

PRIVACY POLICY

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1. What is this privacy policy about?

The Spiez Castle Foundation (hereinafter also referred to as "we", "us") collects and processes personal data concerning you or other persons (so-called "third parties"). We use the term "data" here synonymously with "personal data". Personal data refers to all information relating to an identified or identifiable natural person. The term "data processing" is to be understood situationally and includes any handling of personal data, regardless of the means and procedures used, in particular the procurement, storage, use, modification, disclosure, archiving or destruction of data.

In this Privacy Policy, we describe what we do with your data when you use <https://www.schloss-spiez.ch/>, other websites of ours or our apps (hereinafter collectively referred to as the "Website"), purchase our services, are otherwise in contact with us under a contract, communicate with us or otherwise deal with us. Where appropriate, we will provide you with timely written notice of additional processing activities not mentioned in this Privacy Policy. In addition, we may inform you separately about the processing of your data, e.g. in declarations of consent, contractual conditions, additional data protection declarations, forms and notices.

If you transmit or disclose data about other persons to us, we assume that you are authorised to do so and that this data is correct. By transmitting data about third parties, you confirm this. Please also ensure that these third parties have been informed about this privacy policy.

We collect and process personal data to fulfil our business tasks, within the legally and contractually regulated framework. We collect personal data in a transparent manner and in compliance with the principles of proportionality and purpose limitation. The data is only processed to the extent and for as long as is necessary for our tasks and obligations.

This Privacy Policy is designed to meet the requirements of the EU General Data Protection Regulation ("GDPR"), the Swiss Data Protection Act ("DPA") and the revised Swiss Data Protection Act ("revDSG"). However, whether and to what extent these laws are applicable depends on the individual case.

2. Who is responsible for processing your data?

The Spiez Castle Foundation, Schlossstrasse 16, CH-3700 Spiez, is responsible under data protection law for the data processing described in this privacy policy, unless otherwise communicated in individual cases.

You can contact us as follows for your data protection concerns and to exercise your rights in accordance with section 10:

Stiftung Schloss Spiez
Barbara Egli
Schlossstrasse 16
CH-3700 Spiez
barbara.egli@schloss-spiez.ch

3. What data do we process?

We process different categories of data about you. The most important categories are as follows:

Technical data: When you use our website or other electronic offerings, we collect the IP address of your end device and other technical data to ensure the functionality and security of these offerings. This data also includes logs in which the use of our systems is recorded. To ensure the functionality of these offers, we can also assign you or your end device an individual code (e.g. in the form of a cookie, see section 11). The technical data itself does not allow any conclusions to be drawn about your identity.

Registration data: Certain offers and services can only be used with registration. To do so, you must provide us with certain data and we collect data on the use of the offer or service.

Communication data: If you are in contact with us via a contact form, e-mail, telephone, letter or other means of communication, we collect the data exchanged between you and us, including your contact details and the marginal data of the communication. If we want or need to establish your identity, we collect data to identify you (e.g. a copy of an identity document). Emails in personal mailboxes and written correspondence are generally stored for at least 10 years.

Contract data: This is data that arises in connection with the conclusion or fulfilment of a contract. We generally collect this data from you, from contractual partners and from third parties involved in the fulfilment of the contract, but also from third-party sources and from publicly accessible sources. We generally store this data for 10 years from the last contractual activity, but at least from the end of the contract. This period may be

longer if this is necessary for reasons of proof or to comply with legal or contractual requirements or for technical reasons.

Master data: We define master data as the basic data that we require in addition to the contract data (see above) for the processing of our contractual and other business relationships or for marketing and advertising purposes (in particular surname, first name, email address and, if applicable, gender, address, telephone number and date of birth). We process your master data if you are a customer or other business contact or are working for such a person (e.g. as a contact person of the business partner), or because we wish to contact you for our own purposes or the purposes of a contractual partner (e.g. as part of marketing and advertising, with newsletters, etc.). We receive master data from you yourself (e.g. when a contract is concluded), from organisations for which you work or from third parties such as our contractual partners, associations and from publicly accessible sources such as public registers or the Internet. As a rule, we store this data for 10 years from the last exchange with you, but at least from the end of the contract. This period may be longer if this is necessary for reasons of proof or to comply with legal or contractual requirements or for technical reasons.

Particularly sensitive data: We process particularly sensitive data, especially in the context of personnel administration. If there are reasons for storing and processing particularly sensitive data, we ensure that no unauthorised persons gain access to the data. In addition, our employees who work with particularly sensitive data are obliged to maintain confidentiality. The data is processed in such a way that only those employees who need to work with the respective data have access to it. This applies to both electronic and physical data. Data that is available in electronic form can be protected by encryption.

Data about personnel: Application documents that do not lead to employment will be deleted or destroyed after completion of the application process, unless we receive consent to retain them.

You provide us with much of the data mentioned in this **Section 3** yourself (e.g. via forms, in the context of communication with us, in connection with contracts, when using the website, etc.). You are not obliged to do so, subject to individual cases, e.g. in the context of binding protection concepts (legal obligations). If you wish to conclude contracts with us or make use of services, you must also provide us with data as part of your contractual obligation in accordance with the relevant contract, in particular master data, contract data and registration data. When using our website, the processing of technical data is unavoidable.

Insofar as this is not unauthorised, we also obtain data from publicly accessible sources (e.g. land registers, commercial registers, etc.) or receive data from authorities and other third parties.

4. For what purposes do we process your data?

We process your data for the purposes explained below. These purposes and the underlying objectives represent legitimate interests of us and, where applicable, of third parties. However, we do not use your data for profiling or for automated decisions in individual cases.

We process your data for purposes related to communication with you, in particular to respond to enquiries and assert your rights (Section 10) and to contact you in the event of queries. In particular, we use communication data and master data for this purpose. We retain this data in order to document our communication with you and for follow-up questions.

We process data for the handling of contractual relationships (guided tours, events, room hire, etc.).

We process data to maintain relationships. This may, for example, take the form of newsletters and other regular contacts (electronically or by post) via channels for which we have contact information from you. You can decline such contacts at any time.

We will continue to process your data to improve our products, services and operations.

We may also process your data for security purposes.

We process personal data to comply with laws, directives and recommendations from authorities and internal regulations ("compliance").

We also process data for the purposes of our risk management and in the context of prudent corporate governance, including business organisation and corporate development.

We may process your data for other purposes, e.g. as part of our internal processes and administration.

5. On what basis do we process your data?

If we ask for your consent for certain processing, we will inform you separately about the corresponding purposes of the processing. You can revoke your consent at any time with effect for the future by sending us written notification (by post) or, unless otherwise stated or agreed, by e-mail. You will find our contact details in Section 2. As soon as we

have received notification of the withdrawal of your consent, we will no longer process your data for these purposes.

Where we do not ask for your consent for processing, we base the processing of your personal data on the fact that the processing is necessary for the initiation or execution of a contract with you (or the entity you represent) or that we or third parties have a legitimate interest in it, in particular in order to pursue the purposes and associated objectives described above under Section 4 and to be able to implement corresponding measures. Our legitimate interests also include compliance with statutory provisions, insofar as this is not already recognised as a legal basis by the applicable data protection law.

6. To whom do we disclose your data?

In connection with our contracts, the website, our services and products, our legal obligations or otherwise to protect our legitimate interests and the other purposes listed in Section 4, we also transfer your personal data to third parties, in particular to the following categories of recipients:

Service providers and contractual partners: We work with service providers and contractual partners in Switzerland and abroad who process data about you on our behalf or under joint responsibility with us or who receive data about you from us under their own responsibility (in particular IT providers, payment service providers, debt collection companies, trust companies, banks and insurance companies).

Authorities: We may disclose personal data to offices, courts and other authorities in Switzerland and abroad if we are legally obliged or authorised to do so or if this appears necessary to protect our interests. The authorities process data about you that they receive from us under their own responsibility.

Other persons: This refers to other cases where the involvement of third parties arises from the purposes set out in section 4.

7. Is your personal data also transferred abroad?

As explained in section 6, we also disclose data to other organisations. These are not only located in Switzerland. Your data may therefore be processed both in Europe and, in exceptional cases, in any country in the world. The country to which the data is exported may not have the same data protection standard as Switzerland.

We only transfer data to bodies outside Switzerland if this is necessary under the respective contract, to fulfil legal obligations, to pursue the purposes and associated objectives described above in section 4 or to protect our legitimate interests.

8. How long do we process your data for?

We process your data for as long as our processing purposes, the statutory retention periods and our legitimate interests in processing for documentation and evidence purposes require it or storage is technically necessary. If there are no legal or contractual obligations to the contrary, we will delete your data at the end of the storage or processing period as part of our normal processes.

9. How do we protect your data?

We take appropriate technical and organisational security measures to protect the confidentiality, integrity and availability of your personal data, to protect it against unauthorised or unlawful processing and to counteract the risks of loss, unintentional modification, unwanted disclosure or unauthorised access.

This includes IT and network security solutions, access restrictions, encryption of data carriers and transmissions, instructions, training and controls.

10. What rights do you have?

To make it easier for you to control the processing of your personal data, you also have the following rights in connection with our data processing, depending on the applicable data protection law:

The right to request information from us as to whether and which of your data we are processing.

The right to have us correct data if it is incorrect.

The right to request the deletion of data.

The right to request that we hand over certain personal data in a commonly used electronic format or transfer it to another controller.

The right to withdraw consent where our processing is based on your consent.

The right to request further information necessary to exercise these rights.

If you wish to exercise the above rights against us, please contact us in writing; our contact details can be found in section 2. In order to rule out misuse, we must identify you (e.g. with a copy of your ID, unless otherwise possible).

Please note that these rights are subject to conditions, exceptions or restrictions under the applicable data protection law (e.g. to protect third parties or business secrets). We will inform you accordingly if necessary.

If you do not agree with our handling of your rights or data protection, please let us know (Section 2).

11. Do we use online tracking and online advertising technologies?

We use various technologies on our website with which we and third parties engaged by us can recognise you when you use our website and, under certain circumstances, track you over several visits. We will inform you about this in this section.

Essentially, this is so that we can distinguish access by you (via your system) from access by other users, so that we can ensure the functionality of the website and carry out general analyses, e.g. of the number of visitors. We do not want to infer your identity. However, even without registration data, the technologies used are designed in such a way that you are recognised as an individual visitor each time you access a page, for example by our server (or the servers of third parties) assigning you or your browser a specific identification number (so-called "cookie").

You can programme your browser to block or deceive certain cookies or alternative technologies or delete existing cookies. You can also add software to your browser that blocks tracking by certain third parties. You can find more information about this on the help pages of your browser (usually under the heading "Data protection") or on the websites of the third parties listed below.

A distinction is made between the following:

Necessary cookies: Some cookies are necessary for the functioning of the website as such or for certain functions. For example, they ensure that you can switch between pages without losing the information entered in a form. They also ensure that you remain logged in. These cookies are only temporary ("session cookies"). If you block them, the website may not work. Other cookies are necessary so that the server can save your decisions or entries beyond one session (i.e. one visit to the website) if you use this function.

Performance cookies: In order to optimise our website and corresponding offers and to better tailor them to the needs of users, we use cookies to record and analyse the use of our website, possibly even beyond the session. We do this by using third-party analytics services. We have listed these below. Details can be found on the websites of the third-party providers.

We currently use the following service providers:

Google Analytics: Google Ireland (based in Ireland) is the provider of the "Google Analytics" service and acts as our processor. Google Ireland relies on Google LLC (based in the USA) as its processor (both "Google"). Google uses performance cookies (see above) to track the behaviour of visitors to our website (duration, frequency of pages accessed, geographical origin of access, etc.) and compiles reports for us on the use of our website on this basis. Although we can assume that the information we share with Google is not personal data for Google, it is possible that Google may use this data for its own purposes to draw conclusions about the identity of visitors, create personal profiles and link this data to the Google accounts of these individuals. If you agree to the use of Google Analytics, you explicitly consent to such processing, which also includes the transfer of personal data (in particular website usage data, device information and individual IDs) to the USA and other countries. You can find information on data protection from Google Analytics here <https://support.google.com/analytics/answer/6004245> and if you have a Google account, you can find further information on processing by Google here <https://policies.google.com/technologies/partner-sites?hl=de>.

Google Maps: Your IP address is stored for the purpose of using the Google Maps functions. This is usually transmitted to a Google server in the USA. We have no influence on this data transfer. For more information, see the Google privacy policy <https://policies.google.com/privacy?hl=de>. The use of Google Maps is in the interest of an appealing presentation of our online offers and to make it easy to find the places we have indicated on the website. This is also in our legitimate interests. If you are logged into a user account of a provider, you may enable this provider to assign your surfing behaviour directly to your personal profile. We would like to point out that we have no knowledge of the specific content of the transmitted data or its use. If you do not want these providers to be able to associate your visit to our pages with your user account, please log out of your respective user account before using our website.

Google Maps: Your IP address is stored for the purpose of using the Google Maps functions. This is usually transmitted to a Google server in the USA. We have no influence on this data transfer. For more information, see the Google privacy policy <https://policies.google.com/privacy?hl=de>. The use of Google Maps is in the interest of an appealing presentation of our online offers and to make it easy to find the places we

have indicated on the website. This is also in our legitimate interests. If you are logged into a user account of a provider, you may enable this provider to assign your surfing behaviour directly to your personal profile. We would like to point out that we have no knowledge of the specific content of the transmitted data or its use. If you do not want these providers to be able to associate your visit to our pages with your user account, please log out of your respective user account before using our website.

The use of Google Web Fonts is in the interest of a uniform and appealing presentation of our online offers. For more information about Google Web Fonts, see the Google Web Fonts FAQs: <https://developers.google.com/fonts/faq>.

Meta: Meta Platforms Ireland Limited (hereinafter “Meta”) is the provider of Instagram. If you visit our Instagram page and your browser allows cookies to be stored, Meta stores information and can access it when you visit the Facebook platform or a website that integrates Facebook technologies. Facebook Ireland Ltd. provides more information on data processing in its Instagram privacy policy, which can be found at <https://www.instagram.com/legal/privacy/>.

12. [Can this privacy policy be amended?](#)

This privacy policy is not part of any contract with you. We may amend this privacy policy at any time. The version published on this website is the current version.

Last update: Spiez, 1 September 2023