

# **Data protection**

**Lake Lucerne Navigation Company (SGV AG), Lucerne**

## **Data protection statement**

We – the Lake Lucerne Navigation Company (SGV AG) – are committed to handling your personal data responsibly. Consequently, we consider it a matter of course to comply with the legal requirements of the Swiss Federal Data Protection Act (DSG), the Ordinance on the Federal Data Protection Act (DSV) and other applicable data protection regulations, in particular the EU General Data Protection Regulation (GDPR).

Our pledge to customers:

### **We treat your data confidentially.**

The protection of your personal details and your privacy is important to us. We guarantee that your personal data will be processed in accordance with the applicable provisions of data protection law. In summary, we process personal data exclusively according to the following principles:

### **You decide for yourself about the processing of your personal data.**

Within the legal framework, you can refuse data processing at any time, or revoke your consent to it, or have your data deleted.

### **When processing your data, we offer you added value.**

We use your data exclusively within the framework of providing you services and to offer you added value, such as customized offers, additional information and support. We therefore only use your data for the development, provision, optimization and evaluation of our services or for maintaining customer relationships.

### **Your data will not be sold.**

Your data will only be disclosed to selected third parties listed in this data protection declaration and only for the purposes that are explicitly stated. If we commission third parties to process the data, they are obliged to comply with our data protection standards.

### **We guarantee the security and protection of your data.**

We guarantee the careful handling of your data as well as the security and protection of your data. We ensure the necessary organizational and technical precautions for this. Below you will find detailed information on how we handle your data.

In this data protection declaration, we inform you about the most important aspects of data processing in our company and about the data protection claims to which you are entitled. This data protection declaration covers the collection of personal data both online and offline.

## **1 Contact**

### **1.1 Name and address of our company**

Responsible within the framework of the data protection law:

Lake Lucerne Navigation Company  
Schiffahrtsgesellschaft des Vierwaldstättersees (SGV) AG  
Werftstrasse 5  
6002 Luzern  
Schweiz  
Tel: +41 (0)41 367 67 67  
E-Mail: [datenschutz@sgvholding.ch](mailto:datenschutz@sgvholding.ch)  
Webseite: [www.lakelucerne.ch](http://www.lakelucerne.ch)

### **1.2 Name and address of the data protection coordinator**

The contact details of the data protection coordinator of SGV Group are as follows:

SGV Holding AG  
Datenschutzkoordinator  
Werftstrasse 5  
6002 Luzern  
Schweiz  
Tel: +41 (0)41 367 67 67  
E-Mail: [datenschutz@sgvholding.ch](mailto:datenschutz@sgvholding.ch)  
Webseite: [www.sgvgruppe.ch](http://www.sgvgruppe.ch)

## **2 Legal framework**

The legal basis for the processing of your personal data depends on the purpose of the data processing in each individual case. In particular, the following aspects come into question:

- Your consent, which you can withdraw at any time. An informal message to the following e-mail address is sufficient for this: [datenschutz@sgvholding.ch](mailto:datenschutz@sgvholding.ch).
- The legality of data processing that has already taken place remains unaffected by your revocation;
- the conclusion or performance of a service contract with you or the implementation of pre-contractual measures;
- a general legal obligation that allows us to process data.

## **3 Recipients of personal data**

We treat your personal data as strictly confidential and only pass it on if you have expressly consented to this, or if we are legally obliged or entitled to do so, or if it is necessary to enforce our rights, in particular to enforce claims arising from the contractual relationship. In addition, we will only pass on your personal data to third parties insofar as this is necessary or expedient for the use of the website or for any provision of the services you have requested (also beyond the website).

We disclose some of your personal data to the following categories of recipients:

- Subsidiaries in our group of companies
- Service operators of our website or email systems
- Service operators for our reservations system
- Hosting partners
- The authorities

The legal regulations for the transfer of personal data to third parties are of course observed. If we use authorized intermediaries to provide our services, we take appropriate legal precautions and appropriate technical and organizational measures to ensure the protection of your personal data in accordance with the relevant statutory provisions.

Some of the recipients are in Switzerland, but some are also abroad. Whenever possible, we store all data in Switzerland or in an EU/EEA country that therefore has adequate data protection. With regards to certain types of personal data processing, however, you must expect your data to be transferred to other countries within Europe or beyond, as some of the IT service providers we use are located there. If we transfer data to a country that does not have an adequate legal level of data protection, we require that the recipient takes appropriate measures to protect personal data, such as agreeing to so-called EU standard clauses or accepting other precautions based on justified reasons. Examples of EU standard clauses can be seen [here](#).

## **4 Data storage duration**

In principle, we process your personal data as long as it is necessary for the respective purpose.

Insofar as there are legal storage obligations, the relevant personal data will be stored for the duration of the storage obligation. After the retention period has expired, we check whether there is a further need for processing. If it is no longer necessary, your data will either be deleted or made anonymous.

If we store data on the basis of a contractual relationship with you, this data will remain stored at least as long as the contractual relationship exists. At the longest, the data will be stored as long as the limitation periods for possible claims from us run or while statutory or contractual storage obligations exist.

## **5 Collection and processing of personal data**

### **5.1 Visiting our website**

When you access our website, the browser used on your device automatically sends data to our website server. This data is temporarily stored in a log file, the so-called server log files. The access data includes in particular the IP address, the URL, the operating system used, the name of your internet access provider, the date and time of access, the type of browser you use to access our website and similar. This is exclusive web traffic information that does not allow any conclusions to be drawn about your person.

This data is processed for the purpose of enabling the use of our website (establishing a connection), ensuring system security and stability over the long term, and enabling the optimization of our internet offer. We also keep such web traffic data for internal statistical purposes, on the basis of our legitimate business interests. This data will not be passed on to

third parties or evaluated in any other way. A personal user profile is not created.

The data will be deleted as soon as it is no longer required to achieve the purpose for which it was collected. In the case of collecting your personal data for the sake of website access, this is the case when the respective session has ended.

## 5.2 Newsletter

You have the option of subscribing to our newsletter. In our newsletter we provide information about our services and offers. For these purposes, we need your e-mail address and your stated agreement to actually receive the newsletter. For the processing of your personal data, we therefore obtain your consent during the registration process and refer to this data protection declaration.

We use the so-called double opt-in procedure to register for the newsletter. This means that after you have provided your e-mail address to us, we will send you a confirmation e-mail to the listed e-mail address, in which we ask you to confirm that you wish to receive the newsletter. You can then confirm by clicking on an activation link contained in the confirmation e-mail.

You have the option at any time to unsubscribe from the newsletter and to revoke the consent you have given. You will also find the link to the unsubscribe page in every newsletter. We will store your data until you unsubscribe from the newsletter.

### Braze

To send our newsletter, we use Braze, a service provided by Braze Inc., based in the USA ("Braze"). With Braze we can organize and analyze our newsletter dispatch. This can lead to the aggregated processing of data from our newsletter recipients by Braze, in a way that data cannot be assigned to an identifiable person. Braze processes this data in order to optimize distribution or for statistical purposes.

Furthermore, Braze processes various personal data, such as e-mail addresses, opening rates or other interaction data, in order to control and analyze the sending of our newsletter.

This personal data is transmitted to Braze servers and stored on Braze servers in either the USA or in other countries, where Braze or [Braze's subcontractors](#) maintain facilities. In some instances such a transmission might not actually take place with your data, but the possibility of it happening cannot be ruled out. In its [Data Processing Addendum](#) Braze has promised to implement adequate security measures, in particular by completing [EU contractual clauses](#).

Additionally, Braze is certified under the EU-US and Swiss-US [Data Privacy Framework](#).

You can find more information about data processing and data protection by Braze in [legal notices](#) of their website.

## 5.3 Contact form

For all inquiries that are made using our contact form, your details from this form will be saved for the purpose of processing your actual query. Which specific data is collected through the contact form can be seen on the form itself. The fields marked with \* are mandatory information. The voluntary provision of further data makes it easier for us to process your request and enables us

to respond to your request in greater detail.

The basis for processing your personal data is our legitimate interest in properly handling your request. If you are contacting us because of a previous contract that you have concluded with us or because we are carrying out contractual services on your behalf, then this is an additional basis for the processing of your personal data. Your data will be deleted as soon as it is no longer required to achieve the purpose for which it was originally collected.

You can object to such data processing at any time. Please send your objection to the following email address: [datenschutz@sgvholding.ch](mailto:datenschutz@sgvholding.ch). In such a case, your inquiry will be dropped and no longer processed.

## 5.4 Online applications

If you apply for a position with us, we process the personal data that we receive from you as part of the application process. In addition to your personal information, education, work experience and skills, this includes the usual correspondence data such as postal address, e-mail address and telephone number. Additionally, all documents submitted as part of the application, such as a letter of motivation, curriculum vitae and certificates will be processed. Furthermore, applicants can voluntarily provide us with additional information. This data is only stored, evaluated, processed or forwarded internally as part of the application process. The data can also be processed for statistical purposes, such as reporting. In this case, no conclusions can be drawn about individual persons.

The application data processing can also be done electronically. This is especially the case if you send us relevant application documents electronically, for example by email.

Your application data is processed to fulfill our (pre)contractual obligations as part of the applications process.

You can object to this data processing at any time and withdraw your application. Please send your objection to the person named as the contact person in the job advertisement or to this e-mail address: [datenschutz@sgvholding.ch](mailto:datenschutz@sgvholding.ch).

If we conclude an employment contract with you, the transmitted data will be stored for the purpose of processing the employment contract in compliance with the statutory provisions.

If the application process ends without employment, your data will be deleted, unless you have given us your consent to use your details for further application processes with us. You have the option to subsequently revoke this consent at any time. You can send your revocation to the e-mail address [datenschutz@sgvholding.ch](mailto:datenschutz@sgvholding.ch) or to the e-mail address given in the job advertisement.

## 5.5 Webshop

On our website we use Peaksolution. This is a webshop solution from Alturos Destinations AG, which is based in Switzerland ("Peaksolution").

All information that you provide in our webshop will be transmitted to a Peaksolution server, as the operator of our web shop, and then stored there. To protect your privacy, we have concluded

an order processing contract with Peaksolution. In this contract, Peaksolution commits to ensure data security and to process your data exclusively in Switzerland, or in the member states of the EU or the EEA.

In order to make purchases in our webshop, you must first open a customer account. The personal data that must be provided in the webshop depends on the respective entry form that is used to open the customer account.

When you open a customer account, you will receive password-protected direct access to your stored data. You can then use your customer account to log into our webshop. In the customer account you may view data about your completed or outstanding orders or manage or change your personal data.

The basis for processing your personal data in the webshop is your and our common as well as legitimate interest in processing your order. If the order serves to fulfill a contract to which you are a party or to carry out pre-contractual measures, this is an additional basis for the processing of your personal data.

The purpose of processing your personal data is to provide you with the services that you require and to process the related payment.

As part of the order processing, we accept payment methods such as Mastercard, Visa, American Express, Postfinance Card and TWINT to receive the necessary payment data for processing your order. The payment service provider that you have selected is responsible for your payment data. More detailed Information on data protection from these providers can be found on their websites.

If you wish to close your customer account, the associated data will be deleted, subject to legal retention requirements. You are responsible for backing up your personal data in the event of termination before the end of the contract.

You may find additional information about the functionality of Peaksolution products or data protection at Alturos on the [Peaksolution](#) website or the [data protection statement of Alturos](#).

## **5.6 Sweepstakes**

If you participate in sweepstakes, we collect the personal data that is required to run the sweepstakes competition. This is usually your name and contact information. We may pass on your personal data to our competition partners, in order to send you the relevant prize. Participation in the competition and the associated data collection is of course voluntary. Every competition will give you detailed information about the conditions of participation.

The basis for processing your personal data is your consent.

## **5.7 Market research**

We do not use data that has been collected as part of market research or customer surveys for advertising purposes. You will find detailed information, in particular about the evaluation of your information, in the context of the respective survey or on the forms where you provide your information. Your survey responses will not be shared or published with any third party.

The basis for processing your personal data is your stated consent.

## **5.8 Provision of contractual services**

We process personal data to the extent that is necessary to fulfill our contractual or pre-contractual obligations and to carry out any other services that you have requested. These steps have already been described in this data protection declaration. The specific personal data that is processed as well as the type, scope and purpose of the processing that is required in each case is determined by the contract that you have agreed to in order to receive the requested services.

If we store your personal data on the basis of a contractual relationship, this data will remain stored for at least as long as the contractual relationship exists and at the longest as long as the limitation periods for possible claims from us will run. The data will also remain stored while statutory or contractual storage obligations exist.

## **6 Cookies**

We use so-called cookies on our website. Cookies are small text files that are stored and also saved on your end device with the help of the browser. Cookies do not damage your end device. They cannot run programs and cannot transfer viruses to your computer. Cookies are used to make our website more user-friendly and effective overall and to make your visit to our website as pleasant as possible.

Most of the cookies we use are so-called session cookies. These are automatically deleted when you log out or close your browser. Other cookies remain stored on your computer beyond the respective usage process and enable us or our partner companies (cookies from third parties) to recognize your browser on your next visit. Insofar as other cookies are stored, such as cookies for analyzing surfing behavior, these are treated separately in this data protection declaration.

The basis for processing your personal data by using cookies depends on whether we ask for your consent. If this is the case and you agree to the use of cookies, then the established basis for processing your data is your consent. Otherwise, the personal data processed by using cookies will be used on the basis of our legitimate interests, such as guaranteeing the security of our website. Alternately, the use of cookies may be necessary to fulfill our contractual obligations.

Most internet browsers are regularly set to accept cookies. If you do not want this, you can set your browser so that it informs you about cookies settings and you only allow the acceptance of cookies in individual cases or generally exclude them. You can also activate the automatic deletion of cookies when closing the browser. You can also delete cookies that have already been pre-set by internet browsers or other software programs.

The procedure for controlling and deleting cookies depends on the browser you are using. Information on this can be found in the help menu of your browser. Please note that individual functions of our website may not work if you disable the use of cookies.

You may also revoke any consent to future cookies settings by changing your own privacy settings (see the direct links on the website). For some of the services that we use and describe below, we would also like to point out the alternative ways in which you can prevent data processing by those respective service providers or object to specific types of data processing.



## 7 Google services

Based on your consent, we use various services of Google LLC, which is based in the USA. If you have your residence in the European Economic Area (EEA) or in Switzerland, Google Ireland Ltd. applies for the purposes of our website ("Google"). Google LLC is always responsible for processing personal data when using "YouTube" or "Google Maps". We use the following Google services on our websites:

- Google Tag Manager
- Google Analytics
- Google Ads
- Google Maps
- Google reCAPTCHA
- YouTube

Further information and specific details about these different providers can be found below.

Google uses technologies such as cookies, browser web storage and tracking pixels that enable an analysis of your use of our website. The information generated in this way and about your use of our website can be transmitted to a Google server in the USA and stored there.

We use tools provided by Google which, according to Google, can process personal data in countries in which [Google or Google's subsidiaries](#) maintain facilities. In its [data processing conditions](#) Google promises to ensure an adequate level of data protection by relying on standard EU contractual clauses.

Additionally, Google is certified through the EU-US and Swiss-US [data privacy framework](#).

For more information about data processing by Google and relevant privacy settings, please consult the [data protection declaration](#) and view the [data privacy settings](#) of Google.

### 7.1 Google Tag Manager

Our website uses Google Tag Manager. Website tags can be efficiently managed with the Google Tag Manager. Website tags are placeholders that are stored in the source code of the respective website in order to record the integration of frequently used website elements, such as codes for web analysis services. The Google Tag Manager is an auxiliary service and only processes personal data for technical purposes. It also triggers other tags, which in turn may collect data. Google Tag Manager does not access this data. If a deactivation has been made at the domain or cookie level, this will remain in place for all tracking tags implemented with Google Tag Manager.

You may find additional information about Google Tag Manager on [Google's support page](#), in the [Google Tag Manager user policy](#) or in the general [data protection statement of Google](#).

### 7.2 Google Analytics

For the purpose of analyzing our website and its visitors, as well as for marketing and advertising purposes, we use the web analysis service Google Analytics 4.

Google Analytics uses cookies, which are stored on your end device (laptop, tablet, smartphone, etc.) and enable an analysis of your use of our website. This allows us to evaluate usage patterns on our website and use the statistics/reports obtained to make our offer more interesting.

We also use Google signals. With this service, additional information about users who have activated personalized ads is recorded in Google Analytics and ads can then be delivered to these users in cross-device remarketing campaigns. Google signals make it possible to better serve the personal interests or demographic data of users.

With Google Analytics 4, the anonymization of IP addresses is activated by default. As a result, your IP address will be shortened by Google within Switzerland or the EU/EEA before transmission. Only in exceptional cases will the full IP address be sent to a Google server and shortened there.

Google uses this information to evaluate your pseudonymous use of our website, to compile reports on website activity and to provide us with other services related to website activity and internet usage. According to Google, the IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data. When you visit our website, your user behavior in the form of events, such as page views, interaction with the website or your "click path" is recorded. Other data, such as your approximate location (country and city), technical information about your browser and the end devices you are using, or the referrer URL, are also recorded.

The data collected through the use of Google Analytics will be automatically deleted after 14 months. You can prevent Google's collection and transmission of such data through cookies and other means by downloading and installing the [browser add-on to deactivate Google Analytics](#). This will also allow you to choose settings about IP address registry.

If you wish to object to interest-based advertising by Google, you can access Google's [settings and opt-out possibilities](#).

You can find an overview of data usage in Google Analytics and the measures taken by Google to protect your data in the [Google Analytics help page](#). Additional information is available under the [user terms of Google Analytics](#) and in Google's general [data protection](#) statement.

### **7.3 Google Ads**

Our website uses the online advertising program Google Ads, which is part of Google Marketing Services. Good Ads is designed to draw attention to our attractive offers with the help of advertising material on other, external websites. Through the use of such tools for advertising campaigns, we can determine how successful the specific advertising measures are.

Google Ads places a cookie on your computer ("conversion cookie") if you have reached our website through a Google ad. These cookies usually expire after 30 days and are not intended to identify you personally.

Such cookies allow Google to recognize your internet browser. If you visit certain pages of our website and the cookie has not yet expired, it allows both Google and us to recognize on which

specific banner ad you originally clicked and were then forwarded to our site. Google Ads allocates a different cookie to every customer. This means that the cookies cannot be tracked through the websites of Google Ads customers. We do not collect or process any personal data through these advertising measures. We only receive statistical evaluation data from Google. Based on these evaluations, we can then see which of our advertising measures have been particularly effective. We do not receive any further data from the use of such advertising material, in particular we cannot identify you based on this information.

Based on the advertising information that is collected, categories relevant to your interests are then assigned to your browser. These categories are used to place interest-based advertising.

Through the use of Google Ads we can reach users who have already visited our website. This enables us to present our advertising in order to target groups that are already interested in our products or services.

You can prevent any participation in such a tracking process in a number of ways. These include:

- by setting your browser software accordingly, in particular through the suppression of third-party cookies, this means that you will not receive any advertisements from third-party providers;
- by deactivating cookies for conversion tracking, by adjusting [personalized Google ad settings](#);
- by disabling interest-based ads from providers that are part of the «[YourAdChoices](#)» self-regulatory campaign;

For more information about the function of Google Ads and relevant data protection aspects, please read the [data protection statement and general terms of Google Ads](#).

## 7.4 Google Maps

To integrate interactive maps on our website, we use the online map service Google Maps on our website.

When you access a website on which Google Maps are embedded, Google Maps will set up a cookie. This cookie is usually not deleted when you close the browser, but only expires after a certain period of time, unless you delete it manually. By using Google Maps, information about your use of our website (including your IP address) can be transmitted to a Google server in the USA and stored there.

Google may store this data as usage profiles for the purposes of tailoring services, advertising or market research. If you are logged in to Google, your data is assigned directly to your account. If you do not want this, you must log out first. If you do not agree to the processing of your information, you have the option of deactivating the Google Maps service. To do this, you must deactivate the Java Script function in your browser. However, this can also affect other functions of our website.

For more information, please view the [Google Maps terms of service](#) and [Google's data protection declaration](#).

## 7.5 Google reCAPTCHA

The reCAPTCHA function helps us to distinguish whether an entry on a contact form is made by a human or was automated by a computer program (so-called [bots](#)). This way, we want to ensure the security of our website and protect it from automated entries, attacks or spam.

To do this, reCAPTCHA analyzes the behavior of the website visitor based on various characteristics. These analyzes run entirely in the background and start automatically, when you first visit our website. To distinguish between humans and bots, Google analyzes different information, such as the IP address of the device used, time spent on the website, the browser and operating system used or mouse movements made by the website visitor.

For additional information, please consult [Google's data protection declaration](#) or [Google's terms of service](#).

## 7.6 YouTube

To integrate videos, we use the services of YouTube LLC ("YouTube"), which is based in the USA and is a subsidiary of Google LLC ("Google").

When you start a YouTube video on our website, a connection to YouTube's servers is established. The YouTube server is informed which of our pages you have visited. This information (including your IP address) can be transmitted to a Google server in the USA and stored there. If you are logged into your YouTube account at the same time, you enable YouTube to assign your surfing behavior directly to your personal profile. You can prevent this by logging out of your YouTube account before visiting our website. We use YouTube's so-called extended data protection mode. According to YouTube, this mode means that YouTube does not store any data about you as a visitor to our website before you watch a video.

However, the extended data protection mode does not necessarily exclude the passing on of data to YouTube partners.

For additional information, please consult the [YouTube terms of service](#) and [Google's data protection declaration](#).

## 8 Zendesk Chat

You have the possibility to contact us on our website using Zendesk Chat. This software is operated through an external system of Zendesk Inc., which is based in the USA ("Zendesk"). This is an optional (voluntary) contact option and if you do not want to use Zendesk Chat, you can instead contact us by e-mail or telephone.

When using the chat, the IP address and the page visited (on our site) are also recorded and the chat history is logged and saved. The IP address is anonymized. Additionally, Zendesk Chat uses cookies. The information generated by the cookie about the use of our website (including the anonymized IP address) can be transmitted to Zendesk servers in the USA, Asia Pacific region or the European Union and then stored there. You can find an overview of all sub-processors used by Zendesk on the [Zendesk](#) website.

In order to ensure an appropriate level of data protection when transferring data to the USA or

possibly other countries with inadequate data protection levels, we have concluded a processing agreement with Zendesk that includes standard EU contractual clauses.

You can prevent the storage of cookies by setting your browser software accordingly or deactivate the corresponding cookies by changing your privacy settings in our cookie banner, provided you have consented to the setting of Zendesk Chat cookies; However, we would like to point out that in this case you may not be able to use all functions of this website or the Zendesk Chat to their full extent. Alternatively, you can prevent processing by Zendesk by otherwise contacting us and not using the chat function.

Please consult the [Zendesk privacy policy](#) for additional information.

## 9 Hotjar

Based on your consent, we may use Hotjar ("Hotjar") on our website. This is a web analysis service provided by Hotjar Ltd., a European company based in Malta.

We use Hotjar to better understand the needs of our website visitors and apply it for optimization and marketing purposes, to better meet the interests of our users. With the help of Hotjar, movements on the website can be tracked through so-called "heatmaps". With Hotjar we receive information about where the mouse goes, which buttons are clicked, where is scrolled, how big the screen of the device used is, what type of device is used and information about the browser type. We also receive information about your location (country only) and the preferred language for displaying our website.

This information allows us to make our website faster and more customer-friendly. Hotjar stores such information in a pseudonymized user profile. The information is neither used by Hotjar nor by us to identify individual users. The information provided by Hotjar is not combined with other user data. Where your personal data or third party information is displayed on our website, it is automatically hidden by Hotjar and therefore not traceable by other tools.

The Hotjar data protection declaration states that in most cases personal data is stored in the EU and if personal data is transferred to countries outside the EU, appropriate data protection measures are made through the conclusion of standard contractual clauses.

If you do not want Hotjar to collect your data, you can prevent this by using the Hotjar opt-out feature and by installing the [do not track header](#).

For additional information about Hotjar's data protection and data security measures, please refer to their [data protection declaration](#), their [terms of service](#) as well as their section on [data privacy and legal compliance](#).

### 9.1 Crazy Egg

Based on your consent, we can also use Crazy Egg, an analysis technology system of Crazy Egg Inc., which is based in the USA ("Crazy Egg").

Crazy Egg allows you to use so-called "A/B testing", "click tracking" and "heatmaps" to

understand the impact of various changes to a website, such as changes to input fields over layout design. A/B tests serve to improve the user-friendliness and performance of online products. For example, you will be shown different versions of a website or its elements, such as input forms, on which the placement of content, labels or navigation elements may differ. Based on user behavior, it can then be determined, where users spend the most time on the site or which elements of the website receive the most interaction. Based on these insights about user behavior, it is then possible to optimize the website interface for an enhanced user experience. "Click tracking" allows us to keep an overview of your movements on the site. Because the results of such tests are more accurate if user interaction can be tracked over a certain period of time, cookies are usually stored on user devices for these testing purposes. "Heatmaps" track user mouse movements and are combined with other data to create an overall picture. This makes it possible to identify which website elements are more or less popular.

Technical data such as selected language, operating system, screen resolution and browser type are also recorded. For technical reasons, this information is stored in a so-called session cookie. This means that this cookie is deleted after you leave the website and is not used to track you across other websites or to identify returning visitors. The information collected does not include passwords, the IP address is anonymized and the information is not shared with third parties.

You can object to Crazy Egg's analysis by making the appropriate settings in your browser. Find out more on the [Crazy Egg opt-out page](#).

The information is used exclusively to improve the user-friendliness of our services. For more information, please refer to the [Crazy Egg privacy policy](#).

## **10 Pixels, local data storage and similar technologies**

Based on your consent, we also use other technologies, such as web beacons and local storage. We use these technologies to check which functions are particularly popular, to create a more personal user experience and to display user-relevant advertising. Web beacons (also known as clear GIFs, web beacons or pixel tags) are small units of code installed in or on a website, mobile app or advertisement.

These web beacons may request certain information about your browser and device, such as operating system, browser type, device type and version, referring website, website visited, IP address and other similar information.

### **10.1 Meta Pixel, custom audiences and Facebook conversions**

Based on your consent, if you have your residence in the European Economic Area (EEA) or Switzerland, we use the Meta Pixel service from Meta Platforms Ireland Ltd. The parent company is Meta Platforms Inc., which is based in the USA ("Meta"). Instagram is also a Meta product.

With the help of Meta Pixel, it is possible for Meta to identify visitors to our online sites and generate appropriate advertisements for specific target groups. These customized ads can then display on Facebook or Instagram. Accordingly, we use the Meta Pixel to only show the Facebook and Instagram ads that we place to the Facebook or Instagram pages of users who have shown an interest in our products or who have certain characteristics or interests. This may



include certain topics or products, which are determined based on previous websites visited.

We transmit to Meta such “custom audience” data. With the help of the Meta Pixel, we also want to ensure that our Facebook and Instagram ads correspond to the potential interest of users and do not appear to be annoying or irrelevant. With the help of the Meta Pixel, we can also track the effectiveness of Facebook and Instagram advertisements for statistical purposes and market research. This allows us to see whether users are redirected to our website after clicking on a Facebook or Instagram advertisement (so-called “conversions”).

Furthermore, when using the Meta Pixel, we apply the additional “Automatic Advanced Matching” function. Data such as telephone numbers, email addresses, dates of birth or postal codes are sent to Meta in encrypted form as additional information, provided you have given this data to us. This allows us to increase the number of attributed conversions and expand our custom audiences. Further information on “automatic extended comparison” can be found in the corresponding [Meta help pages](#).

We also use the “Custom Audiences from File” process. This enables us to upload to Meta in encrypted form various customer infos, such as e-mail addresses, telephone numbers, first and last names. This information allows Meta to determine whether to add someone on Facebook or Instagram to our advertising audience. We want to ensure that the ads are only displayed to users who are interested in our information and services. For more information about Customer File Custom Audiences, see the relevant [Meta help pages](#).

By using cookies, Meta can then recognize you in the member area of Facebook or Instagram and optimize the efficiency of advertisements by offering ads tailored to special target groups. The prerequisite for this is that you have a Facebook and/or Instagram account and are logged in to the Facebook or Instagram member area. If you are not a member of Facebook or Instagram, you are not affected by this type of data processing.

General information on the use of data by Meta, your rights in this regard and options for protecting your privacy can be found in the [Meta privacy policy](#). Special information and specific details about Meta Pixel and its functions can be in the [Meta help pages](#). If you would like to generally object to data collection by Meta Pixel and the use of your data to display Facebook or Instagram ads, you can do so in the [advertising settings of Facebook](#) or the [privacy policy of Instagram](#). In order to access these pages, you must be logged in to Facebook or Instagram.

If you do not have a Facebook or Instagram account, you can also deactivate cookies on the [NAI opt-out page](#). In the United States you can access the website [YourAdChoices](#) or alternatively in Europe [Your Online Choices](#).

You may revoke your consent to data processing by Meta Pixel and the use of your data to generate Facebook or Instagram ads for our website at any time by adjusting your privacy settings. Please see direct links listed on the website.

## 10.2 LinkedIn Conversion Tracking

Based on your consent, we use conversion tracking technology from LinkedIn Corporation (“LinkedIn”), which is based in the USA. In case you have your usual residence in the European Economic Area (EEA) or Switzerland, LinkedIn Ireland Unlimited Company, which is based in

Ireland, is responsible.

We use LMS for marketing and optimization purposes, in particular to analyze website utilization, to continuously improve individual functions, products and user experience. We also receive aggregated and anonymous reports of ad activity and information about how you interact with our website from LinkedIn. To do this, LinkedIn uses a Javascript code known as insight tag, which in turn stores a cookie in your web browser or uses a pixel.

According to LinkedIn, the LinkedIn Insight tag collects data about the use of our website, including information such as referrer URL, IP address, device and browser characteristics or timestamps. Data collected through the LinkedIn Insight tag is encrypted, IP addresses are shortened, and members' direct IDs are removed within seven days in order to pseudonymize the data. The remaining pseudonymized data is deleted within 90 days. LinkedIn does not share personal data with the website operator, but only provides summarized reports on the website target group and display performance.

Due to LinkedIn's corporate structure, it cannot be ruled out that your data will also be transferred to LinkedIn in the USA. To protect your privacy with LinkedIn, there is a [data processing agreement](#), which includes standard EU contractual clauses.

Further information about the type, purpose and scope of data processing can be found in the [privacy policy](#), [the cookie policy](#) and the [data protection portal](#) of LinkedIn. You can also object to personalized (LinkedIn) advertising by installing an [opt-out-cookie](#), regardless of whether you are a LinkedIn member or not.

### 10.3 LinkedIn Marketing Solutions

Based on your consent, we use a service from LinkedIn Corporation, which is based in the USA. This provider is referred to as LinkedIn Marketing Solutions ("LMS") or LinkedIn Ireland Unlimited Company ("LinkedIn", in case you have permanent residence in the if you have your habitual residence in the European Economic Area (EEA) or Switzerland based in Ireland, a ("LinkedIn").

LMS stores and processes information about your user behavior on our website. For this purpose, LMS uses, among other things, cookies. The cookies are stored locally in the cache of your web browser on whatever device you are using. The cookies enable an analysis of your use of our website. We use LMS for marketing and optimization purposes, in particular to analyze website utilization, to continuously improve individual functions, products and user experience. Advertisements that might be relevant and interesting to you, are also displayed. If you are logged in to the LinkedIn member area, LinkedIn can assign the use of our online offers to your profile. If you do not want this, you must log out of LinkedIn before visiting our websites.

Further information about the type, purpose and scope of data processing can be found in the [privacy policy](#), [the cookie policy](#) and the [data protection portal](#) of LinkedIn. You can also object to personalized (LinkedIn) advertising by installing an [opt-out-cookie](#), regardless of whether you are a LinkedIn member or not.

## 11 Social Media

We maintain social media profiles on LinkedIn, Facebook, Tripadvisor, Instagram, YouTube and



TikTok.

The data that you enter on our social media profiles will be published by the respective social media platform and will never be used or processed by us for any other purpose. However, we reserve the right to delete content if this should be necessary. If necessary, we will communicate with you via the social media platform.

The basis of interaction is your and our legitimate interest in communicating with each other in this way.

Please be aware that the operators of social media platforms use web tracking methods. Web tracking, over which we have no influence, can also take place regardless of whether you are logged in or registered on the social media platform.

More detailed information on data processing by the different providers of such social media platforms can be found in the data protection declaration of every provider:

Social network	Provider	Data protection
LinkedIn	LinkedIn Corporation (USA)/LinkedIn Ireland Unlimited Company (Ireland)	<a href="#">Data protection guideline</a>
Facebook	Meta Platforms Inc. (USA)/Meta Platforms Ireland Ltd. (Ireland)	<a href="#">Data protection guideline</a>
Tripadvisor	Tripadvisor LLC (USA)/Tripadvisor Ireland Ltd. (Ireland) oder Tripadvisor Ltd. (Vereinigtes Königreich)	<a href="#">Data protection guideline</a>
Instagram	Meta Platforms Inc. (USA)/Meta Platforms Ireland Ltd. (Ireland)	<a href="#">Data guideline</a>
YouTube	YouTube LLC (USA)	<a href="#">Data protection guideline</a>
TikTok	TikTok Inc. (USA) oder TikTok Pte. Ltd. (Singapur)/TikTok Technology Limited & TikTok Information Technologies UK Limited (Ireland/Vereinigtes Königreich)	<a href="#">Data protection statement</a>

## 11.1 Social Wall

We use juicer.io on our website. This is a social wall from SaaS.group LLC, which is based in the USA ("Juicer").

With Juicer we can integrate our activities from social networks on our website or aggregate them on our website through a "feed". This enables all persons, even those who are not registered with a respective social network, to track or access our activities on social networks.

The basis for using Juicer is our legitimate interest in including current information that has already been shared on social networks on our website and thereby making it more interesting.

The static elements that are shown to you in a feed, such as images or video files, are provided directly by the servers of the respective social networks. According to Juicer's privacy policy,

Jucier will not transfer any personal data to the respective social network, nor will Jucier collect any personal data from you, when you view the feed.

If you interact with the feed by sharing a post or giving a “like”, you leave our website and are forwarded directly to the respective social network. For the processing of your personal data by the respective social network as well as your related rights and setting options to protect your privacy, please note the data protection information of the respective network (see section 11 above).

You may find additional information about the function of Jucier and its data protection policies on the official [Jucier website](#). You may also read the [terms of use](#) and [data protection declaration of Jucier](#).

## 12 Shared responsibility in the Swiss public transport sector

As a public transport company, SGV is legally obliged to provide certain subsidized transport services, in cooperation with other Swiss transport companies or associations.

For these purposes and other reasons that have been described in this data protection declaration, data is passed on to national databases. These servers may also be used by other Swiss public transport companies or associations. An overview may be found here: <https://www.allianceswisspass.ch/de/Themen/Datenschutz/Uebersicht-Transportunternehmen-und-Verbuende>).

Data from the purchase of public transport services (such as tickets) and contact information will be stored in a central Swiss database that is managed and maintained by SBB on behalf of the other public transport companies.

For services that you purchase using the SwissPass login, the data will then be stored in another central database (“SwissPass database”), for which we and the other public transport companies are jointly responsible. The database is under the control of SBB on behalf of the other companies. To ensure efficient service provision and collaboration among those partners involved, the data from the various databases may be merged if necessary. In order to enable you to use the so-called Single Sign-On (SSO) (one login for all applications that offer use of their services with the SwissPass login), the aforementioned login, card, customer details and performance data is exchanged between the central login infrastructure of the SwissPass and us.

The scope of access to the shared databases by the individual public transport companies and associations is regulated and limited through a joint agreement. The central storage database and data processing by the other companies and associations is generally limited to contract processing, ticket inspection, after-sale service and revenue distribution. Additionally, purchasing data may sometimes also be used for marketing purposes. Please visit this link for more information: <https://www.allianceswisspass.ch/de/Themen/Datenschutz/Uebersicht-Sortiment>

This includes data evaluation in order to further develop or advertise public transport services in a needs-oriented manner. If processing or customer contact is made with you for this purpose, this will only be carried out by the public transport company or association from which you purchased the corresponding service. Data processing or customer contact from any other public transport company or association will only take place in exceptional cases, under strict guidelines

and only if the evaluation of the data shows that a particular public transport offer could bring added value to you as the customer. An exception to this may be contact by SBB, as SBB carries out the marketing mandate for the other Swiss public transport companies or associations, especially with regards to ticketing. Our legitimate interest forms the legal basis for all the different types of data processing mentioned here.

We will not resell your data. Your personal data will only be passed on to selected service providers and only to the extent that is necessary to provide the service.

These can be IT support service providers, issuers of subscription cards, shipping service providers (such as Swiss Post), service providers who are commissioned to distribute ticket revenue among the different Swiss public transport companies (as stipulated by the Swiss Passenger Transport Act), or our hosting providers, including the IT providers named in the other sections of this document, as they are related to tracking tools, social plug-ins or online advertisements.

Additionally, your data may be passed on, if we are legally obliged to do so, or if it is necessary to protect our rights. This can be to enforce claims arising from the relationship with you. If you book international cross-border trips, your data will then be passed on to the respective foreign provider. However, this only takes place to the extent that is necessary to check the validity of the tickets and to prevent misuse. Our legitimate interest forms the legal basis for the data processing mentioned here.

Your personal data from public transport servers will not be disclosed to other third parties outside of the public transport domain. The only exceptions are SwissPass partners and companies that have been approved by public transport companies to provide public transport services based on a contractual agreement. These intermediaries only receive access to your personal data if you want to purchase a public transport service through them and have given them your consent for access. Even in this case, they will only have access to your data to the extent necessary to determine whether you already have tickets or subscriptions for the planned travel period that are relevant to your trip or the third party service you have requested. The legal basis for this kind of data processing is therefore your consent. You can revoke your consent at any time with effect for the future.

You may access this link to view Swiss Pass partners:

<https://www.allianceswisspass.ch/de/Themen/Datenschutz/Uebersicht-SwissPass-Partner>

If you use your SwissPass, you may be able to access data about what kind of services or tickets you purchased previously. SwissPass partners may then send you information about what kind of offers or specific tickets might be beneficial for you in the future, including discount offers. In the event of loss, theft, misuse, counterfeiting or card substitution, the relevant ticketing partner will also be informed. Such data processing is necessary and accounted for as part of the SwissPass terms of service. These terms of service form the legal basis.

For more information and to read the SwissPass data protection declaration, please visit the following website or also read the data protection declarations of the different SwissPass partners on their respective sites: <https://www.allianceswisspass.ch/de/Themen/Datenschutz>

## **13 Data security**

We take technical and organizational security precautions to protect your personal data against manipulation, loss, destruction or access by unauthorized persons and to ensure both the protection of your rights as well as compliance with applicable data protection regulations.

The measures taken are intended to ensure the confidentiality and integrity of your data and to ensure the long-term availability and resilience of our systems and services when processing your data. They are also intended to ensure the rapid restoration of data availability and access to them in the event of a physical or technical incident.

Our data processing and our security measures are continuously improved in line with technological developments.

We also take our own in-house data protection very seriously. Our employees and the service companies commissioned by us are obliged to maintain confidentiality and to comply with data protection regulations. Additionally, they are only granted access to personal data to the extent necessary.

## **14 Use of our website by minors**

Our websites are intended for an adult audience. Minors, in particular children under the age of 16, are prohibited from transmitting personal data to us or registering for a service without the consent of their parents or legal guardians. If we find that such data has been transmitted to us, it will be deleted. The child's parents (or legal guardians) can contact us and request deletion or unsubscription. For this we need a copy of an official document that identifies you as a parent or legal guardian.

## **15 Linked websites**

Our website may contain links to websites of other providers to which this data protection declaration does not extend. After clicking on the link, we no longer have any influence on the processing of any data transmitted to third parties (such as IP address or URL information), since the behavior of third parties is naturally beyond our control. Therefore, we cannot assume any responsibility for the processing of your personal data by third parties. As concerns the collection, processing or use of your personal data on the websites of other providers, please refer to the data protection information of the respective provider.

Generally, we check that illegal content was not recognizable at the time of our linking to an external website. However, permanent content control and examination of linked pages without concrete indications of an infringement is not reasonable. Upon receiving notification of data rights violations, we will seek to remove questionable external links promptly.

## **16 Your rights**

In principle, you have the right to information, correction, deletion, restriction, data transferability, objection to processing and revocation of consent with regard to your personal data.

If you believe that the processing of your personal data violates data protection law or that your data protection rights have otherwise been violated in any way, you can also complain to the

responsible supervisory authority. In Switzerland, this is the Federal Data Protection and Information Commissioner (FDPIC: <https://www.edoeb.admin.ch/>).

For questions related to our data protection practices or for specific information regarding your rights and how to assert them, you can contact us by using the contact options given in Section 1 of this data protection declaration. If necessary, we reserve the right to request your identification in an appropriate manner in order to process your query.

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