

Document

Version

Privacy Policy Init7 (Switzerland) Ltd.

08/2023

1. Privacy Policy at Init7 (Switzerland) Ltd.

Data protection is one of our most important concerns. Init7 only stores and processes data that is necessary for customer relations and compliance with legal obligations. We use this data exclusively for operational purposes, and we transparently communicate about how it is used. This data is treated confidentially and never sold to third parties.

In this Privacy Policy, we disclose the kind of information we collect, why we collect it, and how we treat the information we collect.

2. Data Categories

Personal Data

concerns any information relating to an identified or identifiable natural person. An “identifiable natural person” is defined as a person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, a location, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

Customer Data

primarily concerns personal master data. This means that it includes information about the customer that is necessary for contractual relations and service orders. Connections are at the center of the process. A natural/legal person is defined as a customer or someone who holds these connections.

User Data

refers to the data generated by customers using the Init7 network.

Marketing Data

concerns the data generated in connection with the use of all publicly accessible means of communication by Init7.

3. Data Creation

Customer Relationship Data/User Data

In Init7's own public appearances, the same rules apply to everyone. Init7 only stores and processes data that is necessary for customer relations and compliance with legal obligations. This means that data is stored, merged, processed, and evaluated if collection, storage, and merging is necessary for the operation, verification, and optimization of Init7's services (availability, speed, and quality) or if there is a legal obligation to do so.

Init7, like all telecommunications service providers (TSP), has the legal obligation to collect/keep individual data related to the connections it creates. The release of this data is based exclusively on Section 2 Art. 10 of the right to inspect files and the right to information on data of the Federal Act on the Surveillance of Post and Telecommunications (SPTA, SR780.1) of March 18th, 2016 (as of September 1st, 2023).

The provision of personal data is only required when contacting us or using our services. We only use the data in its respective context, i.e., to answer inquiries, to provide services, to process contracts or payments, and other business transactions.

Information may be shared with subcontractors or service providers for the purpose of fulfilling contracts or providing services. The exchange of personal data may be reciprocal. Compliance with data protection regulations by subcontractors or service providers is their responsibility; Init7 cannot be held liable for any violations by third parties.

Data in Marketing Communication

In Init7's own public appearances, the same rules apply to all visitors. Visitors are not tracked on a personalized basis. Anonymous traffic measurements are taken, which do not allow any conclusions to be drawn about individuals, and no individual personalized visitor profiles are created. Our servers store information about page accesses (including IP address, browser and operating systems used, and referrers, if applicable) in the log files. This data does not allow any conclusions to be drawn about individuals.

When using services to measure performance and reach, cookies may be used and user profiles may be created. User profiles include, for example, pages visited or content viewed on our website, information about the size of the screen or browser window, and the – at least approximate – location. As a matter of principle, user profiles are created exclusively on a pseudonymous basis. We do not use user profiles to identify individual visitors on our website. Google services with which you are registered as a user can, if necessary, assign the use of our online service to your profile with the respective service, whereby you normally had to give your consent to this allocation in advance.

E-mail

In public appearances and with direct customer contact, options are available that enable fast electronic contact as well as direct communication with us, which also includes a general e-mail address.

If a person contacts Init7 employees by e-mail or via a contact form, personal data transmitted by the person is automatically stored. Personal data provided voluntarily by an individual to Init7 employees is stored for the purpose of processing the request or contacting the individual.

We store correspondence with the individual, including the e-mail address, so that we have a history of past events to refer back to if the individual contacts us again at a later date. We also store any information that the person voluntarily provides, for example, in surveys.

Newsletters

We use the services of Friendly LLC Hergiswil (Switzerland) for newsletters and refer to their Privacy Policy.

Telephone

For communication via telephone, we rely on services provided by a service provider based in Switzerland, to which the provisions from the SPTA apply.

Social Media and Messenger Apps

Init7 has its own presence on various social media channels and messenger apps.

We also use social media to interact with our customers and potential customers, and to display advertisements for our services on third-party platforms and search engine sites.

The Privacy Policies of the respective social media channels and messenger apps apply.

Recruitment Process Applications

We collect and process personal data from applicants during recruitment processes. Processing is carried out electronically, as application documents are sent to us via an application platform or by e-mail. Documents sent to us by other means will be deleted immediately.

We delete or anonymize the application documents twelve months after the recruitment process has been completed, unless applicants have expressly agreed to a longer retention period or there are no other legitimate interests for Init7 that prevent deletion. If an employment contract is concluded, we store the transmitted data for the purpose of processing the employment relationship in compliance with legal regulations.

4. Data Protection

Where We Save Data

We use both our own and external services to host and store our data. Our external service provider for CRM sub-elements is camptocamp SA from Bussigny (Switzerland).

How We Protect Data

We protect data from unauthorized access, loss, or falsification. When using third-party service providers, we only pass on data that is necessary in each case. The data is transmitted in encrypted form if possible.

Inspection

According to Art. 20ff DPO, individuals are entitled to object to having their personal data stored at any time, unless there are contractual concerns or legal reasons to the contrary. Upon request, you will receive information free of charge regarding the data we have stored about you. Furthermore, individuals have the right to have their data corrected, deleted, or blocked. Data deletion may, under certain circumstances, be precluded by legal regulations, in particular with regard to data for billing and accounting purposes. The data will be deleted insofar and as long as the storage is not required for the above-written reasons.

5. Formalities

Amendments and Changes to the Privacy Policy

We may amend and modify this Privacy Policy at any time. The current version of the Privacy Policy is always the one published on our website. In case of inconsistencies in different language versions, the German language version shall prevail.

Contact

If you have any questions about personal data or would like to exercise the right to have your personal data corrected, blocked, or deleted, please contact us at fiber7@init7.net. Processing a request for information can take up to 30 days.

Party responsible for processing personal data:

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