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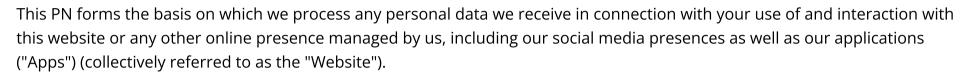


↑ SPT ♥ / Privacy Policy ♥

# **Privacy Policy**

#### 1. Who are we and what is this about?

We are SPT Roth Ltd., Werkstrasse 28, 3250 Lyss, Switzerland, and the controller of this website. This is our privacy notice ("PN"), in which we provide you, as the data subject, with the information required to enable you to exercise your rights and to ensure transparent data processing.



We are part of a group of companies (see <u>SPT Worldwide</u>) that has centralised certain processing operations (e.g. hosting, IT security, communication tools) for the purpose of increasing efficiency, security and optimising costs. As a result, the data collected on the website is shared within the group of companies so that the group's internal service providers can fulfil their designated tasks. The data protection requirements are complied with and we remain the contact person for you.

This website may contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that they have their own PN and we cannot be held liable or responsible for them.

This PN is dated 29 September 2023. We reserve the right to adapt it at any time. The PN as published here applies.

# 2. What personal data do we process from you, for what purpose and with whom do we share it?

#### 2.1. When you visit our website

When you visit our website, our servers temporarily save each access in a log file. The following technical data is collected without your intervention, as is the case with every connection to a web server, and stored by us until automatic deletion:

- All information that you explicitly provide in the context of a request (name, address, age, gender, contact details, etc.)
- IP address and referrer URL (the previously visited page)
- Browser version and browser type used
- Date and time of the visit or request
- Operating system and provider
- any affiliation identity or link identity (with this we can determine that you have come to us from any partner platform)

This data is collected and processed for the purpose of enabling the use of our website (establishing a connection), ensuring system security and stability on a permanent basis and enabling the optimisation of our Internet offering, as well as for internal statistical purposes.

To this end, we are supported by our partners, which are themselves subject to data protection regulations, which we have carefully selected and which are contractually obliged to comply with data protection, especially with regard to data security.

These are (with links to their respective PN):

- WeServe AG, CH-3097 Liebefeld-Bern, Website-Partner, https://www.weserve.ch/datenschutzerklarung
- DV Bern AG, CH-3000 Bern 22, Web-Hosting, https://www.dvbern.ch/de/datenschutz

#### 2.2. If you write to us via the contact form

This website allows you to contact us via a contact form. If you choose to contact us in this way, you consent to us processing your email address, surname, first name, title, region, any other information you provide to us in the contact form as well as the content of our conversation, for the purpose of communicating with you until we are satisfied that you are happy with it, and then archiving or deleting the data in accordance with legal requirements.

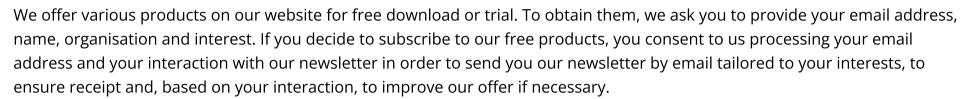
#### 2.3. If you contact us via email or telephone

If you choose to contact us by email or telephone, you consent to us processing your email address, surname, first name, title, organisation (if applicable), telephone number, any other information you provide to us and the content of our conversation for the purpose of communicating with you until we are satisfied that you are happy with it, and then archiving or deleting the data in accordance with legal requirements.

#### 2.4. When you become our offline customer

Becoming our customer requires that you or your organisation conclude a contract with us. To do this, we need data such as surname, first name, title, organisation (if applicable), telephone number, email address, delivery address, billing address and method of payment. On the one hand, this allows us to evaluate entering into a customer relationship with you or your organisation and then decide to do so. On the other hand, it allows us to subsequently provide the services or goods deliveries requested by you or your organisation for the purpose of performing the contract. We will also create a file on you or your organisation containing your contact details, work done, transactions, communications, documents created or received, time spent and information for billing and accounting purposes. All this will be kept in accordance with our legal obligations.

#### 2.5. If you receive free products from us



#### 2.6. When you apply for a job with us

You can apply to us via our job and application platform. If you do so, you consent to us processing your email address, surname, first name, title, address, all data in your CV, your references and certificates, and all other data and letters that you send us for your application in order to check your application, communicate with you in this regard and, if necessary, contact your references. You can revoke your consent at any time. If your application is not successful, we will delete your documents after one year at the latest. For communication via email and telephone, the relevant chapter of this PN applies.

For the operation of our job and application platform, we are supported by our partners, which are themselves subject to data protection regulations, which we have carefully selected and which are accordingly contractually obliged to comply with data protection, in particular also with regard to data security.

These are (with links to their respective PN):

- JobCloud AG, Switzerland, job portal, <a href="https://www.jobcloud.ch/c/en/privacy-policy/">https://www.jobcloud.ch/c/en/privacy-policy/</a>
- Ostendis AG, Schweiz, job portal, <a href="https://www.ostendis.com/en/privacy">https://www.ostendis.com/en/privacy</a>

#### 2.7. If you follow our presence on social media

If you decide to follow our presence on social media and communicate with us via social media, you consent to us processing your username for the purpose of managing and analysing our followers (including for advertising purposes) as well as the content of any interaction with us or our content. You can leave our presence at any time with effect for the future.

We are responsible for the operation of such a presence together with the operator of the respective platform: we for the processing of your data as described above, the platform operator for the processing of your data in accordance with the participation agreement between you and the platform operator itself.

We have presences on the following social media (with links to their respective PN):

• LinkedIn Ireland Unlimited Company, Ireland, LinkedIn, <a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a>

# 3. Which third-party technologies have we embedded?

We use various technologies from (other) third party providers on our website e.g. for analysis, segmentation, marketing, social media integration, security, media display, CRM integration, etc.. They explain in their respective PN which data they process for which purposes, for how long, with whom they share it, which rights you have and how you can exercise them. If applicable, you can opt-out of this processing, for which we provide you with the relevant links below in these cases. You can also make settings in your internet browser that prevent cookies from being stored on your device or tracking technologies from being used, for example. You can make and manage these settings in your internet browser under privacy, security or data protection settings, depending on the provider.

These third party providers are (with links to their respective PN and opt-out options where applicable):

• Google Ireland Limited, Ireland, <a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>





- reCAPTCHA, security and fraud prevention,
- Google Maps, embedding of interactive maps
- Google Ads, advertisement, Opt-out: <a href="https://chrome.google.com/webstore/detail/iba-opt-out-by-google/gbiekjoijknlhijdjbaadobpkdhmoebb?hl=en">https://chrome.google.com/webstore/detail/iba-opt-out-by-google/gbiekjoijknlhijdjbaadobpkdhmoebb?hl=en</a>

For settings relating to cookies and other technologies, please use the personalization options in the cookie banner on our website. We use the cookie management tool <u>Tarte au Citron</u> for this purpose.

## 4. Do we disclose your personal data abroad?

We work with various partners at home and abroad (see above). In principle, these are located in countries with an appropriate level of data protection. If disclosure to individual countries requires additional protection, we ensure this by agreeing standard data protection clauses approved by the authorities with such partners or by relying on the self-certification of such partners under the relevant frameworks.

# 5. What are your rights towards us?

You have the right:

- request information about, correction or deletion of your personal data;
- request us to restrict the processing of your personal data, in particular to object to the processing of your personal data for marketing purposes; and
- require us to provide you or a natural or legal person appointed by you with a digital file of your personal data (data portability).

You can withdraw your consent to the processing of your personal data for the specified purposes at any time with effect for the future.

You also have the right to lodge a complaint with the competent authority (Federal Data Protection and Information Commissioner).

## 6. How can you exercise your rights against us?

If you have any questions about this PN or wish to exercise your rights, please contact us in writing either by post (see above) or by email as follows: info-ch@spt.net



<u>Switzerland (Headquarter)</u> SPT Roth Ltd

3250 Lyss

<u>China</u>

Small Precision Tools Co. Ltd. Wuxi, Jiangsu <u>Japan</u>

SPT JAPAN KK Yokohama-Shi, Kanagawa

**Philippines** 

SPT (Phil.) Clark Corporation Clark Philippines <u>Singapore</u>

SPT Asia Pte. Ltd. 970 Toa Payoh North

<u>USA</u>

Small Precision Tools Inc. Petaluma, CA



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