

## **DATA PRIVACY NOTICE**

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Validato Ltd., Claridenstrasse 34, 8002 Zurich, Switzerland, is the operator of the website [www.validato.com](http://www.validato.com) and the respective services offered. This Data Privacy Notice informs the users of this website in accordance with Swiss and EU data protection law about the nature, scope and purpose of the collection and use of personal data by Validato Ltd. (or any group company of Validato Ltd. located in the European Economic Area).

Your trust is important to us; therefore, we take the issue of data protection seriously and pay attention to appropriate security. We have taken technical and organizational measures to ensure that the Swiss (Swiss Data Protection Act) and EU data protection regulations (the EU General Data Protection Regulation (GDPR)).

### **1 Accessing our website**

When you visit our website, our servers temporarily store access in a log file. The following technical data is collected without your intervention, as is generally the case with every connection to a web server, and is stored by us until it is automatically deleted after 2 years at the latest:

- the IP address of the requesting computer,
- the name of the owner of the IP address range (usually your Internet access provider),
- the date and time of the access,
- the website from which the access was made (referrer URL), if applicable with the search word used,
- the name and URL of the file accessed,
- the status code (e.g. error message),
- the operating system of your computer,
- the browser you use (type, version and language),
- the transmission protocol used (e.g. HTTP/1.1).

The collection and processing of this data is done for the purpose of enabling the use of our website (connection establishment), to ensure system security and stability on a permanent basis and to enable the optimization of our Internet offering, as well as for internal statistical purposes.

The legal basis for this processing is our legitimate interest.

### **2 Opening of a client account**

To access our online platform, a client account must be opened. We collect the following data from the individual:

- salutation
- first and last name
- name and postal address of the client organisation and further information about the corresponding company
- e-mail address
- telephone (optional)
- password

This data is used to provide password-protected access to the platform and to manage the contractual relationship. The legal basis is performance of a contract.

### **3 Purchases in the online platform of Validato Ltd.**

To process a service order, we collect the following data from the client representative:

- name of the principal
- invoice address
- payment details (depending on the selected payment method)
- login data, i.e. e-mail address and password

Unless otherwise stated in this Data Privacy Notice or you have separately consented to it, we will only use the data to process the contract, namely, to perform the requested services. The legal basis is performance of a contract.

The processing of personal data of candidates in connection with the commissioned services is governed exclusively by the applicable DPA.

### **4 Disclosure of data to third parties**

We only pass on your personal data as well as the data transmitted to us if you or the candidate has or have expressly consented to this, if there is a contractual or legal basis for this or if this is necessary to enforce our rights, in particular to enforce claims arising from the contractual relationship.

Furthermore, we will only pass on your data and the data of candidates to third parties if this is necessary within the framework of the use of the website or the processing of the contract, namely the provision of the purchased service (i.e. validation).

The data is passed on for the purpose of providing the requested service and maintaining the functionalities of our website. This is our legitimate interest.

If we make advance payments, e.g. in the case of an order on account, we may obtain credit information from a credit agency based on mathematical-statistical methods to protect our legitimate interests. For this purpose, we transmit the required personal data or the data of the customer to a credit agency and use the information received about the statistical probability of a payment default for a considered decision on the establishment, implementation or termination of the contractual relationship.

Our legitimate interest in data processing lies in the purposes described above.

## **5 Transfer of data abroad**

Where personal data is transferred to a country that does not provide an adequate level of data protection equivalent to Switzerland or the EU, we ensure appropriate safeguards are in place, including Standard Contractual Clauses (SCCs) as adopted by the European Commission (Decision 2021/914), equivalent mechanisms under Swiss law or applicable data privacy framework where the recipient is certified thereunder.

Transfers of personal data in connection with the services are governed exclusively by the applicable DPA.

If you have questions about the safeguards applicable to transfers of your personal data to third countries, please contact us at [gdpr@validato.com](mailto:gdpr@validato.com).

## **6 Cookies**

For information about the cookies we use, their purpose, and how to manage your preferences, please refer to our [Cookie Policy](#)

## **7 Right to information, correction, deletion and restriction of processing**

You have the following rights regarding your personal data:

- **Access, rectification, erasure, restriction of processing, data portability and right to object** .
- **Right to lodge a complaint** with the competent data protection supervisory authority in your country of residence or establishment.
- **Withdrawal of consent** at any time, without affecting the lawfulness of prior processing.

To exercise any of these rights, contact us at [gdpr@validato.com](mailto:gdpr@validato.com). We may require proof of identity before processing your request.

## **8 Data security**

We implement appropriate technical and organizational security measures to protect your personal data against manipulation, accidental loss, destruction and against unauthorized access by third parties. These measures are reviewed and updated in line with technological developments and include, among others, access controls, encryption, and employee confidentiality obligations.

Our employees and contracted service providers are bound by confidentiality obligations and required to comply with applicable data protection regulations.

You should always treat your access data confidentially and close the browser window when you have finished communicating with us, especially if you share a computer with others.

Please note that despite our measures, no transmission of data over the internet can be guaranteed to be completely secure. If you become aware of any security incident affecting your data, please notify us promptly at [gdpr@validato.com](mailto:gdpr@validato.com).

## 9 Retention of data

We retain personal data only for as long as necessary for the purposes for which it was collected, or as required by applicable law. Specifically:

- **Server log files (section 1):** logs are anonymized and retained for up to 2 years, after which they are permanently deleted in accordance with our Retention Policy.
- **Validation data and reports (section 3):** the personal data of persons to be validated and the corresponding validation report are irrevocably deleted 120 days after the report has been generated; any remaining backup copies are fully purged within 130 days.
- **Contract and billing data:** retained for up to 10 years in accordance with applicable accounting and tax retention obligations. During this period, data no longer required for service delivery is restricted to accounting and tax purposes only.
- **Client account data:** retained for the duration of the contractual relationship and deleted upon account closure, subject to any applicable legal retention obligations.

Once retention periods have expired, data is securely deleted or anonymized in accordance with our Information Deletion procedure.

## **10 Marketing Communications**

With your consent, we may contact you by email, phone or post to send you marketing communications, including product updates and new features, newsletters and industry insights, promotional offers and discounts, and event invitations and webinars.

The legal basis for this processing is your consent. You may withdraw your consent at any time, free of charge and without giving reasons, by:

- clicking the unsubscribe link in any marketing email we send you or
- contacting us at [gdpr@validato.com](mailto:gdpr@validato.com).

Withdrawal of consent does not affect the lawfulness of any processing carried out prior to withdrawal. Once you withdraw consent, we will cease sending marketing communications promptly and update our records accordingly.

We will never sell your contact details to third parties for marketing purposes.

## **11 Change of the Data Privacy Notice**

Validato Ltd. reserves the right to amend this Data Privacy Notice at any time. The current version is always available at [www.validato.com](http://www.validato.com). We recommend that you review this policy regularly. Where changes are material, we will notify registered users by e-mail or by a prominent notice on our website.