

PHHD Holding SA privacy statement

Status at 24.02.2025

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1. What is the purpose of this privacy statement?

At PHHD Holding SA (hereinafter also referred to as "we", "us", "our") we attach great importance to the protection of your personal data. PHHD Holding SA is a corporation that invests in the future of technology, established in 2008 in Geneva, Switzerland.

The purpose of this statement is to inform you about how we collect, use, share and protect your data in accordance with the European Union's General Data Protection Regulation (GDPR) and the Swiss Federal Data Protection Act (FDPA).

We invite you to read this statement carefully to understand your data protection rights and how we ensure the confidentiality and security of your personal information. This privacy statement applies to the <https://www.phhd.ch/> website (hereinafter referred to as the "website").

2. Who processes your personal data?

The data controller is the private company that determines the purposes and means of processing your personal data.

The controller of your personal data in accordance with the European Union's General Data Protection Regulation (GDPR) and the Swiss Federal Data Protection Act (FDPA) is, unless we indicate otherwise in a particular case:

PHHD Holding SA

Chemin Auguste-Vilbert 14

1218 Grand-Saconnex

Geneva, Switzerland

Info@phhd.ch

+41 022 306 00 59

If you have any questions or concerns regarding the processing of your personal data. You can contact our data protection department at the following e-mail address:

info@phhd.ch

3. What personal data is collected?

We use the term "**data**" here interchangeably with "**personal data**". Personal data" includes all information relating to an identified or identifiable natural person, i.e. the identity of that person can be established from the data itself or through additional data. This includes information such as your name, address, telephone number, e-mail address or an IP address assigned by your Internet service provider. In general, you can use our website without providing any personal data. Where personal data is collected on our sites, we do so on a voluntary basis wherever possible.

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

- 3.1 Logging data: information relating to the use of the website and platform, such as web pages consulted, IP address, browser settings, frequency of visits, time and duration of visits, search terms, clicks on content, original web page.
- 3.2 Communication data: contact and identification data such as surname, first name, title, address, e-mail address, telephone number, client number; interaction and usage data such as correspondence, chat content, information in forms and ratings and comments left.

We assume that the data you provide is correct and up-to-date. Should you be required to provide us with the data of third parties. We assume that the third party has consented to this and is aware of this data protection declaration.

We reserve the right to check this data at a later date if there is clear evidence of unlawful use which is brought to our attention.

3.1 Log data :

In principle, our website can be accessed without registration. During your visits to our website or use of our services, our web servers temporarily record each access in what is commonly known as a server log file.

This routine procedure captures the following technical data:

- IP address of requesting computer
- Date and time of access/request
- Website from which access was made
- Name and URL of requested data
- Your computer's operating system
- Browser used by you (type, version and language)
- Name of your Internet service provider
- Time zone difference from Greenwich Mean Time (GMT)
- Request content (specific page)
- Access status / HTTP status code
- Last website visited
- Browser settings
- Browser language and software version
- Device type (desktop, tablet, mobile)

This data can only be associated with you indirectly. It is not combined with other data sources. We reserve the right to check this data if we suspect that it is being used for unlawful purposes on the basis of specific evidence brought to our attention.

3.1.1 How is log data collected?

This technical data is generally collected each time you connect to a web server, without requiring any action on your part, using technologies such as cookies, web server logs, web beacons and similar technologies.

3.1.2 How long do we keep your log data?

This information is kept by us for a maximum period of **30 days** before being automatically deleted.

3.2 Communication data

To process your requests for assistance, we have set up a contact form. We collect your data through this form.

In particular, we process :

- Your first and last name
- Your e-mail address
- The subject of your message and your message.

This information is necessary for our teams to process your requests for assistance.

3.2.1 How is communication data collected?

When you contact us via the contact form, by e-mail, by telephone or by post or any other means of communication, we collect the data you exchange with us, including your contact details and the metadata of the communication. If we need to determine your identity, we collect data that enables us to identify you (e.g. a copy of an identity document).

3.2.2 How long do we keep your communication data?

We generally keep this data for 36 months from our last exchange with you. This period may be longer if necessary for evidential purposes, to comply with legal or contractual requirements, or for technical reasons. E-mails in personal inboxes and written correspondence are generally kept for **10** years.

4. On what legal basis do we process your data

We use your data according to the following legal bases, based on different circumstances:

1. If you have given us your consent to process your data, we do so in accordance with Article 6(1)(a) GDPR and Article 6 FDPA.
2. When you benefit from our services, this is based on a contract or pre-contractual measures (in accordance with Article 6, paragraph 1, point b) of the RGPD) and Article 6 FDPA.
3. If we have legal obligations to comply with, we process your data accordingly (in accordance with Article 6(1)(c) RGPD) and Article 6 FDPA.
4. Finally, in certain cases where we have a legitimate interest, such as ensuring the security of our website, providing you with information on the use of our platform, or informing you about products similar to those you have already purchased or researched from us, we may also process your data, provided you have not deactivated such communications (in accordance with Article 6(1)(f) RGPD) and Article 6 FDPA.

5. For what purposes do we process your data?

We process your data for the purposes set out below. These purposes and their objectives serve our interests and, where applicable, those of third parties.

We process your data in order to:

- Make our services available to you and keep them up and running.
- Provide client support.
- Monitor the use of our services.
- Detect, prevent and resolve technical problems.
- We process personal data to comply with the laws, directives and recommendations of the authorities.
- Enable the use of our website (connection establishment).
- Ensure the long-term security and stability of our systems.
- Optimize the user experience (e.g. retaining information from one web page to another).

When we offer you our services or when you use them, we need to collect certain data relating to the conclusion of the contract and the provision or use of the services. You are obliged to provide us with this data. If you do not provide us with this essential information, or if you do so incompletely, we may not be able to conclude a contract between you and us, or the provision of our services may not be possible, or only be possible to a limited extent.

6. With whom is my personal data shared?

It is important to note that log data is not shared with third parties or used for any other purpose. Furthermore, no personal user profile is generated from this data.

- Our company (PHHD Holding SA) is headquartered in Switzerland and complies with the various data protection regulations.

In the context of our contracts, the website, our products and services, our legal obligations, the protection of our legitimate interests, and the other purposes set out in section 5 "For what purposes do we process your data?", we may communicate your personal data to third parties, in particular to the following categories of recipients:

Service providers: We work with service providers in Switzerland who process your data on our behalf or as joint data controllers with us, or who receive data about you from us as independent data controllers.

In particular, we use a Swiss service provider to host our website.

Authorities: We may disclose personal data to agencies, courts and other authorities in Switzerland and abroad if we are legally obliged or entitled to make such disclosures or if it appears necessary to protect our interests.

7. To which countries is my data transferred and with what guarantees?

Within the framework of our contracts, the website, our products and services, our legal obligations, the protection of our legitimate interests, and the other stated purposes, we may communicate your personal data to other parties. These parties are all located in Switzerland. For example, our platform infrastructure is operated on servers located in Swiss computing centers.

8. How long do we process your data?

We process your data for as long as required by our processing purposes, legal retention periods and our legitimate interests in documenting and preserving evidence, or if retention is a technical requirement. You will find further information on the respective retention and processing periods for the various categories of data in sections 3.1.2 and 3.2.2, and for cookies in our cookie policy. In the absence of legal or contractual obligations to the contrary, we will delete or anonymize your data once the retention period has expired or processing has ceased as part of our normal processes.

9. How secure is my data?

To enhance the security of our website and to ensure that your information remains private and secure when you send us messages or confidential data, we use a type of protection called SSL/TLS on our website. You can spot this when the site address begins with "https://" instead of "http://" in the top bar of your browser. Some browsers also display a small padlock next to the address to indicate that the connection is secure.

When SSL/TLS encryption is in place, this means that no one else can intercept or read the information you send via our contact form.

However, it is important to note that total data security, especially when communicating by e-mail, can be compromised. Without the use of specific e-mail encryption methods such as PGP or S/MIME, there is a risk that third parties may gain access to your data. So, in general, data transmission over the Internet involves a certain level of risk.

Our platform infrastructure is operated on servers located in Swiss data centers certified to ISO 27001 and applying high security standards.

10. What are the rights of each individual concerned?

Applicable data protection laws give you the right to object to the processing of your data in certain circumstances, including processing for direct marketing purposes, profiling for direct marketing purposes and other legitimate processing interests..

To help you control the processing of your personal data, you have the following rights with respect to our processing of your data, in accordance with applicable data protection legislation :

- The right to ask us for information about whether we process data about you and, if so, which data.;
- The right to request that we correct data if it is inaccurate;
- The right to request the deletion of data ;
- The right to request that we provide certain personal data in a commonly used electronic format or transfer them to another data controller.;
- The right to withdraw your consent, where our processing is based on your consent ;
- The right to receive, on request, other information relevant to the exercise of these rights.;

If you wish to exercise the aforementioned rights towards us, you can contact us in writing at our e-mail address info@phhd.ch

You will find our contact details in section 2 "Who processes your personal data". In order to prevent misuse, we need to identify you (e.g. by means of a copy of your identity card, if identification is not otherwise possible).

Please note that conditions, exceptions and restrictions may apply to the exercise of these rights in accordance with applicable data protection legislation (e.g. to protect third parties or trade secrets). We will inform you of any such restrictions.

If you do not agree with the way we respond to the exercise of your rights or with our data protection practices, you can let us know at info@phhd.ch.

If you are located in the EEA, the UK or Switzerland, you also have the right to lodge a complaint with the competent data protection supervisory authority in your country. You can find a list of authorities in the EEA here : https://edpb.europa.eu/about-edpb/board/members_en. You can contact the UK supervisory authority at the following address : <https://ico.org.uk/global/contact-us/>. You can contact the Swiss supervisory authority at the following address : <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html>.

In particular, we may need to further process your data and retain your personal data in order to perform a contract with you, to protect our own legitimate interests, for example in enforcing contractual claims, exercising or defending legal claims or complying with legal obligations. To the extent permitted by law, in particular to protect the rights and freedoms of other data subjects and to safeguard legitimate interests, we may also reject a data subject's request in whole or in part (e.g. by redacting content relating to third parties or our trade secrets).

11. Can the data protection declaration be changed?

This data protection declaration does not form part of a contract with you. We may amend this data protection declaration at any time. The version published on this website is the current version.

Please note that this privacy policy may be amended or supplemented at any time, in particular in order to comply with any legislative, regulatory, case law or technological developments. In such a case, the date of the update will be clearly identified at the top of this policy. Such changes are binding on the User as soon as they are posted online. It is therefore advisable for the User to consult the present privacy and cookie use policy on a regular basis in order to take note of any changes.

12. Cookie Policy

On our website, we have chosen to use the minimum number of cookies required. To find out more, please consult our cookie policy.