

# Privacy Policy

Valid from 1 September 2023

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# 1. What is this privacy policy about?

PSP Swiss Property Ltd and its Group Companies (hereinafter "PSP") undertake to process all personal data (hereinafter "personal data") collected through our websites, our apps and services or otherwise in the context of a contract and communications (described below) in accordance with the applicable Swiss Federal Act on Data Protection, and to implement appropriate security measures to protect it against unauthorised access. This privacy policy informs you about what personal data we collect and process in connection with the use of our websites, our app and services or otherwise in the context of a contract and communications (described below), the purposes for which it is used, to whom it may be disclosed and what your rights are in connection with PSP's use of your personal data.

Personal data refers to data relating to specific or identifiable individuals, i.e. conclusions can be made regarding their identity based on the data itself or with corresponding additional data. Personal data includes, for example, surname, first name, address, email address, telephone number, date of birth, national insurance number or passport number.

"Sensitive personal data" is a category of personal data that has special protection in the applicable data protection law. Sensitive personal data includes data relating to religious, philosophical, political or trade union views or activities, health, private life or racial or ethnic origin, genetic data, biometric data uniquely identifying an individual, as well as data relating to administrative and criminal prosecutions or sanctions and social assistance measures.

Point 4 provides details of the data we process within the scope of this privacy policy. "Processing" means any handling of personal data, e.g. obtaining, storing, using, adapting, disclosing and deleting.

In this privacy policy, we describe what we do with your data when you use www.psp.info or any of our other websites or apps (referred to collectively as the "website"), obtain our services, otherwise interact with us under a contract, communicate with us by email or other channels, or otherwise engage with us. Where appropriate, we will give you timely written notification of additional processing activities not mentioned in this privacy policy. In addition, we may inform you separately about the processing of your data, for example in consent forms, contract terms, additional privacy statements, forms and notices.

If you provide or disclose information about other people, such as family members, work colleagues etc., we assume that you are authorised to do so and that this information is accurate. In submitting data about third parties, you are confirming this. Please also ensure that these third parties have been informed of this privacy policy.

This privacy policy is designed to comply with the requirements of the revised Swiss Act on Data Protection Act ("FADP") and, where applicable, the EU General Data Protection Regulation ("GDPR"). However, whether and to what extent these laws are applicable depends on the individual case.

This privacy policy applies to all our websites (hereinafter collectively referred to as the "website"), which are operated by PSP Management Ltd for PSP Swiss Property Ltd or its subsidiaries (hereinafter referred to as "PSP"), as well as in the context of the use of the services we offer and other connections and communications with us.

By accessing PSP's websites, using the services we offer and otherwise connecting and communicating with us, you acknowledge that you have read this privacy policy carefully and agree to the data processing described.



Any questions about this privacy policy can be sent by email to datainfo@psp.info at any time. If you do not agree with this policy, you are not permitted to access the website or use our services.

For better readability, the masculine form may be used for personal names and personal nouns in this declaration. Corresponding terms apply in principle to all genders in the sense of equal treatment. The abbreviated form of language is for editorial reasons only and does not imply any valuation.

## 2. Who is responsible for your personal data?

PSP Management Ltd, Seestrasse 353, 8038 Zurich, is the data controller responsible for the data processing of PSP Swiss Property Group as described in this privacy policy, unless communicated otherwise in individual cases.

PSP determines the purposes for which your personal data is processed and how it is processed and is therefore responsible for processing and using your personal data in accordance with this privacy policy. If you have any questions or concerns about this privacy policy or the processing of your personal data, please contact us by sending an email to datainfo@psp.info at any time.

You may contact us with your data protection concerns and to exercise your rights as follows:

PSP Management Ltd Seestrasse 353 8038 Zurich

Phone: +41 44 625 57 57 Email: datainfo@psp.info

This office can be contacted for all matters involving data protection.

#### 3. How do we process personal data?

All personal data collected via the website or through other connections and communications (see section 1) will be processed in accordance with the applicable Swiss data protection law. We collect and process personal data carefully and for the purposes described in this privacy policy. In accordance with applicable law, we may also use your personal data in ways other than those described in this privacy policy. In this case, we will provide you with specific privacy statements or notices at the time of collection and may seek your consent. We always endeavour, within reason, to collect information in anonymised or pseudonymised form so that we cannot identify you.

#### 4. What data do we process?

You may use our website without actively disclosing personal data. Active data disclosure is required to allow us to respond to your enquiries or requests. This happens when you use contact, registration or application forms (e.g. for the delivery of press releases, property news and other information or ad hoc messages). If you are in contact with us in another way (see section 1), for example through a contract, active disclosure of data is required to fulfil the corresponding request. The data you disclose may relate, for example, to your person, your company or your employer, and your function



or role there. Accordingly, we may collect your title, first and last name, address, telephone number and email address as well as any other contact data and information.

The personal data collected because of your use of our website is generally collected by us to fulfil the purpose for which the data was disclosed and is used specifically in the context of the information and other services for which you have registered, to process your enquiries and requests and, if necessary, to contact you in this regard. This data may be stored for the associated purpose of technical administration, and is used by and, if necessary, also passed on to the responsible internal departments, group companies or service providers whose services we use.

If required by law, personal data may be used for cases such as fraud detection, security incidents, resolving technical issues and similar events.

We process various categories of data about you. The main categories are as follows:

#### Technical data:

When you use our website or other electronic offers (e.g. subscription to our newsletter), we collect the IP address of your device and other technical data to ensure the functionality and security of these offers. This data also includes log records that document the use of our systems. We keep technical data until the purpose or the legitimate interest for the data storage has ceased to exist. To ensure the functionality of these offers, we may also assign an individual code to you or your end device (e.g. in the form of a cookie, see section 10). The technical data does not allow any conclusions to be made about your identity. However, it may be linked to other categories of data (and thus possibly to your person) in the context of user accounts, registrations, access controls or the processing of contracts.

The technical data includes, among other things, the IP address and information about the operating system of your device, the date, region and time of use, and the type of browser used to access our electronic offers. This can help us to serve a web page that is appropriately formatted or show you a web page adapted for your region, for example. The IP address tells us which provider you use to access our offers (and thus also the region), but we cannot usually deduce who you are from this.

### • Registration data:

Certain offers of services (such as distribution of a newsletter) can only be used after registration, which can be completed directly with us or via our external service providers. When registering you must provide us with certain data and we collect data about the use of the offer or service. Registration data includes, but is not limited to, the data we require from you before allowing use of certain free services such as our Wi-Fi service, in this case: name, email and telephone number. You also need to register if you want to subscribe to our newsletter.

## • Communication data:

When you contact us via a contact form, email, telephone, letter or other means of communication, we collect the data exchanged between us and you, including your contact details and data about the communication. If we record or listen in on telephone conversations or video calls, for example for training and quality assurance purposes, we will specifically draw your attention to this. Such recordings may only be made and used in accordance with our internal guidelines. You will be informed if and when such recordings are made, e.g. by a caption displayed during the relevant video call. If you do not wish to be recorded, please let us know or



terminate your participation. If you only do not want your image to be recorded, please switch off your camera. If we want or need to establish your identity, for example when you submit a request for information, media access, etc., we collect data to identify you (e.g. a copy of an ID card). We keep this data until the purpose or the legitimate interest for the data storage has ceased to exist. Emails in personal mailboxes, written correspondence, chats and recordings of (video) calls are retained until the purpose or legitimate interest for storing the data has ceased to exist. Communication data comprises your name and contact details, the method and place and time of communication, and usually also its content (i.e. the content of emails, letters, chats etc.). This data may also contain information about third parties.

#### Master data:

We refer to the basic data that we require in addition to contractual data (see below) for the processing of our contractual and other business relationships as master data. This includes your name, contact details and information such as details of your role and position, your bank account(s), your date of birth, customer history, powers of attorney, signature authorisations and declarations of consent. We process your master data if you are a lessee or tenant, a customer or other business contact, or if you work for one of the above (e.g. as a contact person of a business partner).

We receive master data from you (e.g. in the scope of a rental/lease/tenancy or when registering), from organisations for which you work, or from third parties such as our contractual partners. We can also collect master data from our shareholders and investors. We keep this data until the purpose or the legitimate interest for the data storage has ceased to exist. In the case of marketing contacts, the data is generally retained by us until the purpose or the legitimate interest for the data storage has ceased to exist (e.g. after we have finished handling your request).

Master data includes information such as your name, address, email address, telephone number and other contact details, gender, date of birth, nationality, details of associated persons, websites, photographs and videos, copies of identification documents, details of your relationship with us (customer, supplier, visitor, beneficiary, etc.), details of your status with us, allocations, classifications and distribution lists, details of our interactions with you (including a history of these with corresponding entries), reports (e.g. from the media) or official documents (e.g. extracts from the commercial register, authorisations, etc.) that relate to you. We collect payment details in the form of information about your bank, account number and credit card, for example. Consent or blocking notes also constitute part of the master data, as well as information about third parties, such as contact persons, recipients of services or representatives. In the case of contact persons and representatives of our customers, suppliers and partners, we process master data including name and address, details of role, position in the company, qualifications and, where applicable, details of managers, employees and subordinates and details of interactions with these persons.

Not all master data is collected for all contacts. The data we collect in individual cases depends on the purpose of the processing.



#### Contractual data:

Contractual data includes information about the conclusion of the contract, such as type and date of the contract, information about the services that have been or will be provided, as well as data collected in advance of conclusion of the contract, information required or used for handling and information about reactions (e.g. complaints or information about satisfaction, etc.), details of the application process (such as an application for our services) and details about the contract in question (e.g. its duration) and the handling and administration of the contracts (e.g. information about renting/leasing/tenancy, invoicing, customer service, technical support and the enforcement of contractual claims). Contractual data also includes information about faults, complaints and adjustments to a contract, as well as information about customer satisfaction, which we may collect, for example, by means of surveys. Contractual data also includes financial data such as information about creditworthiness (i.e. information that allows conclusions to be made about the likelihood that debts will be paid), about reminders and about debt collection. We generally collect contract data from you, from contractual partners and from third parties involved in the execution of the contract, but also from third-party sources and from publicly accessible sources. We keep this data until the purpose or the legitimate interest for the data storage has ceased to exist.

#### Behavioural and preference data:

Depending on the nature of our relationship with you, we try to get to know you and better tailor our services to you. We collect and use data about your behaviour and preferences to help us do this. This processing includes evaluations of how often our website has been visited, the regions from which it is visited, the channel through which it has been accessed (e.g. via an advertisement) and which properties and floor plans were viewed. The evaluations are anonymised and no conclusions can be made about a specific individual.

Behavioural data consists of information about certain actions, such as your response to electronic communications (e.g. whether and when you opened an email) or your location, as well as your interaction with our social media profiles and your participation in events. For example, we can collect your location data wirelessly through unique codes sent by your mobile phone or when you use our website. We will inform you of the collection of anonymous movement profiles at the relevant locations.

Preference data tells us about your needs, which products or services might be of interest to you, and how and when you are likely to respond to messages from us. We obtain this information by analysing existing data, such as behavioural data, so that we can get to know you better, tailor our advice and offers more precisely to you and generally improve our offers.

Behavioural and preference data can be evaluated specific to an individual, but also on a non-specific basis.

#### Other data:

We also collect data from you in other situations. For example, data is generated in connection with official or legal proceedings (files, evidence, etc.) that may also relate to you. We may also collect data for health protection reasons (e.g. in the scope of health plans). We can make or obtain photographs, videos and sound recordings in which you may be identifiable (e.g. at



events, using security cameras, etc.). We can also collect information about who enters certain buildings and when, or who has access rights to certain buildings (including in the case of access control, based on registration data or visitor lists, etc.), who attends events and when, or who uses our infrastructure and systems and when.

Finally, we collect and process data about our shareholders and other investors, in addition to master data. This includes information for the relevant registers, regarding the exercise of their rights and the holding of events (e.g. general meetings). We keep this data until the purpose or the legitimate interest for the data storage has ceased to exist.

You provide us with much of the data mentioned in this section 4 yourself (for example in forms, during communication with us, in connection with contracts, when using the website, etc.). You have no obligation to do this, except in individual cases, such as in the context of mandatory protection concepts (legal obligations). If you wish to enter into contracts with us or claim services from us, you must also provide us with data, in particular master data, contract data and registration data, as part of your contractual obligation under the relevant contract. When using our website, the processing of technical data is unavoidable. If you wish to gain access to certain systems or buildings, you will need to provide us with registration details. However, in the case of behavioural and preference data, you generally have the option of objecting or not giving consent.

We only provide certain services to you if you provide us with registration data because we or our contractual partners want to know who is using our services or has accepted an invitation to an event, because it is technically necessary or because we want to communicate with you. If you or someone you represent (e.g. your employer) wishes to enter into or perform a contract with us, we need to collect relevant master, contract and communication data from you, and we process technical data if you wish to use our website or other electronic offerings for this purpose. If you do not provide us with the data required for the conclusion and performance of the contract, you must expect that we will refuse to conclude the contract, that you will commit a breach of contract or that we will not perform the contract. In the same way, we can only respond to a request from you if we process the relevant communication data and – if you communicate with us online – also technical data. The use of our website is also not possible without us receiving technical data.

Unless this is inadmissible, we also take data from publicly accessible sources (e.g. debt collection registers, land registers, commercial registers) or receive data from other companies within our group, from public authorities and from other third parties (such as credit agencies, associations, contractual partners, internet analysis services, etc.).

The categories of personal data we receive about you from third parties include, but are not limited to, information from public registers, information we obtain in connection with official and legal proceedings, information relating to your professional roles and activities (for example, so that we can agree to and process transactions with your employer with your assistance), information about you in correspondence and discussions with third parties or credit reports (to the extent that we process transactions with you personally) to enable us to enter into or process contracts with you or involving you (for example, references, your address for deliveries, powers of attorney, compliance with legal requirements such as anti-fraud and anti-terrorism and export restrictions, details of banks, insurance companies and sales and other contractual partners of ours) for the use or provision of services by you (e.g. payments), your address and, where applicable, interests and other socio-demographic data and data in connection with the use of third-party websites and online services where such use can be attributed to you.



# 5. What personal data do we collect for given processing purposes?

## a) Personal data collected automatically or transmitted using the internet

PSP collects and stores information that your browser automatically sends to us when you visit our website in server log files. The data collection is based on your consent and interest in using our website and our legitimate interest in operating the website. The data may include the following:

- Browser type and version
- Operating system
- Referrer URL (the previous page visited)
- Host name of the accessing computer
- Date and time of access to the server
- Internet Protocol address (IP address)
- Transmitted data volume
- Other similar data and information that serves to protect us in the event of attacks on our IT systems

This personal data will not be merged with other personal data and will be stored separately from any other personal data transmitted by the user. We keep this data until the purpose or the legitimate interest for the data storage has ceased to exist.

PSP uses personal data that is collected automatically for the following purposes:

- To enable the display, operation and functionality of the website
- To ensure the stability and security of the system
- To improve and protect our services
- For statistical purposes in the event of attacks on the network infrastructure through which the website is served

#### b) Personal data that the user transmits to us

PSP collects and processes personal data that the user voluntarily sends to PSP through forms directly on the website, via our contact email addresses, via any other applications connected to the website, by telephone or by any other means (e.g. general contact form, application for a rental property, application form as part of recruitment, use of the Integrity Line and subscription to the newsletter). This information includes, for example, the following personal data:

- Contact category, title, surname, first name, company, address data, country, email address, telephone number
- Your message, comment, inquiry or application dossier as an attachment

This personal data is provided expressly on a voluntary basis. Without this personal data, however, we will not be able to provide the services requested by the user in the desired quality or at all.

PSP uses the personal data that the user provides to us to fulfil the following purposes:

- To provide, maintain, protect and optimise the services and information offered
- To communicate with you and provide you with the best possible and personalised information you need from us (e.g. about our services)
- To offer you new services and information that may be of interest to you
- To comply with legal or other regulatory requirements and internal regulations



- To assert, exercise and/or defend actual or potential legal claims, investigations or similar proceedings
- For other legitimate purposes, if this processing results from the circumstances or was indicated at the time of collection
- Recruitment and related processes

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

Insofar as we ask you for your consent for certain processing, we will inform you separately about the corresponding purposes of the processing. You may withdraw consent at any time with future effect by notifying us in writing (by post) or, where not otherwise stated or agreed, by sending us an email; our contact details can be found in section 2. Once we have received notification that you have withdrawn your consent, we will no longer process your data for the purposes to which you originally consented, unless we have another legal basis for doing so. The withdrawing of consent shall not affect the lawfulness of processing based on consent before consent was withdrawn.

Where we do not ask for your consent for processing, we base the processing of your personal data on the fact that the processing is necessary for the initiation or execution of a contract with you (or the entity you represent) or that we or third parties have a legitimate interest in doing so, in particular in order to pursue the purposes and related objectives described in section 4 above and to be able to implement appropriate measures. Our legitimate interests also include compliance with statutory regulations, insofar as this is not already recognised as a legal basis by the respective applicable data protection law. This also includes the marketing of our services, the interest in better understanding our markets and in managing and developing our business, including operations, safely and efficiently.

This personal data is processed on the following legal bases:

- Your consent, only if it can be withdrawn at any time (when subscribing to our newsletter, as well
  as for the use of Google and Vimeo services and the social media platforms)
- Performance of a contract with you or the intention to enter into a contract with you (For rentals, purchases and sales as well as transactions with service providers)
- Compliance with a legal obligation (For tax, social security or for the purposes of legal investigations or proceedings) or
- Protecting our legitimate interests (protection and security of our services, systems, assets, compliance with legal, regulatory and contractual obligations, assertion, exercise or defence of legal claims, management and efficient organisation of business operations, improvement and development of our services, and sale and marketing of our services)

If the processing is based on your consent or our legitimate interests, you may withdraw consent or object to this processing at any time by contacting us directly at datainfo@psp.info. Please note, however, that the withdrawing of your consent does not affect the lawfulness of the processing based on the consent prior to its withdrawal.



## 7. Who do we share your personal data with?

PSP will take the necessary measures to ensure that only our authorised personnel and agents with the required expertise have access to your personal data to fulfil the purposes for which your personal data was collected.

We can disclose your personal data to the following potential categories of recipients in accordance with the purposes and legal bases of processing described above, to the extent necessary for the intended data processing:

- Other companies in the group.
- We link to the website of SMG Swiss Marketplace Group AG, 8050 Zurich (Homegate.ch & Immoscout24.ch) for the presentation of our properties and rental properties. We ask you to consult the SMG privacy policy mentioned there before disclosing your data. The same applies to other websites presenting information on PSP properties and development projects for which PSP is not the data controller.
- Service providers that process personal data on behalf of and at the instruction of the PSP (data processors including in IT, hosting and support, or recruitment).
- Customers, professionals in the trade, suppliers, insurance companies, tax offices and other business partners, service providers and government agencies.
- Media agencies, the public, including visitors to the Group's websites and social media.
- Buyers or parties interested in acquiring business units, companies or other parts of the Group.
- Courts, arbitration bodies, law enforcement agencies, regulatory authorities, lawyers and other parties in potential or actual legal proceedings where necessary to comply with the law or to assert, exercise or defend rights or legal claims.

We select our partners and data processors carefully and only with sufficient assurance that they have appropriate technical and organisational measures in place in accordance with the legal requirements. Our data processors may only process personal data in accordance with documented instructions from us. They are all subject to confidentiality requirements and may only use your personal data to the extent necessary to fulfil the purpose for which your personal data was collected, unless otherwise required by law.

Personal data remains with us or our data processors. Linked content and websites belonging to our service providers and third parties are generally the responsibility of those service providers and third parties. Please consult their respective privacy statements. In all cases, links are displayed and must be clicked separately.

We do not disclose personal data to third parties except with your consent or for the fulfilment of the purpose for which the data was collected, namely during our business activities, such as to make contact according to a request, and if the disclosure is necessary or required to protect our legitimate interests or for other legal reasons.

When presenting our properties and rental properties, we use Google Maps from Google to provide a better overview (see Cookies). User information is transmitted to Google whenever pages on which the Google Maps service is embedded are accessed. Detailed information on the scope and purpose of data collection and processing can be found in the Google Maps Terms of Use, which are linked on the displayed map extract, as well as in Google's privacy policy (see Cookies). You can disable Google Maps by turning off the JavaScript application in your browser.



We also transfer your personal data to third parties in connection with our contracts, the website, our services and products, our legal obligations or otherwise to protect our legitimate interests, to the following categories of recipients:

#### Group companies:

You can find a list of our group companies here <a href="https://www.psp.info/unternehmen/ueber-uns/juristische-organisation">https://www.psp.info/unternehmen/ueber-uns/juristische-organisation</a>. The group companies may use the data for the same purposes according to this data protection declaration (see section 4).

Group companies will have access to your master data, contract data, registration data, behavioural data and preference data to provide you with offers for their services or to advertise them. If you wish to object to disclosure and use for marketing purposes, you can do so through us, even if this concerns another group company because data has already been transmitted. We also transfer your data to other group companies for certain products and services, e.g. if certain services come from group companies other than us and we only coordinate the processing.

#### • Service providers:

We work with service providers in Switzerland and abroad who process data about you on our behalf or under joint responsibility with us or who receive data about you from us under their own responsibility (e.g. IT providers, trade specialists, mail order companies, advertising service providers, login service providers, cleaning companies, security companies, banks, insurance companies, debt collection companies, credit reference agencies, personnel service providers or address checkers). In the area of IT, the core service providers that we use for the website (see section 12) are Microsoft and Swisscom.

To ensure that we provide our services efficiently and that we can concentrate on our core business, we procure services from third parties in various areas. These services relate to matters such as IT services, distribution of information, marketing, sales, communication or printing services, facility management, security and cleaning, the organisation and holding of events and receptions, debt collection, credit agencies, anti-fraud measures and services provided by consulting firms, lawyers, banks, insurers (including social security) and telecommunications companies. We disclose to these service providers the data required for their services, which may also relate to you. Service providers give information about their own data processing in their own data protection statements.

More information about how Microsoft processes data can be found here:

https://privacy.microsoft.com/en-gb/privacystatement

For the use of Microsoft Teams in particular here:

https://docs.microsoft.com/en-gb/microsoftteams/teams-privacy.

You can find more information about how Swisscom processes data here:

https://www.swisscom.ch/en/business/footer/data-protection.html

#### Authorities:

We may disclose personal data to public offices, courts and other authorities in Switzerland and abroad if we are legally obliged or entitled to do so or if this appears necessary to protect our interests. This can also include health data. The authorities are responsible for processing of data about you that they receive from us.



Examples of such cases include criminal investigations, police measures (e.g. health protection concepts, combating violence, etc.), supervisory requirements and investigations, court proceedings, reporting obligations and pre- and extra-judicial proceedings as well as statutory obligations to provide information and to cooperate. Data may also be disclosed if we wish to obtain information from public bodies, e.g. to justify an interest in information or because we need to say about whom we require information (e.g. from a register).

## • Other persons:

This includes other cases where the inclusion of third parties arises from the purposes set out in section 4, such as recipients of services, media and associations in which we participate or if you are part of one of our publications.

Other recipients include delivery addressees or third-party payment recipients specified by you, other third parties also within the scope of agency relationships (e.g. if we send your data to lawyers or banks) or persons involved in official or legal proceedings. If we work with the media and send them material (e.g. photos), you could also be affected. The same applies to the publication of content (e.g. photos, interviews, quotes, etc.), for example on the website or in other publications by us. In the course of business development, we may sell or acquire businesses, parts of businesses, assets or companies, or enter into partnerships, which may also result in the disclosure of data (including data from you, for example as a customer or supplier or as a supplier representative) to the persons involved in these transactions. Data relating to you may also be exchanged during communication with our competitors, industry organisations, associations and other bodies.

All these categories of recipients may in turn involve third parties, so that your data can also become accessible to them. We may restrict processing by certain third parties (e.g. IT providers), but not by other third parties (e.g. authorities, banks, etc.).

We reserve the right to make these disclosures even if they concern confidential data (unless we have expressly agreed with you that we will not disclose this data to certain third parties, unless we would be legally obliged to do so). Notwithstanding this, your data will continue to be subject to adequate data protection even after disclosure in Switzerland and the rest of Europe. For disclosure to other countries, the provisions of section 8 apply. If you do not wish certain data to be passed on, please let us know so that we can check whether and to what extent we can accommodate you (section 2).

In many cases, the disclosure of even confidential data is necessary to process contracts or provide other services. Non-disclosure agreements also do not generally exclude such data disclosure or disclosure to service providers. However, given the sensitivity of the data and other circumstances, we ensure that these third parties handle the data appropriately. We cannot comply with your objection to data disclosure where the data disclosures in question are necessary for our activities.



We also allow certain third parties to collect personal data from you on our website and at events organised by us (e.g. press photographers, tool providers, marketers we have included on our website, etc.). Insofar as we do not have decision-making involvement in these data collections, these third parties are solely responsible for them. If you have any concerns or wish to exercise your data protection rights, please contact these third parties directly. See section 12 in relation to the website.

## 8. Can your personal data also be sent abroad?

The personal data collected via our website or through other connections and communications (see section 1) is generally stored in Switzerland. In addition, we may transfer, store and process your personal data at data locations in the EU area and the USA (In the case of Google, Vimeo and the social media platforms), e.g. where our third-party providers or partners are located. Therefore, we may transfer your personal data outside the European Economic Area (EEA) if this is necessary for the data processing described in this Privacy Policy in accordance with applicable law.

If data is transferred to countries that do not ensure an adequate level of protection, we ensure adequate data protection by taking appropriate safeguards, such as contractual safeguards (e.g. based on EU standard clauses), based on binding corporate rules, transferring data in accordance with your explicit consent, for the conclusion or performance of a contract with you, or in connection with the assertion, exercise or enforcement of legal claims.

#### 9. How long do we keep information about you?

All personal data is deleted as soon as it is no longer required to achieve the purpose for which it was collected, unless longer retention is necessary to fulfil legal obligations (e.g. retention and documentation obligations), contractual or pre-contractual obligations or our justified business interests (e.g. to assert, exercise or defend legal claims).

#### 10. What online tracking techniques or cookies do we use?

When you access or use the website, we can store cookies – small text files – or similar tools on your computer. We use these cookies to recognise you as a user of the website, to customise content, to improve the performance of the website and to enhance its usability.

## a) Categories of cookies that we use

Depending on their function and purpose, the cookies we use can be divided into the following categories: functional cookies, performance cookies and advertising cookies.

#### Functional cookies:

These cookies serve a variety of purposes in relation to the presentation, functionality and performance of a website and serve to enhance visitors' experience and enjoyment of the website. They allow a website to store information already provided (e.g. username, location or language selection) and provide enhanced, more personalised functionality to visitors. Functional cookies are used to remember things like your login details, for example. These cookies cannot track your movement on other websites.



#### • Performance cookies:

These cookies are used to collect information about how a website is used – for example, how visitors arrived at our website, which pages a visitor opens most often, the path you took through our website during your visit and whether you receive error messages from a page. We can also use these cookies to provide us with certain statistical and analytical information, such as the numbers of visitors who have come to our website. These cookies are used to monitor the level of website activity and improve website performance.

#### Advertising cookies:

Advertising cookies allow us or a third-party provider to serve ads on our website or on third party websites for products that the user likes, so that the ads the user sees are more relevant to their preferences or interests (these are sometimes called targeting cookies). They can also be used to evaluate the effectiveness of advertising and campaigns.

These cookies may be placed either by us or a third party on our behalf. For more information about cookies and their use, see: <a href="http://www.allaboutcookies.org/">http://www.allaboutcookies.org/</a>.

You can configure your browser settings so that no cookies are stored on your computer. Turning cookies off completely may mean that you cannot use all the functions of our website.

By continuing to use our website and/or agreeing to this privacy policy, you consent to cookies being set by us and thus to personal usage data being collected, stored and used, even beyond the end of the browser session. You may withdraw this consent at any time by activating the browser setting to refuse third-party cookies.

We may also integrate further offers from third parties on our website, via social media providers. These offers are deactivated by default. As soon as you activate them (e.g. by clicking a button), the corresponding providers can establish that you are on our website. If you have an account with the social media provider, they can assign this information to you and thus track your use of online offers. These social media providers are solely responsible for processing this data.

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

#### b) Google Analytics

On its website, PSP uses the Google Analytics analysis service, which is operated by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. The cookies used by Google Analytics are stored on your computer, which enables your use of the website to be analysed.

We use Google Analytics based on our legitimate interest in analysing and regularly improving our website, as well as regularly improving our offer using the statistics obtained and making it more interesting to you. Furthermore, the use of Google Analytics is based on your consent to the tracking of your browsing behaviour on our websites and analytical evaluation of this data.

The information about your usage of the website that is generated by the cookie is generally transmitted to and stored on a server operated by Google in the USA. These cookies can contain information including the following: IP address, number, date and time of the visit, duration of the visit, your access page from which you visited the website (referrer URL), the pages you visited on our website, browser type/version and operating system. Google will use this information on our behalf because we have a legitimate interest in analysing user behaviour so that we can optimise the



services offered on our website as well as our advertising. Google uses this information to evaluate your use of our website, to compile reports on website activity and to provide us with other services related to the use of the website and the internet. Likewise, pseudonymised user profiles can be created from the processed personal data.

The "IP anonymisation" function of Google Analytics has been activated on this website. This means that your IP address is masked by Google within the Member States of the European Union or the European Economic Area, and Switzerland, before being transmitted to the USA. The full IP address will only be sent to a Google server in the USA before being masked there in exceptional circumstances.

You can prevent the storage of cookies by configuring your browser software settings accordingly. However, please note that if you do this you may not be able to use all the functions on our website. You can also prevent the collection of personal data regarding your usage of the website generated by the cookie (including your IP address) and its transmission to and processing by Google by downloading and installing the browser plugin from the following link: https://tools.google.com/dlpage/gaoptout?hl=en. Alternatively, or within browsers on mobile devices, you can prevent the collection of your personal data by Google Analytics by clicking or tapping on the following link: Deactivate collection of personal data by Google Analytics for this website. This creates an opt-out cookie that then prevents the collection of your data when you next visit the website. If you delete your saved cookies, you must click this link again. More information on how Google Analytics handles user data can be found in the Google privacy policy: https://support.google.com/analytics/answer/6004245?hl=en.

Furthermore, Google can review the user's use of the website and can combine the personal data collected with other information about the user that Google has independently collected from other websites they have visited and use it for its own purposes (e.g. to monitor advertising) on its own terms based on its own privacy policy. For more information about this and how Google processes personal data, please refer to the relevant Google privacy statements:

https://policies.google.com/?hl=en

https://policies.google.com/technologies/partner-sites.

## c) Google Maps

To improve the presentation of our properties and rental properties, we use Google Maps API, a mapping service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. This allows us to show you interactive maps directly on the website and enables you to use the map function conveniently.

The legal basis for the data processing is your consent based on your voluntary request to create a map and our legitimate interests in presenting our location and of the location we have indicated on the website in a way that makes it easy to find.

The use of Google Maps means that information about the use of our website, including your IP address, can be transmitted to a Google server in the USA and stored there. Google can also transfer the information obtained through Google Maps to third parties where required to do so by law, or where such third parties process the information on Google's behalf.



Google will never combine your IP address with other data that it holds. Nevertheless, it would be technically possible for Google to at least identify individual users based on the data received. It is possible that personal data and user profiles of visitors to the website could be processed by Google for other purposes that we do not and cannot control.

Google Maps can be disabled and data transfers to Google prevented by disabling JavaScript in your browser. However, please note that if you do this you will not be able to use the map display function.

For more information on the purpose and scope of data collection and processing by Google, as well as further information on your rights in this regard and settings options for protecting your privacy, please visit: <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>

#### d) Vimeo.com Inc.

We use video materials to improve the presentation of our properties. For the display and playback of these videos, we work with the service provider Vimeo.com, Inc. 330 West 34th Street, New York, New York 10001, USA.

When you use this service, information about the use of our website, including your IP address, can be transmitted to a Vimeo server in the USA and stored there. Vimeo will also transfer the information it obtains to third parties where required to do so by law, or where such third parties process the information on Vimeo's behalf.

It is possible to disable Vimeo.com and prevent data transfers to Vimeo if you disable JavaScript in your browser. However, please note that if you do this you will not be able to use the video display function.

For more information on the purpose and scope of data collection and processing by Vimeo, as well as further information on your rights in this regard and settings options for protecting your privacy, please visit: <a href="https://vimeo.com/privacy">https://vimeo.com/privacy</a>



# d) List of cookies

Below is a full list of the cookies we use on the website, including information about how they are used and when they expire.

Provider	Cookie name	Category	Purpose and life cycle
Google Maps	_ga_*	Functional cookies	Show the property on the map
Equitiystories Chart	None	Functional cookies	
Disclaimer	pspdisclaimer	Functional cookies	Check whether users have accepted the disclaimer (domicile and residence in Switzerland)
Vimeo	OptanonAlertBoxClosed OptanonConsent language player vuid	Functional cookies	Integration of Vimeo videos
Immoscout	IS24_DATA_2	Functional cookies	Integration of rental offers
EQS	_GRECAPTCHA NID DV AEC 1P_JAR SOCS SEARCH_SAMESITESecure-ENID OTZ SOCS CONSENT	Functional cookies	Integration of the "Information Service" form
Google Tag Manager	_ga_* _ga	Functional cookies	Integration of the Google Tag Manager (tag management system, which can be used to integrate code snippets such as tracking codes or conversion pixels on websites)
Google	_gat	Performance	Integration of Google Analytics
Analytics	_gid _ga	cookies	(Universal Analytics) for website traffic analysis
MyFonts	cf_bm	Necessary cookies	Tracking the number of page views for volume licensing of fonts from MyFonts
None	None	Advertising cookies	

<sup>\*</sup> Exact name may vary



# 11. What data do we process on referrals to social networks?

Our website may use the social plug-ins listed below to raise awareness of our company. The underlying promotional purpose should be regarded as a legitimate interest. The respective providers are each responsible for ensuring operation follows data protection regulations. Any data processing carried out in connection with these plug-ins is done with your consent granted when you use them.

If you use the services of these social networks independently of or in connection with our website, the social networks evaluate your use of the plug-in. In this case, information about the plug-in is forwarded to the social networks.

## a) Facebook

Our website can use plug-ins operated by Facebook, a social network offered by Meta Platforms, Inc., 1601 Willow Road Menlo Park, CA 94025, USA. The Facebook plug-ins are marked with a Facebook logo or the addition "Like" or "Share". You can find an overview of the Facebook plug-ins and what they look like at: https://developers.facebook.com/docs/plugins.

When you visit a page on our website that contains one of these plug-ins or links, your browser establishes a direct connection with the Facebook servers. The content of the plug-in is sent directly from Facebook to your web browser software and integrated into the page.

This integration provides Facebook with the information that your web browser has accessed the corresponding page on our website, even if you do not have a Facebook profile or are not currently logged in to Facebook. This information (including your IP address) is sent directly by your web browser to a server of Facebook in the USA, where it is stored.

If you are logged in to Facebook, it can connect your visit to our website with your Facebook account directly. If you interact with the plug-in, for example by clicking the "Like" button, this information is also sent directly to a Facebook server where it is stored. The information is also published on your Facebook account and displayed there for your Facebook friends to see.

For the purpose and scope of the data collection and the further processing and use of the data by Facebook, as well as your rights in this regard and setting options for protecting your privacy, please refer to Facebook's privacy policy: <a href="https://www.facebook.com/policies\_center">https://www.facebook.com/policies\_center</a>

## b) X corp./ Twitter

Plug-ins operated by the short message network X Corp. (hereinafter "Twitter"), 1355 Market St, Suite 900, San Francisco, CA 94103, USA, can be integrated on our website. You can recognise the Twitter plug-ins ("Tweet" button) by the Twitter logo and the addition "Tweet". When you call up a page on our website that contains such a plug-in, a direct connection is established between your browser and the Twitter server. Twitter receives information that you have visited our website from your IP address through this connection. If you click the Twitter button while you are logged in to your Twitter account, you can link to the content of our pages from your Twitter profile. This allows Twitter to connect your visit to our website with your user account.

As the website provider, we have no knowledge of the content of the data that is transmitted or how it is used by Twitter. You can find more information here: <a href="https://twitter.com/privacy">https://twitter.com/privacy</a>



#### c) LinkedIn

Plug-ins operated the social network LinkedIn Corporation, 1000 West Maude Avenue, Sunnyvale, California 94085, USA, can be used on our website. You can identify the LinkedIn plug-in ("LinkedIn Recommended" button) from the LinkedIn logo. When you access a page of our website that contains such a plug-in, a direct connection is established between your browser and the LinkedIn server. LinkedIn receives information that you have visited our website from your IP address through this connection. If you click the LinkedIn button while you are logged in to your LinkedIn account, you can link to the content of our pages from your LinkedIn profile. This allows LinkedIn to connect your visit to our website with your user account. As the website provider, we have no knowledge of the content of the data that is transmitted or how it is used by LinkedIn. For more information, see: https://www.linkedin.com/legal/privacy-policy

#### d) Pinterest

Plug-ins of the social network Pinterest Inc., 651 Brannan Street, San Francisco, CA 94107, USA, can be installed on our website. You can identify the Pinterest plug-in ("Pinterest Save" button) by the Pinterest logo. When you call up a page of our website that contains such a plug-in, a direct connection is established between your browser and the Pinterest server. Pinterest receives information that you have visited our website from your IP address through this connection. If you click the Pinterest button while you are logged in to your Pinterest account, you can link to the content of our pages from your Pinterest profile. This allows Pinterest to connect your visit to our website with your user account. As the website provider, we have no knowledge of the content of the data that is transmitted or how it is used by Pinterest. For more information, see: <a href="https://policy.pinterest.com/privacy-policy">https://policy.pinterest.com/privacy-policy</a>

The information described in the section also applies to direct links to social networks.

## 12. Newsletter for advertising purposes

If you sign up for our newsletter, we will use your email address to send you information about our services as well as other commercial communications (e.g. press releases, current publications, announcements of events, etc.) that may be of interest to you. We use a double opt-in procedure for newsletter registrations for security reasons. This means that after registration we will send a confirmation email to the email address provided during registration containing a link that you must click on to definitively confirm that the newsletter should be delivered. You can unsubscribe from such newsletter emails at any time by clicking on the highlighted "Unsubscribe from this list" link at the bottom of each email or by contacting us directly by email at datainfo@psp.info.



## 13. Security

PSP has implemented organisational and technical measures to maintain the security of personal data and to protect it against unauthorised or unlawful processing, accidental loss, alteration, disclosure or access.

PSP can use third parties as data processors to collect and process your personal data. The data processors we use will only process your personal data in accordance with our instructions and are required by law to take strict security precautions when handling personal data.

Unfortunately, the transmission of information over the internet is not secure. Although we make best efforts to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. For this reason, you are free at any time to send us your personal data by other means, e.g. by telephone. Once we have received your data, we apply strict procedures and stringent security measures to prevent unauthorised access.

## 14. Third-party privacy statements

Please note that if you click on the link to a third-party website (e.g. marketers, Google or social media or other websites), you can be redirected to a website that we do not control and our privacy policy may no longer apply. Your browsing and interaction on any other website are subject to the terms of use and privacy statements and notices of such third-party websites. Furthermore, we cannot guarantee that these links are correct or up to date.

We recommend that you read the terms of use and the privacy policies and notices on other websites carefully before submitting any personal data to them. We are not responsible or liable for the information content and data processing of such third-party websites.

## 15. Children

Our website is not intended for children, and we do not knowingly collect personal data from children under the age of 16 unless we have the express consent of their parents. If we are notified or otherwise learn that personal data of a child under 16 has been improperly collected, we will take all reasonable steps to delete that personal data.



# 16. What are your rights?

You may request information from PSP, on proof of your identity, as to whether personal data about you is being processed. In addition, you have the right to request the correction, destruction or restriction of your personal data as well as the right to object to the processing of your personal data. Where processing is based on your consent or our legitimate interests, you may withdraw consent or object to such processing at any time by contacting us directly by email at datainfo@psp.info. In certain cases, you have the right to receive personal data that has been generated using online services in a structured, common and machine-readable format so that further use and transfer to any third-party provider is possible.

Inquiries in this regard should be addressed to PSP by email to: datainfo@psp.info. PSP reserves the right to restrict your rights within the scope of the applicable law and, for example, not to disclose comprehensive information or delete personal data. Please note that even after a request to delete your personal data, we must retain it in whole or in part as required by legal and contractual retention obligations. The deletion of your personal data may mean that you can no longer use our services.

If we refuse your request or you are not satisfied with our processing, you also have the right to lodge a complaint with the competent supervisory authority and to seek redress from the competent authority. The competent authority is the Federal Data Protection and Information Commissioner (FDPIC) in Bern (https://www.edoeb.admin.ch/edoeb/en/home.html).

# 17. Changes to this privacy policy

PSP reserves the right to adapt, supplement or otherwise change this privacy policy at any time and without stating reasons. The current privacy policy as published on the website applies.

Last update: 1 November 2023