

Data Privacy Policy

The developer and publisher of this website is Trafag AG (hereinafter “Trafag” or “We”) domiciled at Industriestrasse 11, 8608 Bubikon, Switzerland.

Accordingly, We are responsible for collecting, processing and using your personal data in compliance with the law.

We are obliged to handle your personal data responsibly. As a matter of course, We comply with the applicable data protection laws, particularly the EU General Data Protection Regulation (EU-GDPR).

The details of how We handle your personal data are set forth below.

Please note that the information shown below may be reviewed and amended from time to time. Therefore, We recommend that you read this Data Privacy Policy on a regular basis.

1. Data processing on the website

1.1 Scope and purpose of collecting, processing, and using personal data

1.1.1 Log files on access to our website

Whenever you visit our website, access is always recorded temporarily in a log file.

We collect the following data without any action on your part, and store it until automatic deletion after no more than 12 months:

- The IP address from the computer that accessed the site,
- The date and time of access,
- The name and URL of the data accessed,
- The website from which our domain was accessed,
- The operating system of your computer and the browser you use,
- The name of your ISP.

These data are collected and processed to allow users to visit the website (to establish a connection), ensure regular system security and stability, improve our web pages, and for internal statistics purposes. The information listed above is not linked to or saved with personal data.

Only in the event of an attack on the website’s network infrastructure or suspicion of another prohibited use/misuse of the website will the IP address be analysed for investigation and defence purposes; it may also be used in criminal prosecution proceedings to identify and file civil and criminal charges against the relevant users.

The purposes listed above constitute our legitimate interest in data processing pursuant to Art. 6 (1) (f) EU-GDPR.

1.1.2 Using the contact form

If you communicate with us using the website's contact form, We will collect the following data from you:

- First name*

- Last name*
- E-mail address*
- Message*
- Country (optional)
- Product and item information if a contact form on a product or item page is used

All fields marked * are mandatory.

We use these data to answer the questions you submit or to perform the services you request. Processing your contact enquiry constitutes our legitimate interest pursuant to Art. 6 (1) (f) EU-GDPR. You can object to this data processing at any time (see below for contact information).

1.1.3 Form for downloading or requesting special documents

Some areas of our website allow you to download or order specific documents (such as information pamphlets). If you fill out the forms or input fields as provided for your document request, We will collect the following data:

- Company*
- Last and first names*
- Title*
- Position
- Street, town, postal code*
- Country*
- Tel. no.*
- E-mail address*
- Areas of interest
- Language*
- Message

All fields marked * are mandatory.

We use this data so that We can grant you access to the documents requested or process your document orders and, if needed for this purpose, contact you by phone. We will store the information you provide in our CRM system. Under no circumstances will the telephone number be used for marketing purposes. Processing your request for document download or delivery constitutes our legitimate interest pursuant to Art. 6 (1) (f) EU-GDPR. You can object to this data processing at any time (see below for contact information), but will no longer have access after that.

1.2 Cookies

Cookies help in many ways to make your visit to our website more convenient, enjoyable, and useful. Cookies are information files that your web browser stores automatically on your computer's hard drive when you visit our website.

We use cookies, for example, to temporarily save the services you have selected and your input when you complete a form on the website, so that you do not have to re-enter the information when you access another page on the site. Once you have registered on the website, cookies may also be used to identify you as a registered user, so that you do not have to log in again when accessing another page on the site.

Most internet browsers accept cookies automatically. However, you can set your browser so that it does not store cookies on your computer, or notifies you each time you receive a new cookie. The following pages will explain how you can configure the handling of cookies in the most common browsers.

- [Google Chrome for Desktop](#)
- [Google Chrome for Mobile](#)
- [Microsoft Windows Internet Explorer](#)
- [Microsoft Windows Internet Explorer Mobile](#)
- [Mozilla Firefox](#)
- [Apple Safari for Desktop](#)
- [Apple Safari for Mobile](#)
- [Microsoft Edge](#)
- [Opera](#)
- [Samsung Internet](#)
- [UC Browser](#)

If you disable cookies, you may not be able to use all the features of our website.

1.3 Google Analytics

For the purposes of customer-oriented design and continuous improvement of our pages, We use the web analytics service Google Analytics by Google LLC., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Pseudonymous user profiles are generated and small text files ("cookies") stored on your computer are used for this purpose. The information generated by the cookie regarding your use of this website, such as

- Browser type/version
- Operating system used
- Referrer URL (the previous page visited)
- Host name of the computer (IP address)
- Time of server request
- Areas of interest
- Demographic data
- Behaviour-related data
- Geographic data

- Device type, screen resolution, preferred language,
- Websites accessed

will be sent to Google, a company held by Alphabet, Inc., in the US and stored there. When IP anonymisation (“anonymizeIP”) is activated on this website, the IP address will be shortened before transfer within the member states of the European Union or other countries who are a party to the agreement on the European Economic Area or Switzerland. The anonymised IP address sent from your browser with Google Analytics will not be combined with other data from Google. Only in exceptional cases will the full IP address be transferred to a Google server in the US and shortened there. In these cases, We use contractual guarantees to ensure that Google maintains an adequate level of data protection.

The information will be used to analyse the use of the website, to compile reports on the website activities and to perform other services relating to website use and internet use for the purposes of market research and customer-oriented design of these web pages. This information may also be transferred to third parties if this is required by law or if third parties are processing this data on our behalf. According to Google, under no circumstances will the IP address be combined with other data relating to the user.

Users can prevent the transfer of the data generated by the cookie that relates to website visits by the relevant user (incl. the IP address) to Google and the processing of this data by Google by downloading and installing the browser plug-in available at the link below:

<http://tools.google.com/dlpage/gaoptout?hl=de>

For the sake of completeness, please note that the US authorities can conduct monitoring activities as provided by US law; this also enables general storage of all data transferred from the European Union to the US. This applies without distinction, restriction or exception on the basis of the intended purpose, and without objective criteria that would enable restriction of the US authorities’ access to personal data and their subsequent use to specific, severely limited purposes that would justify access to these data.

Note to users residing in an EU member state: In the view of the European Union, the US does not have an adequate level of data protection – including for the reasons listed in this section. If We have stated in this Data Privacy document that any recipients of data (such as Google) are domiciled in the US, We will use contractual regulations with these companies or ensure that these companies are certified under the EU-US Privacy Shield to make sure that your data are protected adequately by our partners.

Processing these data constitutes our legitimate interest pursuant to Art. 6 (1) (f) GDPR. Information about objections / opting out has been given above.

1.4 Hubspot

We use Hubspot, a service by Hubspot, Inc., domiciled in the US, on our website for the purposes of analytics.

It uses “web beacons” and cookies that are stored on your computer so that We may analyse your use of our website. Hubspot analyses the information collected (such as IP address, geographic location, browser type, length of session and pages accessed) on our behalf in order to generate reports on the visits and on our pages visited.

If you do not wish Hubspot to collect your information in general, you can prevent the storage of cookies at any time by adjusting your browser settings (see Section 1.2 above).

For more details on how Hubspot works, please see the Privacy Policy of Hubspot Inc., at <http://legal.hubspot.com/de/privacy-policy>.

Processing these data constitutes our legitimate interest pursuant to Art. 6 (1) (f) GDPR. Information about objections / opting out has been given above.

1.5 Remarketing and conversion tracking

1.5.1 Google remarketing and conversion tracking

We work in the area of online marketing with Google LLC., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, in order to determine whether an internet user has found our website with a Google ad. Google uses cookies (see Section 1.2 above) that are stored on your computer and enable analysis of website use. Cookies for “conversion tracking” are stored when you click on a Google ad. These cookies expire after 30 days and are not used for personal identification. If you wish to disable these cookies for conversion tracking, you can set your browser to block cookies from the “googleadservices.com” domain. To prevent the execution of JavaScript code by Google entirely, you can install a JavaScript blocker (such as www.noscript.net or www.ghostery.com). If you wish to learn more about these methods or see what options you have to keep Google from using this information, please go to:

<https://support.google.com/adwords/answer/1722022?hl=de>.

We also use Google Dynamic Remarketing by Google. For this purpose, Google uses a remarketing cookie, which allows for recognition of your browser when you visit other websites. The information generated by the cookie about your visit to our website (including your IP address) will be transferred to a Google server in the US and stored there (for more information regarding the transfer of personal data to the US, see Section 1.3).

Google will use this information to analyse your use of the website with regard to the ads to be displayed, in order to compile reports for the website operators on website activities and ads, and to perform other services relating to website use and internet use. Google may also transfer this information to third parties if this is required by law or if third parties are processing these data on Google’s behalf. However, under no circumstances will Google combine your IP address with other data from Google.

You can block remarketing by disabling the relevant cookie (see Section 1.2 for details).

Processing these data constitutes our legitimate interest pursuant to Art. 6 (1) (f) GDPR. Information about objections / opting out has been given above.

1.5.2 Google Tag Manager

To manage the services for use-based advertising, We also use Google Tag Manager. The Tool Tag Manager domain itself has no cookies and does not collect personal data. Rather, the tool triggers the activation of other tags that collect data in some cases. If you have disabled any domains or cookies, this will also apply to all tracking tags that are implemented with the Google Tag Manager.

1.5.3 Hotjar

Hotjar is a complete system for analysing online behaviour, and offers feedback from website visitors at the same time. By combining both components – a) analysis and b) feedback – Hotjar gives us the “big picture” of how We can make visits to our website more enjoyable and improve our performance.

The analytical tool enables measurement and tracking of user behaviour (what users do) while the feedback tool shows what the users are saying (voice of the user/customer).

Hotjar is operated by Hotjar Ltd, St Julian's Business Center, Elia Zammit Straße 3, St. Julian's STJ 1000 in Malta (SP), a European start-up company that is registered under the company number C 65490. If you have specific questions or feedback, please contact Hotjar directly using this link (in English only) at any time.

Collection of information

Hotjar's embedded tracking code on our Trafag website collects information such as:

Device-specific data

- The IP address of your device (collected and saved in anonymous format)
- The device's screen size
- Device type (device identification features) and browser information
- Geographic location (country only)
- Preferred language for website viewing

Log data

Hotjar servers (in Ireland) automatically record information that is generated by Hotjar during use. These data include:

- Referral domains
- Pages visited
- Geographic location (country only)
- Preferred language for website viewing
- Date and time of access to the website's pages

Further links:

<https://help.hotjar.com/hc/en-us/articles/115011624047-Does-Hotjar-Collect-Data-from-ALL-My-Visitors->

<https://help.hotjar.com/hc/en-us/sections/115003180467-Privacy-Security-and-Operations>

1.6 eMailing Tool

We use your e-mail address for e-mail marketing purposes. This is based either on your consent under Art. 6 (1) (a) GDPR or, for existing customers, on a legitimate interest under Art. 6 (1) (f) GDPR.

We use your data for e-mail marketing until you withdraw your consent. You can withdraw consent at any time. For contact information, see Section 1.12 below. You will also find an "unsubscribe" link in all newsletter e-mails.

We use third-party e-mail marketing services (such as Hubspot, Mailchimp) to send the e-mails. Our marketing e-mails may contain a web beacon (tracking pixel) or similar technical tools. A web beacon is a 1 x 1 pixel, invisible image that is linked to the user ID of the respective e-mail recipient.

For each marketing e-mail sent, it provides information on the address file used, the subject matter, and the number of e-mails sent. It also shows which addresses have not yet received

the e-mail, to which addresses the e-mail was sent, and from which addresses the e-mail bounced back. It also provides the open rate, including information about which addresses have opened the e-mail. Finally, it notifies us which addresses have unsubscribed. We use these data for statistical purposes and to improve the content and structure of our e-mails. This allows us to tailor the information and offers in our e-mails more closely to the recipients' individual interests. The tracking pixel is deleted once the recipient deletes the e-mail.

To block web beacons, please set your e-mail program to disable HTML in messages (if not already part of your default settings). The following pages will explain how you can configure the handling of cookies in the most common e-mail programs.

[Microsoft Outlook](#)

[Mail for Mac \("Load remote content to messages"\)](#)

1.7 Storage of data in a central database

We store the data listed in Sections 1.1 et seq. above in a central electronic data processing system. The data pertaining to you are systematically collected and linked to process your orders and perform the contractual services. We use software from Trafag AG, Industriestrasse 11, 8608 Switzerland, for this purpose. Processing these data with the software is based on our legitimate interest in customer-friendly, efficient customer data management pursuant to under Art. 6 (1) (f) GDPR. We also process these data for the purposes of contract fulfilment under Art. 6 (1) (b) GDPR.

1.8 Forwarding data to third parties

We forward your personal data only if you have granted express consent, if there is a legal obligation to do so, or it is necessary to enforce our rights, particularly to assert claims under the contractual relationship.

We also forward your data to third parties, if required, for the use of the website and the contractual performance – specifically, the provision of the services you have requested and the analysis of your user behaviour. Third-party use of the data forwarded to this end is strictly limited to the aforementioned purposes.

A number of third-party providers are listed in this Data Privacy Policy (such as in the sections "Tracking tools" and "Remarketing.")

Our web hosting provider [Stämpfli AG, Wölflistrasse 1, 3001 Bern, Switzerland] is a provider who may receive personal data collected on the website, or has / can have access to these data. The website is hosted on servers in Switzerland. Data are forwarded for the purposes of providing and maintaining the functionality of our website. This constitutes our legitimate interest pursuant to Art. 6 (1) (f) GDPR.

1.9 Transfer of personal data to a foreign country

We are entitled to forward your data to third-party companies in foreign countries if this is required in relation to processing your requests, performing services, or marketing campaigns. These third-party companies are obliged to respect the privacy of users to the

same extent as the provider itself. If the level of data protection in a country is considered inadequate when compared with Switzerland or the EU-GDPR, We will use an agreement to ensure that your personal data is protected at all times under Swiss guidelines or the EU-DGPR.

Various third-party providers and their registered addresses are already listed above (“Forwarding data to third parties”). Some third-party providers listed in this Data Privacy Policy are domiciled in the US (see “Tracking tools” and “Remarketing”). For more information on data transfer to the US, see “Tracking tools.”

1.10 Right of information, rectification, erasure and restriction of processing; right to data portability; right to file a complaint with a supervisory authority

You have the right to obtain information about the personal data We have stored on you upon request and free of charge. You also have the right to the rectification of incorrect data and the right to erasure of your personal data unless there is a legal retention obligation or We are permitted by law to process the data.

You also have the right to return of the data you have sent to us (right to data portability). We will also send the data to a third party of your choice on request. You have the right to obtain the data in a standard file format.

You can reach us for the above purposes at the following e-mail address: Privacy.Policy@trafag.com. We reserve the right to ask for proof of identity before We handle your request.

You also have the right to file a complaint with a data protection authority at any time.

1.11 Retention of data

We store personal data only as long as necessary to use the aforementioned tracking services or further process the data under our legitimate interest. We store contract data for a longer period of time, as required by legal retention obligations. Retention obligations that require us to store data include accounting regulations and tax laws. According to these regulations, business communications, closed contracts, and accounting receipts must be retained for at least 10 years. If We no longer need these data to perform services on your behalf, the data will be blocked. This means that the data can be used only for accounting purposes or tax purposes.

1.12 Data security

We use appropriate technical and organisational security measures that We deem suitable in order to protect your data on file with us from manipulation, partial or complete loss, and unauthorised access by third parties. Our security measures will be updated regularly in line with technological developments.

We also take the protection of our own data within the company very seriously. Our employees and our service providers are obliged to confidentiality and compliance with the data protection regulations. In addition, these parties are granted access to personal data only if necessary.

1.13 Contact

If you have questions about data protection on our website, would like information or want your data to be deleted, please contact us by e-mail at Privacy.Policy@trafag.com

For requests by post, please contact:

Trafag AG
Industriestrasse 11
8608 Bubikon
Switzerland

Last updated: October 2019