

## **Privacy Policy**

This Privacy Policy describes the principles according to which TIMES Attorneys, a law firm with offices in Zurich and Lausanne (hereinafter also "we or us" or "the data controllers"), processes Personal Data. "Personal Data" means any information relating to an identified or identifiable natural person, such as name, address, email address, online identifier or telephone number. We use the term data here synonymously with Personal Data.

This Privacy Policy applies insofar as a processing activity is not subject to another Privacy Policy. By using our services or website, **you consent to the processing of your Personal Data in accordance with this Privacy Policy.**

If you transmit and disclose Personal Data of other persons to us, we assume that these data are correct, that you are authorized to transmit and disclose them in accordance with the applicable data protection laws and that the other person, to the extent necessary, agrees to you providing us with their Personal Data for the purposes of processing in accordance with our Privacy Policy. By submitting this data about third parties to us, you confirm this. Please also ensure that these persons are informed about this Privacy Policy, insofar as a legal duty to inform applies.

### **1. Who is responsible for the processing of Personal Data**

The partner in charge is responsible for the processing of Personal Data in the context of a (potential) mandate relationship. The list of all partners with contact details can be found on our website [timesattorneys.ch](http://timesattorneys.ch). The partners of TIMES Attorneys are jointly responsible for the processing of other Personal Data, unless otherwise communicated in individual cases.

If you have any questions or concerns about the processing of your Personal Data, please contact your primary contact at TIMES Attorneys or

**TIMES Attorneys**  
**Feldeggstrasse 12**  
**8024 Zürich**  
**[info@timesattorneys.ch](mailto:info@timesattorneys.ch)**

### **2. How we process Personal Data**

All Personal Data collected by us will be processed in accordance with the provisions of the applicable data protection laws. We collect and process Personal Data for the purposes described in this Privacy Policy and, if applicable, for additional purposes communicated in a specific individual case.

### **3. What Personal Data do we collect, for what purposes and on what legal basis**

#### *3.1. Automatically transmitted information*

We collect information that your browser automatically transmits to us in "server log files" when you visit our website. This data collection is based on your interest in visiting our website and our legitimate interests in operating the website, i.e. to ensure the functionality and security of our website

This technical data may include, for example, the following data: browser type and version, operating systems used, referrer URL (the previously visited website), host name of the accessing computer, date and time of the server request, internet protocol address (IP address), amount of data transferred and other similar data and information that serve to avert danger in the event of attacks on our IT systems. For more information on the use of cookies and similar technologies, as well as the possibility to disable them, please refer to section 10.

The technical data in itself does not allow any conclusions to be drawn about your identity. This data is not merged with data from other sources.

As a rule, we retain technical data for 6 months. Exceptions with regard to the retention period are regulated in section 6.

Legal basis: This data is processed on the basis of our legitimate interests for the purpose of the proper and secure functioning and administration of our website.

#### *3.2. Information you share*

We process Personal Data that you have submitted (for example, by sending a message via contact form, e-mail, letter, fax, etc. or by telephone). We collect the data exchanged between you and us, including your contact information and the meta data of the communication. This includes for example:

- Name, first name, contact details (address, email address, phone number), date of birth, gender, language, information on your employment relationship, your position, income situation, family circumstances or state of health, the mandate and the relevant facts, information in legal documents, contracts and deeds, bank details, other information about you;
- Your message or request.

We process such Personal Data for the following purposes:

- For the establishment, management and settlement of contractual relationships;
- To respond to and address your inquiries and concerns;
- To provide, document and bill for our legal services;
- To communicate with you as well as with third parties, such as parties to proceedings, courts or authorities, by e-mail, telephone, letter or otherwise;
- To comply with legal or regulatory requirements;

- To alert you to publications, events or services that may be of interest to you;
- In the event of a dispute to enforce or defend actual or alleged legal claims and for investigations or similar proceedings;
- For other lawful purposes, if this processing results from the circumstances or was indicated at the time of collection;
- For marketing purposes and relationship management;
- If you apply for a job with us, we process your data for the purpose of reviewing your application, for carrying out the application process and, if necessary, for the preparation and conclusion of an employment contract.

We normally retain this data for 12 months from the last exchange with you. This period may be longer if this is necessary for reasons of evidence or to comply with legal, regulatory or contractual requirements, or if it is technically required. E-mails in personal mailboxes and written correspondence in mandate relationships are normally retained for at least 10 years. Exceptions regarding the retention period are governed by section 6.

Legal basis: We have a legitimate interest in the processing of Personal Data corresponding to the stated purposes. Some processing is also necessary so that we can fulfill our contractual obligations to you or our legal obligations (e.g. retention obligations).

### *3.3. Information received or generated from third parties*

We process Personal Data that we receive in contact or correspondence with third parties (namely clients, your employer, counterparties, correspondent attorneys, authorities and courts and their employees or other contact persons) namely in the context of a (potential) client relationship (e.g. name, surname contact details (address, email address, phone number), date of birth, gender, language information on employment, your position, income situation, family circumstances or state of health, information on the mandate and the relevant facts, information in legal documents, contracts and deeds, bank details, etc.). In addition, we collect some Personal Data ourselves, e.g. from public registers (e.g. commercial register, trademark register, debt collection register, etc.) and websites.

We process such Personal Data for the following purposes:

- For the establishment, management and settlement of contractual relationships;
- To respond to and address your inquiries and concerns or those of your third parties, namely employer or client or those of our clients;
- To provide, document and bill for our legal services;
- To communicate with you as well as with third parties, such as parties to proceedings, courts or authorities, by e-mail, telephone, letter or otherwise;
- To comply with legal or regulatory requirements;
- In the event of a dispute to enforce or defend actual or alleged legal claims and for investigations or similar proceedings;

- For other lawful purposes, if this processing results from the circumstances or was indicated at the time of collection.

We normally retain these data for 10 years from the last contractual activity, but at least from the end of the mandate. This period may be longer, insofar as this is necessary for reasons of evidence or to comply with legal or contractual requirements or is technically required. Exceptions with regard to the retention period are regulated in section 6.

Legal basis: We have a legitimate interest in the processing of Personal Data corresponding to the stated purposes. Some processing is also necessary so that we can fulfill our contractual obligations to you or third parties or our legal obligations (e.g. retention obligations).

#### **4. With whom we share your Personal Data**

In order to achieve the purposes described in this Privacy Policy, it may be necessary for us to disclose Personal Data to the following categories of recipients: External service providers (such as accountants, banks, etc.), clients, correspondent attorneys, counterparties and their legal representatives, business partners with whom we may need to coordinate the provision of legal services, and government agencies and courts.

We would like to point out that we use external IT service providers and cloud providers with servers in Switzerland for the management of mandates and other processing of Personal Data. We then use certain IT services as well as means of communication that may be associated with data security risks (e.g. e-mail, video conferencing). It is up to you to inform us about the request for special security measures.

The aforementioned categories of recipients may in turn involve third parties, so that your data may also become accessible to them. Please note that we can restrict processing by certain third parties (e.g. IT providers), but not by other third parties (e.g. authorities, banks, etc.).

#### **5. Transfer of Personal Data abroad**

We process the Personal Data in our area of responsibility in Switzerland. However, we may transfer the Personal Data to recipients (namely clients, correspondent attorneys, counterparties and their legal representatives or authorities) who in turn process the Personal Data in other countries, including those that do not ensure a level of data protection comparable to Swiss law. A transfer by us to recipients who process the Personal Data in other countries will normally only take place after prior consultation with you or if the transfer abroad clearly results from the circumstances (e.g. if we are instructed to instruct a lawyer abroad).

A transfer to recipients who process the Personal Data in countries that do not guarantee a level of data protection comparable to Swiss law will only be made on the basis of consent or by contractually obligating the recipient to comply with the applicable data protection laws by means of standard contractual clauses or if we can rely on an exception, namely if the disclosure is necessary for the performance of a contract or the enforcement of legal claims abroad, as well as in cases of overriding public interests.

## **6. How long we store Personal Data**

We will retain your Personal Data for as long as is necessary to fulfill the purposes for which your Personal Data was collected. For this reason, we will delete or anonymize Personal Data as soon as it is no longer necessary to achieve the purposes, subject however to (i) applicable legal or regulatory requirements to retain Personal Data for a longer period of time (e.g., for legal, regulatory, tax or accounting reasons), or (ii) where we have an overriding interest (.e.g., an interest for evidentiary reasons to establish, exercise and/or defend actual or potential legal claims, investigations or similar proceedings, including legal process that we may enforce to preserve relevant information, or where we have an interest in non-personal analysis). Further information on the respective retention and processing duration can be found in section 3.

## **7. No automated decisions with legal effect**

We do not make any decision concerning natural persons which is based exclusively on automated processing of Personal Data - including profiling - and which produces legal effects concerning a natural person or similarly significantly affects a natural person.

## **8. Security**

We take reasonable precautions to protect Personal Data from loss, unauthorized modification or unauthorized access by third parties. Unfortunately, despite due care, the transmission of information via e-mail or the internet is always associated with risks. Any transmission of data is at your own risk.

## **9. What are your rights**

With regard to the processing of your data by us, you have certain rights. In order to facilitate your control over the processing of your Personal Data, you have in particular the right to

- obtain information about the processing of your Personal Data and the purpose of the data processing,
- correct and delete your Personal Data or to restrict the processing of your Personal Data,
- object to the processing,
- withdraw consent, insofar as our processing is based on your consent,
- seek redress from a competent supervisory authority, and
- data transfer/transferability, i.e. you can request that we hand over certain Personal Data in a common electronic format or transfer it to another controller.

However, please note that conditions and exceptions apply to these rights (e.g. due to our professional duty of confidentiality). To the extent permitted or required by law, we may refuse requests to exercise these rights. For example, we may or must retain or otherwise continue to process the personal data despite a request to delete the personal data or restrict processing for legal reasons. If you have any

questions about the processing of your Personal Data, please contact your primary contact at TIMES Attorneys or email to [info@timesattorneys.ch](mailto:info@timesattorneys.ch).

#### **10. Use of cookies and similar technologies**

When using our website, data is generated that is stored in logs (especially technical data). In addition, we may use cookies and similar technologies (e.g. pixel tags or fingerprints) to recognize website visitors, evaluate their behavior and recognize preferences. A cookie is a small file that is transmitted between the server and your system and enables the recognition of a specific device or browser.

You can set your browser to automatically reject, accept or delete cookies. You can also disable or delete cookies on a case-by-case basis. You can find out how to manage cookies in your browser in the help menu of your browser.

Both the technical data we collect and cookies normally do not contain any Personal Data. However, Personal Data that we or third-party providers store from you may be linked to the technical data or to the information stored in and obtained from cookies and thus possibly to your person.

In addition, we use our own tools as well as services of third-party providers (which in turn may use cookies) on our website, in particular to improve the functionality or content of our website.

#### **11. How do we process Personal Data on our social networks?**

We may operate pages and other online presences on social networks and other platforms operated by third parties and process data about you in this context. In doing so, we may receive data from you (e.g., when you communicate with us or comment on our content) and from the platforms (e.g., statistics).

The providers of the platforms may analyze your usage and process this data together with other data they have about you. They also process this data for their own purposes (e.g., marketing and market research purposes and to manage their platforms), and act as their own data controllers for this purpose.

For more information on processing by platform operators, please refer to the privacy statements of the respective platforms. We currently use the following platforms, with the identity and contact details of the platform operator available in the privacy policy in each case:

LinkedIn: [www.linkedin.com](http://www.linkedin.com); privacy policy: <https://de.linkedin.com/legal/privacy-policy>.

#### **12. Changes to our Privacy Policy**

We reserve the right to change the content of this Privacy Policy at any time. It is therefore recommended to consult the Privacy Policy regularly on our website.

Last updated: August 30, 2023