



Privacy Policy

Version as of 5 January 2023



We are pleased about your interest in our company. Data privacy is of considerable importance to Simpego Insurance Ltd (hereinafter referred to as "Simpego"). People can use the Simpego website without providing any personal data. If a data subject would like to use special services of our company via our website, it may be necessary to process personal data. If the processing of personal data is necessary and if there is no statutory basis for such processing, we generally seek the consent of the data subject.

The processing of personal data, such as the name, address, e-mail address or telephone number of a data subject must always be in a manner consistent with the General Data Protection Regulation (GDPR; Datenschutz-Grundverordnung – DSGVO). In this Privacy Policy, our company would like to inform the public about the nature, scope and purpose of our collection, use and processing of personal data. Furthermore, this Privacy Policy informs data subjects of their rights.

As the data controller, Simpego has implemented numerous technical and organisational measures to ensure the most complete protection of personal data processed through this website. Nevertheless, Internet-based data transmissions can always have security vulnerabilities, making it impossible to guarantee absolute protection. For this reason, every data subject is free to submit personal data to us by alternative means, such as by telephone.



1. Definitions

The Simpego Privacy Policy is based on the definitions used by the legislative bodies when enacting the GDPR. Our Privacy Policy aims to be easy to read and comprehensible for the public at large, our customers and our business partners. In order to ensure this, we would like to explain the terms used in advance.

In this Privacy Policy, we use terms including the following:

(a) Personal data

The term “personal data” refers to any information relating to an identified or identifiable natural person (hereinafter referred to as the “data subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

(b) Data subject

The term “data subject” refers to every identified or identifiable natural person whose personal data is processed by the data controller.

(c) Processing

The term “processing” refers to any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

(d) Restriction of processing

The term “restriction of processing” refers to the act of marking stored personal data with the aim of limiting its processing in the future.



e) Profiling

The term “profiling” refers to any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

f) Pseudonymisation

The term “pseudonymisation” refers to the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data is not attributed to an identified or identifiable natural person.

g) Data controller

The term “data controller” refers to the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. Where the purposes and means of such processing are determined by Swiss and/or EU law, the data controller or the specific criteria for its designation may be provided for under Swiss and/or EU law.

h) Data processor

The term “data processor” refers to a natural or legal person, public authority, agency or other body that processes personal data on behalf of the data controller.

i) Data recipient

The term “data recipient” refers to a natural or legal person, public authority, agency or another body to which personal data is disclosed, irrespective of whether a third party or not. However, public authorities that may receive personal data within the framework of a particular investigation mandate under Swiss and/or EU law are not considered to be data recipients.

j) Third party

The term “third party” refers to a natural or legal person, public authority, agency or another body other than the data subject, data controller, data processor or persons who,



under the direct authority of the data controller or data processor, are authorised to process personal data.

k) Consent

The term “consent” refers to any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which the data subject, by a statement or by another clear affirmative action, signifies agreement to the processing of personal data relating to them.

2. Name and address of the data controller

The data controller in accordance with the GDPR, other data protection laws applicable in the Member States of the European Union (EU) and other provisions relating to data protection is:

Simpego Insurance Ltd
Hohlstrasse 556
8048 Zurich
Switzerland
E-mail: doris.andres@simpego.ch
Website: www.simpego.ch

3. Name and address of the data protection officer

Our representative in the European Economic Area (EEA) according to Article 27 GDPR is:

Jörn Schipplick
sum.cumo GmbH
Schäferkampsallee 16
20357 Hamburg, Germany
Tel.: +49 40 609 437 130
E-mail: joern.schipplick@sumcumo.com
Website: www.simpego.ch



Any data subject may contact our data protection officer directly at any time with any questions or suggestions regarding data privacy.

4. Cookies

The Simpego website uses cookies. Cookies are text files that are stored on a computer system via an Internet browser.

Many websites and servers use cookies. Many cookies contain a so-called "cookie ID", a unique identifier of the cookie. The cookie ID consists of a string of characters that websites and servers can associate with the specific Internet browser in which the cookie was stored. On this basis, the websites and servers visited can distinguish the individual browser of the data subject from other Internet browsers that contain other cookies. The unique cookie ID can be used to recognise and identify a specific Internet browser. Through the use of cookies, Simpego can provide the users of this website with services that are more user-friendly than would be possible if a cookie was not set.

A cookie makes it possible to optimise the information and offers on our website for the benefit of the user. As previously mentioned, cookies allow us to recognise our website users. The purpose of this recognition is to make it easier for users to use our website. For example, the user of a website that uses cookies does not have to reenter their login credentials each time they visit the website; instead, the website takes care of this for them by storing a cookie on the user's computer system. Another example would be the shopping cart cookie in the online shop. The online shop uses a cookie to remember the items that a customer has placed in the virtual shopping cart.

The data subject can prevent the cookies from being set by our website at any time by changing the corresponding setting in their Internet browser and thus permanently object to the setting of cookies. They can also delete previously set cookies at any time using their Internet browser or other software programs. This is possible in all common Internet browsers. If the data subject deactivates the setting of cookies in their Internet browser, it might not be possible to fully use all features of our website.



5. Collection of general data and information

Each time a data subject or an automated system visits the Simpego website, the website stores a range of general data and information in the server log files. The following can be recorded: (1) browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (the so-called "referrer"), (4) the web subpages that are visited via an accessing system on our website, (5) the date and time of access to the website, (6) an Internet Protocol address (IP address), (7) the Internet service provider of the accessing system and (8) other similar data and information that serve to avert dangers in the event of attacks on our information technology systems.

When using this general data and information, Simpego does not draw any conclusions about the data subject. Instead, this information is needed (1) to correctly deliver the contents of our website, (2) to optimise the contents of our website and advertising for it, (3) to ensure the permanent functionality of our information technology systems and the technology of our website and (4) to make available to the law enforcement authorities the information needed for prosecution in the event of a cyberattack. The anonymously recorded data and information are therefore analysed by Simpego statistically and, furthermore, with a view to increasing data privacy and data security in our company in order to ensure an optimum level of protection for the personal data processed by us. The anonymous data in the server log files is stored separately from all personal data provided by a data subject.

6. Registration on our website

The data subject has the option to register on the website of the data controller by providing personal data. The personal data transmitted to the data controller is specified in the respective input screen used for registration.



When a person registers on the website of the data controller, the IP address assigned by the Internet Service Provider (ISP) of the data subject, the date and the time of registration are also stored. This data is stored based on this being the only way to prevent misuse of our services and makes it possible for us to investigate criminal offences that have been committed. This means that storing this data is necessary for safeguarding the interests of the data controller.

Having the data subject register by voluntarily providing personal data serves the purpose of the data controller of offering the data subject content or services that, by their nature, can only be offered to registered users.

7. Ways to contact us via the website

On the basis of statutory provisions, the Simpego website contains information that makes it possible to quickly contact our company electronically as well as engage in direct communication with us, also through our general e-mail address. If a data subject contacts the data controller by e-mail or by using a contact form, the personal data transmitted by the data subject is automatically stored. Such personal data that the data subject voluntarily provides to the data controller is to be stored for the purpose of processing or contacting the data subject. This personal data will not be transferred to third parties.

8. Internal use and transfer to third parties

Personal data received from data subjects is generally processed exclusively by the data controller for internal use and for its own purposes.

Data will only be transferred to third parties if Simpego receives the express consent of the data subject, if Simpego is legally obliged to do so (such as by law enforcement authorities) or if transfer to third parties is necessary for the purpose of safeguarding the legitimate interests of Simpego (such as through transfer to a debt enforcement office).

The data controller may also arrange for transfer to one or more data processors, such as parcel service providers, if Simpego fulfils its obligations through the use of third parties as



data processors. Such data processors are only to use personal data for an internal use attributable to the data controller.

9. Routine erasure and blocking of personal data

The data controller processes and stores personal data about the data subject only for the period that is required for the achievement of the storage purpose or to the extent that this was envisaged by the legislative bodies in laws or provisions that are binding for the data controller.

If the storage purpose is no longer applicable or if a retention or storage period envisaged by the legislative bodies expires, the personal data is routinely blocked or erased in accordance with the statutory provisions.

10. Rights of the data subject

a) Right to confirmation

Every data subject has been granted the right by the legislative bodies to obtain confirmation from the data controller as to whether or not personal data concerning them is being processed. If a data subject would like to exercise this right to confirmation, they may contact an employee of the data controller at any time.

b) Right of access

Each of the data subjects affected by the processing of personal data has the right granted by the legislative bodies to obtain, free of charge, access to data on themselves from the data controller and to receive a copy of this information. Furthermore, the legislative bodies have granted the data subject access to the following information:

- The purposes of the processing
- The categories of personal data that are processed
- The data recipients or categories of data recipients to whom the personal data has been or will be disclosed, in particular data recipients in third countries or in international organisations



- Where possible, the envisaged retention period during which the personal data will be stored or, if not possible, the criteria used to determine this retention period
- The existence of a right to rectification or erasure of the personal data concerned or to the restriction of processing by the data controller or a right to object to this processing
- The right to lodge a complaint with a supervisory authority
- If the personal data was not obtained from the data subject: Any available information on the source of the personal data
- The existence of automated decision-making including profiling, referred to in Article 22(1) and (4) GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject

Furthermore, the data subject has a right to information about whether personal data was transferred to a third country or to an international organisation. If this is the case, the data subject also has the right to be informed of the appropriate safeguards relating to the transfer.

If a data subject would like to exercise this right of access, they may contact an employee of the data controller at any time.

c) Right to rectification

Each of the data subjects affected by the processing of personal data has the right granted by the legislative bodies to obtain prompt rectification of inaccurate personal data concerning them. Taking into account the purposes of the processing, the data subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a data subject would like to exercise this right to rectification, they may contact an employee of the data controller at any time.



d) Right to erasure (right to be forgotten)

Each of the data subjects affected by the processing of personal data has the right granted by the legislative bodies to obtain from the data controller the erasure of personal data concerning them without undue delay if one of the following grounds applies and to the extent that the processing is not necessary:

- The personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed.
- The data subject withdraws consent on which the processing is based pursuant to Article 6(1)(a) GDPR, or Article 9(2)(a) GDPR, and where there is no other legal ground for the processing.
- The data subject objects to the processing pursuant to Article 21(1) GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) GDPR.
- The personal data has been unlawfully processed.
- The personal data has to be erased for compliance with a legal obligation EU law to which the data controller is subject.
- The personal data has been collected in relation to the offer of information society services pursuant to Article 8(1) GDPR.

If one of the above-mentioned grounds applies and a data subject would like the personal data stored at Simpego to be erased, they may contact an employee of the data controller at any time. The Simpego employee will ensure that the request for erasure is complied with immediately.

If the personal data was made public by Simpego and if our company, as the data controller, is obliged to erase the personal data pursuant to Article 17(1) GDPR, Simpego, taking account of available technology and the cost of implementation, will take reasonable steps, including technical measures, to inform other data controllers which are processing the personal data that the data subject has requested the erasure by such data controllers of any links to, or copy or replication of, this personal data to the extent that processing is not necessary. The employee of Simpego will arrange the necessary steps on a case-by-case basis.



e) Right to restriction of processing

Each of the data subjects affected by the processing of personal data has the right granted by the legislative bodies to obtain from the data controller restriction of processing if one of the following preconditions is met:

- The accuracy of the personal data is contested by the data subject for a period enabling the data controller to verify the accuracy of the personal data.
- The processing is unlawful, the data subject opposes the erasure of the personal data and requests the restriction of its use instead.
- The data controller no longer needs the personal data for the purposes of the processing, but it is required by the data subject for the establishment, exercise or defence of legal claims.
- The data subject has objected to processing pursuant to Article 21(1) GDPR and it is not yet clear whether the legitimate grounds of the data controller override those of the data subject.

If one of the above-mentioned preconditions applies and a data subject would like the personal data stored at Simpego to be restricted, they may contact an employee of the data controller at any time. The employee of Simpego will arrange the restriction of processing.

f) Right to data portability

Each of the data subjects affected by the processing of personal data has the right granted by the legislative bodies to receive the personal data concerning them, which they have provided to a data controller, in a structured, commonly used and machine-readable format. Furthermore, they have the right to transmit this personal data to another data controller, without hindrance from the data controller to which the personal data has been provided, if the processing is based on consent pursuant to Article 6(1)(a) GDPR or Article 9(2)(a) GDPR or on a contract pursuant to Article 6(1)(b) GDPR and the processing is carried out by automated means, unless the processing is required for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller.



Furthermore, the data subject has the right when exercising their right to data portability pursuant to Article 20(1) GDPR to have the personal data transmitted directly from one data controller to another if this is technically feasible and if the rights and freedoms of other persons are not adversely affected.

To establish the right to data portability, the data subject may contact an employee of Simpego at any time.

g) Right to object

Each data subject affected by the processing of personal data has the right granted by the legislative bodies on grounds relating to their particular situation to object at any time to the processing of personal data concerning them which is based on Article (6)(1)(e) or (GDPR). This also applies to profiling based on these provisions.

Simpego no longer processes the personal data in the event of an objection unless we demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or if processing is necessary for the establishment, exercise or defence of legal claims.

If Simpego processes personal data for the purpose of direct marketing, the data subject has the right to object at any time to processing of personal data processed for such marketing. This also applies to profiling, insofar as the profiling is connected with such direct advertising. If the data subject objects to the processing for direct marketing purposes, Simpego will no longer process the personal data for such purposes.

Furthermore, where Simpego processes personal data for scientific or historical research purposes or statistical purposes pursuant to Article 89(1) GDPR, the data subject, on grounds relating to their particular situation, has the right to object to processing of personal data concerning them, unless this processing is necessary for the performance of a task carried out for reasons of public interest.

For the exercise of the right to object, the data subject may directly contact any employee of Simpego or another employee at any time. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise their right to object by automated means using technical specifications.



h) Automated individual decision-making, including profiling

Each data subject affected by the processing of personal data has the right granted by law not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them, provided that the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and the data controller, or (2) is authorised by Union or Member State law to which the data controller is subject and that such law provides for adequate measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is made with the data subject's explicit consent.

If the decision (1) is necessary for entering into, or performance of, a contract between the data subject and the data controller, or (2) the decision is made with the data subject's explicit consent, Simpego implements suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, which at least include the right to obtain the data subject's involvement on the part of the data controller, to express their own point of view and to contest the decision.

If a data subject would like to exercise their rights concerning automated decisions, they may contact an employee of the data controller at any time.

i) Right to withdraw data protection consent

Each of the data subjects affected by the processing of personal data has the right granted by the legislative bodies to withdraw their consent to the processing of personal data at any time.

If a data subject would like to exercise their right to withdraw consent, they may contact an employee of the data controller at any time.

11. Data protection in applications and application procedures

The data controller collects and processes the personal data of applicants for the purpose of managing the application procedure. Processing can also be done electronically. This is particularly the case if an applicant transfers the corresponding application documents electronically to the data controller, for example by e-mail or via a web form on the



website. If the data controller concludes an employment contract with an applicant, the data provided for the purpose of managing the employment relationship is stored with due consideration of the statutory provisions. If the data controller does not conclude an employment contract with the applicant, the application documents are automatically erased two months after the announcement of the rejection unless the data controller has other legitimate interests that override the erasure. Other legitimate interests in this context are, for example, a burden of proof in proceedings in accordance with the General Equal Treatment Act (GETA; Allgemeines Gleichbehandlungsgesetz – AGG).

12. Privacy policy on the use and application of Google Analytics (with anonymisation function)

The data controller has integrated the Google Analytics component (with anonymisation function) into this website. Google Analytics is a web analysis service. Web analysis is the collection, compilation and evaluation of data on the behaviour of website visitors. A web analysis service collects data about which website a data subject came to a website from (the so-called “referrer”), which subpages of the website were accessed and how often and for how long a subpage was viewed, for example. Web analysis is primarily used to optimise a website and analyse the cost-benefit ratio of Internet advertising.

The company operating the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

The data controller uses the affix “_gat._anonymizeIp” for web analysis via Google Analytics. This affix makes it possible for Google to shorten and anonymise the IP address of the Internet connection of the data subject if our website is being accessed from a Member State of the EU or from another contracting party to the Agreement on the EEA. The purpose of the Google Analytics component is to analyse the stream of visitors to our website. Google will use the data and information collected for the purpose of evaluating your use of our website, compiling reports on website activity for website operators, and providing other services relating to website activity.



Google Analytics sets a cookie on the information technology system of the data subject. What cookies are has already been explained above. Setting the cookie allows Google to analyse the use of our website. Each time a data subject accesses one of the individual pages of this data controller-operated website on which a Google Analytics component has been integrated, the Internet browser on the data subject's information technology system is automatically triggered by the respective Google Analytics component to transmit data to Google for the purpose of online analysis. As part of this technical process, Google obtains knowledge in regard to personal data, such as the IP address of the data subject, which Google then uses for purposes including tracing the origin of visitors and clicks, which subsequently makes it possible to settle commissions. The cookie enables the storage of personal data such as the time of access, the place from which access originated, and the frequency of visits to our website by the data subject. This personal data, including the IP address of the Internet connection used by the data subject, is transmitted to Google in the USA each time you visit our website. Google stores this personal data in the USA. Using the relevant technical process, Google may share the collected personal data with third parties.

As described above, the data subject can prevent the cookies from being set by our website at any time by changing the corresponding setting in their Internet browser and thus permanently object to the setting of cookies. Putting such a setting into effect on the Internet browser in use would also prevent Google from setting a cookie on the information technology system of the data subject. In addition, the data subject can delete a cookie already set by Google Analytics in their Internet browser or other software programs at any time.

The data subject also has the option of objecting to the collection of data generated by Google Analytics and related to the use of this website as well as to the processing of such data by Google in order to prevent such processing. To do this, the data subject needs to download and install a browser add-on from the link. This browser add-on uses JavaScript to tell Google Analytics that no data or information about visits to websites may be transmitted to Google Analytics. Google considers installing the browser add-on to be an objection. If the information technology system of the data subject is deleted, formatted or reinstalled at a later point in time, the data subject must reinstall the browser add-on in order to deactivate Google Analytics. If the browser add-on is uninstalled or deactivated



by the data subject or another person within their area of control, it is possible to reinstall or reactivate the browser add-on.

Further information and Google's applicable Privacy Policy can be found at www.google.de/intl/de/policies/privacy and at www.google.com/analytics/terms/de. Google Analytics is explained in more detail under this link: www.google.com/intl/de_en/analytics.

13. Privacy policy on the use and application of Google

AdWords

The data controller has integrated Google AdWords into this website. Google AdWords is an Internet advertising service that allows advertisers to place ads both in Google's search engine results and in the Google advertising network. Google AdWords allows an advertiser to specify certain keywords in advance, by means of which an ad is displayed in Google's search engine results exclusively when the user uses the search engine to retrieve a keyword-relevant search result. In the Google advertising network, the ads are distributed to topic-relevant websites using an automatic algorithm and in accordance with the previously defined keywords.

The company operating the Google AdWords services is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

The purpose of Google AdWords is to advertise our website by displaying interest-relevant advertising on the websites of third-party companies and in the search engine results of the Google search engine and to display third-party advertising on our website.

If a data subject accesses our website via a Google ad, Google will store a so-called "conversion cookie" on the data subject's information technology system. What cookies are has already been explained above. A conversion cookie becomes invalid after 30 days and is not used to identify the data subject. If the cookie has not yet expired, the conversion cookie is used to track whether certain subpages, such as the shopping basket of an online shop system, have been retrieved from our website. The conversion cookie enables both us and Google to track whether a data subject who has accessed our



website via an AdWords ad has generated a sale, that is, has completed or cancelled a purchase.

Google uses the data and information collected through the conversion cookie to compile visit statistics for our website. In turn, we use these visit statistics to determine the total number of users referred to us via AdWords ads, that is, to assess the success or failure of the respective AdWords ad and to optimise our AdWords ads for the future. Neither our company nor other Google AdWords advertisers receive information from Google that would allow the data subject to be identified.

The conversion cookie stores personal data such as the websites the data subject visits. Accordingly, this personal data, including the IP address of the Internet connection used by the data subject, is transmitted to Google in the USA each time you visit our website. Google stores this personal data in the USA. Using the relevant technical process, Google may share the collected personal data with third parties.

As described above, the data subject can prevent the cookies from being set by our website at any time by changing the corresponding setting in their Internet browser and thus permanently object to the setting of cookies. Putting such a setting into effect on the Internet browser in use would also prevent Google from setting a conversion cookie on the information technology system of the data subject. In addition, the data subject can delete a cookie already set by Google AdWords in their Internet browser or other software programs at any time.

Furthermore, the data subject has the option to object to interest-based advertising by Google. To do this, the data subject needs to call up the link www.google.de/settings/ads from each of the Internet browsers they use and change the settings as desired there. Further information and Google's applicable Privacy Policy can be found at

www.google.de/intl/de/policies/privacy.



14. Other tools

a) Use of Hotjar

We use Hotjar, an analysis software of

Hotjar Ltd. (hereinafter referred to as "Hotjar")

www.hotjar.com

Level 2, St Julian's Business Centre, 3

Elia Zammit Street

St Julian's STJ 1000, Malta, Europe

With Hotjar, it is possible to measure and evaluate your usage behaviour on our website (clicks, mouse movements, how far down you scroll on a page, etc.). The information generated by the tracking code and cookie about your visit to our website is transmitted to the Hotjar servers in Ireland and stored there.

The following information is collected in relation to the end user's terminal device and browser:

- IP address of the terminal device (collected and stored in anonymised form; see docs.hotjar.com/v1.0/docs/data-safety-and-security for more details)
- The screen resolution of the terminal device
- The terminal device type (individual terminal device identifiers), operating system and browser type
- Geographical location (country only); (preferred language when viewing the Hotjar-based website)

User interactions

- Mouse events (movements, position and clicks)
- Keystrokes



Log data

Our servers automatically record information collected from Hotjar-based websites on a random basis. This data includes:

- The referring domain
- Pages visited
- Geographical location (country only)
- Preferred language when viewing the website
- Date and time when the pages of the website were accessed

Cookies

Hotjar-based websites use cookies to collect non-personal data, including standard Internet log data and information about end-user behaviour patterns when visiting a Hotjar-based website. This is done to provide you with a better user experience on the Hotjar-based website, to recognise preferences, to diagnose technical problems, to analyse developments and to assist our customers in improving their websites.

Cookies are small files that websites place on computers or terminal devices for the purpose of logging and improving the functionality of Hotjar-based websites.

We also use cookies to record login data on your terminal device or computer. This allows us to identify whether a particular terminal device has already visited a particular Hotjar-based website, making it unnecessary for you to reenter your login credentials each time you visit that Hotjar-based website.

Hotjar also uses cookies to determine whether the user opted out of being tracked by Hotjar services.

Most browsers allow you to choose whether or not to allow cookies. If you do not want cookies placed on your computer, please set your browser preferences to reject all cookies before accessing a Hotjar-based website. Please note that this may make it impossible to use some features of certain Hotjar-based websites.

You can find more information about cookies, including how to check which cookies have been stored and how to manage and delete them, at www.allaboutcookies.org.



You can find more information about the cookies we use at www.hotjar.com/cookies. When sharing your behaviour patterns and other information generated in connection with your visit to customer websites, Hotjar is committed to ensuring that your privacy rights are respected at all times.

When visiting a customer website, you can opt out of Hotjar's collection of your data at any time by visiting www.hotjar.com/opt-out and clicking on "Disable Hotjar".

b) Conversion tracking with Microsoft Bing

We use conversion tracking from Microsoft (Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA). Microsoft Bing Ads sets a cookie if our website is accessed via a Microsoft Bing ad. In this way, we and Microsoft Bing can recognise that someone has clicked an ad, been redirected to our website and reached a previously determined target page (conversion page). We are only provided with the total number of users who clicked a Bing ad and were then redirected to the conversion page. No personal data about the identity of the users is communicated. If you do not wish to participate in such tracking, you can use your browser settings to refuse setting of the cookie required for this purpose. Further information on data privacy and the cookies used can be found on the Microsoft website: privacy.microsoft.com/de-DE/privacystatement.

c) Webtrekk

If you have given your consent (see our explanation of "Cookies" above), this website uses Webtrekk technology to collect and store data for marketing and optimisation purposes. This data is stored and processed in anonymous or pseudonymous profiles (depending on the technology used and the service concerned).

These user profiles are stored in cookies or using the other technologies mentioned above. In addition to the data stored when you access the website (as described above), this also includes data about the website from which you access our website, the websites you visit when you access our website and, if applicable, search terms you used to find our website. Without the express consent of our users, data collected using Webtrekk technology is not used to personally identify a user and is not merged with other personal data about the respective user.



Objecting to data storage

a) You can also object to Webtrekk's collection and storage of your data by clicking the following link: [I object to data storage](#)

To turn off Webtrekk's usage analysis on this website, an opt-out cookie is set. For the named domain, the cookie is set for each browser and computer. Therefore, if you access our website from home and from the office or with different browsers, you need to separately declare your objection to data storage on each terminal device and browser.

b) Alternatively, you may refuse the use of cookies by selecting the appropriate settings on your browser. Please note that if you do this, you might not be able to use the full functionality of this website.

Further information on web tracking can be found in the Privacy Policy of our service providers: www.webtrekk.com/de/legal/opt-out-webtrekk.

d) Use of DoubleClick

We integrated components of DoubleClick by Google on this website. DoubleClick is a Google brand under which mainly special online marketing solutions are marketed to advertising agencies and publishers.

The company operating DoubleClick by Google is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

DoubleClick by Google transmits data to the DoubleClick server with every impression as well as with clicks or other activities. Each of these data transmissions causes a cookie request to be sent to the data subject's browser. If the browser accepts this request, DoubleClick sets a cookie on your computer. What cookies are has already been explained above. The purpose of the cookie is the optimisation and display of advertising. The cookie is used for purposes such as controlling and displaying user-relevant ads and for creating reports on or improving advertising campaigns. Furthermore, the cookie serves to prevent the same ad from being displayed several times.

DoubleClick uses a cookie ID that is required for the proper function of technical features, such as displaying an ad in a browser. In order to prevent duplicate ad placements,



DoubleClick can also use the cookie ID to record which ads will have already been displayed in a browser. The cookie ID also makes it possible for DoubleClick to record conversions. Conversions are recorded when, for example, a DoubleClick ad was previously displayed to a user and the user subsequently makes a purchase on the advertiser's website using the same Internet browser.

A cookie from DoubleClick does not contain any personal data, but a DoubleClick cookie may contain additional campaign identifiers. A campaign identifier is used to identify the campaigns with which the user has already been in contact.

Each time you access one of the individual pages of this website operated by Simpego on which a DoubleClick component has been integrated, the respective DoubleClick component will automatically prompt your browser to transmit data to Google for the purpose of online advertising and the settlement of commissions. As part of this technical process, Google obtains knowledge of data that Google also uses to generate commission statements. Among other things, Google can track that you have clicked certain links on our website.

As described above, you can prevent the cookies from being set by our website at any time by changing the corresponding setting in your Internet browser and thus permanently object to the setting of cookies. Putting such a setting into effect on the Internet browser in use would also prevent Google from setting a cookie on your computer. Cookies already set by Google can also be deleted at any time using an Internet browser or other software program.

You can find further information and the applicable Privacy Policy of DoubleClick by Google at <https://policies.google.com/?hl=de>.

e) Using fusedeck

The fusedeck tracking solution of Capture Media AG (hereinafter referred to as "Capture Media") is integrated into this website. Capture Media is a Swiss company based in Zurich that provides commissioned services for measuring this website's traffic in regard to engagement and events. Tracking is anonymous, which means that no connection can be made to specific or identifiable persons.



Further information on data protection as well as on the rights of data subjects in connection with fusedeck, including the possibility to opt out (object), can be found in the Privacy Policy and the instructions on the right to object.

<https://privacy.fusedeck.net/de/hwIELRS4TV>

15. Legal basis of the processing

For our company, Article 6(1)(a) GDPR serves as the legal basis for processing operations, for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is a party, as is the case, for example, with processing operations that are necessary for the delivery of goods or the provision of another service or consideration, the processing is based on Article 6(1)(b) GDPR. The same applies to processing operations that are necessary for the implementation of pre-contractual measures, such as when enquiries about our products or services are made. If our company is subject to a legal obligation that requires the processing of personal data, such as complying with tax obligations, then said processing is based on Article 6(1)(c) GDPR. In rare cases, the processing of personal data might become necessary to protect vital interests of the data subject or another natural person. This would be the case if a visitor were to be injured on our premises, for example, and as a result their name, age, health insurance details or other vital information needed to be shared with a doctor, hospital or other third party. Then the processing would be based on Article 6(1)(d) GDPR. Ultimately, processing operations could be based on Article 6(1)(f) GDPR. Processing operations that are not covered by any of the above-mentioned legal justifications depend on this legal basis if the processing is necessary to protect a legitimate interest of our company or a third party, provided that the interests, fundamental rights and freedoms of the data subject do not predominate. We are permitted to carry out such processing operations in particular because they have been specifically mentioned by the European legislative body. In this respect, the legislative body took the view that a legitimate interest could be assumed if the data subject is a customer of the data controller (Recital 47(2) GDPR).



16. Legitimate interests in the processing pursued by the data controller or a third party

If the processing of personal data is based on Article 6(1)(f) GDPR, our legitimate interest is the performance of our business activities for the benefit of the well-being of all our employees and our shareholders.

17. Duration for which the personal data is stored

The criterion for the duration of the storage of personal data is the applicable statutory retention period. After this period expires, the corresponding information will be routinely erased if it is no longer required for the fulfilment or initiation of the contract.

18. Legal or contractual requirements to provide personal data; necessity for the conclusion of the contract; obligation of the data subject to provide personal data; possible consequences of non-provision

We would like to inform you that the provision of personal data is in some cases required by law (e.g. tax regulations) or may also result from contractual arrangements (e.g. information about the contractual partner). To conclude a contract, it is sometimes necessary for a data subject to provide us with personal data that subsequently must be processed by us. For example, the data subject is obliged to provide us with personal data when our company concludes a contract with them. Failure to provide personal data would mean that the contract with the data subject could not be concluded. The data subject must contact one of our employees before providing personal data to us. Our employee will inform the data subject on a case-by-case basis whether the provision of the personal data is required by law or contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and what the consequences of not providing the personal data would be.



19. Simpego FlexDrive

This section only applies to you if you use the Simpego FlexDrive offer and the associated Simpego FlexDrive app. Unless specifically regulated in this section, the general provisions of this Privacy Policy also apply.

The Simpego FlexDrive app (hereinafter referred to as the “app”) incorporates cloud-based technology to measure and reward good driving behaviour without the need for a device to be permanently installed in the vehicle. This cloud-based technology, as well as the app, is provided and maintained by our third-party provider. Simpego is the data controller of the personal data processed by the app, and our third-party provider is the data processor.

Data collection:

If you use the app, the following categories of personal data in particular will be collected from you.

Data provided by you:

When you download and use the app (after signing up for the app), you can provide personal data such as your name and contact details (e.g. e-mail, phone number and address) and other data you provide when using the app.

Data collected through use of the app:

In addition, we may also collect data primarily relating to your driving habits and activities during your journeys (hereinafter referred to as “driving data”). This driving data includes location, trip duration (start and end time), odometer reading, routes, braking, rapid acceleration, hard stopping, rapid turning, cornering, speeding, mobile device information, information about travel outside the vehicle, mobile interactions while driving (e.g. phone activity, phone calls and phone handling activity) and potential collisions.



Data use

In addition to the purposes set out in the general provisions of this Privacy Policy, we use the data collected through the app for the following purposes in particular:

- Facilitating, operating and providing the app and, in particular, profiling users based on their driving behaviour and ensuring the evaluation of users
- Authenticating the identity of users and allowing them to access the app
- Automatic detection of collisions and subsequent notification of us
- Providing help and support to users
- Further developing, adapting and improving the app and the user experience based on common or personal preferences, experiences and difficulties
- Contacting users with general or personalised service-related messages (e.g. requests for schedules, information on the use of services, etc.)
- Supporting and improving our data security measures, including the prevention and mitigation of fraud, errors or illegal or prohibited activity
- Compiling aggregated statistical data, derived non-personal data or anonymised or pseudonymised data (that is non-personal) that we or our business partners may use to provide and improve our respective services.

Evaluation in particular

The data processor can use all data mentioned above under "Data collection" to evaluate your driving behaviour within the app. You can view your current rating transparently in the app. The app also gives you feedback on which events during your journeys were considered bad for your rating.

Data retention

The data processor has locations in various countries. However, your personal data in regard to your use of the app will only be processed in countries that provide adequate data privacy in accordance with the GDPR. The driving data collected by the app is erased or anonymised one year after collection.