

Privacy Policy

Effective Date: August 2019

bahargroup GmbH, Ilgenstrasse 2, CH-9000 St.Gallen, Switzerland (hereafter "Bahargroup") is committed to protecting your personal information. Some of the personal information you input into www.bahargroup.ch (the "Website") will be included in a data file of Bahargroup. Where European Economic Area and Swiss ("EEA + CH") law applies, Bahargroup is the controller of your personal information.

This Privacy Policy describes, among other things, the types of information collected about you when you visit the Website; how your information may be used and when it may be disclosed; how you can control the use and disclosure of your information; and how your information is protected.

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1. Types of personal information collected

We use different methods to collect personal information from and about you including through:

- **Direct Interactions:** You may provide personal information to us when you register for certain services, access various content or features, start a LifeChat with one of our customer consultants or directly contact us via contact form on the website. You may also provide personal information to Bahargroup if you post in community discussions, participate in any other online interactive features and if you participate in any research questionnaires, projects and surveys (the nature of which will be explained to you in more detail prior to your participation in them). The types of information we may collect from you includes personal details (including name and gender), contact information (including email address, postal address / location, telephone numbers), education and training details (including qualification, attendance at educational establishments and training received), and employment details (including details of previous employment roles).
- **Automated technologies or interactions:** When you use our Website, we will automatically collect technical information about your equipment, browsing actions and patterns, including your browser type and operating system, the links you click on within the Website, unique identifiers (including mobile device identification and IP address), information collected through cookies, web beacons and other, similar technologies, your bandwidth speed and information about the software programs installed on your computer and standard server log information.

- **Third parties or publicly available resources:** Where permitted by applicable law, we may collect information about you from other sources, including through interactive applications (such as mobile devices, third-party services, and embedded video players), from third party sites (for example social media sites), and from commercially available sources (such as data aggregators and public databases). The types of information we may collect includes personal details (including name, age, gender and other demographic data), contact information (including postal address and telephone numbers), your interests and purchase behavior and navigation data (including websites visited and advertisements viewed or clicked on).

This Privacy Policy does not cover the practices of third parties, including those that may disclose information to Bahargroup.

2. Purposes for processing your personal information

We may process any personal information you provide to us to enable us to perform the contract entered into between you and us, to ensure compliance with local legal and regulatory requirements and for the purposes of our legitimate business interests, including:

- To enable us to fulfil your requests for products, services, and information, including to complete transactions that you have requested;
- To ensure the security of our websites;
- To enable you to participate in features such as surveys, polls, promotions and message boards;
- With your consent, to provide you with electronic newsletters, information, special offers and promotional materials about us and the Website and on behalf of our Group Companies, in accordance with applicable law (see Your Choices below for further information of opting out of such marketing communications);
- To better understand how you interact with the website to understand and improve the Website and our service offerings (including customizing the content of the Website and developing advertising tailored to your interests); and to produce anonymous or aggregated data and statistics that might help third parties develop our or their own products and service offerings; and
- To enable us to process and consider your application to join Bahargroup and our Group Companies.

Combining Information. The information we collect about you may be combined for the purposes outlined in this Privacy Policy, including to help us tailor our communications to you and to develop rich online content and services.

3. Disclosure of your personal information

Bahargroup is committed to maintaining your trust and we want you to understand when and with whom we may share information collected about you. We may share your personal information with the following categories of recipients:

- **Bahargroup Group Companies:** We may share your contact information with other Group Companies so that they can contact you regarding features such as surveys, polls and

promotions and/or send you communications about their products and services. A list of our group companies can be viewed [here](#).

- **Authorized third-party service providers:** We may share your information with services providers who help us with specialized services, including customer support, email and text message deployment, business analytics, marketing and data processing. These service providers are required to keep your personal information confidential and secure, and must only use your personal information as instructed by Bahargroup; and
- **Our selected commercial partners and sponsors:** Where you have chosen to enter a sweepstakes, contest, or other promotion your personal information may be disclosed to sponsors and third parties who help design, administer and implement the promotion, including in connection with winner selection, prize fulfilment and aggregated data analysis.

We may also share your personal information in the following circumstances:

- **Business transfers:** We may share your information in connection with a substantial corporate transaction, such as the sale of a Group Company, a merger, consolidation, asset sale, or in the unlikely event of bankruptcy.
- **Legal requirements:** We may disclose information about our users, including contact information, where we have a legal duty to do so, including in response to court orders or legal process, and to comply with other legal obligations imposed on us.
- **Protect our Website and users:** We may disclose information to protect and defend the legal rights, interests, and safety of the Website, the Bahargroup group of companies, and their employees, agents, and contractors (including enforcing our agreements); to protect the safety and security of users of the Website and members of the public. Your personal information may also be subject to foreign laws and may be accessible by foreign governments, courts, law enforcement and regulatory agencies.

We may share aggregated or anonymized information with third parties, for purposes including helping us develop content and services we hope you will find of interest or to help these third parties develop our or their products and service offerings. This sharing of anonymized or aggregated information will not include information that could be used to identify you.

4. Your choices

You can choose to enjoy content and features on the Website without directly providing us with any information about you; however, as described above, some information may automatically be collected or may be requested so you can take advantage of certain features and services offered on the Website.

We send marketing communications where you have agreed to us doing so. You can opt out of receiving marketing emails or text messages from us by following the instructions contained in any such message or by contacting us at any time (see Section 11 "Questions" below). Please note that even if you unsubscribe to marketing communications, we still may need to send you communications relating to your use of the Website, such as service announcements and if we may need to send certain information to you under a legal, regulatory, or ethical requirement.

5. Protection of your personal information

We have adopted appropriate and commercially reasonable technical, organizational, administrative, and physical measures to help protect your personal information from loss, misuse and unauthorized alteration. Please note that no data transmission or storage can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot ensure or warrant the security of any personal information you transmit to us via the Website.

6. Storing and transferring your personal information

Your personal information collected via this Website will be stored on servers located in Switzerland or an EU member state.

We share your personal information with our Group Companies. If you are located in the EEA+ CH, this will involve transferring your data outside the EEA + CH.

Many of our external third parties are based outside the EEA + CH so their processing of your personal information will involve a transfer of data outside the EEA + CH.

Whenever we transfer your personal information out of the EEA +CH, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us at christian.gerig@bahargroup.ch if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA + CH.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymize your personal information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

7. User-generated content

The Website may enable users to submit their own content for contests, blogs, LifeChats, videos, message boards, and other functions. Publication of user generated content on the Website is subject to any Terms of Use that may be notified to you prior to your submitting content. Please remember that any information you disclose as or in relation to user-generated content will be publicly available. You should exercise caution when deciding to disclose your contact details, financial information, and other information in a submission. We cannot prevent such information from being used in a manner that may violate this Privacy Policy, the law, or your personal privacy and safety.

8. Third party sites

The Website may contain links to non- Bahargroup websites. Links to other websites are provided for information only and do not constitute endorsements of those other websites. When you select a link to a third party website from the Website, you will be leaving the Website and this Privacy Policy does not cover any information collected through any other website. Any information that you disclose on the third party site will be governed by that site's privacy policy. You should review the privacy policies of those third party sites before providing any information to them. We are not responsible or liable for the privacy practices or policies of any non-Bahargroup websites. Your use of third-party websites is at your own risk.

9. Your rights

You may be entitled under local law to:

- access, update or amend the information that we hold about you;
- object to the processing of your information by Bahargroup, including for marketing purposes or otherwise where you have a legitimate reason for doing so; and/or
- ask us to delete your information. Please note that we may need to retain some information about you in order to satisfy our legal or security obligations.

Residents of the EEA + CH: In addition to the rights listed above you may also have the right to: (a) restrict the processing of personal information we hold about you; (b) object to the processing of personal information we hold about you; (c) receive any personal information we hold about you in a structured and commonly used machine-readable format or have such personal information transmitted to another company and/or (d) not be subject to any decision that significantly affects you being taken solely by automated processing, including profiling.

Please contact us if you wish to exercise any of these rights. We will process any request in line with any local laws and our policies and procedures. We may ask you for additional information to confirm your identity and for security purposes, before disclosing information requested to you. If you are located in the EEA + CH, you have the right to lodge a complaint about how we process your personal information with the supervisory authority in your country. We would, however, appreciate the chance to deal with your concerns before you approach your local supervisory authority so please contact us in the first instance.

10. Changes to this Privacy Policy

We may update this Privacy Policy to reflect changes in our practices and service offerings. If we modify our Privacy Policy, we will update the "Effective Date" and such changes will be effective upon posting. If we make any material changes in the way we use your personal information, we will notify you by sending an email message to the email address you most recently provided to us or by prominently posting a notice of the changes on the Website.

11. Questions

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact christian.gerig@bahargroup.ch

11. Company address

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