

# **Sphinx Werkzeuge AG Privacy Statement**

## 1. General

The protection and security of personal data is of the highest priority for Sphinx Werkzeuge AG, CHE-107.551.023, Gewerbestrasse 1, 4552 Derendingen. We have an open and transparent process. This Privacy Statement informs you of the nature, extent and purpose of the personal data processed by us. It also informs you of your rights.

Personal data shall mean any information that relates to an identified or identifiable natural person ('Data Subject'). Processing means any operation which is performed on personal data - whether or not by automated means - such as collection, recording, storage, alteration, retrieval, use, disclosure by transmission, dissemination or otherwise making available, or erasure.

## 2. Name and address of the Controller

Controller means the natural or legal person that determines the purposes and means of processing personal data.

The Controller is:

### **Sphinx Werkzeuge AG**

Gewerbestrasse 1

4552 Derendingen

Switzerland

Telephone: +41 32 671 21 00

Fax: +41 32 671 21 11

Website: [www.sphinx-tools.ch](http://www.sphinx-tools.ch)

Email: [info@sphinx-tools.ch](mailto:info@sphinx-tools.ch)

### 3. Contact for queries relating to data protection

Data subjects may contact us directly with questions or enquiries regarding data protection. Please use the following contact details:

Sphinx Werkzeuge AG  
Gewerbstrasse 1  
4552 Derendingen  
Switzerland  
Email: datenschutz@sphinx-tools.ch

### 4. Categories of personal data

Sphinx Werkzeuge AG may process the following categories of personal data. However, Sphinx Werkzeuge AG will not process any more personal data than is necessary.

Sphinx Werkzeuge AG processes customer data. We understand this to include the following:

- Master and transaction data (for example name, address, date of birth, telephone number, contract number and term, information on transactions completed, bank details)
- Marketing data (for example requirements, wishes, preferences)
- Technical data (for example, internal and external identifiers, transaction numbers, IP addresses, logs of access or changes, email addresses)

Sphinx Werkzeuge AG processes data concerning suppliers and other business partners. We understand this to include the following:

- Master and transaction data (for example name, address, date of birth, telephone number, contract number and term, information on transactions completed, bank details)
- Marketing data (for example requirements, wishes, preferences)
- Technical data (for example internal and external identifiers, transaction numbers, IP addresses, logs of access or changes, e-mail addresses)

#### 5. Length of storage period

The length of the storage period for personal data is determined according to the statutory retention requirements (depending on the applicable legislation, these amount to five or ten years, or more) or the purpose of the respective data processing.

#### 6. Purpose of data processing

Sphinx Werkzeuge AG may process the personal data described in paragraph 4 to carry out its services and for its own or statutory purposes. In particular, this includes implementing and processing contracts, planning and product development, marketing, market research, comprehensive support, advice and information about the services on offer, preparing and providing bespoke services, statutory or regulatory access, information or reporting obligations to courts and authorities and fulfilling official decrees.

#### 7. Legal basis for data processing

Data processing is lawful if the processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract. For example, this is the case for processing operations that are necessary for the delivery of goods or to provide another service or service in return. The same applies to processing operations necessary to carry out precontractual measures, such as enquires about our products or services. If Sphinx Werkzeuge AG processes personal data for the purposes stated in this paragraph, it is acting on this legal basis.

Data processing is also lawful if the Data Subject has given its consent to data processing or if the processing is necessary to fulfil a legal obligation to which Sphinx Werkzeuge AG is subject. Data processing is also lawful if it is in the legitimate interests of Sphinx Werkzeuge AG or a third party, which may be the case, for example, if the Data Subject is a customer of Sphinx Werkzeuge AG. Data processing is also lawful if vital interests of a natural person are to be protected or if the processing is necessary for the performance of a task that is in the public interest.

## 8. Data security

Your personal data provided to us is secured by technical and organisational security measures that make it inaccessible to unauthorised third parties. We continually adapt and improve these security measures in step with technological and organisational changes. However, you should always be aware that the transfer of information via the internet and other electronic means involves certain security risks and that Sphinx Werkzeuge AG cannot guarantee the security of information transferred in this way.

## 9. Disclosure of personal data

Sphinx Werkzeuge AG will not sell, forward or otherwise disclose your personal data to third parties, except in the ways described in this Privacy Statement.

Your personal data may be forwarded to third parties who act for us or on our behalf so that they can further process the data in accordance with the purpose(s) for which the data was originally collected, or for other legally permissible purposes. These third parties are contractually required to only use personal data for the agreed purposes, to not sell it to other parties, and to not disclose it to other parties except if this is legally prescribed, permitted by us, or described in this Privacy Statement.

Personal data may also be disclosed to third parties if we are legally required to do this by a court order or official procedures or if this is required to assist in criminal or legal investigations or other legal investigations or proceedings in Switzerland or abroad.

## 10. The Data Subject's rights

You may request information from Sphinx Werkzeuge AG as to whether personal data concerning you is being processed. If this is the case, we will inform you of the personal data that exists in our data collections, including available information about the origin of the data, the purpose and, if necessary, the legal bases for its processing, as well as the categories of personal data processed, the people involved in its collection and the recipients of the data. You also have a right to rectification, a right to erasure of personal data (right to be forgotten if no other retention requirements contradict this or there is no legal basis for the processing), a right to restriction of processing, a right to data portability and the right to withdraw data protection-related consent.

Our data protection officer accommodates access requests and other concerns relating to data protection (see paragraph 3).

#### 11. Data logging during visits to this website

When visiting Sphinx Werkzeuge AG's website or when visiting Sphinx Werkzeuge AG's online shop, the web server automatically records log files that cannot be associated with a specific person. This data contains, for example, the type and version of browser, operating system used, referrer URL (the site visited beforehand), IP address of the requesting computer, date and time of the server request and the client's file request (file name and URL). This data is only collected for the purpose of statistical analysis. It is not passed on to third parties for commercial or non-commercial purposes.

#### 12. Newsletter and contact form

You have the option of subscribing to our newsletter via the contact form on our website or sending another enquiry ('I have a question', 'Please contact me', 'I would like to order the free Precision Mechanics Product Catalogue' and 'I would like to become a country representative'). We require your email address, first and last name, company name, address and telephone number for this. Before you subscribe to the newsletter or send your query, we require you to confirm that you have read and accepted this Privacy Statement and that you agree to receive the newsletter, provided you have clicked the corresponding field. Your details may be stored and used for market research and advertising purposes.

As soon as you sign up for the newsletter, we will send you a confirmation email with a link for you to confirm your registration. You can cancel the subscription to the newsletter at any time. You can unsubscribe at any time via the link in the newsletter or by sending an email to [info@sphinx-tools.ch](mailto:info@sphinx-tools.ch). We will then immediately delete your data associated with sending the newsletter.

#### 13. Creating a user account in the online shop

Sphinx Werkzeuge AG operates an online shop. To be able to use all of the functions in the online shop, in particular, to be able to see the prices of products and place orders, you must create a user account. We require your email address, first and last name, company name, address and telephone number for this. You must also choose a password for your user account.

If you have agreed to the creation of a personal user account by means of a declaration of consent, we will use your data to process orders. By registering, you give your consent to your details being stored and used for market research and advertising purposes.

#### 14. Cookies

We use so-called 'session cookies' on our website in order to make our website easier to use. These are small text files that are placed on your hard drive for the duration of your visit to our website and, depending on your browser settings, are deleted when you close the browser. These cookies do not retrieve any information about you that is stored on your hard drive and do not damage your PC or its files. Most browsers are configured to accept cookies automatically. However, you may stop cookies from being stored or configure your browser to notify you when cookies are being sent.

#### 15. Note on Google Analytics

Our websites use Google (Universal) Analytics, a web analysis service from Google Inc. ([www.google.ch](http://www.google.ch)). Google (Universal) Analytics uses methods that allow an analysis of your use of the websites, such as, for example, so-called 'cookies', i.e. text files that are stored on your computer. The information generated on your use of these websites is usually transferred to a Google server in the USA or the European Union, where it is stored. By activating IP anonymisation on these websites, the IP address will first be shortened before transfer within the member states of the European Union or other contracting member states of the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be sent to a Google server in the USA and truncated there. The anonymised IP address communicated by your browser as part of Google Analytics is not joined with any other data held by Google.

You can prevent Google from collecting and processing data generated by the cookie and data on your use of the website (including your IP address) by downloading and installing the browser plug-in available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=en-GB>

You can find Google's privacy policy at:

<https://policies.google.com/privacy?gl=en>

## 16. Use of Facebook plug-ins

We have integrated plug-ins from the social network facebook.com (hereinafter 'Facebook') into our website. Facebook is a company of Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA. You can see a list of these Facebook plug-ins and what they look like at the following address:

<https://developers.facebook.com/docs/plugins> Each time you request a website that has one of these plug-ins, the plug-in causes the browser you are using to load and display the plug-in's image from the Facebook server. By integrating plug-ins, Facebook receives information that your browser has requested the corresponding page of our website, even if you do not have a Facebook profile or are not logged in to Facebook. This information (including your IP address) is transferred directly from your browser to Facebook's server in the USA and stored there.

If you are a Facebook member and are logged in to Facebook when you visit our website, Facebook identifies from the information sent by the plug-in which specific page of our website you are visiting and assigns this to your personal profile on Facebook, irrespective of whether you activate one of the plug-ins. If you activate one of the plug-ins, for example by clicking the 'Like' button or by posting a comment, this is sent to your personal profile on Facebook and stored there. To prevent Facebook from assigning the collected data to your profile, you must log out of Facebook before visiting our website.

At the following address, you will find Facebook's privacy policies with more information on how Facebook collects and uses data, your rights relating to this, and configuration options to protect your privacy:

<https://www.facebook.com/privacy/explanation>

## 17. Integration of services and content from third-party providers (for example, YouTube and Google Maps)

Sphinx Werkzeuge AG's website contains content from third parties, such as, for example, videos from YouTube and maps from Google Maps (hereinafter referred to as 'Third-party Providers'). To use such content, the transfer of the user's IP address to the respective Third-party Provider is required for technical purposes. Because without the IP address, the Third-party Provider would not be able to send the content embedded in the website to the respective user's browser. We

have no influence on whether a Third-party Provider stores or otherwise uses the IP address for statistical purposes, for example.

18. Exclusion of liability

The content of Sphinx Werkzeuge AG's websites does not contain any assurances or guarantees. Sphinx Werkzeuge AG is not liable in any way, including negligence and liability to third parties, for possible direct, indirect or consequential damages that arise as a result of using information and material from the websites or from accessing links to other websites.

19. Updating and amending the Privacy Statement

Parts of the Privacy Statement may be amended or updated by us without you being informed beforehand. Please check the Privacy Policy before you use our website so that you are up to date with any potential amendments or updates.

Privacy Statement valid from: August 2018.