



## PRIVACY POLICY

### 1. What does this privacy policy cover?

This privacy policy (hereinafter referred to as the "policy") provides information on how Swiss Wine Promotion AG (hereinafter referred to as "we" or "Swiss Wine") processes your personal data (hereinafter referred to as "you") and for what purposes.

"Personal data" includes all information relating to an identified or identifiable natural person, meaning the identity of this natural person can be established from the data itself or from additional data.

You will find information about the data we process in this privacy policy.

"Processing" refers to any operation performed on personal data, such as the collection, recording, storage, use, modification, disclosure, retention, deletion or destruction of data.

In this Privacy Policy, we describe how we process your personal data when you:

i) Use our **website <https://swisswine.ch/>** or our other **websites**:

- <https://swisswineweek.com>
- <https://swisswinegourmet.ch>
- <https://swisswine-campus.ch>
- <https://aucoeurdesvendanges.ch>
- <https://ampulsderernte.ch>
- <https://nelcuoredellavendemmia.ch>
- <https://attheheartoftheharvest.ch>

hereinafter collectively referred to as the "Website."

- ii) contact us for training;
- iii) communicate with us or interact with us in another way;
- iv) apply for a job;
- v) subscribe to our newsletter.

If necessary, we will inform you of any processing activity not covered by this privacy policy through a separate statement.

We process your personal data in accordance with the requirements of the Federal Data Protection Act (hereinafter referred to as "LPD") and, where applicable, in accordance with the **General Data Protection Regulation of the European Union** (hereinafter referred to as "GDPR").



## 2. Who is responsible for processing your data?

Swiss Wine Promotion AG  
Belpstrasse 26  
3007 Bern  
Phone: +41 31,398 52 20  
E-mail: info@swisswine.ch

is the 'Data Controller' under this Privacy Policy, and you can contact us for any questions regarding data protection and to exercise the rights outlined in *section 8* below.

## 3. What data do we process?

Visiting and browsing the Website generally involve the collection or processing of personal data from users/visitors, including **navigation data**. In addition to "navigation data," **personal data voluntarily provided** by users interacting with the Website's features may be processed upon the user filling out data collection forms to request information of any kind (e.g. about the services we offer), establishing contact/correspondence and interacting with us, or submitting a job application, as described in *section 4.8* below. Since the use of certain services requires a user account, such as registering a restaurant (via our website [www.swisswinegourmet.ch](http://www.swisswinegourmet.ch)) or enrolling in training via our website [www.swisswine-campus.ch](http://www.swisswine-campus.ch), in this context we will process **registration data** (name, surname, e-mail address and a password).

## 4. Purpose of processing and legal basis

### 4.1 Visit our website - Navigation data

Each time a user/visitor accesses our Website, our server collects a range of information about the user which is stored in server log files. Information collected includes, but is not limited to:

- Internet Protocol (IP) address;
- Type of browser and device settings used to connect to the Website;
- Date and time of access;
- Time zone relative to GMT;
- The site from which you access our Website.



The use of this general information does not involve the identification of a specific person. The collection of this information or data is technically necessary for displaying our Website and ensuring its stability and security. This information is also collected to improve the Website and analyse its usage. The legal basis for the temporary recording of information and log files is our legitimate interest in providing our Website with sufficient quality and continuously improving it.

#### **4.2 Registration on the Website - Registration data**

We also collect personal data from users when they register on the Website to add a restaurant to the Swiss Wine Gourmet guide or participate in training.

Personal data includes, but is not limited to:

- Contact details (name, surname, email address)
- Password

We process this personal data for the purposes described based on the legal basis of our legitimate interest in processing the request (e.g. verifying the conditions for issuing the label, or organising training).

#### **4.3 Contact us**

We process your data for the purpose of communicating with you, particularly to respond to your requests and exercise your rights (cf. *Section 8*) and to allow us to contact you if you have any questions. To do this, you can contact us using the email address and phone number provided on the Website. The personal data you provide to us will be stored and processed by us for the purpose of handling your request. The legal basis for this processing of personal data is our legitimate interest in processing your request.

For organising phone conferences, online meetings, video conferences, and/or webinars ("Online Meetings"), we use the "Microsoft Teams" platform. For this platform, we process and store the information you uploaded when using the video conferencing service, whether provided or invented, as well as the metadata used to maintain the platform provided. Further information on the processing of personal data by Microsoft Teams can be found in the privacy statements for these platforms. If you do not wish to be recorded, please inform us or leave the video conference. If you simply do not want your image to be recorded, turn off your camera. The legal basis for this processing of personal data is the execution of a contract with you, including the preparation of the contract and its possible implementation.



## 4.4 Cookies/Analytics tools

Our website may use cookies or other technologies/tools such as pixels, tags, or external services ("cookies or analytics tools"). Cookies are text files stored in or by your web browser on your computer system or mobile device. The cookie contains a distinctive string that uniquely identifies your browser or mobile device when you visit the Website again.

The purpose of using cookies is, on the one hand, to enable and simplify the use of our website by users/visitors. Certain functions of the website cannot be offered without the use of cookies [known as strictly necessary cookies]. On the other hand, we use cookies/analytics tools to analyse user behaviour on our website, especially for audience measurement and marketing purposes.

You can also configure your browser to block or deceive certain types of cookies or alternative technologies, or to delete existing cookies. You can also add software to your browser to block certain third-party tracking. You will find further information in *Section 4.4.3* below.

### 4.4.1 Strictly Necessary Cookies

Strictly necessary cookies are essential for the operation of our website or certain features. For example, these allow you to navigate from one page to another without losing the information you entered in a form. They also ensure that you stay logged in. These cookies only exist temporarily ["session cookies"]. If you block them, the Website may not function correctly. Other cookies are necessary for the server to store options or information [entered by you] beyond a session [i.e. a visit to a Website] if you use this feature [e.g. language settings, consent, etc.]. These cookies have an expiration date of up to 24 months.

The legal basis for processing data when using strictly necessary cookies is our legitimate interest, primarily to ensure the functionality and improvement of our website.

### 4.4.2 Performance & Marketing Cookies

Performance cookies enable us to analyse visitor behaviour and traffic sources, allowing us to measure our Website's performance and enhance the user/visitor experience. They help us identify page popularity and track how visitors navigate our Website. The data collected is aggregated and anonymous. Performance cookies also have an expiration period of up to 24 months. Detailed information can be found on third-party provider Websites.



Marketing cookies enable us to show advertisements that are relevant to you. These cookies may remember that you visited our Website and may share this information with other companies, including advertisers. Their expiration period ranges from a few days to 24 months, depending on the circumstances.

If we are using cookies for analytics and marketing, we seek your consent. Therefore, data processing for analytics and marketing depends on your consent. If you give us your consent, you can revoke it at any time with immediate effect. However, this does not affect lawful processing based on consent before withdrawal. You can withdraw your consent by changing your cookie settings.

#### 4.4.3 Disabling cookies via your browser

You can object to the use of cookies, for example by (i) adjusting your browser settings or (ii) using suitable cookie-blocking software (e.g. Ghostery, etc.).

For guidance on managing cookies directly from your browser, you can refer to the following pages:

- **Microsoft Internet Explorer:** Click the three dots on the top right and select "Settings". On this page, click "Privacy". Here, you can modify your cookie settings: <http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-11-win-7>
- **Google Chrome:** Click the three dots on the top right and select "Settings". Select "Privacy and security" to adjust your privacy settings:  
[https://support.google.com/accounts/topic/7189049?hl=en&ref\\_topic=2373957&visit\\_id=638372192566439996-3804492015&rd=1](https://support.google.com/accounts/topic/7189049?hl=en&ref_topic=2373957&visit_id=638372192566439996-3804492015&rd=1)
- **Mozilla Firefox:** In the top right menu, select "Settings". On this page, click "Privacy & Security". Here, you can modify your cookie settings:  
<https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop>
- **Safari:** In the top right settings drop-down menu, select "Preferences." Choose "Security" to modify your cookie settings: <https://support.apple.com/en-gb/HT201265>

For more information, visit the following website: <http://www.youronlinechoices.eu/>

If you are unsure about your browser type and version, click "Help" at the top of the browser window to find all the necessary information.

If you know your browser, click the browser you use to access the cookie management page.

#### 4.4.4 Google Analytics

We use Google Analytics. Google Ireland Ltd. [based in Ireland] provides the "Google Analytics" service and acts as the data controller. Google Ireland uses Google LLC [based in the United States] as a subcontractor [both called "Google"]. Google collects information about visitor behaviour to our Website [duration, pages viewed, geographic region, etc.] using performance cookies [see above], and uses this information to create reports on the use of our Website. We have configured



this service to truncate user/visitor IP addresses in Europe before they are transmitted to the United States and cannot therefore be tracked. We have disabled the "Data Sharing" and "Signals" options. Although we can assume that the information shared with Google does not constitute personal data for Google, it is possible that Google may draw conclusions about the identity of visitors from the data collected, create personal profiles and associate these data with these people's Google accounts for its own purposes. In any case, if you consent to the use of Google Analytics, you are expressly giving your consent for this type of processing, including the transfer of your personal data (in particular with regard to the use of the Website, information on the device and unique identifiers) in the United States and other countries. The Google Analytics privacy policy can be found here <https://policies.google.com/privacy> and, if you have a Google account, you can find more details about processing by Google <https://policies.google.com/technologies/partner-sites>.

#### **4.5 Social media plugins**

On our website, we may use the social media plugins in the table below. For this purpose, we use the 2 Click button, which means that when you visit our Website, no personal data is generally transmitted to plugin providers. The provider is only informed that you have visited our Website when you click on the field of the selected plugin and activate it. In addition, the scope of the collection includes the data referred to in Section 4.1. above of this Privacy Policy. The legal basis for processing your data in connection with social media plugins is our legitimate interest in enabling our users to use social media plugins.



We have no control over the data collected and the data processing operations of the plugin providers. These are subject to the respective privacy policies of the third-party providers. Further information on the purpose and scope of data collection and processing by plugin providers can be found in these providers' privacy policies below.

Plugins	Provider and privacy policy
LinkedIn	LinkedIn Ireland Unlimited Company : <a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a>
Instagram	Meta Platforms Ireland Limited: <a href="https://privacycenter.instagram.com/policy/?entry_point=ig_help_center_data_policy_redirect&amp;__coig_consent=1">https://privacycenter.instagram.com/policy/?entry_point=ig_help_center_data_policy_redirect&amp;__coig_consent=1</a>
Facebook	Meta Platforms Ireland Limited: <a href="https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&amp;entry=0">https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&amp;entry=0</a>
On TikTok	TikTok Technology Limited, Ireland <a href="https://www.tiktok.com/legal/page/eea/privacy-policy/en">https://www.tiktok.com/legal/page/eea/privacy-policy/en</a>

#### 4.6 Videos on YouTube

We may embed videos from the YouTube platform on our Website so that they can be played directly from our Website. YouTube videos are all embedded in "privacy-enhanced mode", which means that no user data is transmitted to YouTube if the user does not play the videos. Data about you is only transmitted when you play the videos.

The legal basis for processing your data is your consent. Further information on the processing of personal data by Google Ireland Limited in connection with playing YouTube videos can be found here <https://support.google.com/youtube/answer/10364219?hl=en#:~:text=YouTube%20non%20sells%20the%20information,ricerca%20personalizzati%20e%20annunci%20pertinenti>.



#### **4.7 Meta Pixel**

Our Website uses the Meta pixel operated by Meta Platforms Ireland Limited. The Meta pixel is a snippet of code that, when added to our website, allows us to measure the effectiveness of our advertising by tracking the actions people take on our website. In particular, this allows us to monitor the behaviour of users of the site, it also allows us to monitor the effectiveness of Facebook advertisements for statistical and market research purposes, by checking whether users have been redirected to our Website after clicking on a Facebook ad.

Data processing by Facebook takes place within the framework of Meta's data usage policy. Therefore, general information about the provider and the privacy policy can be found here:

[https://www.facebook.com/privacy/policy/?entry\\_point=data\\_policy\\_redirect&entry=0](https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0)

In terms of specific information and details about the Facebook pixel and how it works, you can find these in Meta's help section:

<https://www.facebook.com/business/help/742478679120153?id=1205376682832142>

The legal basis for processing your data is your consent. You can object to the collection of your data by the Facebook pixel and the use of your data to display Facebook advertisements. To set the types of ads you see on Facebook, you can go to the page created by Facebook and follow the instructions for usage-based advertising settings: <https://www.facebook.com/settings?tab=ads>. The settings are platform-independent, meaning they apply to all devices, such as desktop and mobile.

#### **4.8 Job applications**

You can apply for a vacant role at Swiss Wine by post or by email. The application documents and personal data you provide to us will be treated strictly confidentially, will not be disclosed to third parties and will only be processed for the purpose of processing your application for employment with us. Application materials will be deleted/destroyed or, if of interest to the Company, will be retained for 12 months from receipt and then deleted/destroyed, unless subject to a legal retention obligation. The legal basis for processing your data is the pre-contractual phase, which involves drawing up the employment contract with you, as well as our legitimate interests.

#### **4.9 Subscribing to newsletters**

Subject to your consent, by subscribing to the controller's newsletter, your data is processed in order for you to receive information material about events, projects, new services and activities in general carried out by the controller.

#### **5. Links to other sites**

Our Website contains links to Websites operated by third party companies. This Privacy Policy does not extend to the Websites of these other companies. When using these websites, you must respect the





privacy policies of these companies regarding data processing. If there are any indications of possible violations on the pages linked by us, we ask you to inform us so that we can prevent any possible link.

## 6. Disclosure of personal data to recipients and abroad

### 6.1 Disclosure of personal data to recipients

We will only pass on your personal data to third parties if this is necessary to provide our service, if these third parties provide us with a service, if we are required to do so by law or the authorities, or if we have an overriding interest in disclosing personal data. We will also pass on your personal data to third parties if you have consented to this or if you have asked us to do so.

The following categories of recipients may receive personal data from us:

- Service providers (e.g. IT service providers, hosting providers, web service providers for the operation and maintenance of the Website).
- Contractual partners with whom we work to promote Swiss wine.

### 6.2 Disclosure of personal data abroad

For the purposes referred to in *point 4.4 above*, your data may also be disclosed to third parties abroad. Your personal data may therefore be processed in Switzerland, the European Union or the European Economic Area (hereinafter referred to as "EU/EEA"), but may also be processed and transferred to a country outside Switzerland, the EU or the EEA.

If a recipient is located in a country that does not have adequate legal data protection, we require the recipient to undertake to comply with the applicable data protection legislation (for this purpose we use the standard contractual clauses revised by the European Commission, which can be consulted here: [https://eur-lex.europa.eu/eli/dec\\_impl/2021/914/oj](https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj) unless the recipient is already subject to a set of legally accepted rules to guarantee data protection or we are able to make an exception. An exception will apply, for example, in the case of legal proceedings abroad, in cases of overriding public interest or if a contract execution requires data to be disclosed, as well as if you have consented to the transfer of these data or if the data has generally been made available directly by you and you have not objected to its processing.

We draw your attention to the fact that data transmitted abroad are no longer protected by Swiss law and that foreign laws and local authorities may require the disclosure of these data to authorities and other third parties.

## 7. Retention period

We process and store your personal data for as long as necessary in accordance with the purpose of its processing, if there is another legal basis for doing so (e.g. statutory retention periods) and if our legitimate interests in documenting and evidencing retention require it or if retention is a technical requirement. We retain personal data that we hold for a contractual relationship with you, at least for the duration of this contractual relationship and for the limitation periods for possible claims or on



the basis of contractual retention obligations. As soon as your personal data is no longer necessary for the above purposes, it will be inactive, erased or anonymised wherever possible. Regarding newsletter subscription, data is retained until the user unsubscribes.

## 8. Your rights

In accordance with the data protection law applicable to you and to the extent that it is applicable, you have a right to information, rectification, erasure, a right to the limitation of data processing, and a right to object to our data processing, as well as the right to transmit certain personal data to be transferred to another location (data portability). Please note, however, that we reserve the right to apply any legal restrictions available to us, for example if we are obliged to store or process certain data, if we have an overriding interest (to the extent that we are entitled to claim such an interest) or if we need the data to assert our rights. If this results in any charge to you, we will notify you in advance.

If data processing is based on your consent, you can revoke it at any time with immediate effect after giving it. However, this does not affect lawful processing based on consent before withdrawal.

Exercising these rights generally requires you to clearly prove your identity (e.g. through a copy of an identity document, if your identity is unclear or cannot be verified in any other way). To exercise your rights, please contact us at the address provided in *section 2* of this Privacy Policy.

Furthermore, each data subject has the right to assert legal claims or lodge a complaint with the competent data protection authority. The competent data protection authority may vary depending on your place of residence or where the alleged violation of the applicable data protection law occurs.

## 9. Data security

We take appropriate security measures to maintain the necessary security of your personal data and to ensure its confidentiality, integrity and availability, as well as to protect it against unauthorised or unlawful processing and to mitigate the risk of loss, accidental alteration, disclosure or unauthorised access.

## 10. Changes to this Privacy Policy

This Privacy Policy is not part of any agreement with you. We expressly reserve the right to modify this privacy policy at any time. The version published on this site is the current version.

21 November 2023



## 11. Attachments

### 10.1 List of cookies, web analytics tools and tracking tools used

OUTIL	/NOM	DESCIPTION DU COOKIE	DUREE	TYPE / categorie	Fournisseur	Parti (primaire ou tiers)
Google Analytics	_ga	Le cookie _ga, installé par Google Analytics, calcule les données relatives aux visiteurs, aux sessions et aux campagnes et suit également l'utilisation du site pour le rapport d'analyse du site. Le cookie stocke les informations de manière anonyme et attribue un numéro généré de manière aléatoire afin d'identifier les visiteurs unique	2 ans	Analyse	Google Inc	
Facebook Pixel	_fbp			Marketing	Meta Platforms, Inc.	
Facebook Pixel	_sb	Destiné à enregistrer des informations sur la navigateur		Marketing		
Facebook Pixel	_datr	Destiné à prévenir en cas de fraude (d'utilisation des services Meta)		Marketing		
Facebook Pixel	_wd	Destiné à enregistrer la résolution de l'écran		Marketing		
Mapbox	_uetvid	Destinés à faire fonctionner les cartes intégrées sur le site en utilisant le service Mapbox		Fonctionnel	Mapbox Inc.	
	_vwo_uuid_v2			Fonctionnel		
	session			Fonctionnel		
	_cioid			Fonctionnel		
	ajs_anonymous_id		Fonctionnel			
	_mkto_trk		Fonctionnel			
	ajs_user_id		Fonctionnel			
	mkjs_user_id		Fonctionnel			



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	mkjs_group_id		Fonctionnel		
Multilingue	i18n_redirected	Le cookie i18n_redirected permet de sauvegarder la langue sélectionnée par l'utilisateur pour la récupérer lors d'une prochaine connexion au site	Fonctionnel	Swiss Wine	Primaire

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