# Cookie Policy of sbgs.ch

To find more information on California consumers and their privacy rights, Users may read the privacy policy.

To find more information on Virginia consumers and their privacy rights, Users may read the privacy policy.

To find more information on Colorado consumers and their privacy rights, Users may read the privacy policy.

To find more information on Connecticut consumers and their privacy rights, Users may read the privacy policy.

To find more information on Utah consumers and their privacy rights, Users may read the privacy policy.

This document informs Users about the technologies that help sbgs.ch to achieve the purposes described below. Such technologies allow the Owner to access and store information (for example by using a Cookie) or use resources (for example by running a script) on a User's device as they interact with sbgs.ch.

For simplicity, all such technologies are defined as "Trackers" within this document – unless there is a reason to differentiate. For example, while Cookies can be used on both web and mobile browsers, it would be inaccurate to talk about Cookies in the context of mobile apps as they are a browser-based Tracker. For this reason, within this document, the term Cookies is only used where it is specifically meant to indicate that particular type of Tracker.

Some of the purposes for which Trackers are used may also require the User's consent. Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

Sbgs.ch uses Trackers managed directly by the Owner (so-called "first-party" Trackers) and Trackers that enable services provided by a third-party (so-called "third-party" Trackers). Unless otherwise specified within this document, third-party providers may access the Trackers managed by them.

The validity and expiration periods of Cookies and other similar Trackers may vary depending on the lifetime set by the Owner or the relevant provider. Some of them expire upon termination of the User's browsing session.

In addition to what's specified in the descriptions within each of the categories below, Users may find more precise and updated information regarding lifetime specification as well as any other relevant information — such as the presence of other Trackers — in the linked privacy policies of the respective third-party providers or by contacting the Owner.

# Activities strictly necessary for the operation of sbgs.ch and delivery of the Service

Sbgs.ch uses so-called "technical" Cookies and other similar Trackers to carry out activities that are strictly necessary for the operation or delivery of the Service.

# **Third-party Trackers**

#### Tag Management

This type of service helps the Owner to manage the tags or scripts needed on sbgs.ch in a centralized fashion. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

#### **Google Tag Manager (Google Ireland Limited)**

Google Tag Manager is a tag management service provided by Google Ireland Limited.

Personal Data processed: Trackers.

Place of processing: Ireland – <u>Privacy Policy</u>.

#### Spam and bots protection

This type of service analyzes the traffic of sbgs.ch, potentially containing Users' Personal Data, with the purpose of filtering it from unwanted parts of traffic, messages and content that are recognized as spam or protecting it from malicious bots activities.

#### Google reCAPTCHA

Google reCAPTCHA is a SPAM protection service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

The use of reCAPTCHA is subject to the Google privacy policy and terms of use.

Personal Data processed: answers to questions, clicks, keypress events, motion sensor events, mouse movements, scroll position, touch events, Trackers and Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

Storage duration:

• GRECAPTCHA: duration of the session

• rc::a: indefinite

rc::b: duration of the sessionrc::c: duration of the session

# Other activities involving the use of Trackers

#### **Experience**

Sbgs.ch uses Trackers to improve the quality of the user experience and enable interactions with external content, networks and platforms.

#### Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of sbgs.ch and interact with them. Such services are often referred to as widgets, which are small elements placed on a website or app. They provide specific information or perform a particular function and often allow for user interaction.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

#### **Google Fonts (Google Ireland Limited)**

Google Fonts is a typeface visualization service provided by Google Ireland Limited that allows sbgs.ch to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u>.

#### Measurement

Sbgs.ch uses Trackers to measure traffic and analyze User behavior to improve the Service.

# Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

#### Google Analytics (Universal Analytics) (Google Ireland Limited)

Google Analytics (Universal Analytics) is a web analysis service provided by Google Ireland Limited ("Google"). Google utilizes the Data collected to track and examine the use of sbgs.ch, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Trackers and Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

Storage duration:

• AMP TOKEN: 1 hour

• \_ga: 2 years

• \_gac\*: 3 months

• \_gat: 1 minute

• gid: 1 day

#### Google Analytics 4

Google Analytics 4 is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google"). Google utilizes the Data collected to track and examine the use of sbgs.ch, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting <u>Google's official documentation</u>.

Personal Data processed: number of Users, session statistics, Trackers and Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>; Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

Storage duration:

\_ga: 2 years\_ga\_\*: 2 years

#### Anonymized analytics services

The services contained in this section allow the Owner, through the use of third-party Trackers, to collect and manage analytics in an anonymized form.

#### Google Analytics (Universal Analytics) with anonymized IP

Google Analytics (Universal Analytics) is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google"). Google utilizes the Data collected to track and examine the use of sbgs.ch, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>; Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

Storage duration:

- AMP TOKEN: 1 hour
- \_ga: 2 years
- \_gac\*: 3 months
- gat: 1 minute
- gid: 1 day

#### Heat mapping and session recording

Heat mapping services are used to display the areas of sbgs.ch that Users interact with most frequently. This shows where the points of interest are. These services make it possible to monitor and analyze web traffic and keep track of User behavior. Some of these services may record sessions and make them available for later visual playback.

# **Microsoft Clarity (Microsoft Corporation)**

Microsoft Clarity is a session recording and heat mapping service provided by Microsoft Corporation.

Microsoft processes or receives Personal Data via Microsoft Clarity, which in turn may be used for any purpose in accordance with the Microsoft Privacy Statement, including improving and providing Microsoft Advertising.

Personal Data processed: Trackers.

Place of processing: Ireland – Privacy Policy.

Storage duration:

• ANONCHK: 10 minutes

CLID: 1 yearMR: 7 daysMUID: 1 year

• SM: duration of the session

\_clck: 1 year\_clsk: 1 day

# How to manage preferences and provide or withdraw consent

There are various ways to manage Tracker related preferences and to provide and withdraw consent, where relevant:

Users can manage preferences related to Trackers from directly within their own device settings, for example, by preventing the use or storage of Trackers.

Additionally, whenever the use of Trackers is based on consent, Users can provide or withdraw such consent by setting their preferences within the cookie notice or by updating such preferences accordingly via the relevant consent-preferences privacy widget, if available.

It is also possible, via relevant browser or device features, to delete previously stored Trackers, including those used to remember the User's initial consent preferences.

Other Trackers in the browser's local memory may be cleared by deleting the browsing history.

With regard to any third-party Trackers, Users can manage their preferences via the related opt-out link (where provided), by using the means indicated in the third party's privacy policy, or by contacting the third party.

#### **Locating Tracker Settings**

Users can, for example, find information about how to manage Cookies in the most commonly used browsers at the following addresses:

- Google Chrome
- Mozilla Firefox
- Apple Safari
- Microsoft Internet Explorer
- Microsoft Edge
- Brave
- Opera

Users may also manage certain categories of Trackers used on mobile apps by opting out through relevant device settings such as the device advertising settings for mobile devices, or tracking settings in general (Users may open the device settings and look for the relevant setting).

#### Consequences of denying the use of Trackers

Users are free to decide whether or not to allow the use of Trackers. However, please note that Trackers help sbgs.ch to provide a better experience and advanced functionalities to Users (in line with the purposes outlined in this document). Therefore, if the User chooses to block the use of Trackers, the Owner may be unable to provide related features.

#### **Owner and Data Controller**

Swiss Business Group Solutions Via Livio 5 6830 Chiasso, Switzerland

#### Owner contact email: info@sbgs.ch

Since the use of third-party Trackers through sbgs.ch cannot be fully controlled by the Owner, any specific references to third-party Trackers are to be considered indicative. In order to obtain complete information, Users are kindly requested to consult the privacy policies of the respective third-party services listed in this document.

Given the objective complexity surrounding tracking technologies, Users are encouraged to contact the Owner should they wish to receive any further information on the use of such technologies by sbgs.ch.

# **Definitions and legal references**

#### Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

# **Usage Data**

Information collected automatically through sbgs.ch (or third-party services employed in sbgs.ch), which can include: the IP addresses or domain names of the computers utilized by the Users who use sbgs.ch, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

#### User

The individual using sbgs.ch who, unless otherwise specified, coincides with the Data Subject.

#### **Data Subject**

The natural person to whom the Personal Data refers.

#### **Data Processor (or Processor)**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

#### **Data Controller (or Owner)**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of sbgs.ch. The Data Controller, unless otherwise specified, is the Owner of sbgs.ch.

#### sbgs.ch (or this Application)

The means by which the Personal Data of the User is collected and processed.

#### Service

The service provided by sbgs.ch as described in the relative terms (if available) and on this site/application.

#### **European Union (or EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

#### Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

#### Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

# Legal information

This privacy statement has been prepared based on provisions of multiple legislations.

This privacy policy relates solely to sbgs.ch, if not stated otherwise within this document.

Latest update: March 11, 2024