

# Online Data Protection Statement

## **BELIMO Automation AG**

The present Online Data Protection Statement describes the extent, the purpose and the ways and means that we at **BELIMO Automation AG, Brunnenbachstrasse 1, 8340 Hinwil, Switzerland ("Belimo")**, process your personal data when you visit our website.

We take the protection of your personal data very seriously and we adhere to the stipulations set forth in the applicable data protection regulations regarding the processing of personal data.

Further information on the processing of your personal data when you visit our website (including your rights) and other data processing performed by Belimo can be found in the General Data Protection Statement under the following link: [General Data Protection Statement](#).

## **1.1. Processing of personal data**

We collect and save the following personal data about you when you visit our website:

### **Registration on the website for queries**

You must register on the website to obtain the following services:

- Storage of a project list (e.g. shopping cart)
- Price query via saved shopping cart
- Orders
- Download of price catalogue
- Download of software, incl. Update Service
- Newsletter registration (see also Section 1.6 for more details)

As a rule, we collect the following data for the registration:

- Name, First name
- Address data
- Telephone number, valid email address
- User name and password
- Company name

The data collected in the registration form is saved for processing and replying to the respective queries and for possible follow-up questions. We do not disseminate this data without your consent.

In the event of applicability of the EU General Data Protection Regulation (GDPR), the legal basis for the processing of the personal data when consent has been given is Art. 6 Sect. 1 lit. a GDPR. If the data is processed for the fulfillment of a contract with the affected individual, including pre-contractual measures, then the legal basis for this is Art. 6 Sect. 1 lit. b GDPR.

## 1.2. Use of cookies

We use cookies on our website in order to make it more user-friendly and to ensure that certain functions will work, e.g. the shopping cart feature. Cookies are small text files which are stored on your computer or mobile end device. When a cookie is activated, your browser can be identified by means of the cookie ID and the information that is contained in the cookie can be used. No personal data is stored which could be linked to a particular individual.

You can find out which cookies are used on this website and for how long in our [Cookie Declaration](#).

Common browsers offer optional settings for refusing to accept cookies, either all of them or just certain ones, or you can delete the cookies on your computer by using the corresponding browser function. Some of the functions on our website will not be fully available for use if you make these kinds of adaptations to your settings.

In the event of applicability of the EU General Data Protection Regulation (GDPR), the legal basis for the use of the technically necessary cookies is Art. 6 Sect. 1 lit. f GDPR. The legal basis for the use of cookies for analysis purposes is Art. 6 Sect. 1 lit. a GDPR.

## 1.3. Web analysis, monitoring and optimisation

We carry out web analyses, monitoring and optimisations. Web analytics (also referred to as "reach measurement") is used to evaluate the flow of visitors to our online offering and may include behaviour, interests or demographic information about visitors, e.g. age or gender, as pseudonymous values. With the help of reach analysis, we can, for example, recognise at what time our online offer or its functions or content are most frequently used or invite re-use. Likewise, we can understand which areas require optimisation.

In addition to web analysis, we may also use testing procedures, e.g. to test and optimise different versions of our online offer or its components.

Unless otherwise stated below, profiles, i.e. data summarised for a usage process, can be created for these purposes and information can be stored in a browser or in a terminal device and read from it. The information collected includes, in particular, websites visited and elements used there as well as technical information such as the browser used, the computer system used and information on usage times. If users have agreed to the collection of their location data from us or from the providers of the services we use, location data may also be processed.

The IP addresses of the users are also stored. However, we use an IP masking process (i.e. pseudonymisation by shortening the IP address) to protect users. In general, the data stored in the context of web analysis, A/B testing and optimisation are not real ID user data (e.g. email addresses or names), but pseudonyms. This

means that we as well as the providers of the software used do not know the actual identity of the users, but only the information stored in their profiles for the purpose of the respective procedures.

- **Types of data processed:** usage data (e.g. web pages visited, interest in content, access times); meta, communication and procedural data (e.g. IP addresses, time data, identification numbers, consent status).
- **Affected persons:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Reach measurement (e.g. access statistics, recognition of returning visitors); profiles with user-related information (creation of user profiles); provision of our online offer and user-friendliness.
- **Safety measures:** IP masking (pseudonymisation of the IP address).
- In the event of applicability of the EU General Data Protection Regulation (GDPR), the **legal basis** for the processing of personal data is: Consent (Art. 6 Sect. 1 p. 1 lit. a) GDPR); Legitimate Interests (Art. 6 Sect. 1 p. 1 lit. f) GDPR).

Further information on processing operations, procedures and services:

- **Google Optimize:** Software for the analysis and optimisation of online offers on the basis of feed-back functions as well as pseudonymously conducted measurements and analyses of user behaviour, which may include in particular A/B tests (measurement of the popularity and user-friendliness of different contents and functions), measurement of click paths and interaction with contents and functions of the online offer; **service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; In case of applicability of the EU General Data Protection Regulation (GDPR), the legal basis for the processing of personal data is: Consent (Art. 6 Sect. 1 p. 1 lit. a) GDPR); **Website:** <https://optimize.google.com>; **Privacy Policy:** <https://policies.google.com/privacy>; **Order Processing Agreement:** <https://business.safety.google/adsprocessorterms>; **Basis of Third Country Transfer:** EU-US Data Privacy Framework (DPF), Standard Contractual Clauses (<https://business.safety.google/adsprocessorterms>); **Further information:** <https://privacy.google.com/businesses/adsservices> (types of processing as well as data processed).
- **Google Analytics:** We use Google Analytics to measure and analyse the use of our online offer on the basis of a pseudonymous user identification number. This identification number does not contain any unique data, such as names or email addresses. It is used to assign analysis information to an end device in order to recognise which content users have called up within one or various usage processes, which search terms they have used, have called up again or have interacted with our online offer. The time of use and its duration are also stored, as well as the sources of the users who refer to our online offer and technical aspects of their end devices and browsers. This involves creating pseudonymous profiles of users with information from the use of various devices, whereby cookies can be used. Google Analytics does not log and store individual IP addresses for Swiss and EU users. However, Analytics provides rough geographic location data by deriving the following metadata from IP addresses: City (and the derived latitude and longitude of the city), Continent, Country, Region, Subcontinent (and ID-based equivalents). In the case of Swiss and EU data traffic, the IP address data is used exclusively for this derivation of geolocation data before it is immediately deleted. They are not logged, are not accessible and are not used for any other purpose. When Google Analytics collects measurement data, all IP queries are performed on EU-based servers before the traffic is forwarded to Analytics servers for processing; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; In case of applicability of the EU General Data Protection Regulation (GDPR), the legal basis for the processing of personal data is: Legitimate Interests (Art. 6 Sect. 1 p. 1 lit. f) GDPR);

**Website:** <https://marketingplatform.google.com/intl/en/about/analytics/>;

**Privacy Policy:** <https://policies.google.com/privacy>;

**Order Processing Agreement:** <https://business.safety.google/adsprocessorterms/>;

**Basis of Third Country Transfer:** EU-US Data Privacy Framework (DPF), Standard Contractual Clauses (<https://business.safety.google/adsprocessorterms/>); **Opt-Out:** Opt-out plugin:

<https://tools.google.com/dlpage/gaoptout?hl=en>, Settings for the display of advertisements:

<https://adssettings.google.com/authenticated>; Further information:

<https://privacy.google.com/businesses/adsservices> (types of processing as well as data processed).

- **Google Tag Manager:** Google Tag Manager is a solution with which we can manage so-called website tags via an interface and thus integrate other services into our online offer (please refer to further information in this Data Protection Statement). The Tag Manager itself (which implements the tags) therefore does not yet create user profiles or store cookies, for example. Google receives only the user's IP address, which is necessary to run the Google Tag Manager; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; In case of applicability of the EU General Data Protection Regulation (GDPR), the legal basis for the processing of personal data is: Consent (Art. 6 Sect. 1 p. 1 lit. a GDPR); **Website:** <https://marketingplatform.google.com>; Privacy Policy: <https://policies.google.com/privacy>; Order Processing Agreement: <https://business.safety.google/adsprocessorterms/>;
- **Basis of Third Party Transfer:** EU-US Data Privacy Framework (DPF), Standard Contractual Clauses (<https://business.safety.google/adsprocessorterms/>).
- **Mouseflow:** Mouseflow is a web analytics tool provided by Mouseflow ApS, Flaesketorvet 68, 1711 Copenhagen, Denmark. The purpose of the data processing is to analyse this website and its visitors. For this purpose, data are collected and stored for marketing and optimisation purposes. From this data, user profiles can be created under a pseudonym. Cookies can be used for this purpose. With the web analysis tool Mouseflow, randomly selected individual visits (only with anonymised IP address) are recorded. This creates a log of mouse movements and clicks with the intention of randomly replaying individual website visits and deriving potential improvements for the website. The data collected with Mouseflow will not be used to personally identify the visitor to this website without the separately granted consent of the person concerned and will not be merged with personal data about the bearer of the pseudonym. In the event of the applicability of the EU General Data Protection Regulation (GDPR), the legal basis for the processing of personal data is: Art. 6 (1) f) GDPR arising from the legitimate interest in direct customer communication and in the needs-based design of the website. You have the right to object to this processing of your personal data based on Art. 6 (1) f) GDPR at any time for reasons arising from your particular situation. To do this, you can use the following link to disable recording on all websites that use Mouseflow globally for the browser you are currently using: <https://mouseflow.com/opt-out/>.

## 1.4. Online marketing

We process personal data for online marketing purposes, which may include, but are not limited to, marketing advertising space or displaying promotional and other content (collectively, "Content") based on users' potential interests and measuring its effectiveness.

For these purposes, so-called user profiles are created and stored in a file (so-called "cookie") or similar procedures are used, by means of which information about the user relevant to the presentation of the aforementioned content is stored. This information may include, for example, content viewed, websites visited, online networks used, but also communication partners and technical information such as the browser used, the computer system used and information on usage times and functions used. If users have consented to the collection of their location data, this can also be processed.

The IP addresses of the users are also stored. However, we use available IP masking procedures (i.e. pseudonymisation by shortening the IP address) to protect users. Generally, as part of the online marketing process, we do not store real ID user information (e.g. email addresses or names), but we do store pseudonyms. This means that neither we nor the providers of online marketing services know the actual identity of users, only the information stored in their profiles.

The information in the profiles is usually stored in the cookies or by similar means. These cookies can usually be read later on other websites using the same online marketing procedure and analysed for the purpose of displaying content, as well as supplemented with further data and stored on the server of the online marketing procedure provider.

In exceptional circumstances, real ID information may be associated with the profiles if, for example, the users are members of a social network whose online marketing procedures we use and the network links the users' profiles with the aforementioned data. Please note that users may enter into additional agreements with providers, for example by giving their consent as part of the registration process.

In principle, we have access only to summarised information about the success of our advertising. However, conversion measurements allow us to check which of our online marketing activities have resulted in a conversion, i.e. a contract being concluded with us. Conversion measurement is used solely to analyse the success of our marketing measures.

- **Types of data processed:** usage data (e.g. web pages visited, interest in content, access times); meta, communication and procedural data (e.g. IP addresses, time data, identification numbers, consent status).
- **Affected persons:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Reach measurement (e.g. access statistics, recognition of returning visitors); tracking (e.g. interest/behavioural profiling, use of cookies); marketing; profiling with user-related information (creating user profiles); conversion measurement (measuring the effectiveness of marketing measures).
- **Safety measures:** IP masking (pseudonymisation of the IP address).
- In the event of applicability of the EU General Data Protection Regulation (GDPR), the **legal basis** for processing personal data is: Consent (Art. 6 Sect. 1 p. 1 lit. a) GDPR; Legitimate Interests (Art. 6 Sect. 1 p. 1 lit. f) GDPR).
- **Opt-Out:** We refer to the data protection notices of the respective providers and the objection options (so-called "opt-outs") specified to the providers. If no explicit opt-out option has been specified, you have on the one hand the option of switching off cookies in your browser settings. However, this may restrict the functions of our online offer. We therefore recommend the following additional opt-out options, which are summarised for each region: a) Europe: <https://www.youronlinechoices.eu>. b) Canada: <https://www.youradchoices.ca/choices>. c) USA: <https://www.aboutads.info/choices>. d) Cross-regional: <https://optout.aboutads.info>.

Further information on processing operations, procedures and services:

- **Google Ads and conversion measurement:** Online marketing practices for the purpose of placing content and ads within the service provider's advertising network (e.g. in search results, in videos, on web pages, etc.) so that they are displayed to users who are likely to be interested in the ads. In addition, we measure the conversion of the ads, i.e. whether the users have taken the opportunity to interact with the ads and use the advertised offers (so-called conversion). However, we receive only anonymous information and no personal information about individual users; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; In case of applicability of the EU General Data Protection Regulation (GDPR), the **legal basis** for the processing of personal data is: Consent (Art. 6 Sect. 1 p. 1 lit. a)

GDPR), Legitimate Interests (Art. 6 Sect. 1 p. 1 lit. f) GDPR); **Website:** <https://marketingplatform.google.com/>; **Privacy Policy:** <https://policies.google.com/privacy>; **Basis of Third Country Transfer:** EU-US Data Privacy Framework (DPF); **Further information:** Types of processing and data processed: <https://privacy.google.com/businesses/adsservices>; Data processing terms and conditions between data controllers and standard contractual clauses for third country data transfers: <https://business.safety.google/adscontrollerterms>.

- **LinkedIn:** Insights Tag/Conversion Measurement; **Service Provider:** LinkedIn Ireland Unlimited Company, Wilton Plaza Wilton Place, Dublin 2, Ireland; **Legal basis:** Consent (Art. 6 Sect. 1 p. 1 lit. a) GDPR); **Website:** <https://www.linkedin.com/>; Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>, Cookie Policy: <https://www.linkedin.com/legal/cookie-policy>; **Basis for Third Country Transfer:** Standard Contractual Clauses (<https://legal.linkedin.com/dpa>); **Opt-Out:** <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

## 1.5. Content Delivery Network (CDN) from Akamai

Akamai is a content delivery and cloud infrastructure service provider which distributes, accelerates and protects online applications. The Akamai servers in worldwide use are controlled by Akamai Technologies, Inc., Cambridge, MA, USA.

We use the Akamai services for the acceleration of our website so that it can offer an acceptable response time worldwide.

Akamai transfers personal data (from the log files, e.g. IP addresses) to the US every time data is processed, because certain servers for processing the log files are to be found only in the US. Akamai has received certification under the Privacy Shield Programme in order to structure this transfer of personal data from the EU to the US in conformance with data protection policies. In addition, Belimo and Akamai have furthermore agreed to the EU standard contractual clauses. The different Akamai companies have also set up these agreements with one another.

In the event of applicability of the EU General Data Protection Regulation (GDPR), the legal basis for the use of Akamai and the processing of the personal data associated with it is Art. 6 Sect. 1 lit. f GDPR.

## 1.6. Newsletter distribution

You can register for the Belimo Newsletter on our website by specifying your contact data and a valid email address. We use the Double-Opt-In procedure for confirmation of the registration. That means you will receive a confirmation email which you must confirm before the first newsletter is sent out. It is only after confirmation is received that you will receive our newsletter.

You can revoke your consent to the saving of the data, the email address and their use for sending the newsletter at any time, e.g. by using the unsubscribe link in the newsletter email.

We use Microsoft Dynamics 365 from the provider Microsoft Corporation (Microsoft Schweiz GmbH, The Circle 02, 8058 Zurich Airport) - hereinafter referred to as "Microsoft" - for newsletter distribution and newsletter tracking. For more information about Microsoft's privacy practices, users should refer to the Microsoft Privacy Statement at <https://privacy.microsoft.com/en-us/privacystatement>. The data generated in the course of using the Microsoft Dynamics 365 application is stored on data centres within the European Union. In cases where personal data is transferred to third countries whose level of data protection is not considered adequate, the data transfer proceeds on the basis of standard contractual clauses. More information on the

standard contractual clauses with Microsoft can be found here

<https://learn.microsoft.com/en-us/compliance/regulatory/offering-eu-model-clauses>.

In the event of applicability of the EU General Data Protection Regulation (GDPR), the legal basis for processing personal data for the purpose of sending a newsletter is Art. 6 Sect. 1 lit. a GDPR.

## 1.7. Use of social media plugins

This website embeds videos from the website **YouTube**. The website is operated by Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland. When you visit one of our websites on which YouTube is embedded, a connection to YouTube's servers is established. This tells the YouTube server which of our pages you have visited. Furthermore, YouTube may store various cookies on your terminal device or use comparable technologies for recognition (e.g. device fingerprinting). In this way, YouTube can obtain information about visitors to this website. This information is used, among other things, to collect video statistics, improve the user experience and prevent fraud attempts. If you are logged into your YouTube account, you enable YouTube to associate your browsing behaviour directly with your personal profile. You can prevent this by logging out of your YouTube account. YouTube is used in the interest of an attractive presentation of our online offerings. In the event of applicability of the EU General Data Protection Regulation (GDPR), the **legal basis** for the processing of personal data is: Consent (Art. 6 Sect. 1 p. 1 lit. a) GDPR), Legitimate Interests (Art. 6 Sect. 1 p. 1 lit. f) GDPR). Once consent has been given, it can be revoked at any time. For further information on the handling of user data, please refer to **YouTube's Privacy Policy** at:

<https://policies.google.com/privacy>. **Basis for data transfer:** EU-US Data Privacy Framework (DPF). The DPF is an agreement between the European Union and the USA to ensure compliance with European data protection standards for data processing in the USA. Every DPF-certified company undertakes to comply with these data protection standards. **Further information:** <https://www.dataprivacyframework.gov/s/participant-search/participant-detail?contact=true&id=a2zt000000001L5AAI&status=Active>.

## 1.8. Server logfiles

Each time our website is called up, our system automatically collects data and information from the computer system of the computer from which the callup is issued and stores these in logfiles. These logfiles provide information on such things as the IP address, the browser used, the website that is visited, the time of the access and the amount of data transferred. We do not use this data to identify individual users, nor does any evaluation for marketing purposes take place. The information is processed for ensuring the security of our information technology systems and is deleted after six months.

In the event of applicability of the EU General Data Protection Regulation (GDPR), the legal basis for the temporary saving of the server logfiles is Art. 6 Sect.1 lit. f GDPR.

## 1.9. Rights of the affected individuals

As an affected individual, you have a right to information regarding which data we process about you. You have in addition the right to demand that the processing of your data be corrected, deleted or limited, in addition to the right, if applicable, to data portability. These rights exist insofar as no statutory retention obligations or other justified interests on the part of Belimo prevent their application. Furthermore, you have the right, insofar as it is applicable to you, to file a complaint with the government agency responsible for data privacy.

You have the right to revoke permission which was previously granted for data processing at any time.

You can assert your rights by notifying the contact address pursuant to Sect. 1.12.

## 1.10. Technical and organisational measures

To protect your personal data, we implement appropriate technical and organisational measures which undergo continuous improvement in accordance with current technical developments.

All of the information which you transfer to our website, e.g. on the occasions of queries or logins, is encrypted for transfer between your browser and our system using SSL (Secure Socket Layer). You recognise the encrypted connection by the prefix "https://" in the address line of the browser.

## 1.11. Duration and place of storage of your personal data

Your personal data will be processed or retained for as long as it is needed or as required by law. Your personal data is primarily stored in Switzerland, but can be viewed by and/or transmitted to all Belimo Group companies or authorised distribution partners and also to service providers in Switzerland and abroad, if applicable. The locations of our Group companies, authorised distribution partners and service providers can be found [here](#). If these countries do not have adequate data protection, we have taken appropriate protective measures and, for example, concluded the EU standard contractual clauses.

## 1.12. Contact information

### **BELIMO Automation AG**

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