

PREAMBLE TO THE PUBLISHED PRIVACY POLICY:

Data Transfers to U.S. and Compliance with the Swiss-U.S. DPF

As a "covered entity" under the SFS Group USA, Inc. certification with the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF), Truelove and Maclean is included in the privacy protections guaranteed by the DPF standards for any data transfers from Switzerland. SFS Group USA, Inc. has committed to the U.S. Department of Commerce to adhere to the Swiss-U.S. DPF principles in processing personal data originating from Switzerland. This certification by SFS Group USA, Inc. ensures that any personal data shared with Truelove and Maclean is handled in compliance with these DPF principles.

If there is any conflict between the terms in this privacy policy and the DPF principles, the DPF principles will govern. For more details on the Data Privacy Framework (DPF) and SFS Group USA, Inc.'s certification, please refer to the SFS Group USA, Inc. Swiss-U.S. Data Privacy Framework Statement; <https://us.sfs.com/data-privacy-framework> and the official Data Privacy Framework Website; <https://www.dataprivacyframework.gov/>

Your data are safe with us

We treat your personal data responsibly, taking into account all relevant provisions of the applicable data protection law.

Use of personal data

We only collect, use and transfer your personal data to third parties if this is permitted by law or if your consent to the collection of data is given.

Personal data means any information that can be used to identify your person and which can be traced back to you - such as your name, e-mail address and telephone number.

We process and store personal data only for the period necessary to achieve the purpose of storage, or as far as this is stipulated by the European legislator or other legislators by law or regulation to which the controller (responsible for the data protection) is subject to.

If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, personal data is routinely blocked or deleted in accordance with legal requirements.

We may share your personal information with other companies in our group if necessary for the purposes of the legitimate interests pursued by the SFS Group and to provide certain services. Group companies may be located in countries that do not ensure an equivalent level of data protection. We guarantee appropriate data protection through contractual agreements with the Group companies. You expressly consent to such data transfers.

In accordance with the legal requirements, we will disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

We are subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC) and assume liability in cases of unlawful data transfers to third parties.

Collection of General Data and Information

Our websites collect a series of general data and information when the website is called up. This general data and information is stored within the server log files. The following information may be collected: (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites which are reached via an accessing system on our website, (5) the date and time of access to the Internet site, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, we do not draw any conclusions about the data subject. Rather this information is needed to (1) deliver the content of our website correctly, (2) optimize the content of our website as well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology, and (4) provide law enforcement authorities with the necessary information for criminal prosecution in case of a cyber-attack. We therefore analyze the collected data for the purpose of statistics and with the aim of increasing the data protection and data security in our company in order to ensure the best possible level of data protection and data security for the personal data we process.

Cookies

On our website we use the web analytics service Matomo to analyze visitor statistics.

Matomo uses „cookies“. Cookies are text files that are stored on your computer system and allows us to analyze the use of our website. For this purpose, the usage information generated by the cookie (including your shortened IP address) will be transmitted to our server and stored for analysis purposes, which we use to optimize our website. Your IP address will be immediately anonymized during that process so that you remain anonymous to us as a user. The information generated by the cookie about your use of this website will not be disclosed to third parties

You can disable the use of cookies in your browser settings. However, this may mean that our website can no longer be used to its full extent.

By using our website you consent to the data processing by Matomo to the extent described above and for the purpose stated above.

Data Security/Secure Data Transmission

Through technical and organizational measures, we secure our IT systems against unintentional admittance, access, transfer, entry, loss and distribution as well as destruction and alteration by unauthorized persons.

The data transmission of personal data on our websites is protected according to up-to-date technical standards.

Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the Purposes for which we will use your personal data section above.

Internal Third Parties

We may share your personal data with other companies in our group, details of which can be found here: <https://www.sfs.com/ch/en/sfs-group/> (“Group”) acting as joint controllers or processors and providing IT and system administration services. We also may share your personal data with our Group companies in some urgent cases in order to meet delivery timescale requirements due to the geographical location of the delivery location.

External Third Parties

- Service providers acting as processors based in the USA, the European Union and Switzerland who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the USA who provide consultancy, banking, legal, insurance and accounting services.
- Delivery providers based in the country in which the delivery location in relation to any particular order is based.
- Marketing service providers based in the USA acting as processors.
- HM Revenue & Customs, regulators and other authorities based in the USA who require reporting of processing activities in certain circumstances.

Other Third Parties

- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Ask Nicely

With Ask Nicely we collect customer and user feedback.

For the technical recording of customer and user feedback, we use Ask Nicely, a product of Ask Nicely Limited, Lvl 1, 63 Ponsonby Rd, Ponsonby 1011, Auckland, New Zealand.

When using feedback functions, a connection to Ask Nicely’s IT systems is established and data entered is stored there. Ask Nicely is used to automatically send survey e-mails to receive customer ratings and other customer feedback. When customers respond to such a request, information such as the e-mail address is used to contact them to respond to a review or feedback, for example. The feedback and data provided will not be published. If users do not wish to provide customer feedback, there is an option to unsubscribe by clicking on the unsubscribe button located at the bottom of the email received.

Further information on this can be found at <https://www.asknicely.com/privacy>.

Handling of Contact Information

If you contact us via the contact options offered, your contact details will be stored so that they can be used to process and answer your request. Without your consent, this data will not be disclosed to third parties.

Your Rights

Upon request, you will receive free information as to whether personal data has been processed about you and, if so, what personal data has been stored about you.

If your request is not in conflict with a legal duty to retain data (e.g. data retention), you have the right to have corrected incorrect data and to have deleted your personal data (for the future).

You can object to the processing of your data at any time. We will no longer process your personal data in the event of an objection, unless we can demonstrate that compelling legitimate interests override your interests, rights and freedoms or if the processing of the data is intended for the establishment, exercise or defense of legal claims.

You have the right to withdraw your consent to data processing - for the future - at any time without giving a reason.

Contacts

Regarding your personal data on this website, the responsible body is:

SFS Group USA, Inc.
1045 Spring Street
Wyomissing, PA 19610

SFS Data Protection Officer:

e-mail: dataprotection@sfs.com

[Notification to the Data Protection Office](#)

Please note that if your complaint is not resolved through other dispute resolution procedures, under limited circumstances, you may be entitled to invoke binding arbitration.

Disclaimer

As a provider we are responsible for the content published by us according to the general legal provisions. The contents of our websites are created and updated to the best of our knowledge and belief. We do not guarantee that the information provided is complete, correct and in any case up-to-date. This also applies to all links to which this website refers directly or indirectly. We are not responsible for the content of an external site that is reached with such a link.

We reserve the right to make changes or additions to the information provided without prior notice.