

Privacy Policy

The Singularity Group AG

The protection of personal data is important to us. Therefore, we process personal data exclusively on the basis of the applicable data protection legislation, in particular (and all as may be amended from time to time):

- the Swiss Federal Act on Data Protection of 19 June 1992 (FADP);
- upon its effectiveness, the Swiss Federal Act on Data Protection of 25 September (FADP 2020); and,
- to the extent applicable, the EU General Data Protection Regulation (GDPR) of which some central aspects are taken into account.

In this “**Privacy Policy**” we inform you about the types of personal data we might collect, how this data is used, to whom it is transferred and what options and rights you have in connection with our data processing. In addition, we describe the measures we take to ensure data security and how you, as a Data Subject (*betreffene Person*), can contact us if you have any questions about our data protection practice.

Name and Address of the Controller

The Singularity Group AG, Zurich (“**we**” / “**us**”) is the ‘Controller’ (*Verantwortlicher*) within the meaning of the applicable data protection legislation. If you have any questions regarding the processing of your personal data, please do not hesitate to contact us:

info@singularity-group.com

+41 43 558 71 79

The Singularity Group
Obere Zäune 16
8001 Zurich
Switzerland

Scope of Processing of Personal Data

We only process your personal data if this is necessary to maintain the functionality of our website as well as its contents and services. Further, we process your personal data in order to maintain our relationship with you, for example to send you newsletters and invite you to events.

The processing of your personal data is normally only carried out with your prior consent, except those cases where prior consent cannot be obtained for factual reasons and the processing of your personal data is permitted by law. We do not process any data which is classified as “sensitive personal data”.

Legal Basis for Processing Personal Data

We are obliged to process your personal data in a lawful way, and processing must be carried out in good faith and be proportionate. Personal data may only be obtained for a specific purpose that is identifiable to the person concerned.

Furthermore, we are obliged to destroy or make anonymous any personal data as soon as they are no longer required for the purpose of the processing.

We are further obliged to ensure that the personal data we process is correct and accurate and to take all reasonable measures that data which does not meet these criteria are rectified, erased or deleted.

Period of Storage and Erasure of Personal Data

Your personal data will be erased or deleted as soon as it is no longer necessary to achieve the purpose for which it was collected. Furthermore, personal data may be stored if this has been required by regulations, laws or other provisions to which we are subject. The personal data will also be blocked or deleted if a storage period prescribed by the aforementioned standards expires, unless there is a need for further storage of the data for the conclusion or performance of a contract.

Provision of the Website and Creation of Log Files

Every time you visit our website, our system automatically collects data and information from the computer system of the calling computer. The following data is collected:

1. Information relating to the browser type and version used
2. The user's operating system
3. The user's Internet Service Provider
4. The user's IP address
5. Date and time of access
6. Websites from which the user's system reaches our website
7. Websites accessed by the user's system via our website

The data is also stored in the log files of our system but is not stored together with other personal data concerning you. Not affected by this are your IP address or other data that enable the assignment of the data to you.

The temporary storage of your IP address by the system is necessary to enable the website to be delivered to your computer. For this, the IP address must remain stored for the duration of the session. The data will be deleted when the respective session has ended. This purpose creates a legitimate interest in data processing.

Use of 'Cookies'

Our website uses so-called cookies. Cookies are text files which your web browser automatically and temporarily saves on the hard disk of your computer during the time you visit our website. Such cookies may be stored on your operating system to gather anonymized data for the purpose of understanding user journey. This cookie enables to recognise website visitors when the website is called up again by the same browser.

We use cookies to make our website more user-friendly. Some elements of our website require that the calling browser can be identified even after a page change.

The following data is transmitted in these cookies: country level, browser type, session time, incoming links and outgoing links, path through website, time per page, total time on website. Cookies are not attached to IP addresses, nor collected for any other purposes, particularly, they are not used to create user profiles.

Cookies are stored on your computer and transmitted to our site. Your internet browser should allow you to deactivate or restrict the transmission of cookies by changing the settings in your Internet browser. If cookies are deactivated for our website, it may no longer be possible to use all functions of the website in full.

Newsletter

We use Mailchimp's newsletter distribution service to send out emails to interested parties. Mailchimp tracks email opens and link clicks and also allows us to effectively remove user profiles from the distribution list via an "Unsubscribe" feature if users no longer wish to receive our newsletter.

You can subscribe to a free newsletter on our website. When registering for the newsletter, the data from the input mask is transmitted to us. In addition, the following data is collected upon registration: (i) first and last name, (ii) date and time of registration, (iii) e-mail address. During the registration process, your consent is obtained for the processing of the data and reference is made to this Privacy Policy. In connection with the dispatch of newsletters, no personal data is transmitted to third parties. The data will be used exclusively for sending the newsletter.

You can cancel the subscription to the newsletter at any time. For this purpose, there is a corresponding link in every newsletter.

Web Analysis by Google Analytics

On our website we use Google Analytics, a web analysis service of Google Inc. ("Google"). Google Analytics uses cookies, which are saved on the user's computer and which enable an analysis of the use of the website (for cookies see above). If individual pages of our website are accessed, the following data is stored: (i) the accessed website, (ii) the website from which the user has accessed the accessed website (referrer), (iii) the sub-pages accessed from the accessed website, (iv) the time spent on the website, (v) the frequency with which the website is accessed.

To ensure that any personal reference can be excluded when processing your IP address, we have activated anonymization functions as a result of which IP addresses are not stored completely and are only processed further in abbreviated form. As far as the data collected about you contains a personal reference, this will be deleted immediately. By anonymizing the IP address, users' interest in protecting their personal data is sufficiently taken into account.

For the deactivation or restriction of cookies in general, please refer to the section "Cookies" above.

Use of Google Tag Manager

We do not use Google Tag Manager.

Rights of the Data Subject

If personal data concerning you are processed, you are a data subject within the meaning of the FADP and the GDPR and you have the following rights:

Right to Information and of Access

You may request from us information as to whether personal data are being processed about you and we shall provide you with the information necessary in order to enable you to invoke your rights under the FDAP and to ensure that transparency in data processing is guaranteed. In any case, we shall provide you with the following information:

- a) the identity and contact details of the Controller;
- b) the personal data processed as such;
- c) the purposes of the processing;
- d) the envisaged period for which the personal data will be stored, or, if specific information on this is not possible, the criteria used to determine that period;
- e) where the personal data is not collected from you, any available information as to their source;
- f) as the case may be, the existence of automated decision-making (including profiling) and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you;
- g) the recipients or categories of recipients to whom the personal data has been or will be disclosed, including as to whether the personal data concerning you is transferred abroad. In this context, you may request to be informed of the appropriate safeguards relating to such transfer pursuant to the applicable data protection legislation;

- h) the existence of the right to request from us rectification or erasure of personal data, or restriction of processing of personal data concerning you or to object to such processing;
- i) the right to lodge a complaint with a supervisory authority.

Your right of access may be restricted pursuant to the applicable data protection legislation, in particular, art. 26 FDPA 2020.

Right to Rectification

You have the right to obtain from us the rectification and/or completion of incorrect, inaccurate or incomplete personal data concerning you.

Your right to rectification may be restricted pursuant to the applicable data protection legislation, in particular, art. 32 para. 1 FDPA 2020.

Right to Restriction of Processing

You have the right to request that the processing of your personal data be restricted or stopped or to object that your personal data are used for particular purposes.

Right to Erasure

You have the right to request from us that personal data we have collected and processed about you be erased or destroyed. If we were not able to erase or destroy such data due to technical or legal restrictions or for other compelling legitimate grounds, we would abstain from further processing such data.

Right to Data Portability

You have the right to receive the personal data concerning you which you have provided to us in a structured, commonly used and machine-readable format. In addition, you may also request us to transfer the data to another controller if this does not require disproportionate effort and where:

- a) the data is processed with your consent or in direct connection with the conclusion or performance of a contract between you and us; and
- b) the processing is carried out by automated means.

Changes to this Privacy Policy

We reserved the right to change or adapt this Privacy Policy at any time in compliance with the applicable data protection provisions. We will tell you about any changes by posting an updated privacy policy on our website. Any change we make applies from the date we post it on the website. If you have any questions about our Privacy Policy, please send us an e-mail to info@singularity-group.com.

This Privacy Policy was last updated in October 2021