

PRIVACY COMPLIANCE POLICY

1. INTRODUCTION

Data protection is a key concern to SINTETICA SA. This privacy statement is intended to help understanding our general privacy policy.

In addition to this statement, you will find any information concerning the data processing of your personal data as a user of our website www.sintetica.ch (or its alias www.sintetica.com) in our “Cookie Policy” (https://careers.sintetica.com/cookie_policy.php).

2. LEGAL BASIS

This privacy statement is based on: the Swiss Federal Data Protection Act (FDPA) (<https://www.admin.ch/opc/en/classified-compilation/19920153/201903010000/235.1.pdf>) and the EU General Data Protection Regulation (GDPR) (<https://eur-lex.europa.eu>).

3. CONTROLLER

The Controller is SINTETICA SA, with registered office in:
Via Penate 5; 6850 Mendrisio; Switzerland.

Contact details of the **Data Protection Officer**:

the company has appointed a Data Protection Officer, who can be contacted at the email address support@sintetica.com placing in the email subject field “To the attention of the Data Protection Officer”, or any equivalent wording.

4. DEFINITIONS

Personal data

Any information relating to an identified or identifiable natural person (data subject). In particular, by reference to an identifier such as the name, the first name or the address, the email, the telephone number, a picture, etc.

Consent

Consent means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Privacy Impact Assessment (PIA)

A PIA is a detailed study to establish the risk to privacy that a personal data processing could have on the privacy of the data subject should an incident occur.

Purpose of processing

The purpose of processing is the reason why the data is collected.

Data subject

Any natural person subject to a processing of personal data.

Controller

The controller is the natural person or legal person on whose behalf the treatment is carried out. It determines alone or jointly the purposes of the treatment.

Processor

The processor is any natural or legal person, public authority, service or other body that processes personal data on behalf of the controller. For example, a web host or an online service provider.

Processing

Any transaction or set of transactions involving personal data, whether or not performed using automated processes, including the collection, recording, organisation, retention, adaptation, modification extraction, consultation, use, communication by transmission, dissemination or any other form of provision, reconciliation or interconnection and limitation, erasure or destruction.

5. PROCESSING YOUR DATA

We only process data that you choose to transmit to us and for which you explicitly consent to the treatment.

CONTACT FORM

Through the website, it is possible to fill out some contact or subscription forms. Some personal data will be requested (for example Name, Email, Phone number, ...).

There is the opportunity to write a message related to a contact request. We recommend that the message remains concise and any personal information will not be provided to us.

NEWSLETTER

You can also choose to receive our newsletter by ticking the option provided for this purpose. You will then receive a request for consent by email which will clearly indicate the purposes of processing your personal data that you can accept or refuse selectively.

If you have subscribed to our newsletter and do not wish to receive it anymore, you can unsubscribe by clicking on the “unsubscribe” link at the bottom of the newsletter. By doing so, you will receive an automatic confirmation of unsubscription and your data will be automatically deleted from the file provided for this purpose.

6. PURPOSES OF TREATMENT

We treat your data only in order to best meet your expectations. By collecting some of your personal data, two purposes stand out:

A. Operational purposes:

1. Respond to requests for contacts or information
2. Establishment of an offer(s)

B. Marketing purposes:

7. TRANSFER OF YOUR DATA

As part of the implementation of this privacy policy, we may use subcontractors, processors based in Switzerland and in other countries to execute our various data processing.

We draw your attention to the fact that the servers of our subcontractors, processors may be located in states whose legislation does not include data protection rules appropriate or equivalent to the FDPA or the GDPR.

If this is the case, we ensure that our subcontractors, processors, provide data protection safeguards and that they apply equivalent or GDPR-compliant standards, regardless of the geolocation of their servers.

8. DATA PROTECTION MEASURES

We strive to maintain a high level of security in the collection, processing and retention of data by relying on organisational and technical measures and taking the necessary precautions regarding the nature of the personal data that you are likely to communicate to us and the risks presented by their treatment in order to preserve its security and prevent such that they are altered, damaged, destroyed or that unauthorised third parties have access to it.

However, we draw your attention to the fact that it is impossible to guarantee absolute protection and invite you to apply good practices in order to contribute to the security of your data, in particular not to communicate your identifiers and passwords to other users. third parties, to disconnect systematically from your profiles and customer accounts, to close your browser window after your session, to clean the browsing history, especially if you access the Internet from a public post to which others people have access and not to save your credentials and passwords in the browser.

We supervise the processing of data by technical and organisational measures specific to the processing of personal data. All of our staff, agents and partners are required to adhere to these measures.

Encryption

We use Secure Socket Layer (SSL) encryption to protect our website from the loss, destruction, access, modification and dissemination of data by unauthorised third parties. SSL encryption encrypts content when data is provided on our site. We use the TLS standard.

Sensitisation

We make our employees and partners aware of the risks associated with the processing of personal data.

Limitation of processing

We limit the collection and processing of personal data to the strict minimum necessary to fulfil the intended purpose.

Access control

We control and limit access to the processing of personal data to a limited number of people.

Keeping your data

The data is stored in our systems for the time necessary for the intended processing. After processing, the data is archived and anonymised or destroyed.

PIA

We carry out a Privacy Impact Assessment before implementing any personal data processing that may involve a risk for the data subjects' privacy.

Selection of subcontractors, processors

We endeavour to select mainly subcontractors, processors, established in Switzerland or the European Union who contractually undertake to respect the confidentiality of personal data and who are guaranteed by the adoption of organisational and technical measures consistent with the FDPA and the GDPR.

9. YOUR RIGHTS

The Federal Data Protection Act and the EU General Data Protection Regulation grant the following rights to the data subjects:

- Right of information

- Right to access your data
- Right to rectification of your data (complete, updated)
- Right to oppose the processing of your data
- Right to limit the processing of your data (Purpose & duration of treatment)
- Right to the portability of your data (transmitted to a third party on your instruction)
- Right to erase your data (Right to be forgotten)

10. EXERCISE YOUR RIGHTS & INFORMATION

You can exercise your rights or request information by contacting us via the following email address:

support@sintetica.com

We will do what is necessary to answer you as soon as possible.

Our privacy policy may require periodic updates, including as part of the evolving regulatory framework for data protection. We invite you to check this page regularly to make sure you have read the latest version.