

VOLIRO



Voliro Privacy Notice

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Voliro AG

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(the **Voliro/we/us/our**)



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1. Introduction

At Voliro (collectively “**Voliro**”, “**us**”, “**we**”) we value privacy and commit to being transparent about how we collect, use and protect your personal data. This Privacy Notice will inform you as to how we collect, use and share your personal data when you:

- (a) use our products or services,
- (b) provide products or services to us,
- (c) visit our websites,
- (d) request information about our services,
- (e) request or create an account,
- (f) apply for a job, or
- (g) otherwise communicate, interact, or enter into a business relationship with us.

It also tells you about your data protection rights and how the law protects you in accordance with your local laws including the Swiss Federal Act on Data Protection (“**FADP**”), the EU General Data Protection Regulation 2016/679 (“**GDPR**”), and other similar laws.

This Privacy Notice is issued on behalf of “Voliro”. When we mention “**Voliro**”, “**we**”, “**us**” or “**our**” further below, we are referring to the relevant company responsible for processing your data. **Voliro** includes **Voliro Ltd.**, a limited company registered in Switzerland under company number CHE-206.478.915 and with registered offices at Förrlibuckstrasse 150, 8005 Zurich, Switzerland.

It is important that you read this Privacy Notice together with any other privacy notices and similar documents we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Notice supplements other notices and privacy policies and is not intended to override them.

As used in this Privacy Notice, “personal data”, “personal information” or “data” means any information that relates to, is capable of being associated with, describes, or could be linked to, an identified or identifiable natural person (‘data subject’). It does not include data where the identity has been removed. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

You may provide us with data that relates to other individuals. In this case, we understand that this data is correct and that you act within your rights when sharing it with us. We may not be



in direct contact with these individuals and cannot inform them directly about our data processing, but we ask you to inform these individuals about our data processing (e.g., by referring them to this Privacy Notice).

a. Third party links

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy notices and practices.

For some websites managed by Voliro group companies, the group company may act as a controller for data collected from the website. This Privacy Notice may not apply to open source project websites sponsored by Voliro. Such project websites may have their own privacy notices, which we encourage you to review.

Please also note that co-branded websites (websites where Voliro presents content together with one or more of our business partners) may be governed by additional or different privacy notices. Please refer to the privacy notice on those websites for more information about applicable privacy practices.

a. Changes to the Privacy Notice and your duty to inform us of changes

We keep our Privacy Notice under regular review and may update it from time to time. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2. Data processing when providing or receiving products and services

When you use our products or services or if you provide products or services to us, we process data for onboarding, for the conclusion of an agreement and for its performance and management:

- (a) We may process personal data if we are in contact with you in view of a potential agreement. This includes data you provide to us, e.g., your name, contact details or date of birth, information collected through forms, details of products or services requested and the date of agreement, and data we receive from third parties or publicly available sources, e.g., information from the Internet, sanctions lists, media, public registers, etc.



- (b) If we enter into an agreement with you, we process the data from the onboarding and information on the agreement (e.g. the date and the content of the agreement).
- (c) We also process personal data during and after the agreement. Examples are information on the purchase of products or services, payments, user credentials, access data and logins, contacts with customer service, claims, complaints, returns, data on the termination of the agreement and – if there ever should be disputes in relation with the agreement – also on these and related proceedings. Without these data processing operations, we would not be able to perform agreements.
- (d) We may advertise our products or services, e.g., through newsletters. More details are set out in sec. 3.
- (e) We also process the data set out above for statistical purposes. These statistics support the improvement and development of products and business strategy generally. We may also use them on a personally identifiable basis for marketing purposes; for more information, please see sec. 3.

For corporate partners, we process less personal data because data protection law only applies to data of individuals. However, we process data of individuals with whom we are in contact, e.g. name, contact details, professional details and details from communications, user account information, and details about management persons, etc. as part of the general information about companies with which we cooperate.

3. Data processing for marketing

We also process personal data to advertise our products and services, including to deliver relevant content suggestions and recommendations to you and measure or understand the effectiveness of the content we serve to you, to enable you to complete a survey or give feedback, and to perform analytics to improve our website, products/services, marketing, and customer relationship experiences:

- (a) Newsletter: We send out electronic information and newsletters, which may include advertising for our products and services. We will ask for your consent before sending out electronic marketing, except for certain offers to existing customers. [In addition to your name and e-mail address, we may also process information about which products or services you have used, whether you open newsletters, and which links you click on. For this purpose, a service provider we use includes invisible images that are loaded from a server via a coded link and transmits related information. This is a common method that



helps us assess the effect of newsletters and optimize them. You can object by setting your email program accordingly (e.g. by switching off automatic loading of images).

- (b) Online advertising: where applicable, information on personalized display of advertising on third-party sites and platforms.
- (c) Advertising calls: if applicable, information on advertising calls.
- (d) Market research: We also process data to improve and develop new products or services, e.g., information about purchases made or reactions to newsletters or information from customer surveys and polls or from social media, media monitoring services and public sources.
- (e) Testimonials: We may publish your testimonials about our services on our website and in our marketing materials.

4. Data processing in relation with our website

For technical reasons, every time you use our website, some data is collected that is temporarily stored in log files (log data), in particular the IP address of the device, information about the internet service provider and the operating system of your device, information about the referring URL, information about the browser used, date and time of access, and content accessed when visiting the website. We use this data to provide our website, to ensure security and stability, to optimize our website and for statistical purposes.

Our website also uses **cookies and other tracking technologies** that allow us to analyze user behavior on our website, primarily to improve our website, to deliver relevant content, suggestions and recommendations to you and measure or understand the effectiveness of the content we serve to you, to perform analytics to improve our website, products/services, marketing, and customer relationship experiences, and for troubleshooting. Cookies are small files that your browser saves on your device. This allows us to separate individual visitors from others, but usually without identifying visitors. Cookies may also include information about content accessed and the duration of the visit. Certain cookies (“session cookies”) are deleted when the browser is closed. Others (“persistent cookies”) are stored for a certain period of time so that we can recognize recurring visitors. We may also use other technologies, such as tracking pixels or browser fingerprints. Tracking pixels are tiny, invisible images that allow collection of certain data on user behavior (e.g., site visits), by sending information back to the web server when loaded. Browser fingerprints are information about the configuration of your device that make your device distinguishable from others.



You can configure your browser in the settings so that it blocks or deletes certain cookies and other stored data. You can find out more about this in the help pages of your browser (usually under “privacy”).

Cookies and other technologies may also be used by third parties that provide services to us. These may be located outside of Switzerland and the EEA (for more information, see sec. 10). For example, we use analytics services so that we can optimize and personalize our website. Cookies and similar technologies from third-party providers also enable them to target you with individualized advertising on our websites or on other websites as well as on social networks that also work with this third party and to measure how effective advertisements are (e.g., whether you arrived at our website via an advertisement and what actions you then take on our website). The relevant third-party vendors may record website usage for this purpose and combine their records with other information from other websites. They can record user behavior across multiple websites and devices to provide us with statistical data. The providers may also use this information for their own purposes, e.g. for personalized advertising on their own website or other websites. If a user is registered with the provider, the provider can assign the usage data to the relevant person.

The most important third-party provider is Google. You can find more information about them below. Other third parties generally process personal and other data in a similar way.

We use **Google Analytics** on our website, an analysis service provided by Google LLC (1600 Amphitheatre Parkway, Mountain View, CA, USA) and Google Ireland Ltd (Gordon House, Barrow Street, Dublin 4, Ireland). Google collects certain information about the behavior of users on the website and about the end user device. The IP addresses of visitors are shortened in Europe before being forwarded to the USA. Google provides us with evaluations based on the recorded data, but also processes certain data for its own purposes. Information on the data protection of Google Analytics can be found [here](#), and if you have a Google account yourself, you can find further details [here](#).

5. Data processing via social media

We operate our own presences on social networks and other platforms (LinkedIn, Instagram and YouTube). If you communicate with us there or comment on or redistribute content, we collect information for this purpose, which we use primarily for communication with you, for marketing purposes and for statistical evaluations (see sec. 3 and 7). Please note that the provider of the platform also collects and uses data (e.g. on user behavior) themselves, possibly together with other data known to them (e.g. for marketing purposes or to personalize the platform content). Insofar as we are jointly responsible with the provider, we enter into a corresponding agreement, about which you can obtain information from the provider.



6. Data processing for recruiting

When you apply for a job at Voliro or contact us in relation to a job opening, we may process the personal data that you send us in connection with your application (e.g., contact or master data, CV information, qualifications, skills, interests, diplomas and references), but also data that is publicly available (e.g., from the Internet or job-related social media platforms), data that we obtain from third parties (e.g., from recruitment agencies or, with your consent, from references) and data that we already have (if you have previously been employed by a Voliro group company), in each case insofar as such data is relevant to the assessment of your application. We may also process communication data when we exchange information about your application. If you provide us with data about other persons, such as references, we assume that you are authorized to do so, and that this data is correct.

We may process your data as part of your application and to fill vacancies within Voliro. We may also process data for security purposes (e.g., access control) and for communication with you. With your consent, we also process data to fill other positions within Voliro.

7. Other processing purposes

Typical (though not necessarily frequent) cases are as follows:

- (a) **Communication:** When we are in contact with you (e.g. when you call us, when you communicate with us by e-mail or on a social media platform, or when you meet us), we process the content as well as information about the nature, timing, and location of the communication. For your identification, we may also process information about proof of identity. Telephone conversations with us may be recorded; we will inform you of such recordings at the beginning of each conversation. If you do not want us to record such conversations, you have the option at any time to terminate the conversation and contact us by other means (e.g. by e-mail).
- (b) **Events:** We may process data if you attend our events, including registration data, preferences and event images.
- (c) **Compliance with legal requirements:** We may process and/or disclose data to authorities as required by law or to comply with internal regulations.
- (d) **Prevention:** We process data to prevent crime and other misuse, for example fraud prevention or for internal investigations.



- (e) **Legal proceedings:** Where we are involved in legal proceedings (e.g. court or administrative proceedings), we process data such as information about other parties to the proceedings and individuals involved such as witnesses and disclose data to such parties, courts, and authorities, possibly also abroad.
- (f) **IT security:** We also process data for monitoring, controlling, analyzing, securing, and assessing our IT infrastructure, as well as for backups and archives.
- (g) **Competition:** We process data about our competitors and the market environment in general (e.g. the political situation, the association landscape, etc.). We may also process data about key persons, such as their name, contact details, role or function and public statements.
- (h) **Transactions:** If we sell or acquire assets, business units or companies, we process data to prepare and execute transactions, e.g. information about customers or their contact persons or employees, and we may also disclose such information to potential buyers or sellers.
- (i) **Other purposes:** We process data to the extent necessary for other purposes such as training and education, administration (e.g. contract management, accounting, enforcement and defense of claims, evaluation and improvement of internal processes, preparation of anonymous statistics and evaluations; and safeguarding other legitimate interests).

8. Data disclosures

We may share your personal data with the parties set out below:

- (a) Third party service providers who perform a variety of services on our behalf in accordance with this policy (IT service providers and system administrators, third parties who host and manage data or provide programming or technical support, deliver our products and services, conduct reference checks on candidates on our behalf, etc.).
- (b) Third party service providers who perform other services and process personal as separate data controllers, such as postal, shipping, and logistics services, or financial services (such as banks or payment service providers).
- (c) Professional advisors including lawyers, bankers, auditors and who provide consultancy, banking, legal, insurance and accounting services.



- (d) Third-party analytics partners to analyze website traffic and understand user or customer needs and trends or our third-party marketing service providers to help us to communicate with users or customers.
- (e) Third parties if we are required to do so by law, or if we believe that such action is necessary to: (i) fulfill a government, or regulatory authority request; (ii) conform with the requirements of the law or legal process; (iii) protect or defend our legal rights or property, our websites, users or customers.
- (f) Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets.
- (g) Alternatively, we may seek to acquire other businesses or merge with them. Upon a respective change of control event the new owners may use your personal data in the same way as set out in this Privacy Notice.
- (h) Other third parties subject to your prior consent.

9. International transfers

The recipients of data are not all located in Switzerland, in particular certain service providers (especially IT service providers). These providers may have locations within the EU or the EEA, but also in other countries worldwide, e.g., in the USA. We may also share data with authorities abroad if we are legally compelled to do so or, for example in relation with a sale of assets or with legal proceedings (see sec. 7). Not all these countries have an adequate level of data protection. We therefore use appropriate safeguards, in particular the EU standard contractual clauses, which can be found [here](#). In certain cases, we may share data abroad without such safeguards, as permitted under applicable data protection law, e.g., with your consent or where the disclosure is necessary for the performance of the contract, for the establishment, exercise, or enforcement of legal claims or for overriding public interests.

10. Data retention

We will only retain your personal data for as long as reasonably necessary to fulfill the processing purposes, as long as we have a legitimate interest in storing it (e.g., in order to enforce legal claims, for archiving and or to ensure IT security) and as long as data is subject to a statutory retention obligation (for certain data, for example, a ten-year retention period applies). To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from



unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements. After these periods have expired, we delete or anonymize your personal data. In some circumstances you can ask us to delete your data as per the provisions in the following sections.

11. Data security

We have put in place appropriate technical and organizational measures to prevent your personal data from being accidentally lost, used, altered, disclosed or accessed in an unauthorized way. We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

12. Your legal rights

Depending on the country you are located in you may have certain rights under your local privacy laws. Please refer to the supplements to this Privacy Notice for an enumeration of the specific rights that apply to you. In general, these may include the following rights, which may be subject to conditions or restrictions depending on applicable laws:

- (a) Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- (b) Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- (c) Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.



- (d) Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- (e) Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - (i) You want us to establish the data's accuracy.
 - (ii) Our use of the data is unlawful but you do not want us to erase it.
 - (iii) You need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - (iv) You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- (f) Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- (g) Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Exercising any of your rights listed above is usually free of charge. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive, or refuse to comply with your request in these circumstances, in each case in accordance with applicable laws. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.



13. Contact and Complaints

If you have any questions about this Privacy Notice or a related topic, including any requests to exercise your legal rights, please contact us at legal@voliro.com. You also have the right to make a complaint at any time to the competent data protection supervisory authorities.



Annex I: EEA/UK Supplement Statement to Our Data Privacy Notice

This supplement statement explains the additional data protection rights that residents of the European Economic Area (EEA) and the United Kingdom (UK) have under the General Data Protection Regulation (GDPR), the UK General Data Protection Regulation (UK GDPR) and the UK Data Protection Act 2018.

Data Protection Rights:

- (a) **Right to access:** You have the right to access your personal data that we hold about you and to receive a copy of that data.
- (b) **Right to rectification:** You have the right to request that we correct any inaccurate or incomplete personal data that we hold about you.
- (c) **Right to erasure:** You have the right to request that we delete your personal data in certain circumstances, such as when the data is no longer necessary for the purposes for which we collected it, when you withdraw your consent, or when we are processing your data unlawfully.
- (d) **Right to restrict processing:** You have the right to request that we restrict the processing of your personal data in certain circumstances, such as when you contest the accuracy of the data or when you object to our processing of the data.
- (e) **Right to data portability:** You have the right to receive your personal data in a structured, commonly used, and machine-readable format, and to have that data transmitted to another data controller where technically feasible.
- (f) **Right to object:** You have the right to object to the processing of your personal data in certain circumstances, such as when we are processing your data for direct marketing purposes or when we are processing your data based on our legitimate interests.
- (g) **Right to withdraw consent:** If we are processing your personal data based on your consent, you have the right to withdraw that consent at any time.

Legal Basis for Processing Personal Data

We only use your information in a lawful, transparent, and fair manner. Depending on the specific personal data concerned and the factual context, when an organization processes



personal data as a controller for individuals in regions such as the EEA and the UK, they may rely on the following legal bases as applicable in your jurisdiction:

- (a) **As necessary for a contract:** When we enter into a contract directly with you, we may process your personal data on the basis of the contract in order to prepare and enter into the contract, as well as to perform and manage the contract. This may include providing products and services, features and services to account owners, their users, and those they invite to join meetings and webinars hosted on their accounts, and managing the relationship and contract, including billing, compliance with contractual obligations, and related administration.
- (b) **Consistent with specific revocable consents:** We may rely on your prior consent to utilize cookies to engage advertising and analytics partners to deliver tailored advertising and analysis of their website usage, and other instances where we separately ask you for your consent. You have the right to withdraw your consent at any time.
- (c) **As necessary to comply with legal obligations:** We may process your personal data to comply with the legal obligations to which we are subject for the purposes of compliance with laws, regulations, codes of practice, guidelines, or rules applicable to us, and for responses to requests from, and other communications with, competent public, governmental, judicial, or other regulatory authorities. This may include detecting, investigating, preventing, and stopping fraudulent, harmful, or unlawful behavior.
- (d) **To pursue legitimate interests of us or third parties:** We may process personal data if necessary for the purposes of the legitimate interests pursued by us or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. This may include, e.g., statistical evaluations, security and fraud prevention, analytics and improvement (cf. sections 3, 4 and 5), marketing purposes (sec. 3), or the purposes listed in sec. 7.

Note that we may process your personal data for more than one legal basis depending on the specific purpose for which we are using your data. Generally, we do not rely on consent as a legal basis for processing your personal data. However, we will not send you any marketing communications and we will not share your personal data with any third party for marketing purposes without your prior explicit opt-in. You have the right to withdraw consent to marketing by following the opt-out links on any marketing message sent to you or by contacting us at any time.



Contact Us

If you wish to exercise any of your data protection rights, or if you have any questions or concerns about how we process your personal data, please contact us at legal@voliro.com. We will respond to your request or inquiry as soon as possible and in any event within one month of receipt of your request, unless the request is complex or numerous, in which case we may require up to two months to respond. We may also require additional information from you to verify your identity before we can process your request.

You also have the right to lodge a complaint to a data protection authority. For more information, please contact your local data protection authority.



Annex II: US and State-specific Supplement Statement to Our Data Privacy Notice

If you are a resident of the United States, you may have certain data protection rights under federal law. In addition to these, residents of certain states will have additional rights under their respective local privacy regulations.

California residents

California residents may have certain additional rights under the California Privacy Rights Act of 2023. These include:

- (a) The right to know the categories of personal information we collect and the purposes for which we use it.
- (b) The right to request that we disclose the specific pieces of personal information we have collected about you.
- (c) The right to request that we delete your personal information, subject to certain exceptions and limitations under the law.
- (d) The right to opt-out of the sale of your personal information, if applicable.
- (e) The right to non-discrimination for exercising your data protection rights.

California's Shine the Light Law:

California Civil Code Section 1798.83, also known as "Shine The Light" law, permits California residents to annually request information regarding the disclosure of your Personal Information (if any) to third parties for the third parties' direct marketing purposes in the preceding calendar year. We do not share Personal Information with third parties for the third parties' direct marketing purposes.

Residents of States other than California:

Residents of states other than California may also have additional rights and protections under those laws such as:

- (a) The right to request access to the personal data collected about them.
- (b) The right to request the correction or deletion of personal data that is inaccurate or outdated.



- (c) The right to request that personal data be transferred to another organization.
- (d) The right to object to the processing of personal data for certain purposes, such as direct marketing.
- (e) The right to opt-out of the sale of personal data, if applicable.
- (f) The right to know how personal data is collected, used, and shared.
- (g) The right to know the categories of personal data that are collected and the purposes for which they are collected.
- (h) The right to know the categories of third parties with whom personal data is shared.
- (i) The right to know the sources of personal data, if not collected directly from the individual.
- (j) The right to know the retention period for personal data.

Note that these rights may not apply to your state. Please refer to your local data protection regulations in order to ascertain your privacy rights. If you have any questions or concerns about your data protection rights or our data privacy practices, please contact us at:

legal@voliro.com.