



Privacy Statement neon Website

neon Switzerland AG

Disclaimer: Please note that this Privacy Statement has been translated for convenience purposes only. In the event of any discrepancies, contradictions, or variations between the translated version and the [original German version of this Privacy Statement](#), the German version shall prevail and be considered the authoritative document.

This Privacy Statement applies to the website www.neon-free.ch (hereinafter referred to as the «Website») and describes how the responsible party, neon Switzerland AG, Badenerstrasse 557, 8048 Zurich, Switzerland (hereinafter referred to as «neon» or «we»), in its capacity as controller, processes your personal data when you visit the website www.neon-free.ch. Where it is technically possible and reasonable, neon will, upon your request, ensure that the use of the website is possible in an anonymised or pseudonymised form. Within the meaning of this privacy policy, personal data is any information relating to an identified or identifiable natural person.

neon is obliged to protect your privacy and confidentiality on the basis of business secrecy and for this reason takes a large number of technical and organisational data protection precautions for all processing of personal data.

Within the framework of our business relationships, we depend on processing personal data that is required for the establishment and implementation of business relationships and the fulfilment of the associated legal or contractual obligations, as well as for the provision of services or the execution of orders.

This policy may be updated at any time. You are therefore advised to read the latest version of this page regularly. The current, valid version of the privacy policy can be found on our website at <https://www.neon-free.ch/en/privacy-policy/>.

1. Area of Application

This Privacy Statement applies only to the use of the website www.neon-free.ch and therefore, in particular, not to:



- use of the neon app. For further information about data protection when using the neon app, refer to the Terms and Conditions of the app and the Privacy Statement, which can be accessed at <http://www.neon-free.ch/en>;
- other websites to which you are referred by clicking on a link.

2. Categories of personal data

The following categories of personal data may be collected, processed, and used by neon in connection with a visit to the website:

- IP address, operating system, browser type, browser version, browser configuration, name of the Internet service provider, and other types of information relating to the devices used to access our website, as well as the connection that is relevant to identify the type of device operated by the user, to connect with the website, to enable data exchange with the user and the device operated by the user, and to guarantee convenient use of the website;
- URL and IP address of the website from which the user accessed our website or that redirected the user to our website, including the date and time;
- sub-pages visited by the user during a session on our website, as well as the links accessed on the website, including date and time; and
- the content of any communication initiated via the website, including any information that users of the website share with neon and/or other users of the website or on the basis of applications, forms, or surveys that you as a user fill out and share with neon (e.g., questions that users address to neon via the contact form, or the content of applications for vacant positions, or contractual data via website contact in accordance with section 5).

3. Legal bases and purposes for data processing

We collect, process and use this personal data in a lawful way and in good faith. Depending on the respective purpose of the data processing, neon processes your personal data on the following legal bases and, if necessary, for the following purposes:



3.1. Contract fulfilment and execution

neon primarily processes personal data in the context of initiating, concluding, executing, or terminating contracts, particularly in order to

- manage, operate, maintain, and optimise the website and the services provided thereon;
- to help us improve the website and our services;
- to answer questions put to us by users and to attend to the concerns of users;
- to be able to show information and advertising about our products to users; and
- to prevent unlawful use of our website and the services offered via it.

3.2. Legal obligations

neon is required to comply with applicable laws and may be required by law or an official order to provide information, report your personal data, or hand over your personal data.

3.3. Safeguarding legitimate interests

We use your personal data to improve, develop, and expand our services and products. Our legitimate interest is based on the intention of ensuring the functionality of our website with respect to our services, running our website in a user-friendly way, keeping information constantly updated, and meeting the needs of our customers and website visitors.

We never use the data collected for the purpose of making conclusions about you personally.

3.4. Consent

For further processing purposes not related to the actual fulfilment of the contract (e.g., to enable contract fulfilment and processing by third parties or to provide you with offers and services tailored to your needs), the processing of your



personal data can be based on your consent, which you can withdraw at any time.

3.5. Data security

Access to personal data is restricted to those employees, contractors, and third parties that require knowledge of this data for the provision of products and services or in connection with the website. We use physical, electronic, and procedural security precautions for the protection of personal data. They include the use of firewalls, personal passwords, as well as encryption and authentication technologies. We use personal data belonging to our customers or former customers exclusively for the aforementioned purposes and will only pass on this data to third parties with the consent of the customer, or where permitted or required, for compliance with a legal obligation.

3.6. Duration of processing

We store your personal data in accordance with the relevant data protection laws. In particular, personal data is only stored for as long as it is required to achieve the purposes pursued by the processing, on the basis of our legitimate interests for documentation, or for a maximum of as long as permitted by law, i.e., for example for the duration of the entire business relationship (from the initiation and processing to the termination of the customer relationship) as well as beyond this in accordance with the statutory storage and documentation obligations.

It is therefore possible that personal data will be retained for the period in which claims can be asserted against neon and insofar as we are otherwise legally obliged to do so or justified business interests require this (e.g., for evidence and documentation purposes).

As soon as your personal data is no longer required for the above-mentioned purposes, it will be deleted or anonymised as far as possible. For operational data (e.g., system protocols, log files), shorter retention periods of twelve months or less apply.



4. Recipients of personal data

Third parties commissioned by us to perform technical or organisational services for us and in accordance with our instructions, or under their own or joint responsibility, which we require for the fulfilment of the purposes stated in this Privacy Statement or for our other business activities (e.g., customer support, IT security, and technical support services, hosting of our systems, provision of additional services), may have access to personal data belonging to users. Our service providers are contractually obliged to process the personal data exclusively on our behalf and in accordance with our instructions. We also oblige our service providers to comply with technical and organisational measures that ensure the protection of personal data.

5. Location of data processing

Your personal data may be transmitted abroad insofar as this is necessary to provide our services (e.g., for payment orders or maintenance and security of our products and services) or is required by law (e.g., as part of the automatic exchange of information) or on the basis of your consent. We make certain in every case (e.g., by entering into suitable contracts) that an adequate level of protection is afforded to the data that is equivalent to the standards applied in Switzerland.

If processing takes place in countries with legislation that does not provide an adequate level of data protection, the protection of your personal data will be ensured by means of the precautions provided for by law, such as in particular the conclusion of contractual agreements (revised standard contractual clauses of the European Commission, which can be found at https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj) as well as appropriate technical and organisational measures.

6. Cookies

Our website sometimes uses cookies. Our website cannot function without cookies. They make our site more user-friendly, effective and secure. We use them for statistical purposes, to improve the user experience, and to optimise online campaigns. Cookies are small (text) files that are placed in your browser or on your device (e.g., computer, smartphone, or tablet) when you visit our website. You can make suitable adjustments to your browser settings to prevent the storage of



cookies or to enable their storage in particular cases only. However, we would like to point out that if you do so, you may not be able to use the full functionality of this website. One of the cookies that we use is mainly needed to operate parts of the website and has already been placed on your device. You agree to our cookies policy by using our website.

Most of the cookies used by us are «session cookies». They are automatically deleted at the end of your visit. Other cookies, so-called «permanent cookies», will be saved on your device until you delete them. These permanent cookies enable us to identify your browser during your next visit.

Cookies can be classified into different categories depending on their purpose. Within the framework of the website, neon uses the following cookies:

- Language setting cookies: This cookie stores your language preference so as to show you the website in your selected language on your next visit.
- Analysis cookies: Tracking of the number and type of visits to the website and its pages so as to identify which parts of the website are working well, and which parts require improvement.
- Storage of user preferences for the screen layout, including the preferred language and region.
- Collection of statistical data on the number of visitors and their usage habits, as well as improvement in speed and performance of the website sections.
- Cookies by third parties and partners. We occasionally use plug-ins and components by third parties to improve user experience and our online advertising campaigns. These components may also use cookies for similar purposes. Neither third parties nor neon have access to the data that is collected by other parties by means of these cookies.

We also use cookies to show advertising banners by neon when you visit websites by third parties with whom we have marketing arrangements. Under certain circumstances, these third parties may collect anonymised information about your use of our and other websites and may make this anonymised data available to us, including, but not limited to, geographic data, information on your usage of a website or the name of websites on which you were shown advertising banners.



6.1. Google Analytics and comparable services

We use tracking technologies and web analytics services provided by Google Inc. («Google»), such as Google Analytics and Google Tag Manager, Microsoft Bing and Meta Connect to understand how our website is used. The information generated by these cookies about your usage of this website is usually sent to one of Google's servers in the United States and stored there. Due to the activation of the IP anonymisation on these websites, your IP address will, however, be previously abbreviated by Google within Member States of the European Union or in other signatory states to the Agreement on the European Economic Area and thus be protected from being traced. Your full IP address will be transmitted to a Google server in the USA and truncated there only in exceptional cases. Google will use this information on our behalf to evaluate your use of the website, compile reports on the website activities, and to provide us with further services associated with the use of the website and the Internet. The IP address transmitted by your browser within the framework of Google Analytics is not associated with any other Google data. For further information, visit <https://www.google.com/intl/en/policies/privacy>.

Browser plug-in. You can prevent the cookie storage by making appropriate adjustments to the settings of your browser software; however, we would like to point out that in this case you might not be able to use all functionalities of this website. In addition, you may prevent the transmission of the data created by the cookie related to your use of this website (including your IP address) to Google, and the processing of such data by Google, by downloading and installing the browser plug-in available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>.

Objection to data collection You can prevent the collection of your data by Google Analytics by clicking on the following [link](#). This will place an opt-out cookie on your device that will prevent collection of your data when you visit this website in the future: Disabling Google Analytics.

Google AdWords Remarketing. This cookie can associate your visit to the website with advertising banners by Google. For further information, visit the Google website.

We use retargeting and remarketing functions by third-party providers on our website. These technologies enable us to show personalised advertising to Internet users that have visited our website in the past when they visit websites operated by our partners. The retargeting, i.e., remarketing provider, stores a cookie



on your hard drive for this purpose. The cookie technology stores pseudonymised usage information, e.g., which advertising you have received from us or clicked on, and which advertising content you have viewed. On no accounts will the pseudonymised data be associated with your personal data. Instead, it is used exclusively to enable advertising that reflects your interests.

You may object to the use of the following retargeting, i.e., remarketing providers, by clicking on the link to the page where you can disable cookies: Google Ad-words: <https://adssettings.google.com/authenticated?hl=en>

6.2. Delete cookies

You can decide against the use of cookies at any time (on this website) by deleting the cookies placed on your device by this website. You can do this by changing the settings in your browser and by deleting all cookies.

7. Contact via website / «Support Widget»

When you use the «Support Widget» integrated on our website and send us a request via chat, please be aware that you should not enter any data that is particularly sensitive or worth protecting (e.g., indications of your credit rating, deposits of money, or changes of address).

The support widget is provided by the third-party service provider Freshworks Inc («Freshworks») to enable interaction with you on our website. As a data processor acting on our behalf, Freshworks automatically receives and records the chat conversation, the date of your message, your device model, your IP address, technical data about your internet browser, and your usage pattern through cookies. Freshworks performs analytics on such data on our behalf which helps us improve our service for you. You can read about the cookies that Freshworks sets in their cookie policy [here](#).

8. Risk of data transfers

Data transmitted via public networks like the Internet or email services can be accessed by anyone. Information transferred via the Internet (such as online



forms) and content received online may be transmitted via networks operated by third parties. neon cannot guarantee the confidentiality of information or documents that are transmitted by means of these public networks or networks operated by third parties.

If you disclose personal data via a public network or networks operated by third-party providers, you should be aware of the fact that your data may be lost. Also, third parties might gain access and hence collect and use the data without your consent. While many of the individual data packages are transmitted in an encrypted form, the names of the sender and the recipient are not. Third parties can therefore draw conclusions on accounts and business relationships that exist or are being established. Even if the sender and the recipient are residents of the same country, the transmission of data over these networks frequently – and without monitoring – takes place via third countries, so also via countries that do not offer the same degree of protection as the country in which you are domiciled. We do not accept responsibility for the security of your data during transfer via the Internet and reject all liability for direct and indirect damages. The use of other means of communication is permitted if you consider this to be necessary or reasonable for security reasons.

Data that you enter in online forms may be passed on to and processed by third parties for the purpose of order processing. Your data will be transferred with advanced encryption for certain services.

9. **Your rights**

Upon your written request, neon will provide you with information on all of the personal data we have stored about you, its source, the recipients and categories of recipients to whom we have disclosed personal data about you, and on the purpose of storage or data processing. You also have the right to demand the rectification, blocking, or erasure of personal data. Any consent given can be revoked at any time by notifying neon in writing. In addition, you can object to data processing at any time, request that certain personal data be handed over in a standard electronic format, or transferred to other responsible parties.

Exercising these rights is subject to conditions, exceptions, or restrictions (e.g., for the protection of third parties or business secrets or due to our legal duty of confidentiality). We reserve the right to redact or only provide excerpts of data for reasons of data protection or confidentiality. In addition, in the event of violations of data protection regulations, you can file a complaint with the



competent data protection authority or assert your rights by filing a complaint with a competent court.

Contact the following email address if you have any questions in this regard or about personal data in general:

By email: service@neon-free.ch

By mail: neon Switzerland AG, Badenerstrasse 557, CH-8048 Zürich

10. Links

This website may include links to other websites that are not operated or monitored by neon. These websites are not subject to the terms of this policy, and we are neither responsible for their contents nor for the principles by which they manage personal data. We recommend that you read the policies of the individual websites and that you review how they protect personal data, as well as their trustworthiness.

11. Entry into force

This Privacy Statement enters into force immediately; neon reserves the right to amend the Privacy Statement at any time. You will find the latest version of our website at www.neon-free.ch/en/privacy/website.