

# Privacy Policy

## Data Protection Controls and Procedures

### Background

In Switzerland, data protection is regulated at the federal and the cantonal level. The Federal Act on Data Protection (“DPA”) and its corresponding ordinances regulate the processing of personal data by private parties and by federal authorities. In addition, there are cantonal rules addressing the processing of personal data by the cantonal and municipal authorities.

The most important statute regarding data protection is the DPA. There are several implementing regulations and guidelines, such as the Ordinance to the Federal Act on Data Protection and the Ordinance on Data Protection Certification.

### 1. Introduction

1.1. At Cornice Claims Associates S.A.R.L. (“the Company”), we’re committed to protecting our client’s privacy. This Privacy Policy explains how our company uses the personal data we collect from you when you engage our services or use our website.

### 2. How We Collect Personal Data

#### 2.1. Directly

We obtain personal data directly from individuals in a variety of ways, including obtaining personal data from individuals who provide us their business card, complete our online forms, subscribe to our newsletters and preference centre, register for webinars, attend meetings or events we host, or visit our offices. We may also obtain personal data directly when, for example, establishing a business relationship, performing professional services through a contract, or through our hosted software applications.

#### 2.2. Indirectly

We obtain personal data indirectly about individuals from a variety of sources, including our clients. We may attach personal data to our customer relationship management records to better understand and serve our business clients, prospects, subscribers and individuals, satisfy a legal obligation, or pursue our legitimate interests.

- Public Sources – Personal data may be obtained from public registers (such as Commercial Registers), news articles, sanctions lists, and Internet searches.
- Social and Professional Networking Sites – If you register or login to our websites using social media (e.g., LinkedIn, Google, or Twitter) to authenticate your identity and connect your social media login information with us, we will collect information or content needed for the registration or login that you permitted your social media provider to share with us.



That information may include your name and email address and depending on your privacy settings, additional details about you, so please review the privacy controls on the applicable service to set how much information you want shared with us.

- Business Clients – Our business clients may engage us to perform professional services which involves sharing personal data they control as part of that engagement. Our services may also include processing personal data under our clients’ control on our hosted software applications, which may be governed by different privacy terms and policies.

### **3. Categories of Personal Data We Collect**

We may obtain the following categories of personal data about individuals through direct interactions with us, or from information provided through client engagements, from applicants, our suppliers and through other situations including those described in this Privacy Policy.

#### **3.1 Personal Data**

Below is a list of personal data we commonly collect to conduct our business activities:

- Contact details (e.g., name, company name, job title, work and mobile telephone numbers, work and personal email and postal address)
- Professional details (e.g., job and career history, educational background and professional memberships, published articles).
- Financial information (e.g., taxes, bank details, insolvency records).

#### **3.2 Sensitive Personal Data**

When we do need to process sensitive personal data, it is with the consent of the individual unless it is obtained indirectly for legitimate purposes. Examples of sensitive personal data we may obtain include:

- Personal identification documents that may reveal beneficial owners of corporate entities, or applicants.
- Adverse information about potential or existing clients and applicants that may reveal criminal convictions or offences information.
- Information provided to us by our clients in the course of a professional engagement.

#### **3.3 Location-based Data**

We may process geographical locations, e.g., when you are using our website to locate an office near you.

### **4. Lawful Reasons We Have for Processing Personal Data**

We may rely on the following lawful reasons when we collect and use personal data to operate our business and provide our services:

- Contract – We may process personal data in order to perform our contractual obligations.
- Consent – We may rely on your freely given consent at the time you provided your personal data to us.

- Legitimate interests – We may rely on legitimate interests based on our evaluation that the processing is fair, reasonable and balanced. These include:
  - Delivering services and products – To deliver the services and products our clients have engaged us to provide.
  - Marketing – To deliver timely industry insights and professional knowledge, offerings and invitations we believe are welcomed by our business clients, prospects, subscribers and other individuals.
- Legal obligations and public interest – We may process personal data in order to meet regulatory and public interest obligations or mandates.

## 5. Why We Need Personal Data

We aspire to be transparent when we collect and use personal data and tell you why we need it, which typically includes:

- Providing professional advice and delivering reports and services related to our advisory, legal, and other professional services.
- Promoting our professional services and capabilities to existing and prospective business clients.
- Sending invitations and providing access to guests attending our events and webinars or our sponsored events.
- Personalising online landing pages and communications we think would be of interest based on interactions with us.
- Administering, maintaining, developing and ensuring the security and functionality of our information systems, applications and websites.
- Authenticating registered users to certain areas of our sites.
- Processing online requests, including responding to communications from individuals or requests for proposals and quotations.
- Complying with legal and regulatory obligations relating to sanctions, embargo assessment, countering money laundering, terrorist financing, fraud and other forms of financial crime.
- Preventing fraud or criminal activity, safeguarding our IT systems and handling of claims.
- Employment of personnel and work processes.

In some situations, the provision of personal data is required to provide the services in such cases this is indicated on the website accordingly or pointed out in the disclaimers or contractual agreements. Furthermore, we may be required to collect certain personal data by law. If you fail to provide such data, we may not be able to provide the services, or we may have to cancel a product or service you have with us.

## 6. Sharing Personal Data with Third Parties

We may share personal data with trusted third parties to help us deliver efficient and quality services and products. These recipients are contractually bound to safeguard the data we entrust to them. We may engage with several or all of the following categories of recipients:

- Member firms of the Company network, where necessary for administrative purposes (e.g. hosting and supporting IT applications, performing client conflict checks, HR support functions) and to provide professional services to our clients (e.g., when providing services involving advice from the Company's member firms in different territories).



- Parties that support us as we provide our services and products (e.g. providers of telecommunication systems, mailroom support, IT system support, archiving services, document production services and cloud-based software services, scanning services).
- Our professional advisers, including lawyers, auditors and insurers.
- Payment services providers.
- Marketing services providers.
- Law enforcement or other government and regulatory agencies (e.g. FAOA, FINMA) or to other third parties as required by, and in accordance with, applicable law or regulation.

## **7. Do we transfer your personal data outside Switzerland?**

We store personal data on servers located in Switzerland. We may transfer personal data to the Company's member firms and reputable third-party organisations situated inside or outside Switzerland when we have a business reason to engage these organisations. Each organisation is required to safeguard personal data in accordance with our contractual obligations and applicable data protection legislation. Such safeguards may include transfer to countries that have been deemed to provide an adequate level of protection according to lists of countries published by the Federal Data Protection and Information Commissioner; applying standard data protection model clauses, binding corporate rules or other standard contractual obligations which provide for appropriate protection of data.

## **8. Website Visitors**

### **8.1. Cookies**

Cookies may be used by us to provide you with customised information from our website. A cookie is an element of data that a website can send to your browser, which may then store it on your device or system. We use cookies so that we can give you a better experience when you use <http://www.corniceclaims.com>.

Most web browsers automatically accept cookies. You do not have to accept cookies, and you should read the information that came with your browser software to see how you can set up your browser to notify you when you receive a cookie. This will give you the opportunity to decide whether to accept it. If you disable cookies from your browser you may not be able to access certain features of a particular website including <http://www.corniceclaims.com>.

Our website uses Functional and Required cookies necessary to allow you to navigate and use key features on our website. The cookies installed depend on the functionalities you select whilst on our website.

We use Analytical and Performance cookies which enable us see how many visitors use our website and to see how visitors navigate around our website. This helps us to improve the way our website works.

### **8.2. Submitting an Enquiry Via the 'Contact Us' Form**

When you submit an enquiry via our website, we ask you for your name, contact telephone number, email address and a brief description of your enquiry. We use this information to respond to your query, including providing you with any requested information about our services. Your enquiry is stored and processed as an email which is hosted by us in Switzerland. We do not use the

information you provide to make any automated decisions that might affect you. We keep enquiry emails for not less than seven years after which they are securely archived.

### 8.3. Security

The security of your Personal Information is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

### 8.4. Links to External Sites

Our website, <http://www.corniceclaims.com>, contains links to external sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We advise you to review the Privacy Policy and terms and conditions of every site you visit. We have no control over, and assume no responsibility for the content, privacy policies or practices of any third-party sites, products or services.

### 8.5. Your Data Protection Rights

We would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

- *The right to access* – You have the right to request the Company for copies of your personal data. We may charge you a small fee for this service.
- *The right to rectification* – You have the right to request that the Company correct any information you believe is inaccurate. You also have the right to request the Company to complete the information you believe is incomplete.
- *The right to erasure* – You have the right to request that the Company erase your personal data, under certain conditions.
- *The right to restrict processing* – You have the right to request that the Company restrict the processing of your personal data, under certain conditions.
- *The right to object to processing* – You have the right to object to the Company's processing of your personal data, under certain conditions.
- *The right to data portability* – You have the right to request that the Company transfer the data that we have collected to another organisation, or directly to you, under certain conditions.

## 9. **Privacy Questions or Concerns**

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at the details below.

### 9.1. Contact Us

Cornice Claims Associates S.A.R.L.

Our registered address is 150 Route de Ferney, 1218 Geneva, Switzerland.

If you have questions about this Privacy Policy, you can contact us by post at the above address, by email at [richard@corniceclaims.com](mailto:richard@corniceclaims.com) or by phone at +41 22 791 6429.



9.2. Concerns

To report concerns you may have about our data handling practices, you can contact the responsible data protection supervisory authority:

Switzerland: [Federal Data Protection and Information Commissioner](#)

**10. Changes to Our Privacy Policy**

Although most changes are likely to be minor, we may change our Privacy Policy from time to time, and at our sole discretion. We encourage visitors to frequently check this page for any changes to our Privacy Policy. Your continued use of this site after any change in this Privacy Policy will constitute your acceptance of such change.

This Privacy Policy was last updated on 1 July 2022.