



Strategic Program Solutions

Privacy Policy

Please refer often to this page for the latest information and the effective date of any changes. The version published on this website is the current version. Changes to the Notice shall not apply retroactively.

Strategic Program Solutions GmbH (hereinafter referred to as “SPS”). This privacy notice („Privacy Notice”) is based on the EU General Data Protection Regulation („GDPR”) requirements – even where GDPR does not apply – to ensure a high level of protection for all individuals whose personal data is processed by all legal entities of SPS.

This Privacy Policy describes the processing of personal data by all legal entities of SPS, unless specified otherwise. If you have any questions or requests in relation to the processing of your personal data, you can contact our Data Protection Team at info@strategicprogramsolutions.com.

Which personal data do we process and for what purposes?

“Personal data” is the information relating to yourself (or from which you may be identified). We may process personal data in the following situations and for the following purposes:

- **Communication:** We may process personal data when you have contact with SPS, such as when you contact our customer services department or when you write to or call us. In this case, we may typically process name(s) and contact data as well as the content and time of the relevant messages. We may use this data to provide you with information, process your request, and communicate with you. We may also forward your messages within SPS if your request concerns another SPS company or an employee.
- **Visiting websites;** using cookies and other tracking technologies: Please refer to our Website and Cookies Privacy Notice for information on how we may process personal and other data when you use our website.
- **Use of e-mail:** We may use your name and e-mail address to send you alerts, updates, event invitations and other information by e-mail. However, we will ask for consent first unless we have other legal grounds, such as where we obtained your contact details from you in the context of our services. We may use a third-party provider to be made aware if you open our e-mails or if you click on links included in them. You may prevent this by using the appropriate settings in your e-mail settings.
- **Visiting our premises:** When you enter our premises, we may make video recordings (CCTV1) in appropriately marked areas for security and evidence purposes. In addition, when entering/signing in to our buildings, you may have to provide us personal data such as your name, address, employer, title, identification details, copies of documents, government-issued documents, mobile phone and telephone number(s), date and place of birth, all citizenship details (including previous citizenships), nationality details (including previous nationalities), residence permit(s), and place of residence. We collect this personal data for security reasons and for compliance with regulatory requirements (e.g., trade compliance) as well as background checks and any other checks we may conduct to verify information provided including third party reference information (as permitted under applicable law). We may also collect information from third parties such as information from official registers, e.g., to comply with sanctions and embargo regimes. Furthermore, you may be able to use our Wi-Fi service.

In this case, we collect device-specific data when you sign in and ask you to provide your name and your e-mail address for security and access control purposes.

- **Business partners:** SPS is working together with various companies and business partners, such as suppliers, commercial customers of our goods and services and with external service providers (for example, IT service providers). We may process personal data about the contact persons in these companies, for instance: their name, job, citizenship details (including previous citizenships), nationality details (including previous nationalities), residence permit(s), place of residence, place & date of birth and title. We process this personal data to conclude, administer, and perform contractual relationships, for communication and compliance purposes as well as for security reasons and for compliance with regulatory requirements (e.g., trade compliance). Depending on the field of activity, we are also required to scrutinize the relevant company and/or its employees. We may also process personal data about you to improve our Customer Relationship Management.

- **Administration:** We may process personal data from contracts and communications and for our internal administration. For example, we may process personal data in the context of IT or real estate management. We may also process personal data for accounting, archiving and statistic purposes and in general, to review and improve internal processes.

- **Corporate transactions:** We may also process personal data from contracts and communications in order to prepare and process company transactions.

- **Job applications and Employment:** We may also process personal data when you apply for employment at SPS. As a general rule, we require the usual information and documents as well as the ones mentioned in a job advertisement. We process the personal data of our employees in the course of their employment.

- *Protection of rights:* We may process personal data in various constellations to protect our rights, for example to assert claims in and out of court and before local and foreign authorities or to defend ourselves against claims. In addition, we may have to process prospects clarified or submit documents to an authority. Authorities may also require us to disclose documents containing personal data.

Website and Cookies Privacy Notice

“Personal data” is the information relating to yourself (or from which you may be identified). We may have obtained your Personal Data from yourself directly through:

a. Log data: Every time you use our websites or apps, certain data is automatically generated and temporarily stored in so called log files. For example, the following data may be stored: • IP address of your end device (tablet, PC, smartphone, etc.), • Information about your internet service provider, • Information about the operating system of your end device, • Information about the referring URL, • Information about the browser used, • Date and time of access, and • Content accessed when visiting the website. The log data is processed for the purpose of enabling the use of our websites and apps (connection establishment), ensuring their functionality, system security, stability, optimization of our online offers, and for statistical purposes, in accordance with our internal policies and regulations and in compliance with the applicable laws. Aside from this, the log data and possibly other data available to us will be evaluated for the purpose of preventing or detecting attacks on our websites or other unauthorized activities involving our apps.

b. Cookies and similar technologies: We collect information using first party and third-party cookies and similar tools and technologies (hereinafter referred to collectively as “cookies”) across our website to improve its performance (e.g., to analyse how well the website is performing) and enhance the user experience (e.g., remembering your previously set preferences such as language settings). Cookies are individual codes, or small text files (similar to a serial number) that our server or servers of our service providers transmit to your system when you connect to our website, and that your system (browser, mobile device) accepts and stores until the set expiration time. Cookies help our website to

recognize your device the next time you visit it. Web beacons, pixel tags or other similar files can also do the same thing.

The cookies used on our website do not collect information that identifies you personally: they collect more general information, for example, on how users arrive at and use our website, or a user's general location, about the number of visitors to the websites, the pages visited, and the time spent on the websites. Your system transmits these codes to our server or the service provider's server with each additional access. They are often required for the functionality of our website. Other technologies may be used to recognize you with some likelihood (i.e., to distinguish you from other users), such as «fingerprinting». Fingerprinting combines your IP address, the browser you use, screen resolution, language settings and other information that your system tells each server).

You may refuse the use of cookies and similar technologies by selecting the appropriate settings on your browser or by declining cookies when you visit our websites. However, this may affect your experience on the website, and you might be prevented from accessing some features of our website or certain content and/or functionality might not be available. Cookies that are essential for technically error-free and optimal operation of our services may be stored on the basis of our legitimate interest ("strictly necessary cookies"). Cookies that are not technically essential may be set only when you have given your consent. You may change your cookie settings at any time and withdraw any consent that you have already given. Please find below examples of services by third-party service providers that may use cookies and similar technologies:

Our websites may use the following analytics services:

- Google Analytics and all Google Services such as Google Maps operated by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA or, for services provided in the European Economic Area and in Switzerland, by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. We do not use "Google Analytics" on our website; however, it may be used if you are using a Google service, which might be embedded in our website. For statistical analysis of visitor access, cookie-generated user information may be transmitted to our servers and stored for usage analysis for the purpose of optimising our website. We may also use functionalities from social media providers, which may result in the provider concerned processing data about you. Our websites may contain links or plug-ins that redirect visitors to the websites of the following social networks:
- "Facebook", operated by Meta Platforms Inc., 1601 Willow Rd, 94025 Menlo Park, USA, or if the service is provided in the EU by Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland; and "Instagram", operated by Meta Platforms Inc., 1601 Willow Rd, 94025 Menlo Park, USA, or if the service is provided in the EU by Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland.
- "YouTube", a service operated by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA or, for services provided in the European Economic Area and in Switzerland, by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.
- "X", operated by X Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107 USA.
- "LinkedIn", operated by LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland.

If you click on the relevant link or button, information that you have viewed on certain pages of our websites may be forwarded to the servers of the above social networks. For users who are logged into these social networks at the same time, this means that the usage data may be assigned to their personal account or profile. If you use the links or buttons, it cannot be excluded that this information will be transmitted directly from your browser to the mentioned social networks and stored there. Even if you are not a member of the mentioned social networks, these social networks may nevertheless still identify and store your IP.

If you do not consent to the mentioned social networks collecting data about you, please log off from the respective account before visiting our website. You also have the option of blocking add-ons or the websites on your browser. Social media content displays: We may use certain services for

displaying webpages and managing our social networks to display content on social media and plug-ins.

c. Contact form: If you use the contact form on our website to contact us, we will ask you for personal information. A valid email address must be provided for us to be able to respond to your request. You may voluntarily provide additional personal data. Your personal data will be processed further by e-mail. For technical reasons, encrypted transmission of your contact details cannot be guaranteed. Therefore, it is theoretically possible for unauthorized persons to access or falsify your data. Processing of the data for contact purposes is based on your freely given consent. By clicking the "Send" button, you agree to processing of your contact details for the purposes of responding to your request or feedback.

Your consent is the sole basis for processing the data entered on the contact form. You may withdraw your consent with future effect at info@strategicprogramsolutions.com at any time. We use your data only insofar as necessary to process your inquiries and for possible further correspondence. In order to be able to process your query and any follow-up questions, the information that we collect when using the contact form will be stored. Barring another statutory duty of retention, the data will be deleted in accordance with data protection law once your queries have been addressed.

On what legal basis do we process your personal data?

We process personal data according to the applicable law on the following legal bases:

- For the performance of a contract (article 6 para.1 let. b GDPR),
- For legitimate interests (article 6 para. 1 let. f GDPR), which includes: the interest in customer care and communication with customers outside of a contract; in marketing activities; in relationship management; in improving products and services and developing new ones; in combating fraud, and the prevention and investigation of offences; in the protection of customers, employees and other persons and data, secrets and assets of SPS ; in IT security, especially in connection with the use of websites and other IT infrastructure; in the organisation of business operations, including the operation and further development of websites and other systems; in company management and development; in the sale or purchase of companies, parts of companies and other assets; and in the enforcement or defence of legal claims,
- Based on a consent, where such consent was obtained separately (article 6 para.1 let. a GDPR), and
- For compliance with legal and regulatory obligations (article 6 para. 1 let. c GDPR). If you provide us with special categories of personal data (e.g., sensitive personal data), we will process these on the basis of your consent (article 9 para. 2 let. a GDPR). In addition, we are also use your personal data in anonymous form for statistical purposes. We do not intend to use your personal data for purposes other than those listed above. Otherwise, your prior consent will be obtained.

You are generally under no obligation to disclose personal data to us. However, we must collect and process certain data to be able to conclude and perform a contract, and for compliance and security purposes.

Who may have access to your personal data

We restrict access to personal data to our employees who need that information to process it for the relevant purpose. They act in accordance with our instructions and are bound to confidentiality and secrecy when handling your personal data and are aware of the data protection and data security implications. We may transfer your personal data to other legal entities within SPS Group for the purpose of internal administration and for the processing purposes described in this Privacy Notice. This means that your personal data can also be processed and combined with personal data originating from another SPS company for the respective purposes.

We may also disclose your personal data to third party service providers, in particular for the following services:

- IT services, such as for data storage, cloud services, data analytics etc.,

- consulting services: tax consultants, lawyers, management consultants, recruiters, etc.,
- logistics to deliver goods,
- administrative services
- business information and debt collection.

Generally, these service providers process personal data on our behalf as processors. Our processors are obliged to process personal data exclusively in accordance with our instructions, taking appropriate security measures. Certain service providers are joint controllers with us or independent controllers (e.g., debt collection agencies). We ensure an appropriate level of data protection when engaging service providers by way of contractual agreements. There are cases where we may disclose your personal data to other third parties who may use personal data also for their own purposes, for instance:

- We may disclose your personal data to third parties if this is required by law (e.g., the authorities). We also reserve the right to process your personal data to comply with a court order or to assert or defend legal claims or if we consider it necessary for other legal reasons.
- We may disclose your personal data to third parties if this is necessary for a corporate transaction (for example an acquirer). Recipients of your personal data mentioned in the section above, may be located abroad worldwide, including in countries outside of Switzerland, the EU or the EEA that may not have laws in place that protect your personal data to the same extent as the laws as mentioned.

How long do we retain your personal data?

We retain your personal data:

- As long as it is necessary for the purposes for which the data was collected. In case of contracts, we generally retain your personal data for the duration of the contractual relationship and the statutory period of limitation,
- As long as we have a legitimate interest in retaining the data. This may be the case if we need personal data to enforce or defend claims, for backup and archiving purposes, and to ensure IT security,
- To comply with statutory duties of retention.

If you have given us consent, we will store your data until you withdraw your consent, unless there are statutory retention periods preventing the deletion. After the expiration of the retention period, your personal data will be either deleted or retained in a form that does not allow your personal identification (e.g., through anonymization).

How do we protect your personal data?

We take appropriate technical and organisational security measures to maintain the required security of your personal data and to protect it against unauthorised or unlawful processing and to prevent the risk of loss, unintentional alteration, unintentional disclosure or unauthorised access.

Your rights under the applicable data protection laws

You have the following rights:

- Right of access: You are entitled to a copy of the personal information we hold about yourself and certain details on how we use it. Your personal data will usually be provided to yourself in writing, unless otherwise requested, or where you have made the request by electronic means, in which case the information will be provided to you by electronic means where possible. If you make a subject access request and there is any question about who you are, we may require you to provide information from which we can satisfy ourselves as to your identity.
- Right to rectification: We take reasonable steps to ensure that the information we hold about yourself is accurate and complete. However, if you do not believe this is the case, you can ask SPS to update

or amend it.

- **Right to erasure:** In certain circumstances, you have the right to ask SPS to erase your personal information, for example where the personal information we collected is no longer necessary for the original purpose or where you withdraw your consent. However, this will need to be balanced against other factors (e.g., we may have legal and regulatory obligations, which means we cannot comply with your request).
- **Right to restriction of processing:** In certain circumstances, you are entitled to ask us to stop using your personal information, for example where you think that the personal information, we hold about yourself, may be inaccurate or where you think that we no longer need to use your personal information.
- **Right to data portability:** In certain circumstances, you have the right to ask that we transfer personal information that you have provided to us to another third party of your choice.
- **Right to object:** You have the right to object to processing, which is based on our legitimate interests, which is the case here. Unless we do have compelling legitimate grounds for the processing, we will no longer process the personal data on that basis when you file an objection. Note however, that we may not be able to provide certain services if we are unable to process the necessary personal data for that purpose.
- **Right to withdraw consent:** In most cases, we do not base the processing of your personal data on your consent. However, it may happen that we ask for your consent in specific cases. In case we do this, you have the right to withdraw your consent to further use of your personal information. To withdraw your consent, please contact the SPS Data Protection Team. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. In addition, if you withdraw consent, it will not affect the lawfulness of what we have done before such withdrawal.
- **Right to lodge a complaint:** You have the right to lodge a complaint with a supervisory authority. The supervisory authority of your country of residence will generally be competent for a complaint and will also provide advice or direct you to another supervisory authority. To exercise these rights, please contact our SPS Data Protection Team at info@strategicprogramsolutions.com. Please note that these rights are subject to certain conditions and may be subject to exceptions.

Contact details

If you have any questions or would like to exercise your rights in relation to the processing of your personal data, please contact the SPS Data Protection Team at info@strategicprogramsolutions.com.

*Physical requests may be sent to: Strategic Program Solutions GmbH, Data Protection Officer
Bundesplatz 9, 6300, Zug, Switzerland.*