

# Data projection

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## 1. Responsibility for your data

Our customers expect a high level of quality not only from our products and services, but also in the processing of their personal data. In this data protection notice, we inform our customers, suppliers, service providers and other website visitors about our processing of their personal data.

Responsible for the processing of your data is **SPEMOT** AG based in Switzerland.

- Postal address: Industriestrasse 70, 4657 Dulliken, Switzerland
- E-Mail-address: [office@spemot.com](mailto:office@spemot.com)
- E-Mail- address of the data protection officer: [dataprotection@spemot.com](mailto:dataprotection@spemot.com)

SPEMOT AG (hereinafter: SPEMOT ) is responsible for the processing and protection of your personal data, which we process according to your wishes and in accordance with the provisions of the applicable data protection law (Swiss Data Protection Act, taking into account the 2023 revision, as well as German and EU data protection laws). If and insofar as the GDPR and/or German law is/are applicable, the provisions set out below shall apply. Your personal data will only be processed by us if this is permitted by law.

With the following information, we would like to inform you about the processing of your data - in particular with regard to the use of our website:

## **2. Personal data**

Personal data is any information relating to an identified or identifiable natural person (Art. 4 No. 1 GDPR). This includes, for example, data that you provide to us when using our website or communicating with us, such as your address data, registration data, telecommunications data, order data or financial data, but also data that is automatically collected when you use our website, such as your IP address.

## **3. Integration of service provider**

We have to use service providers in order to be able to divide our work. Our service providers include, for example, ICT service providers, banks and payment service providers, logistics and transportation companies, advertising and communication agencies, document shredders, accounting service providers and tax and legal advisors. Depending on the individual case, they may receive your data as a processor (Art. 28 GDPR) or as a controller (legal basis: Art. 6 para. 1 b, f GDPR) to the extent necessary and within the scope of what is permitted by law.

These service providers can be located in Germany or Switzerland (see 12)

## **4. Data security**

We take technical and organizational security precautions to protect your personal data against accidental or intentional manipulation, loss, destruction or access by unauthorized persons and to ensure the protection of your rights and compliance with the applicable data protection regulations of Switzerland and the EU.

The measures taken are intended, among other things, to ensure the confidentiality, integrity, availability and resilience of the systems and services in connection with the processing of your data in the long term and to restore them quickly in the event of a physical or technical incident.

Our data processing and security measures are continuously improved in line with technological developments. Our employees are of course obliged to maintain confidentiality and to comply with data protection requirements.

## **5. Mandatory information**

If certain data fields are designated as mandatory or mandatory fields and marked with an asterisk ( \* ), the provision of this data is required by law or contract, or is necessary for the conclusion of the contract, the desired service or the stated purpose. Provision is at your discretion. Failure to provide this data may result in the contract not being fulfilled by us, or the desired service not being provided or the stated purpose not being achieved.

## **6. Processing of data**

### **General inquiries and communication**

We process your data, e.g. in telephone calls, via the SPEMOT website, contact forms, email, postal correspondence or our social media channels, initially to answer your inquiries (legal basis: Art. 6 para. 1 f, b GDPR). This is generally done in our interest in offering a good service and working reliably. Any information designated by us as mandatory (e.g. in data entry fields) is required in order to be able to contact you or communicate with you about your request. The voluntary provision of further data makes it easier for us to communicate with you.

If another company from our group of companies is responsible for your inquiries, it may receive your data to the extent necessary for the above purposes and process it accordingly (legal basis: Art. 6 para. 1 b, f GDPR). Accordingly, this company may also have forwarded your data to us for further processing. The company from our group of companies may be based in Switzerland or Germany (see 15.).

As a rule, we store your data processed for these purposes for twelve months after answering the general inquiry in the event of further inquiries, unless it concerns commercial or business letters, which we store for six or ten years (legal basis: §§ 147 AO, 257 HGB, Art. 6 para. 1 c GDPR), or unless we are obliged to store it for longer for other reasons (legal basis: Art. 6 para. 1 c GDPR).

## **7. Right of objection/revocation**

If you wish to withdraw your consent or object to the processing of your personal data for advertising purposes or due to your particular situation, simply send a message to the above contact details at any time. Your data will then no longer be processed for the advertising purposes covered by the consent or objection. This will not affect the lawfulness of the processing carried out prior to the objection. After your objection to the processing of your personal data for advertising purposes, the contact data required for this purpose will be included in an internal advertising blacklist and permanently stored (blocked) - only for this purpose - and used for comparison with our future advertising files (legal basis: Art. 21 para. 3, Art. 17 para. 3 b, Art. 6 para. 1 c GDPR). This ensures that your objection to advertising is permanently observed.

## **8. Data that we collect automatically during use**

When you visit our website, you transmit data to our web server via your Internet browser (for technical reasons). The following data is processed during an

processed during an ongoing connection to enable communication between your Internet browser and our web server (legal basis: Art. 6 para. 1 f GDPR):

- Content of the request (page, name of the requested file, etc.),
- Date and time of the request,
- amount of data transferred,
- Access status (file transferred, file not found, etc.),
- Time zone difference to Greenwich Mean Time (GMT),
- Source/reference from which you reached the page,
- Web browser(s) and operating system used,
- IP address.

Temporary storage or processing of this so-called server log data is necessary to ensure functionality or technical security, in particular to defend against and defend against attempts at attack or damage, and is carried out with our corresponding legitimate interest (legal basis: Art. 6 para. 1 f GDPR). This data is not merged with other data sources.

The data is no longer processed on a personal basis (i.e. it is anonymized) as soon as it is no longer required to achieve the purpose for which it was collected. In principle, data is anonymized or deleted by shortening the IP address, unless it needs to be kept longer for documentation purposes (e.g. to document consent given, see above, legal basis: Art. 6 para. 1 c, Art. 5 para. 2, Art. 7 para. 1 GDPR).

## **9. What are cookies and what are they used for?**

### **a. Cookies**

Cookies are small text files that are transferred to your end device (e.g. PC, tablet, smartphone) via your web browser or other programs in order to “remember” information about you. These are stored locally on your end device and kept ready for later retrieval (Art. 25 TTDSG). Where we use the term “cookies” below, we also mean other technical measures such as HTML storage, tags, images or scripts.

### **b. Use of Cookies**

Cookies are used to make our website more user-friendly, effective and secure.

The cookies enable us to recognize your browser on your next visit.

You can view and decide in detail how long which cookies are used on which legal basis and which data processing of which tools take place in the privacy settings of our so-called Consent Management Platform (unless the use is absolutely necessary). This Consent Management Platform is permanently accessible on our website, e.g. via the floating fingerprint symbol on our website.

As a general rule, cookies may be used or read on this website and personal data may be processed,

- which are absolutely necessary, for example to enable and securely offer the functions of our website, and also to be able to prove consent (“Essential”) (legal basis/s: Art. 6 para. 1 b, c, f GDPR, § 25 para. 2 no. 2 TTDSG) (see also below 10., 13.),
- to evaluate visits to our website (website analysis) in order to make our website more user-friendly and to better adapt it to your needs (e.g. also video embedding) or, if necessary, to measure the success of our external advertisements and to track origin pages (so-called referrers) (“marketing”) (legal basis/s: Art. 6 para. 1 a GDPR, § 25 para. 1 TTDSG) (see also below 11., 12.).

Insofar as data processing takes place on the basis of a legitimate interest, this is the provision of an interesting and secure website or easier compliance with applicable data protection regulations.

### **c. Rejection / deletion of cookies**

You can set your web browser so that it notifies you when cookies are set, generally rejects cookies, restricts their setting or deletes them. However, if you reject or restrict the setting of cookies using your browser, you will no longer be able to use various functions on our website. You can use your web browser to delete stored cookies at any time, even automatically.

By deleting cookies, you can also revoke consent given via our Consent Management Platform (see b. above).

You can find out about this option for the most commonly used browsers via the following links:

- [Microsoft Edge](#)
- [Microsoft Internet Explorer](#)
- [Firefox](#)
- [Google Chrome](#)
- [Safari](#)
- [Brave](#)
- [Opera](#)

## **10. Use of the Borlabs Consent Management Platform**

We use the Borlabs Cookie Consent Management Platform as a consent management tool on our website. You can use this tool to individually manage and customise your data protection settings.

### **How you can customise your consents**

You can change or revoke your consent at any time. To do this, use the button that we have integrated on our data protection page. Simply click on 'Adjust settings' to open the dialogue again. [Customise settings](#)

## 11. Exercise of data protection rights

If you have any questions about the processing of your personal data by us, we will of course be happy to provide you with information about the data concerning you (Art. 15 GDPR). If the legal requirements are met, you also have the right to rectification (Art. 16 GDPR), erasure (Art. 17 GDPR), restriction of processing (Art. 18 GDPR), objection (Art. 21 GDPR, see above) and the right to data portability (Art. 20 GDPR).

In all these cases, please feel free to contact us using the contact details above (see 1.).

Finally, you have the right to lodge a complaint with a competent data protection supervisory authority (Art. 77 GDPR, Section 19 BDSG).

The data protection authority responsible for SPEMOT AG Switzerland is

Federal Data Protection and Information Commissioner (FDPIC), Feldeggweg 1, CH 3003 Bern.

## 12. Adequacy decision on data transfer

The European Commission has adopted a corresponding adequacy decision, according to which personal data may be transferred to Switzerland without further authorization ([schweiz\\_de.pdf \(hessen.de\)](#)). Switzerland has an equivalent level of data protection.

## 13. Changes

From time to time it is necessary to adapt the content of this privacy policy for data collected in the future. We therefore reserve the right to amend this information at any time. We will also publish the amended version of the data protection information here. If you visit us again, you should therefore read the data protection information again.

**Status:** Januar 2025