



# PRIVACY POLICY

of PAWI Packaging Schweiz AG

**For ease of readability, the generic masculine or neutral wording is used in this document. Unless otherwise indicated, the terms used in this document refer to all genders.**

For customers and potential customers, users of our online presence at the domain [pawi.com](http://pawi.com) (e.g. [shop.pawi.com](http://shop.pawi.com), [www.pawi.com](http://www.pawi.com), [pacdesigner.pawi.com](http://pacdesigner.pawi.com) ), newsletter recipients, those present on or around our site, applicants, employees and suppliers.

This Privacy Policy describes how we, PAWI Packaging Schweiz AG, with its registered office in Winterthur, process your personal data when you, as a customer, purchase services or products from us, use our online shop, visit our website or other online presences, work for us or apply for a job with us, are a supplier of us or are otherwise connected with or communicate with us.

If you transmit or disclose data to us about other persons such as other family members, employees, etc., we assume that you are authorised to do so, that this information is accurate and that we may process it as described here. By submitting data about third parties, you confirm this. Please also ensure that these third parties have been informed about this Privacy Policy.

The protection of your privacy is very important to us. Of course, we only process your data in accordance with the Swiss Data Protection Act.

# 1. WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA?

PAWI Packaging Schweiz AG is responsible for the data processing described in this Privacy Policy, unless otherwise communicated in individual cases. We may also issue additional privacy policies for certain of our services that apply in addition to or in place of this Privacy Policy.

If you have any questions about how we handle personal data or any other data protection concerns, you can contact us at the following address:

**PAWI Packaging Schweiz AG**  
Grüzefeldstrasse 63  
CH-8404 Winterthur

E-Mail: [privacy@pawi.com](mailto:privacy@pawi.com)  
Website: [www.privacy.pawi.com](http://www.privacy.pawi.com)

# 2. WHAT PERSONAL DATA DO WE PROCESS AND FOR WHAT PURPOSE?

## 2.1 Customers, potential customers, users of our online content at the domain [pawi.com](http://pawi.com)

- a) If you as a customer receive our services or products (e.g. through direct orders or orders from one of our webshops under the [pawi.com](http://pawi.com) domain), or if you as an existing customer or potential customer request a quote, then we process the data received from you or a third party about you or your employees (name, address, email address, bank details, credit information, etc.), related correspondence (quotes, conversation and consultation notes, orders placed, invoices, other contractual correspondence) and other documentation arising in connection with the order in order to process corresponding orders.
- b) From time to time, we also invite our customers, potential customers and other interested parties to events or send them similar invitations or messages in order to maintain contacts, raise awareness of our services and acquire new customers. For this purpose, we process data received from customers, potential customers or interested parties from public sources or from third parties (name, contact details), together with any preferences or other characteristics that allow us to classify and address the persons concerned in an appropriate manner.

## 2.2 Website and other online presence

- a) Website: When you visit one of our websites, we process the associated access data (IP address, date and time of access to our websites, device information (hardware model, operating system version, device identification, etc.), websites visited, system activities, browser type, browser language, URL of previously visited websites, name of content accessed, etc.) in order to enable use of the website (establishing a connection), to ensure system security and stability, to analyse the use of our services to ensure quality, to optimise our services, to combat misuse and for internal statistical purposes. We also use tracking tools on our website that allow us to track your visit

in detail, so that we can optimise our online presence, improve our offer and show you content tailored to you.

- b) Online presence: We have a presence on various social media platforms. Please be aware that we have no influence on their data processing and that your activities will be processed there in accordance with the Privacy Policy of the respective platform. If you interact with us on these channels, we process the data we receive from you (your profile, your activities) in order to interact with you.
- c) Posts/publications: On these platforms, as well as on our website or other publications, we also publish content in which we provide information and interact with or report on customers and other interested parties. In the context of such posts, we disclose certain personal data to these platforms for publication or publish it in these formats (e.g. photos, videos or descriptions of customer or team events, stories about customers, employees, etc.). If you do not want to be mentioned or featured in relation to this, please contact the photographer directly at the event. For stories, we are in direct contact with those affected and only publish such content with their consent.
- d) Other enquiries: If you contact us using our contact details on one of our websites, a contact form or in any other way, we will process the information received from you and any access data (see above) in order to respond to your enquiry.

### **2.3 Newsletter**

- a) If you register for our newsletter, we process the data you provide in order to send you our newsletter and other advertising content in which we draw attention to our services or services of third parties closely associated with us. You can opt out at any time. The easiest way of doing this is by clicking on the unsubscribe link at the end of each newsletter. Our newsletters and other notifications may contain web links or tracking pixels that record whether a particular newsletter has been opened and which links have been clicked on. We process the information obtained in this way together with the access data (see above) for the purposes stated above.

### **2.4 Visitors on or around our site (video surveillance)**

- a) Some of our production facilities and other indoor and outdoor sites are under video surveillance for security reasons. In particular, we disclose this data to authorities in the event of misuse (e.g. physical assault, theft, damage to property or trespassing). If you are on or near any of these sites, you may be caught by our surveillance cameras. Access to the recordings is only granted to the responsible member of the Executive Board and the specialist IT employee.

### **2.5 Employees and applicants**

- a) Employees: If you are employed by us, we process your data (all information that we receive from you (including information about your relatives, e.g. for family allowances or emergency lists), contract data (salary, job description, etc.), salary-related data, data about business expenses, technical data (e.g. logins, log-in/unbadging, activities on the business systems such as bookings in ERP) and communication data (email, phone calls, etc.), important events (marriage, divorce, children, etc.) and any health data (e.g. illness and accident data), insurance-related data, and in a few cases also religious data (due to withholding tax) and other data (e.g. your deployment dates, absences, data about your performance such as employee qualifications) to process the employment relationship.
- b) Applicants: When you apply for a job with us, we process the data that we receive from you (name, contact details, CV, salary expectations, references, diplomas, etc.) and references obtained from the individuals you have cited in order to check your suitability for the advertised role or other vacancies. If you are employed, these documents will be added to your personnel file. If you give us your explicit written

consent, we will store your application documents in our talent pool for a maximum of one year for any future employment opportunity.

c) Lorry logistics tracking: Our lorries are equipped with GPS tracking. We process the associated data and the driver's personal details to optimise our fleet management and for better deployment planning.

#### **2.6 Other purposes**

We may also process the above-mentioned data to comply with legal obligations and official orders, including communication with authorities and courts, and to enforce and defend against legal claims.

## **3. TO WHOM DO WE DISCLOSE YOUR PERSONAL DATA?**

In the course of our business activities and for the purposes set out in section 2, we also disclose your personal data to third parties, if permitted and deemed appropriate to us, either because they are processing it for us or because they wish to use it for their own purposes. In addition to any positions already mentioned in section 2, this applies in particular to the following third parties (hereinafter collectively referred to as 'recipients'):

- Service providers (e.g. banks, insurance companies, subcontractors, etc.), including contractors (e.g. IT providers, trustees, etc.)
- Social insurance, authorities
- Authorities or other third parties if we are legally obliged to do so or if it is necessary to protect our interests, e.g. to combat misuse or safeguard rights, as well as other parties in potential or actual legal proceedings

Otherwise, we only disclose personal data to third parties if this is necessary to achieve the purposes described in this Privacy Policy or our business activities, if this is provided for by law or in a decree, if it is necessary to enforce our legal claims or if you have given your consent to this. You can obtain further information on disclosures of personal data from the contact person specified in section 1.

## 4. ARE YOUR PERSONAL DATA SENT ABROAD?

The recipients are generally in Switzerland. In certain cases, however, we may also disclose personal data to IT service providers and other recipients located abroad (namely in EU or EEA countries and the USA, in particular in the case of certain IT service providers). If we transfer data to a country without adequate statutory data protection, we will ensure an adequate level of protection as required by law through the use of appropriate contracts (in particular on the basis of standard contractual clauses) or other measures provided for by law or rely on statutory exceptions such as your consent, the conclusion or execution of a contract or the establishment, exercise or enforcement of legal claims. You can obtain further information about the countries concerned and the measures implemented from the contact person mentioned in section 1.

## 5. WHAT RIGHTS DO YOU HAVE?

Persons about whom we process data have the right to request information about the data we process about them and to request that it be rectified or erased.

Where our processing is based on consent, data subjects have the right to withdraw this consent at any time with future effect.

In order to exercise such rights, data subjects may contact the address mentioned in section 1 above. We will process these requests in accordance with the Swiss Data Protection Act but may also reject them or only fulfil them to a limited extent in accordance with the statutory regulations.

## 6. COOKIES

We use cookies on our websites. These are small text files that are stored on your device.

We use such cookies to enable better use of the platform (e.g. storage of login status or language choice). We also use cookies to generate statistical evaluations of the use of our platforms.

Most browsers are set to automatically accept cookies. You can deactivate them by deactivating cookies in your browser settings.

## 7. CHANGES TO THIS PRIVACY POLICY

Adjustments to this Privacy Policy may be necessary from time to time, e.g. if the law or the way in which we process personal data change. In this case, we will notify you of the change in an appropriate form (e.g. by activating it on our website or by sending an email to you), and with this information, the new version will become binding.

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