



Privacy policy

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Privacy Policy of Gremotool GmbH, Wilerstrasse 3, CH-9200 Gossau (SG) Switzerland.

Effective as of 17.03.2026

TRANSLATION NOTICE

This English translation is provided for convenience and understanding only. The legally binding version of these General Terms and Conditions is the original German text. In the event of any discrepancies, differences in interpretation or inconsistencies, the German version shall prevail.

1 PRIVACY POLICY OF GREMOTOOL GMBH

Effective as of: 17. March 2026 • Last updated: 01. January 2026

We process personal data in accordance with the revised Swiss Data Protection Act (revDSG) and its implementing ordinances, and, where applicable, take into account the EU General Data Protection Regulation (GDPR) as well as relevant US data-protection requirements (in particular the CCPA/CPRA).

This Privacy Policy explains which data we collect, the purposes for which we use it, the legal bases on which such processing is carried out, and the rights available to individuals whose data we process.

1.1 Responsible Entity and Contact Details

Gremotool GmbH

Wilerstrasse 3, CH-9200 Gossau

Telephone: +41 71 930 03 90 • E-Mail: info@gremotool.ch

Contact for Data Protection Matters: info@gremotool.ch

Where an EU or UK representative is required under Art. 27 GDPR or UK GDPR, we will appoint such a representative separately and publish the relevant contact details in this section. Specialised service providers may be engaged to act as an EU/UK representative where necessary.



1.2 Scope of this Privacy Policy

This Privacy Policy applies to all personal data that we process in the course of our business activities. It particularly covers:

- Prospective customers, customers, suppliers/partners, website visitors, applicants, and other business contacts.
- All online services of Gremotool, including the website, embedded services (e.g., maps, social-media plugins and technical integrations), communication and collaboration tools, as well as events (online and on-site).

2 CATEGORIES OF PERSONAL DATA

The following categories of personal data may be processed depending on the relationship and the purpose:

- Master data / contact details: name, title, company, role, address, email, telephone number.
- Communication data: content and metadata from email, telephone calls, and video conferences.
- Web and device data: IP address, timestamps, device and browser information, usage behaviour (e.g., clicks), cookie data and consent information.
- Application data: CV, certificates, qualifications, references.
- Contract and billing data: contract details, service information, delivery information, payment information.
- Special categories of personal data only where necessary and permitted (e.g., health information for events relating to dietary requirements or allergies).

Personal data may also be obtained, where permitted, from publicly accessible sources (e.g., commercial registers, press), from authorities, or from third parties.

3 PURPOSE AND LEGAL BASES OF PROCESSING

The processing of personal data serves different purposes depending on the specific situation, and it is carried out on the legal bases applicable to each context. The following sections provide an overview of the main processing activities.

3.1 Contractual Relationships, Service Provision and Customer Support

Personal data is processed for the initiation, execution and fulfilment of contracts, as well as for maintaining business relationships. This includes communication, support, the sending of information, administration, invoicing and quality assurance.

Legal bases:

- Switzerland (revDSG): processing in accordance with the principles of good faith and proportionality, and with consideration of the principles of privacy by design and privacy by default.
- EU (GDPR): Art. 6(1)(b) (contractual relationship), Art. 6(1)(f) (legitimate interests), and Art. 6(1)(a) (consent, where required).



3.2 Website Operation, IT Security und Logs

For the provision of our website and to ensure stability and security, we process technically necessary data, including server and access logs such as IP addresses, timestamps, and browser or device information. These data are used for error analysis, ensuring functionality, and protecting against attacks.

Legal bases:

- Legitimate interests (IT security, operation of the website)
- Necessity for providing online services

3.3 Analytics, Reach Measurement and Marketing Communication

Non-essential cookies, pixels, and analytics or marketing technologies are used only with consent. Consent may be withdrawn at any time.

For GDPR-compliant consent, granular choices and genuine freedom of choice are required.

3.4 Events (including Photo/Video) and Visitor Management

For events, we process personal data for organisation, execution and follow-up. This may include the creation or publication of photos and videos. Depending on the purpose, processing is based either on consent or on legitimate interests (e.g., documentation, public relations).

Consent may be withdrawn at any time.

3.5 Applications

Application documents are processed to assess suitability, conduct the selection process, and fulfil internal documentation and record-keeping obligations.

Legal bases include pre-contractual measures, legitimate interests, or—where required—your consent.

3.6 Legal Obligations and Legal Enforcement

We process personal data to comply with statutory retention, documentation or information obligations. This also includes the use of data to assert, defend or enforce legal claims, for evidence purposes, or as part of risk management.

4 PROCESSORS, THIRD PARTIES AND INTERNATIONAL DATA

TRANSFERS

We use carefully selected processors for various services, such as hosting, IT operations, communication and collaboration services, video-conferencing, web analytics and technical website functions. These service providers are contractually obliged to ensure confidentiality, data security and purpose-bound processing.

Our main current service providers include:

- Hostpoint AG (CH) – hosting and technical server/access logs
- Wix.com Ltd. (IL/international) – website builder, technical platform, and privacy and cookie-management tools



- Microsoft Teams, Zoom, TeamViewer – communication and video-conferencing services (processing according to their respective privacy policies; data-processing agreements and Standard Contractual Clauses where required)
- Google Maps – display of map content on our website (possible transfers to third countries)

International data transfers:

If personal data is transferred to countries outside Switzerland, the EU or the EEA—particularly to countries without an adequate level of data protection such as the USA—we ensure that appropriate safeguards are in place. Depending on the service, these may include:

- EU Standard Contractual Clauses (SCCs)
- Certifications under the EU/Swiss/UK Data Privacy Framework (DPF)
- Other recognised protection mechanisms

These transfer mechanisms are reviewed regularly and documented in accordance with the applicable data-protection requirements.

Transparency regarding (sub-)processors:

We maintain an up-to-date overview of the processors we use and their potential sub-service providers.

Detailed information is available upon request.

5 WEBSITE, COOKIES AND SIMILAR TECHNOLOGY

5.1 Hosting, Technik und Logs (Hostpoint)

When our website is accessed, server log files are created automatically. These may contain in particular the following information:

- IP address
- Date and time of access
- Browser and device information (user agent)
- Referrer URL

The log files serve the technical provision, stability, security, error analysis and the prevention of unauthorised access. They are generally stored by Hostpoint for up to around six months, insofar as this is operationally necessary.

5.2 Website Builder and Privacy Tools (Wix)

Our website is technically operated via Wix. Wix provides various data-protection and security functions, including:

- Privacy Centre
- Cookie banner and consent management
- Logging of consents (consent logs)
- Tools to support compliance

These functions help us ensure compliance with the applicable data-protection requirements.



5.3 Cookies/Consent under the GDPR

Non-essential cookies or comparable technologies (such as analytics IDs, marketing pixels or SDKs) are used only with your consent.

Users are provided with:

- granular selection options
- a genuine alternative without coercion
- transparent information about the purpose and storage duration
- the ability to withdraw their consent at any time

This approach corresponds to the current requirements for GDPR-compliant consent, including the obligations relating to freedom of choice and the avoidance of disadvantage.

6 EMBEDDED SERVICES AND THIRD-PARTY CONTENT

6.1 Google Maps

Our website uses Google Maps to display geographical information in a user-friendly way. When accessing pages on which a Google Maps map is embedded, technical data are automatically transmitted to Google. These may include in particular:

- IP address
- Date and time of access
- Browser and device information

Depending on your device configuration and your location, this may involve a transfer of data to the USA. Google bases such international data transfers on recognised transfer mechanisms, in particular the Data Privacy Framework (DPF) and Standard Contractual Clauses (SCCs). The Google Maps platform is also subject to the provider's own security and compliance measures.

6.2 Social Media Plugins and Other Embedded Content (z. B. LinkedIn)

Our website may integrate content or functions from external providers, for example:

- social media plugins
- sharing buttons
- embedded posts or multimedia elements

When such content is loaded, the respective third-party providers receive technical access data, such as:

- IP address
- browser or device information
- where applicable, referrer information

This data processing is carried out in accordance with the privacy policies of the respective providers. Users are advised to review the information provided there regarding data processing, international data transfers (e.g., to the USA) and the protection mechanisms used (e.g., SCCs, DPF).



7 Communication and Video Conferences

When you contact us—by telephone, email or through online meetings—we process the contact and communication data generated in this context. This includes in particular:

- contact information (e.g., name, email address)
- metadata such as date, time, duration of the communication or the channel used
- content data where such data arise in the course of communication (e.g., chat messages, audio/video transmission, screen sharing)

For web meetings and digital collaboration, we use certified communication and video-conferencing services, such as:

- Microsoft Teams
- Zoom
- TeamViewer

These providers generally act as processors and process personal data in accordance with the data-processing or controller-processor agreements concluded with us.

Where the use of these services involves international data transfers, particularly to the USA, such transfers take place in accordance with the protection mechanisms contractually provided by the providers (e.g., Standard Contractual Clauses, Data Privacy Framework certifications or equivalent safeguards).

8 APPLICATIONS

Applications—regardless of whether they are submitted by email, by post or via online forms—are treated confidentially and used exclusively to assess suitability, to conduct the recruitment process and to fill the respective position.

After completion of the recruitment process, application documents are generally deleted or destroyed unless:

- consent has been given for longer retention (e.g., inclusion in a talent pool), or
- statutory retention or documentation obligations require otherwise.

Processing is carried out in accordance with the general data-protection principles of the revDSG and, where applicable, the GDPR.



9 CATEGORIES OF RECIPIENTS

We disclose personal data only when this is required for the respective processing purpose, when a legal basis exists, or when corresponding consent has been obtained. Possible categories of recipients include in particular:

- IT, cloud, security and hosting service providers as well as communication and collaboration providers
- (e.g., technical infrastructure, support, digital collaboration)
- Consulting, fiduciary, compliance and legal service providers as well as insurance companies
- (e.g., legal assessments, contractual matters, insurance or damage cases)
- Authorities, public bodies and courts, where we are legally obliged to do so or where this is necessary to protect our rights

All processors engaged are contractually obliged to ensure confidentiality, data security and purpose-bound processing. The required technical and organisational measures, as well as transfer mechanisms (e.g., for international data transfers), are implemented. Further information can be found in Section 5.

10 RETENTION PERIOD

We generally store personal data only for as long as is necessary for the respective processing purpose or where we are legally required to do so (e.g., due to retention or documentation obligations or applicable limitation periods).

Server log files generated in the course of operating our website are generally deleted by our hosting provider Hostpoint after around six months, unless longer retention is necessary for technical, security-related or operational reasons.

11 DATA SECURITY

We implement appropriate technical and organisational measures (TOMs) to ensure the security of your personal data and to protect it against loss, misuse, unauthorised access or other risks. These measures include in particular:

- access restrictions and role-based permissions (need-to-know principle)
- encryption of data during transmission and, where possible, during storage
- security monitoring and oversight of system and network activities
- regular training of our employees on data protection and information security
- technical security mechanisms of the platforms and service providers we use, such as hosting and mapping services or communication systems

These protective measures are continuously reviewed and further developed in line with the state of the art and legal requirements.



12 DATA PROTECTION IMPACT ASSESSMENT (DPIA) AND NOTIFICATION OF BREACHES

A Data Protection Impact Assessment is carried out when a planned or existing data processing activity is likely to result in a high risk to the personality or fundamental rights of the individuals concerned. The assessment considers the risks involved, the type of data affected and the technical and organisational measures planned to mitigate those risks.

If a data breach occurs that may pose a high risk to the affected individuals, notifications are made:

- in Switzerland: to the FDPIC as quickly as possible,
- under the GDPR: to the competent supervisory authority within the legally prescribed deadlines,
- and, where required, to the affected individuals in order to inform them about possible risks and recommended protective measures.

These procedures ensure the protection of the individuals concerned and compliance with legal obligations.

13 YOUR RIGHTS

Individuals have various rights in connection with the processing of their personal data, depending on the applicable data-protection law.

13.1 Rights under Swiss Law and the GDPR

Depending on the legal system, you are entitled to the following rights in particular:

Right of access:

- You may request information about which personal data we process about you, for what purposes and to which recipients such data is disclosed.

Right to rectification:

- You may request the correction of inaccurate or incomplete data.

Right to erasure:

- You may request the deletion of your personal data, provided that no statutory or contractual retention obligations prevent this.

Right to restriction of processing

- You have the right to request that the processing of your personal data be restricted

Right to data portability

- (This generally applies under the GDPR.)



Right to object

- You may object to certain types of processing, in particular processing based on legitimate interests.

Right to withdraw consent

- You may withdraw any consent you have given at any time. The withdrawal does not affect the lawfulness of processing carried out prior to the withdrawal.

Right to lodge a complaint

- You may lodge a complaint with a competent supervisory authority if you believe that your personal data is being processed unlawfully.

13.2 Additional Information for Individuals Residing in the United States (especially California)

For individuals residing in U.S. states with data-protection laws—particularly California (CCPA/CPRA)—additional or expanded rights may apply. These include in particular:

- the right to access (“Right to Know”)
- the right to deletion
- the right to correction
- the right to data portability
- the right to opt out of the processing or disclosure of personal data (e.g., “Do Not Sell or Share My Personal Information”)
- the right to restrict the use of sensitive data
- the right to non-discrimination for exercising these rights

Where required, we provide appropriate opt-out mechanisms and notices, particularly for individuals subject to U.S. law.

14 OBLIGATION TO PROVIDE DATA

Certain personal data must be provided in the context of our business relationships and when using our website so that we can offer our services and fulfil contractual or technical tasks.

This includes in particular:

- technical data required for the operation and delivery of the website (e.g., IP address)
- mandatory information in forms that is essential for processing enquiries, orders or applications

Without the provision of such data, we may be unable to provide certain services or may only be able to provide them to a limited extent.



15 SPECIFIC INFORMATION ON SERVICES

Cookie-and Consent-Management (Wix)

- We use the privacy and consent-management functions provided by Wix, including the cookie banner, preference settings, logging of consents (consent logs) and opt-out options. Further information can be found in the Wix Privacy Center.

Google Maps

- We use Google Maps to display geographical content. Information on international data transfers (e.g., DPF, SCCs) as well as on security and compliance measures can be found in the relevant Google policies and trust/policy centres.

Server-Logs (Hostpoint)

- Information on the categories of log data collected, their purposes and the respective deletion periods can be found in the Hostpoint documentation.

16 CONTACT AND SUPERVISORY AUTHORITY

Contact for Data-Protection Matters

E-Mail: info@gremotool.ch

Competent Supervisory Authority in Switzerland

Federal Data Protection and Information Commissioner (FDPIC)

(Enquiries and notifications are made in accordance with the legal requirements of the revised Swiss Data Protection Act.)

17 CHANGES TO THIS PRIVACY POLICY

We reserve the right to amend this privacy policy at any time, in particular in the event of legal, technical or organisational changes or when new or modified processing purposes arise.

The version of the privacy policy published at the time is always the one that applies.

The last update was made on 1 January 2026.

9200 Gossau, 01. January 2026

Management of Gremotool GmbH

