

## Privacy Notice of the **Aldebaran Consulting & Advisory** group

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### 1. What is this Privacy Notice about?

The **Aldebaran Consulting & Advisory** group (also «we», «us») collects and processes personal data that concern you but also other individuals («**third parties**»). We use the word «**data**» here interchangeably with «**personal data**».

In this Privacy Notice, we describe what we do with your data when you use **www.aldebaranconsulting.com**, or our LinkedIn page (collectively «**website**»), obtain services or products from us, interact with us in relation to a contract, communicate with us or otherwise deal with us. When appropriate we will provide a just-in-time notice to cover any additional processing activities not mentioned in this Privacy Notice.

If you disclose data to us or share data with us about other individuals, such as co-workers, etc., we assume that you are authorized to do so and that the relevant data is accurate. When you share data about others with us, you confirm that. Please make sure that these individuals have been informed about this Privacy Notice.

This Privacy Notice is aligned with the EU General Data Protection Regulation («**GDPR**»), the Swiss Data Protection Act («**DPA**») and the revised Swiss Data Protection («**revDPA**»). However, the application of these laws depends on each individual case.

## 2. Who is the controller for processing your data?

**Aldebaran Consulting & Advisory SA, Geneva** (the «**Aldebaran Consulting & Advisory**») is the controller for the **Aldebaran Consulting & Advisory**'s processing under this Privacy Notice, unless we tell you otherwise in an individual case.

You may contact us for data protection concerns and to exercise your rights under Section 10 as follows:

**Aldebaran Consulting & Advisory SA**  
**6, place Ruth-Bösiger**  
**PO Box 1278**  
**CH-1211 Geneva 1**  
[dataprotection@aldebaranconsulting.com](mailto:dataprotection@aldebaranconsulting.com)

## 3. What data do we process?

We process various categories of data about you. The main categories of data are the following:

- **Master data:** With master data we mean the basic data that we need, in addition to contract data (see below), for the performance of our contractual and other business relationships or for marketing and promotional purposes, such as name and contact details, and information about, for example, your role and function, your bank details, your date of birth, customer history, powers of attorney, signature authorizations and declarations of consent. We process your master data if you are a customer or other business contact or work for one (for example as a contact person of the business partner), or because we wish to address you for our own purposes or for the purposes of a contractual partner (for example as part of marketing and advertising, with invitations to events, with vouchers, with newsletters, etc.). We receive master data from you (for example when you make a purchase or as part of a registration), from parties you work for, or from third parties such as contractual partners, associations and address brokers, and from public sources such as public registers or the internet (websites, social media, etc.). We generally keep master data for **10** years from the last exchange between us or from the end of the contract. This period may be longer if required for evidentiary purposes, to comply with legal or contractual requirements, or for technical reasons.
- **Contract data:** This means data that is collected in relation to the conclusion or performance of a contract, for example information about the contracts and the services provided or to be provided, as well as data from the period leading up to the conclusion of a contract, information required or used for performing a contract, and information about feedback (for example complaints, feedback about satisfaction, etc.). We generally collect this data from you, from contractual partners and from third parties involved in the performance of the contract, but also from third-party sources (for example credit information providers) and from public sources. We generally keep this data for **10** years from the last contract activity or from the

end of the contract. This period may be longer where necessary for evidentiary purposes, to comply with legal or contractual requirements, or for technical reasons.

- **Communication data:** When you are in contact with us via the contact form, by e-mail, telephone or chat, or by letter or other means of communication, we collect the data exchanged between you and us, including your contact details and the metadata of the communication. If we record or listen in on telephone conversations or video conferences, for example for training and quality assurance purposes, we will tell you specifically. Such recordings may only be made and used in accordance with our internal policies. You will be informed if and when such recordings take place, for example by an indication during the video conference in question. If you do not want to be recorded, please notify us or leave the (video) conference. If you simply do not want your image to be recorded, please turn off your camera. If we have to determine your identity, for example in relation to a request for information, a request for press access, etc., we collect data to identify you (for example a copy of an ID document). We generally keep this data for **12** months from the last exchange between us. This period may be longer where required for evidentiary purposes, to comply with legal or contractual requirements, or for technical reasons. E-mails in personal mailboxes and written correspondence are generally kept for at least **10** years. Recordings of (video) conferences we will usually keep for **24** months. Chats are generally stored for **2** years.

Much of the data set out in this Section 3 is provided to us by you (through forms, when you communicate with us, in relation to contracts, when you use the website, etc.). You are not obliged or required to disclose data to us except in certain cases, for example within the framework of binding health protection concepts (legal obligations). If you wish to enter into contracts with us or use our services, you must also provide us with certain data, in particular master data and contract data, as part of your contractual obligation under the relevant contract. When using our website, the processing of technical data cannot be avoided.

As far as it is not unlawful we also collect data from public sources (for example debt collection registers, land registers, commercial registers, the media, or the internet including social media) or receive data from other companies within our group, from public authorities and from other third parties (such as credit agencies, address brokers, associations, contractual partners, internet analytics services, etc.).

#### **4. For what purposes do we process your data?**

We process your data for the purposes explained below. Further information is set out in Sections 11 and 12 for online services. These purposes and their objectives represent interests of us and potentially of third parties. You can find further information on the legal basis of our processing in Section 5.

We process your data for purposes related to **communication** with you, in particular in relation to responding to **inquiries** and the **exercise of your rights** (Section 10) and to enable us to **contact** you in case of queries. For this purpose, we use in particular communication data and master data, and registration data in relation to offers and services that you use.

We keep this data to document our communication with you, for training purposes, for quality assurance and for follow-up inquiries.

We process data for the conclusion, administration and performance of **contractual relationships**.

We process data for **marketing purposes** and **relationship management**, for example to send our customers and other contractual partners personalized advertising for products and services from us. This may happen in the form of newsletters and other regular contacts (electronically, by e-mail or by telephone), through other channels for which we have contact information from you, but also as part of marketing campaigns (for example events, etc.) and may also include free services (for example invitations, etc.). You can object to such contacts at any time (see at the end of this Section 4) or refuse or withdraw consent to be contacted for marketing purposes. With your consent, we can target our online advertising on the internet more specifically to you (see Section 11). Finally, we also wish to enable our contractual partners to contact our customers and other contractual partners for marketing purposes (see Section 6).

We process personal data to **comply with laws, directives and recommendations from authorities and internal regulations** («Compliance»).

We also process data for the purposes of our **risk management** and as part of our **corporate governance**, including business organization and development.

We may process your data for **further purposes**, for example as part of our internal processes and administration or for quality assurance purposes and trainings.

## 5. On what basis do we process your data?

Where we ask for your **consent** for certain processing activities (for example for the processing of sensitive personal data, for marketing mailings, for personalized motion profiles and for advertising management and behavior analysis on the website), we will inform you separately about the relevant processing purposes. You may withdraw your consent at any time with effect for the future by providing us written notice (by mail) or, unless otherwise noted or agreed, by sending an e-mail to us; see our contact details in Section 2. For withdrawing consent for online tracking, see Section 10. Where you have a user account, you may also withdraw consent or contact us also through the relevant website or other service, as applicable. Once we have received notification of withdrawal of consent, we will no longer process your information for the purpose(s) you consented to, unless we have another legal basis to do so. Withdrawal of consent does not, however, affect the lawfulness of the processing based on the consent prior to withdrawal.

Where we do not ask for consent for processing, the processing of your personal data relies on the requirement of the processing for **initiating or performing a contract** with you (or the entity you represent) or on our or a third-party **legitimate interest** in the particular processing, in particular in pursuing the purposes and objectives set out in Section 4 and in implementing related measures. Our legitimate interests also include compliance with **legal**

**regulations**, insofar as this is not already recognized as a legal basis by applicable data protection law (for example in the case of the GDPR, the laws in the EEA and in the case of the DPA, Swiss law). This also includes the marketing of our products and services, the interest in better understanding our markets and in managing and further developing our company, including its operations, safely and efficiently.

## 6. With whom do we share your data?

In relation to our contracts, the website, our services and products, our legal obligations or otherwise with protecting our legitimate interests and the other purposes set out in Section 4, we may disclose your personal data to third parties, in particular to the following categories of recipients:

- **Service providers:** We work with service providers in Switzerland and abroad who process your data on our behalf or as joint controllers with us or who receive data about you from us as separate controllers (for example IT providers, shipping companies, advertising service providers, login service providers, cleaning companies, security companies, banks, insurance companies, debt collection companies, credit information agencies, or address verification providers). For the service providers used for the website, see Section 11. Key service providers in the IT area are **Microsoft** and **Lenovo**, and in security **BitDefender**.
- **Contractual partners including customers:** This refers to customers (for example service recipients) and our other contractual partners as this data disclosure results from these contracts.
- **Authorities:** We may disclose personal data to agencies, courts and other authorities in Switzerland and abroad if we are legally obliged or entitled to make such disclosures or if it appears necessary to protect our interests. More

All these categories of recipients may involve third parties, so that your data may also be disclosed to them. We can restrict the processing by certain third parties (for example IT providers), but not by others (for example authorities, banks, etc.).

## 7. Is your personal data disclosed abroad?

As explained in section 6, we disclose data to other parties. These are not all located in Switzerland. Your data may therefore be processed both in Europe and in the United States; in exceptional cases, in any country in the world.

If a recipient is located in a country without adequate statutory data protection, we require the recipient to undertake to comply with data protection (for this purpose, we use the revised European Commission's standard contractual clauses, which can be accessed here: [https://eur-lex.europa.eu/eli/dec\\_impl/2021/914/oj?](https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?)), unless the recipient is subject to a legally accepted set of rules to ensure data protection and unless we cannot rely on an exception. An exception may apply for example in case of legal proceedings abroad, but also in cases of overriding public interest or if the performance of a contract requires disclosure, if you have consented or if data has been made available generally by you and you have not objected against the processing.

## **8. How long do we process your data?**

We process your data for as long as our processing purposes, the legal retention periods and our legitimate interests in documentation and keeping evidence require it or storage is a technical requirement. You will find further information on the respective storage and processing periods for the individual data categories in Section 3, and for cookies in Section 11. If there are no contrary legal or contractual obligations, we will delete or anonymize your data once the storage or processing period has expired as part of our usual processes.

## **9. How do we protect your data?**

We take appropriate security measures in order to maintain the required security of your personal data and ensure its confidentiality, integrity and availability, and to protect it against unauthorized or unlawful processing, and to mitigate the risk of loss, accidental alteration, unauthorized disclosure or access.

## **10. What are your rights?**

**Applicable data protection laws grant you the right to object to the processing of your data in some circumstances, in particular for direct marketing purposes, for profiling carried out for direct marketing purposes and for other legitimate interests in processing.**

To help you control the processing of your personal data, you have the following rights in relation to our data processing, depending on the applicable data protection law:

- The right to request information from us as to whether and what data we process from you;
- The right to have us correct data if it is inaccurate;
- The right to request erasure of data;
- The right to request that we provide certain personal data in a commonly used electronic format or transfer it to another controller;
- The right to withdraw consent, where our processing is based on your consent;
- The right to receive, upon request, further information that is helpful for the exercise of these rights;

**If you wish to exercise the above-mentioned rights in relation to us**, please contact us in writing, at our premises or, unless otherwise specified or agreed, by e-mail; you will find our contact details in Section 2. In order for us to be able to prevent misuse, we need to identify you (for example by means of a copy of your ID card, unless identification is not possible otherwise).

Please note that conditions, exceptions or restrictions apply to these rights under applicable data protection law (for example to protect third parties or trade secrets). We will inform you accordingly where applicable.

If you do not agree with the way we handle your rights or with our data protection practices, please let us (Section 2) know. If you are located in the EEA, the United Kingdom or in Switzerland, you also have the right to lodge a complaint with the competent data protection supervisory authority in your country. You can find a list of authorities in the EEA here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en). You can reach the UK supervisory authority here: <https://ico.org.uk/global/contact-us/>. You can reach the Swiss supervisory authority here: <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html>.

## 11. Do we use online tracking and online advertising techniques?

We use various techniques on our website that allow us and third parties engaged by us to recognize you during your use of our website or of our pages on social networks, and possibly to track you across several visits. This Section informs you about this.

In essence, we wish to distinguish access by you (through your system) from access by other users, so that we can ensure the functionality of the website and carry out analysis and personalization. We do not intend to determine your identity, even if that is possible where we or third parties engaged by us can identify you by combination with registration data. However, even without registration data, the technologies we use are designed in such a way that you are recognized as an individual visitor each time you access the website, for example by our server (or third-party servers ) that assign a specific identification number to you or your browser (so-called «cookie»).

We use these technologies on our website and may allow certain third parties to do so as well. You can also set your browser to block or deceive certain types of cookies or alternative technologies, or to delete existing cookies. You can also add software to your browser that blocks certain third-party tracking. You can find more information on the help pages of your browser (usually with the keyword «Privacy») or on the websites of the third parties set out below.

We distinguish the following categories of «cookies» (including other technologies such as fingerprinting):

- **Necessary cookies:** Some cookies are necessary for the functioning of the website or for certain features. For example, they ensure that you can move between pages without losing information that was entered in a form. They also ensure that you stay logged in. These cookies exist temporarily only («session cookies»). If you block them, the website may not work properly. Other cookies are necessary for the server to store options or information (which you have entered) beyond a session (i.e. a visit to the website) if you use this function (for example language settings, consents, automatic login functionality, etc.). These cookies have an expiration date of up to **24** months.

We currently use offers from the following service providers and advertising partners (where they use data from you or cookies set on your computer for advertising purposes):

- **Google Analytics:** Google Ireland Ltd. (located in Ireland) is the provider of the service «Google Analytics» and acts as our processor. Google Ireland relies on Google LLC

(located in the United States) as its sub-processor (both «Google»). Google collects information about the behavior of visitors to our website (duration, page views, geographic region of access, etc.) through performance cookies (see above) and on this basis creates reports for us about the use of our website. We have configured the service so that the IP addresses of visitors are truncated by Google in Europe before forwarding them to the United States and then cannot be traced back. We have turned off the «Data sharing» option and the «Signals option». Although we can assume that the information we share with Google is not personal data for Google, it may be possible that Google may be able to draw conclusions about the identity of visitors based on the data collected, create personal profiles and link this data with the Google accounts of these individuals for its own purposes. In any event, if you consent to the use of Google Analytics, you expressly consent to any such processing, including the transfer of your personal data (in particular website and app usage, device information and unique IDs) to the United States and other countries. Information about data protection with Google Analytics can be found here [<https://support.google.com/analytics/answer/6004245>] and if you have a Google account, you can find more details about Google's processing here [<https://policies.google.com/technologies/partner-sites?hl=en>].

## **12. What data do we process on our social network pages?**

We may operate pages and other online presences («profiles», etc.) on social networks and other platforms operated by third parties and collect the data about you described in Section 3 and below. We receive this data from you and from the platforms when you interact with us through our online presence (for example when you communicate with us, comment on our content or visit our online presence). At the same time, the platforms analyze your use of our online presences and combine this data with other data they have about you (for example about your behavior and preferences). They also process this data for their own purposes, in particular for marketing and market research purposes (for example to personalize advertising) and to manage their platforms (for example what content they show you) and, to that end, they act as separate controllers.

We process this data for the purposes set out in Section 4, in particular for communication, for marketing purposes (including advertising on these platforms, see Section 11) and for market research. You will find information about the applicable legal basis in Section 5. We may disseminate content published by you (for example comments on an announcement), for example as part of our advertising on the platform or elsewhere. We or the operators of the platforms may also delete or restrict content from or about you in accordance with their terms of use (for example inappropriate comments).

For further information on the processing of the platform operators, please refer to the privacy information of the relevant platforms. There you can also find out about the countries where they process your data, your rights of access and erasure of data and other data subjects rights and how you can exercise them or obtain further information. We currently use the following platforms:



- **Swisscom:** Swisscom is the operator of our website ([www.aldebaranconsulting.com](http://www.aldebaranconsulting.com)). The controller for the operation of the platform is Swisscom Ltd., Bern, Switzerland. Their privacy notice is available at [www.swisscom.ch/privacy](http://www.swisscom.ch/privacy). Some of your data will be transferred within the European Economic Area, to Kosovo and to the United States. With regard to the data collected and processed when visiting our site, we are joint controllers with Swisscom Ltd., Bern, Switzerland.
- **Pipedrive:** Pipedrive is the operator of our CRM ([www.pipedrive.com](http://www.pipedrive.com)). The controller for the operation of the platform is Pipedrive OU, Tallinn, Estonia. Their privacy notice is available at [www. https://www.pipedrive.com/en/privacy](https://www.pipedrive.com/en/privacy). Some of your data will be transferred within the European Economic Area and to the United States. With regard to the data collected and processed on the platform, we are joint controllers with Pipedrive OU, Tallinn, Estonia.
- **LinkedIn:** On LinkedIn we operate the page <https://www.linkedin.com/company/aldebaran-consulting-and-advisory/>. The controller for the operation of the platform for users from Europe is LinkedIn Ireland Ltd Unlimited Company., Dublin, Ireland. Their privacy notice is available at [https://www.linkedin.com/legal/privacy-policy?trk=content\\_footer-privacy-policy#choices](https://www.linkedin.com/legal/privacy-policy?trk=content_footer-privacy-policy#choices) . Some of your data will be transferred to the United States. You can object to advertising here: [https://www.linkedin.com/help/linkedin/answer/a1342443?trk=microsites-frontend\\_legal\\_privacy-policy&lang=en-us&intendedLocale=en](https://www.linkedin.com/help/linkedin/answer/a1342443?trk=microsites-frontend_legal_privacy-policy&lang=en-us&intendedLocale=en). With regard to the data collected and processed when visiting our site for «page in-sights», we are joint controllers with LinkedIn Ireland Ltd Unlimited Company., Dublin, Ireland. As part of page insights, statistics are created about the actions visitors perform on our site (comment on posts, share content, etc.). It helps us understand how our page is used and how to improve it. We receive only anonymous, aggregated data. We have agreed our data protection responsibilities according to the information on <https://www.linkedin.com/legal/user-agreement>

### 13. Can we update this Privacy Notice ?

This Privacy Notice is not part of a contract with you. We can change this Privacy Notice at any time. The version published on this website is the current version.

Last updated: **September 3, 2023**