, phone +39 02 87366082, email: [dpo@indoconsulting.it](mailto:dpo@indoconsulting.it), as its representative within the European Union.

#### 4. Purpose of Processing, Legal Basis, and Retention Period of Your Personal Data

##### 4.1 AREAS of the website where CONTACTS are available – *Data provided directly by the Data Subject through the contact details indicated in the footer or on the navigation pages.*

The explicit and voluntary sending of messages to the contact addresses published on the website entails the acquisition of the sender's contact details, as well as any personal data included in the communications.

Such data are processed for the following purposes:

4.1.1 **To recontact the User:** your contact details will be used for the purpose of recontacting you and responding to your request. The provision of such data is necessary in order to process the request.

*Legal basis (Switzerland):* Article 31(2)(a) FADP, overriding interest of the Controller, specifically the processing of data relating to the Data Subject in direct connection with the conclusion of a contract, the performance of pre-contractual measures, and the handling of specific User requests.

*Legal Basis (EU):* Article 6(1)(b) GDPR, the performance of pre-contractual measures taken at the request of the Data Subject.

*Retention Period:* data will be retained for the time necessary to respond to the request or, in the case of quotations, for the duration of the validity of the quote agreed between the parties.

##### 4.2 CONTACT AREAS - *Data provided directly by the Data Subject through the completion of forms used to request information or quotations.*

The explicit and voluntary completion of these forms entails the acquisition of the sender's contact details and identification data, enabling them to request information on SIP's services and products or to request quotations.

Such data are processed for the following purposes:

4.2.1 **To recontact the User:** your contact details will be used for the purpose of recontacting you and responding to your request. The provision of data marked with an asterisk is necessary in order to process the request.

*Legal basis (Switzerland):* Article 31(2)(a) FADP, overriding interest of the Controller, specifically the processing of data relating to the Data Subject in direct connection with the conclusion of a contract, the performance of pre-contractual measures, and the handling of specific User requests.

*Legal Basis (EU):* Article 6(1)(b) GDPR, the performance of pre-contractual measures taken at the request of the Data Subject.

*Retention Period:* data will be retained for the time necessary to respond to the request or, in the case of quotations, for the duration of the validity of the quote agreed between the parties.

##### 4.3 Website Browsing Data.

For its correct functioning, the website automatically collects certain personal data during normal browsing, including IP addresses or domain names of the computers used by users, URI (Uniform Resource Identifier) addresses of requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the server's response (success, error, etc.), and other parameters relating to the user's operating system and IT environment. For further details, please refer to the Cookie Policy.

Our website collects some of this data, in some cases also through cookies, for the following purposes:

**4.3.1 Security:** to ensure system security and compliance with legal obligations. Data may be disclosed to competent authorities, upon their request, for reasons of security and in the public interest. The provision of such data is mandatory.

*Legal basis (Switzerland):* Article 31(1) FADP - processing required by law.

*Legal Basis (EU):* Article 6(1)(c) GDPR - compliance with a legal obligation.

*Retention Period:* In accordance with legal requirements and no longer than prescribed by applicable law. Please refer to the Cookie Policy for further details.

We use Google reCAPTCHA to protect the website from spam and malicious automated activity. This service analyses website traffic to filter out unwanted traffic, spam messages, and malicious bots.

**4.3.2 Website Functionality:** processing is carried out to ensure the functionality of the website by enabling essential features without which the site cannot operate correctly. The provision of this data is strictly necessary for the functioning of the site and the provision of browsing services on the platform.

*Legal basis (Switzerland):* Article 31(2)(a) FADP – overriding interest of the Controller.

*Legal basis (EU):* Article 6(1)(f) GDPR – legitimate interest of the Controller.

*Retention period:* until the end of the browsing session or in accordance with the retention periods set for cookies. For further details, please refer to the Cookie Policy.

This website uses WordPress tools to support these purposes.

## **5. Categories of Recipients of Personal Data, Disclosure and Dissemination.**

Your personal data will not be disseminated to unspecified parties by means of availability or consultation.

We may disclose your personal data to the following categories of recipients::

5.1 Employees and authorized personnel (such as administrative staff, sales staff, accounting staff, system administrators) within the limits necessary to perform their duties for the Controller, and subject to an appointment letter imposing confidentiality and security obligations..

5.2 Consultants or service providers acting as data processors (such as hosting providers, IT companies, communication agencies, or other entities providing outsourced services on behalf of the Controller), within the limits necessary to perform their tasks, and subject to a data processing agreement imposing confidentiality and security obligations.

- The hosting provider of the website is Infomaniak Network SA, based in Switzerland.

- For website development, we use tools provided by Automattic Inc., based in the United States.

5.3 Public bodies or other authorities where disclosure is required (or permitted) under applicable Swiss, EU, or other relevant law, and strictly within their remit (e.g., cantonal or federal authorities for accounting or tax purposes, where a legal reporting obligation exists).

The Controller relies exclusively on certified and secure service providers who:

(i) are established in Switzerland;

(ii) are established outside the EEA, in particular in the United States, where we use Google reCAPTCHA for spam protection and WordPress tools provided by Automattic Inc. Such transfers are carried out only after verifying that appropriate safeguards are in place under Swiss and European law, including adherence to the EU–U.S. Data Privacy Framework (for EU users) and the Swiss–U.S. Data Privacy Framework (for Swiss users). Accordingly, such transfers are lawfully authorized.

No transfers of personal data are made to providers that do not ensure adequate data protection standards under Swiss law.

The Data Subject may request further information by contacting us at [info@sipsa.ch](mailto:info@sipsa.ch) or by reaching out to our EU Representative at [dpo@indoconsulting.it](mailto:dpo@indoconsulting.it)

## **6. Methods of Processing**

The processing of personal data is carried out using appropriate technical and organizational measures to ensure a level of security appropriate to the risk. Processing may be performed either on paper or with the aid of automated IT tools designed to store, manage, and transmit the data.

This website uses **SSL encryption** for security reasons and to protect the transmission of data. You can recognize a secure connection by the address bar of your browser. When SSL encryption is activated, the data transmitted cannot be read by third parties.

## **7. Rights of Data Subjects**

### **7.1. If you are domiciled in Switzerland**

Articles 25 to 32 of the FADP grant you the following rights and claims, within the limits prescribed by law:

- right of access, to request information on the processing of your personal data;
- right to request the update and rectification of your personal data;
- right to request the restriction of processing and disclosure to third parties;
- right to request the erasure or destruction of personal data;
- right to request a prohibition on processing or disclosure to third parties;
- right to request that the contested nature of the data be indicated, or that a judgment be mentioned.

If you have a complaint regarding how we handle your personal data, we would appreciate the opportunity to address it directly. However, you also have the right to lodge a complaint with the Federal Data Protection and Information Commissioner (FDPIC)

### **7.2. If you are domiciled in the EU**

Articles 15 to 21 of the GDPR grant you the following rights, within the limits prescribed by law:

- Right of Access (Art. 15 GDPR) and Right to Rectification (Art. 16 GDPR);
- Right to Erasure (Art. 17 GDPR) and Right to Restriction of Processing (Art. 18 GDPR), meaning that the data may no longer be processed and cannot be modified;
- Right to Data Portability (Art. 20 GDPR), i.e., the right to receive the personal data concerning you, which you have provided and which is processed by automated means, in a structured, commonly used, and machine-readable format, and to transmit it to another controller, or request direct transfer to another controller;
- Right to Object (Art. 21 GDPR), i.e., the right to object to the processing of your personal data, including for direct marketing purposes or market research.

If you have a complaint regarding how we handle your personal data, we would appreciate the opportunity to address it directly. However, you also have the right to lodge a complaint with the competent supervisory authority in the country where you are habitually resident, without prejudice to any other administrative or judicial remedy.

## **8. How to Exercise Your Rights**

To exercise your rights and claims, in accordance with the procedures and timeframes set out under the FADP or GDPR, you may contact the Controller directly at [info@sipsa.ch](mailto:info@sipsa.ch) or our EU Representative at [dpo@indoconsulting.it](mailto:dpo@indoconsulting.it)

Please note that the collection of website browsing data, specifically technical or functional cookies (limited to those necessary to ensure website functionality and enable basic features), is essential for the operation of the website. Users therefore have no right to restrict this type of processing.

We kindly ask you to promptly notify the Controller, or our designated EU Representative, of any changes to your personal data so that we may comply with Art. 6 FADP and/or Art. 16 GDPR, which requires that personal data be accurate and up to date.

Privacy Policy last updated: 23 May 2025.

**Annex not to be included in the privacy policy; this information must be provided to the website administrator.**

## **CONSENT CHECKBOXES**

### **Contact Forms**

**At the end of each form, before submission, insert the following checkbox with a link to the website's Privacy Policy.**

☐ In accordance with data protection regulations, the Federal Act on Data Protection (FADP) and the EU General Data Protection Regulation (GDPR), I have read and understood the Privacy Policy. (**mandatory**)