

---

# Privacy Policy

## 1. Introduction

This Privacy Policy explains what to expect when we collect any personal information about you when you use this website (available via the following address: <https://safeswiss.com/>) or our applications (for Android or iOS devices).

You must be 18 or older to use our website and services.

We take the privacy of your information very seriously.

Table of contents:

- *Who we are*
- *How to contact us*
- *What personal information we collect and use*
- *Cookies*
- *Why we collect and use personal information*
- *Legal basis for the use of personal information*
- *Whom personal information may be shared with*
- *Where we store and use personal information*
- *How long we use personal information*
- *Your rights if we process your personal information*

## 2. Who are we?

In this Policy, “we”, “us”, and “our” refer to SafeSwiss Secure Communications AG, a company operating in and based under the laws of Switzerland.

## 3. How can you contact us?

You can contact us via email: [support@safeswiss.com](mailto:support@safeswiss.com)

To verify your identity, we may ask you to provide us with some additional information.

---

## 4. What information do we collect and use?

We may collect and use information about visitors of our website, users of our applications, and those who subscribed for our marketing materials and advertisements (please note that neither our website, nor apps display ads).

We may collect and process the following data about you:

- **Information you give us.**

- You may give us information about you by filling forms on our website or by corresponding with us via email or otherwise. Typically, this includes information you provide when you register on our site, subscribe to our service, and when you report a problem, etc. The information you give us may include your name, address, email address, and or phone number, credit card information.

- **Information we collect about you.**

**With regard to each of your visits to our site, we may automatically collect the following information:**

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to individual pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

### **Information you give us:**

**4.1.** Information you provide us with during registration or setting up your account in our system (“Account data”).

Account data may include:

- *Username*
- *Avatar (any picture you may upload to be associated with your account in our system)*
- *Answers to a security question*

---

#### 4.2. Your email address created as the result of registration in our system (“**Email address**”)

##### **Information we collect about you:**

With regard to each of your visits to our site may automatically collect the following information:

#### 4.3. Information about your device, browser, and application by means of which you use our website and apps (“**Technical data**”).

Technical data may include:

- Internet protocol (IP) address
- Brand, model, functional capabilities, memory size and screen resolution of your device
- Unique device identifier (UDI)
- Browser type and version
- Operational system and platform
- Referral source
- Uniform Resource Locators (URL) clickstream to, through and from our site
- Geographical location (country) of your device

**Note: This information is only used in a way which does not identify anyone.**

#### 4.4. Information on how you use our website and applications (“**Service data**”)

Service data may include:

- Date, time and length of visit
- Pageviews
- Website navigation paths
- Methods used to browse away from the website
- Download errors
- Page response times

**Note: This information is only processed in a way which does not identify anyone.**

#### 4.5. Content that has been generated in the course of use of our services (for example, received and sent messages).

---

**4.6.** Your email address you provide to us when subscribing for our marketing materials (“**Notification data**”)

## **5. Cookies**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy.

## **6. What do we do with your personal information?**

We process your personal information for the following purposes:

### **6.1.** To provide our services

Including but not limited to carrying out our obligations arising from any contracts concluded between you and us and providing you with the information, products, and services that you request from us

### **6.2.** To provide access to our services

For example, we use Account data to provide users of our services with the possibility to use those specific services they have subscribed for (by logging in into their particular account).

### **6.3.** To support and maintain our services

We use Technical and Service data to ensure our website and applications work properly.

For example, we track system failures, program errors, and other problems that may occur when you use our services. This data, together with information on your activities, such as your website navigation path, before the occurrence of said problems, help us to fix and maintain our website and applications.

### **6.4.** To personalize our services

We may use Technical and Service data to analyze how users scroll and click our website and applications. Based on this analysis, we may try to personalize the interface of our website and application to display them in the most user-friendly manner.

It is important to note that you have the opportunity to opt-out from any advertising services at any time using the “unsubscribe” link in our emails or contacting our support team.

#### **6.5. To communicate with you**

We may use your personal information, such as an email address to contact you. For example, we may send you an email if we identify fraudulent activity with your account or to send you information on upcoming changes to our policies or services.

We use your personal information to keep records of our communications with you. For example, to be sure that your requests as a customer have been resolved by us.

Also, we may use users’ unique device identifier (UDI) to send push notifications to a device.

#### **6.6. To control and verify payment for our services**

We use your personal information to verify the payments you have made for the use of our service and to keep records that the services you use are duly paid.

## **7. What is the legal basis for our processing of your personal information?**

We process your personal information when one of the following applies:

**7.1.** You gave us your prior consent with respect to specific purposes for the processing of your personal information. For example, to send you marketing materials.

## **8. Do we disclose your personal information to third parties?**

**8.1.** We may share your personal information with:

Our payment service provider (for processing of any payments between you and us).

**8.2.** We may share your personal information with any third parties where it is required by a legal obligation to which we are subject.

---

## 9. Where do we store and use personal information?

**9.1.** The personal information that we collect and use in relation to you is held on our servers in Switzerland.

**9.2.** Where personal information is transferred in relation to providing our services, we will take all technical and organizational measures reasonably necessary to ensure that it is subject to appropriate safeguards and that it is treated securely and in accordance with this Policy.

Technical and organizational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorized access to your information, please let us know immediately by contacting us via this email address: [info@safeswiss.com](mailto:info@safeswiss.com).

If you want detailed information on how to protect your information against fraud, identity theft, viruses, and many other online problems, please contact us at [info@safeswiss.com](mailto:info@safeswiss.com).

**9.3.** We follow generally accepted industry standards to protect personal information.

- All personal information collected and used by us is encrypted and stored on secure servers.
- Access to your account is controlled by a password and a username that is unique to you.
- Any payment details are encrypted using SSL technology (typically, you will see a lock icon or green address bar (or both) in your browser when we use this technology.

**9.4.** Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website or applications, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

**9.5.** Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee or warrant the security of your information transmitted to our website, and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorized access.

---

## 10. How long do we keep your personal information?

We process personal information only for so long as is necessary for the purpose(s) for which it was originally collected, after which it will be deleted except to the extent that it is necessary for us to continue to process it for the purpose of compliance with legal obligations to which we are subject or for another legitimate and lawful purpose.

## 11. What are your rights?

**11.1.** You have the following rights in relation to personal information relating to you that we process:

- **Right to access** – the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update, or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is “manifestly unfounded or excessive.” Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.
- **Right to correct** – the right to have your personal information rectified if it is inaccurate or incomplete.
- **Right to erase** – the right to request that we delete or remove your personal information from our systems.
- **Right to restrict our use of your personal information** – the right to “block” us from using your personal information or limit the way in which we can use it.
- **Right to data portability** – the right to request that we move, copy, or transfer your personal information.
- **Right to object** – the right to object to our use of your personal information, including where we use it for our legitimate interests.

**11.2.** To make inquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your personal information (where consent is our legal basis for processing your personal information), please contact us via [info@safeswiss.com](mailto:info@safeswiss.com).

**11.3.** It is important that the personal information we hold about you is accurate and up to date. Please keep us informed if your personal information changes during the period for which we hold it.

---

## 12. How can you access your personal information, and how can you withdraw your consent to processing your personal information by us?

You can access your personal information and/or withdraw your consent to any relevant processing of personal information conducted by us:

12.1. By emailing us at [info@safeswiss.com](mailto:info@safeswiss.com).

## 13. Changes to our Policy

We reserve the right to change this Policy as we may deem necessary from time to time or as may be required by law.

Any changes we may make to our Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to this Policy.

## 14. General

14.1. This Policy will be governed by and interpreted according to the law of Switzerland. All disputes arising under and/or in relation to the Policy will be subject to the exclusive jurisdiction of the Swiss courts.

Questions, comments, and requests regarding this Policy are welcomed and should be addressed to [privacy@safeswiss.com](mailto:privacy@safeswiss.com)

Enjoy Your Privacy.