

## PRIVACY POLICY

When you use our internet pages, various personal data is collected. Personal data is data with which you can be personally identified. This privacy statement explains what information we collect and how we use it. It also explains how and for what purpose this is done.

This declaration applies to the Internet pages **www.nevestierlehorn.com**. Please note that links to other websites, for which different data protection rules may apply, are possible.

The privacy policy is governed by Swiss law, insofar as this is applicable. Where applicable, provisions of the European Union (EU), in particular the EU General Data Protection Regulation (GDPR) and German Federal Data Protection Act, are taken into account.

The controller for purposes of data processing on our website is: Neves, Stierle & Horn Immobilien AG, General-Guisan-Quai 34, 8002 Zurich, Phone: +41 (0) 44 545 77 11, E-mail: [info@nevestierlehorn.com](mailto:info@nevestierlehorn.com) (please also refer to our imprint).

The obligation to appoint a data protection representative in the EU does not apply to us pursuant to Art. 27 para. 2 lit. a GDPR.

### 1. Collected data

When collecting and processing personal data, we always comply with the legal requirements of the applicable data protection laws.

#### 1.1 General data collection

Our Internet pages collect a number of general data with each access. This general data and information is stored in the log files of the server. The following data is collected:

- IP-Address
- Date and time of access
- Time zone
- Contents of request
- Access status/http status code
- Transferred data volume
- Website from which the request is originating
- Browser (incl. language and version)
- Operating system

When these general data are used, they are not assigned to a specific person. The collection of this data is based on our legitimate overriding interests (Art. 13 para. 1 Swiss Federal Act on Data Protection [FADP] and Art. 6 para. 1 lit. f GDPR, respectively) and is technically necessary in order to display our website to you and to guarantee its stability and security.

## **1.2 Contacting us and contact form**

If you contact us via the e-mail address provided and/or via the contact form provided, we will always treat the data you provide in accordance with the applicable data protection regulations. The data you provide will only be used to process your request. The processing of your data is based on our legitimate overriding interests in responding to your inquiry (Art. 13 para. 1 FADP and Art. 6 para. 1 lit. f GDPR, respectively). If the purpose of the e-mail contact is to conclude a contract, the additional legal basis for data processing is the conclusion of the contract (Art. 13 para. 1 FADP and Art. 6 para. 1 lit. b GDPR, respectively).

## **2. Cookies**

Our website uses so-called cookies, which are small text files that are stored on your computer and can be retrieved there again. Cookies are used to enable you to register for our services and to personalize the website for you. For this purpose, our website is supported by cookies, which collect information about your IP address, the time and duration of your visit, the number of your visits, the use of forms, your search settings, your display view, your settings for favorites on our website

The storage time of the cookies varies depending on whether they are transient or persistent cookies.

- Transient cookies are automatically deleted when you close your browser. These include, in particular, session cookies. These save a session ID, which can be used to assign various requests from your browser to the joint session. This enables your computer to be recognised when you return to our website. The session cookies are deleted when you close your browser.
- Persistent cookies are automatically deleted after a specified period, which may vary depending on the cookie. You can manually delete these cookies at any time in the security settings of your browser.

You can prevent the use of cookies by our website at any time by means of an appropriate setting in your internet browser and thus permanently object to the use of cookies. Furthermore, cookies that have already been stored can be deleted at any time via your internet browser or other software programs. If you deactivate the use of cookies in your browser, it is possible that certain functions of our website become unavailable.

The use of cookies is based on our legitimate overriding interest in simplifying the use of our website and being able to continually improve its content (Art. 13 para. 1 FADP and Art. 6 para. 1 lit. f GDPR, respectively).

## **3. Web-Tracking**

We use Google Analytics on our website, a web analysis service provided by Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland ("Google"). Google Analytics uses cookies to help the website analyze how users use the site. The information generated by the cookie about your use of the website will be transmitted in anonymous form to and stored by Google on servers in the United States. Thanks to anonymization, this data cannot be assigned to any specific person. Google will process this information for the purpose of evaluating the use of the website, compiling reports on user activity and providing other services relating to website activity and internet usage. Google may transfer this information to third parties.

The analysis activity is based on our legitimate overriding interest in constantly improving our website and its user-friendliness (Art. 13 para. 1 FADP and Art. 6 para. 1 lit. f GDPR, respectively).

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

Google is certified under the Privacy Shield Agreement and thereby guarantees to maintain an adequate level of data protection to that in the EU

(<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>).

or more information on data processing by Google, please refer to Google's privacy policy: <http://www.google.de/intl/de/policies/privacy>

#### **4. Google Maps**

We can use a plug-in of the Internet service Google Maps on our website. Google Maps is operated by Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland ("Google"). When you use Google Maps on our website, information about the use of this website (including IP address) is transmitted to and stored on a Google server in the USA. We have no knowledge of the exact content of the data transmitted, nor of its use by Google. Google may transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. If you deactivate Javascript in your browser, you prevent the execution of Google Maps. However, you will then not be able to use any Google map displayed on our website. You can find out more about the data protection regulations and terms of use for Google Maps here: [https://www.google.com/intl/de\\_de/help/terms\\_maps.html](https://www.google.com/intl/de_de/help/terms_maps.html)

The provision of Google Maps on our website serves the user friendliness and easier localization of our location and thus to our legitimate overriding interests (Art. 13 para. 1 FADP and Art. 6 para. 1 lit. f GDPR, respectively).

#### **5. Social Media Plug-ins and Tools**

We currently use the social media plug-ins and tools listed in the following table. When you visit our websites, the data mentioned in section 1.1 of this declaration may be transmitted to the plug-in providers without further notice. The plug-in provider stores the data collected about you as usage profiles and uses these for the purposes of advertising, market research and/or the design of its website.

We have no influence on the collected data and data processing operations of the plug-in providers. These are subject to the respective privacy policies of the third-party providers. Further information on the purpose and scope of data collection and processing by the plug-in provider can be found in the following privacy policies of these providers.

The data processing via the plug-in providers is based on our legitimate overriding interest in improving the user-friendliness of our website and facilitating the sharing of content for the user (Art. 13 para. 1 FADP and Art. 6 para. 1 lit. f GDPR, respectively).

<b>Plug-in/tool</b>	<b>Privacy policy</b>
Facebook	<a href="https://www.facebook.com/about/privacy">https://www.facebook.com/about/privacy</a>
Instagram	<a href="https://help.instagram.com/519522125107875">https://help.instagram.com/519522125107875</a>
LinkedIn	<a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a>

#### **6. Newsletter**

With your consent (Art. 13 para. 1 FADP and Art. 6 para. 1 lit. a GDPR, respectively), you can subscribe to our newsletter, with which we inform you about our current interesting offers. To subscribe to our newsletter, we use the so-called double opt-in procedure. This means that after your registration we will send you an e-mail to the given e-mail address in which we will ask you to confirm that you wish to receive the newsletter. The only mandatory information for sending the newsletter is your e-mail address, which we store after your registration.

You can revoke your consent to receive the newsletter at any time and unsubscribe from the newsletter. You can cancel or unsubscribe by clicking on the link provided in every newsletter e-mail or by sending an e-mail to [info@nevesstierlehorn.com](mailto:info@nevesstierlehorn.com).

Furthermore, we can send you our newsletter within the framework of your user or contractual relationship (Art. 13 para. 1 FADP and Art. 6 para. 1 lit. b GDPR, respectively). You can unsubscribe from the newsletter at any time by clicking on the link provided in every newsletter e-mail, by sending an e-mail to [info@nevesstierlehorn.com](mailto:info@nevesstierlehorn.com) or by sending a message to the contact details given in the imprint.

To send our newsletter we use *Mailchimp*, a service of the third-party provider The Rocket Science Group LLC, 675 Ponce de Leon Ave NE Suite 5000, Atlanta GA-30308, USA (Mailchimp). If you subscribe to our newsletter, your details may be sent to Mailchimp. You can find out more about data processing by Mailchimp from the respective privacy policy: <https://mailchimp.com/legal/>. Mailchimp is certified under the Privacy Shield Agreement with Switzerland and the EU. The Privacy Shield agreement guarantees an adequate level of data protection. More information can be found at the following link: <https://www.privacyshield.gov>

## **7. Registration**

On our website, we offer users the opportunity to register in our customer center by entering certain personal data. The data is entered into an input mask and transmitted to us and stored. The data will not be passed on to third parties. The data collected is derived from the respective input mask. As part of the registration process, your consent to the processing of this data will be obtained.

A registration of the user can be necessary for the provision of certain contents and services on our website or for the fulfilment of a contract with the user or for the implementation of pre-contractual measures (Art. 13 para. 1 FADP and Art. 6 para. 1 lit. b GDPR, respectively).

## **8. Data transfer**

We may use external processors for the processing of personal data. They are subject to the same strict data protection regulations.

## **9. Storage periods**

The personal data which we process about you within the framework of our web presence will be deleted or blocked as soon as the processing purpose no longer applies. In addition, the data may be stored if this is required by law. Blocking or deletion of the data can also be postponed until the relevant limitation and retention periods have expired and insofar as the data is still required for the conclusion or performance of a contract.

## **10. Your rights**

You have the following rights towards us with regard to personal data concerning you:

- right to access and information,
- right of rectification and deletion,
- right to limit data processing,
- right of objection against data processing.

If data processing on our website is based on your consent, you can revoke this at any time for the future without giving reasons. In order to be able to process your requests to exercise your rights, it may be necessary for you to provide proof of identification.

To exercise your rights, please send an e-mail to [info@nevesstierlehorn.com](mailto:info@nevesstierlehorn.com).

In Switzerland, there is no right of appeal to a supervisory data protection authority. If the GDPR is applicable to a processing activity (in particular in Germany), there is a right of appeal to the competent supervisory data protection authority.

## **11. Data security**

Numerous technical and organizational measures have been implemented to protect your data in order to ensure the most complete possible protection of the personal data processed via this website. Please note, however, that communication by e-mail, fax, mobile phone or internet applications involves certain inherent risks such as the possibility of unauthorized persons viewing the content of a message, its modification or loss. We do not assume any liability for this.