

Data protection declaration of Turicum Legal Ltd.

Type of personal data



General personal data

We process your general personal data.



Financial data

We process your financial data.



Health data

We process your health data.



Location data

We process your location data.



Privacy

We process data about your privacy and intimacy.

Source of personal data



Provided data

We process personal data that you provide to us.



Collected data

We process personal data that we collect about you.



Received data

We process personal data about you that we have received from third parties.

Purpose of processing



Product development

We use your personal data to develop and improve products and services.



Other purposes

We use your personal data for other purposes not related to the core service.

Disclosure to third parties



Data Transfer

We share your personal data with other companies who can decide for themselves how they use the data.

Place of processing



Worldwide

We also might process your personal data outside of Switzerland and the EU.

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1. WHAT IS THIS DATA PROTECTION DECLARATION ABOUT?

Turicum Legal Ltd. CHE-155.771.892, Stockerstrasse 41, 8002 Zurich (the "**Turicum Legal Ltd.**", hereinafter also "**we**", "**us**") is a Swiss law firm with its registered office in Zurich. In the course of our business activities, we obtain and process personal data, in particular personal data about our clients, associated persons, counterparties, courts and authorities, correspondent law firms, professional and other associations, visitors to our website, participants in events, recipients of newsletters and other entities or, in each case, their contacts and employees (hereinafter also "**you**"). In this privacy policy, we provide information about these data processing activities.

If you disclose data to us about other persons (e.g. family members, representatives, counterparties or other associated persons), we assume that you are authorized to do so and that these data are correct and that you have ensured that these persons are informed about this disclosure, insofar as a legal duty to inform applies (e.g. by bringing this data protection declaration to their attention in advance).

2. WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR DATA?

Responsible for the processing described in this data protection declaration under data protection law is:

Turicum Legal Ltd.
Stockerstrasse 41
CH-8002 Zurich
+41 58 400 70 70
dataprotection@turicum-legal.ch

3. FOR WHAT PURPOSES DO WE PROCESS YOUR DATA?

When you use our services, www.turicum-legal.ch/de or www.turicum-legal.ch/en (hereinafter "**website**"), or otherwise deal with us, we obtain and process various categories of your personal data. In general, we may collect and otherwise process this data for the following purposes:

- **Communication:** We process personal data in order to communicate with you as well as with third parties, such as parties to proceedings, courts or authorities, by email, telephone, letter or otherwise (e.g. to respond to inquiries, in the context of legal advice and representation, and to initiate or execute contracts). This also includes that we may send our clients, contractual partners and other interested persons

information about events, changes in the law, news about our law firm or similar. This may take the form of newsletters and other regular contacts (electronic, postal, telephone), for example. You can decline such communication at any time or refuse or revoke your consent to such communication. For this purpose, we process in particular the content of the communication, your contact data and the marginal data of the communication, but also image and audio recordings of (video) telephone calls. In the event of an audio or video recording, we will inform you separately and you are free to inform us if you do not wish to be recorded or to terminate the communication. If we need or want to establish your identity, we will collect additional data (e.g. a copy of an identification document).

- **Initiation and conclusion of contracts:** With regard to the conclusion of a contract, such as in particular a contract for the establishment of an attorney-client relationship, with you or your client or employer, which also includes the clarification of any conflicts of interest, we may in particular obtain and otherwise process your name, contact details, powers of attorney, declarations of consent, information about third parties (e.g. contact persons, family details as well as counterparties), contract contents, date of conclusion, creditworthiness data as well as all other data which you make available to us or which we collect from public sources or third parties (e.g. commercial register, credit agencies, sanctions lists, media, legal protection insurances or from the Internet).
- **Administration and processing of contracts:** We obtain and process personal data so that we can comply with our contractual obligations to our clients and other contractual partners (e.g. suppliers, service providers, correspondence law firms, project partners) and, in particular, to provide and collect contractual services. This also includes data processing for client management (e.g. legal advice and representation of our clients before courts and authorities and correspondence) as well as data processing for the enforcement of contracts (debt collection, legal proceedings, etc.), accounting and public communication (if permitted). For this purpose, we process in particular the data which we receive or have collected in the course of the initiation, conclusion and execution of the contract, as well as data which we generate in the course of our contractual services or which we collect from public sources or other third parties (e.g. courts, authorities, counterparties, information services, media, detective agencies or from the Internet). Such data may include, in particular, minutes of conversations and consultations, notes, internal and external correspondence, contractual documents, documents that we prepare and receive in the course of proceedings before courts and authorities (e.g. statements of claim, appeals and complaints, judgments and decisions), background information about you, counterparties or other persons, as well as other mandate-related information, performance records, invoices, and financial and payment information.
- **Operation of our website:** In order to operate our website in a secure and stable manner, we collect technical data, such as IP address, information about the operating system and settings of your terminal device, region, time and type of use. In addition, we use cookies and similar technologies. For more information, see section 8.
- **Improvement of our electronic offers:** In order to continuously improve our website and other electronic offerings, we collect data about your behavior and preferences by, for example, analyzing how you navigate through our website and how you interact with our social media profiles.
- **Registration:** In order to use certain offers and services (e.g. free WLAN, newsletter), you must be registered (directly with us or via our external login service providers). For this purpose, we process the data disclosed during the respective registration. Furthermore, we may also collect personal data about you during the use of the offer or service; if necessary, we will provide you with further information about the processing of this data.
- **Security purposes as well as access controls:** We obtain and process personal data to ensure and continuously improve the appropriate security of our IT and other infrastructure (e.g. buildings). This includes, for example, monitoring and controlling electronic access to our IT systems as well as physical access to our premises (including by means of procedures involving the processing of biometric data),

analysis and testing of our IT infrastructures, system and error checks, and the creation of security copies. For documentation and security purposes (preventive and incident investigation), we may also use access logs or visitor lists and deploy surveillance systems (e.g. security cameras) in relation to our premises. We will draw your attention to surveillance systems at the relevant locations by means of appropriate signs.

- **Compliance with laws, directives and recommendations of authorities and internal regulations ("Compliance"):** We obtain and process personal data to comply with applicable laws (e.g. anti-money laundering, tax obligations or our professional duties), self-regulations, certifications, industry standards, our corporate governance, as well as for internal and external investigations to which we are a party (e.g. by a law enforcement or regulatory agency or an appointed private entity).
- **Risk management and corporate governance:** We obtain and process personal data as part of risk management (e.g. to protect against criminal activities) and corporate governance. This includes, among other things, our operational organization (e.g. resource planning) and corporate development (e.g. acquisition and sale of parts of operations or companies).
- **Job application:** If you apply for a job with us, we obtain and process the relevant data for the purpose of reviewing the application, carrying out the application process and, in the case of successful applications, for the preparation and conclusion of a corresponding contract. For this purpose, in addition to your contact data and the information from the corresponding communication, we also process in particular the data contained in your application documents and the data as we can additionally obtain about you, for example from job-related social networks, the Internet, the media and from references, if you consent that we obtain references.
- **Other purposes:** Other purposes include, for example, training and educational purposes and administrative purposes (e.g. accounting). We may listen to or record telephone or video conferences for training, evidence, and quality assurance purposes. In such cases, we will notify you separately (e.g. by displaying a notice during the video conference in question) and you are free to tell us if you do not want to be recorded or to stop the communication (if you just do not want your image recorded, please turn off your camera). In addition, we may process personal data for the organization, implementation and follow-up of events, such as, in particular, lists of participants and the content of presentations and discussions, but also image and audio recordings made during these events. The protection of other legitimate interests is also one of the further purposes, which cannot be named exhaustively.

4. WHERE DOES THE DATA COME FROM?

- **From you:** The majority of the data we process is disclosed to us by you (or your terminal device) (e.g. in connection with our services, the use of our website or communication with us). You are not obliged to disclose your data, with exceptions in individual cases (e.g. legal obligations). However, if you wish to conclude contracts with us or use our services, for example, you must disclose certain data to us. The use of our website is also not possible without data processing.
- **From third parties:** We may also obtain or receive data from publicly available sources (e.g. debt collection registers, land registers, commercial registers, media or the internet including social media) from (i) public authorities, (ii) your employer or client who either has a business relationship with us or otherwise deals with us, and (iii) other third parties (e.g. clients, counterparties, legal protection insurers, credit agencies, address dealers, associations, contractual partners, internet analysis services). This includes, in particular, the data we process in the course of initiating, concluding and executing contracts, as well as data from correspondence and discussions with third parties, but also all other categories of data.

5. WHO DO WE DISCLOSE YOUR DATA TO?

In connection with the purposes listed in section 3, we transfer your personal data in particular to the categories of recipients listed below. If necessary, we obtain your consent for this or have our supervisory authority release us from our professional duty of confidentiality.

- **Service providers:** We work with service providers in Switzerland and abroad who (i) on our behalf (e.g. IT providers), (ii) under joint responsibility with us, or (iii) under their own responsibility process data that they have received from us or collected for us. These service providers include, for example, IT providers, banks, insurance companies, debt collection agencies, credit reporting agencies, address checkers, other law firms or consulting firms. We generally agree on contracts with these third parties regarding the use and protection of personal data.
- **Clients and other contractual partners:** First of all, this refers to clients and other contractual partners of ours for whom a transfer of your data results from the contract (e.g. because you are working for a contractual partner or he is providing services for you). This category of recipients also includes entities with which we cooperate, such as other law firms in Switzerland and abroad or legal protection insurance companies. The recipients process the data under their own responsibility.
- **Authorities and courts:** We may disclose personal data to offices, courts and other authorities in Switzerland and abroad if this is necessary for the fulfillment of our contractual obligations and, in particular, to conduct our mandate, or if we are legally obligated or entitled to do so, or if this appears necessary to protect our interests. These recipients process the data under their own responsibility.
- **Counterparties and persons involved:** To the extent necessary for the performance of our contractual obligations, in particular for the management of the mandate, we also disclose your personal data to counterparties and other persons involved (e.g. guarantors, financiers, affiliated companies, other law firms, respondents or experts, etc.).
- **Other persons:** This refers to other cases where the inclusion of third parties results from the purposes according to section 3. This concerns, for example, delivery addressees or payment recipients specified by you, third parties in the context of representative relationships (e.g. your lawyer or your bank) or persons involved in official or legal proceedings. We may also disclose your personal data to our supervisory authority, in particular if this is necessary in individual cases to release you from our professional duty of confidentiality. If we cooperate with the media and transmit material to them (e.g. photos), you may also be affected. In the course of business development, we may sell or acquire businesses, parts of businesses, assets or companies, or enter into partnerships, which may also result in the disclosure of data (including data about you, e.g. as a client or supplier or as their representative) to the persons involved in these transactions. Communications with our competitors, industry organizations, associations and other bodies may also involve the exchange of data relating to you.

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

We also allow certain third parties to collect personal data from you on our website and at events organized by us on their own responsibility (e.g. media photographers, providers of tools that we have integrated on our website, etc.). Insofar as we are not decisively involved in these data collections, these third parties are solely responsible for them. If you have any concerns or wish to assert your data protection rights, please contact these third parties directly. We have listed your rights in section 7. You will find information about the activities on our website in section 8.

6. DOES YOUR PERSONAL DATA END UP ABROAD?

We process and store personal data mainly in Switzerland and in the European Economic Area (EEA), but potentially in any country in the world, depending on the case - for example, via subcontractors of our service providers or in proceedings before foreign courts or authorities. In the course of our activities for clients, your personal data may also end up in any country in the world.

If a recipient is located in a country without adequate data protection, we contractually oblige the recipient to comply with an adequate level of data protection (for this purpose, we use the revised standard contractual clauses of the European Commission, which can be accessed here: https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj? including the supplements necessary for Switzerland), unless the recipient is already subject to a legally recognized set of rules to ensure data protection. We may also disclose personal data to a country without adequate data protection without entering into a separate contract for this purpose if we can rely on an exemption provision for this purpose. An exception may apply namely in the case of legal proceedings abroad, but also in cases of outweighing public interests or if the performance of a contract which is in your interest requires such disclosure (e.g. if we disclose data to our correspondence offices), if you have given your consent or it is not possible to obtain your consent within a reasonable period of time and the disclosure is necessary to protect your life or physical integrity or that of a third party, or if it concerns data that you have made generally available and you have not objected to its processing. We may also rely on the exception for data from a register provided for by law (e.g. CR), to which we have gained legitimate access.

7. WHAT RIGHTS DO YOU HAVE?

You have certain rights in connection with our data processing. In accordance with applicable law, you can, in particular, request information about the processing of your personal data, have incorrect personal data corrected, request the deletion of personal data, object to data processing, request the release of certain personal data in a standard electronic format or its transfer to other persons responsible.

If you wish to exercise your rights towards us, please contact us; you will find our contact details in section 2. In order for us to exclude any misuse, we must identify you (e.g. with a copy of your ID card, if necessary).

Please note that prerequisites, exceptions or restrictions apply to these rights (e.g. for the protection of third parties or business secrets or due to our professional duty of confidentiality). We reserve the right to black out copies or to supply only excerpts for reasons of data protection or confidentiality.

8. HOW ARE COOKIES, SIMILAR TECHNOLOGIES AND SOCIAL MEDIA PLUG-INS USED ON OUR WEBSITE AND OTHER DIGITAL SERVICES?

When using our website (incl. newsletter), 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.

In general, both the technical data we collect and the cookies do not contain any personal data. However, personal data that we or third-party providers commissioned by us store from you (e.g. if you have a user account with us or these providers) may be linked to the technical data or to the information stored in and obtained from cookies and thus possibly to your person.

We also use social media plug-ins, which are small pieces of software that establish a connection between your visit to our website and a third-party provider. The social media plug-in tells the third-party provider that you have visited our website and may send the third-party provider cookies that the third-party provider has previously placed on your web browser.

For more information on how these third-party providers use your personal data collected via their social media plug-ins, please refer to their respective privacy statements.

In addition, we use our own tools as well as third-party services (which may in turn use cookies) on our website, in particular to improve the functionality or content of our website (e.g. integration of videos or maps), to compile statistics as well as to serve advertisements.

Currently, we may in particular use offers of the following service providers and advertising partners, whereby their contact details and further information on the individual data processing is available in the respective privacy policy:

- **Google Analytics**

Provider: Google Ireland

Privacy policy: <https://support.google.com/analytics/answer/6004245>

Information for Google accounts: <https://policies.google.com/technologies/partner-sites?hl=de>

Some of the third-party providers we use may be located outside of Switzerland. Information on the disclosure of data abroad can be found under point 6. In terms of data protection law, they are in some cases "only" order processors of us and in some cases responsible parties. Further information on this can be found in the respective data protection declarations.

9. HOW DO WE PROCESS PERSONAL DATA ON OUR SOCIAL MEDIA NETWORKS?

We 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 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 the 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:

- **Instagram**

www.instagram.com

Privacy Policy: <https://privacycenter.instagram.com/policy>

- **LinkedIn**

www.linkedin.com

Privacy Policy: <https://de.linkedin.com/legal/privacy-policy>

We are entitled, but not obliged, to check third-party content before or after it is published on our online presences, to delete content without notice and, if necessary, to report it to the provider of the relevant platform. Some of the platform operators may be located outside of Switzerland. For information on data disclosure abroad, please refer to section 6.

10. WHAT ELSE SHOULD BE CONSIDERED?

We do not assume that the EU General Data Protection Regulation ("GDPR") is applicable in our case. However, if this should exceptionally be the case for certain data processing, then exclusively for the purposes of the GDPR and the data processing subject to it, this section 10 shall additionally apply.

We base the processing of your personal data in particular on the fact that

- it is necessary for the initiation and conclusion of contracts and their administration and enforcement as described in section 3 (Art. 6 para. 1 lit. b GDPR);
- it is necessary for the protection of legitimate interests of us or of third parties as described in section 3, specifically for the communication with you or third parties to operate our website, for the improvement of our electronic offers and the registration for certain offers and services, for security purposes, for compliance with Swiss law and internal regulations for our risk management and corporate governance and for other purposes such as training and education, administration, evidence and quality assurance, organization, execution and follow-up of events and for the protection of other legitimate interests (in this regard section 3) (Art. 6 para. 1 lit. f GDPR);
- it is required or permitted by law on the basis of our mandate or position under the law of the EEA or a member state (Art. 6 para. 1 lit. c GDPR) or is necessary to protect your vital interests or those of other natural persons (Art. 6 para. 1 lit. d GDPR);
- you have separately consented to the processing.

We would like to point out that we generally process your data for as long as our processing requirements (see section 3), the legal retention periods and our legitimate interests, in particular for documentation and evidence purposes, demand or for as long as storage is technically necessary (e.g. in the case of backups or document management systems). If there are no legal or contractual obligations or technical reasons to the contrary, we will generally delete or anonymize your data after the storage or processing period has expired as part of our normal processes and in accordance with our retention policy.

If you do not disclose certain personal data, this may mean that it is not possible to provide the related services or conclude a contract. We generally disclose where personal data requested by us is mandatory.

The right to object to the processing of your data as set out in section 7 applies in particular to data processing for the purpose of direct marketing.

If you do not agree with our handling of your rights or data protection, please let us know (see contact details in section 2). If you are located in the EEA, you also have the right to complain to the data protection supervisory authority in your country. You can find a list of authorities in the EEA here: https://edpb.europa.eu/about-edpb/about-edpb/members_de.

11. MAY THIS DATA PROTECTION DECLARATION BE CHANGED?

This privacy policy is not part of any contract with you. We may amend this privacy policy at any time. The version published on this website is the current version.

As of September 1, 2023