



Privacy Policy

Name and Address of the Controller

Controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions, in particular Switzerland, related to data protection is:

Rochester-Bern Executive Programs

Prof. Dr. Petra Joerg
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Switzerland

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Website: <https://www.rochester-bern.ch>

General

We are very delighted that you have shown interest in our enterprise. Based on Article 13 of the Swiss Federal Constitution and the data protection provisions of the Swiss Confederation (Data Protection Act, DSG), every person has the right to protection of their privacy as well as protection against misuse of their personal data. Data protection is of a particularly high priority for the management of Rochester-Bern Executive Programs. We treat your personal data confidentially and in accordance with the legal data protection regulations as well as this privacy policy.

In cooperation with our hosting providers, we make every effort to protect the databases as well as possible against unauthorized access, loss, misuse, or falsification.

The use of the Internet pages of Rochester-Bern Executive Programs is possible without any indication of personal data; however, if a data subject wants to use special enterprise services via our website, processing of personal data could become necessary. If the processing of personal data is necessary and there is no statutory basis for such processing, we generally obtain consent from the data subject.

The processing of personal data, such as the name, address, email address, or telephone number of a data subject shall always be in line with the General Data Protection Regulation (GDPR) and Swiss Data Protection (DSG), and in accordance with the country-specific data protection regulations applicable to Rochester-Bern Executive Programs. Without your consent, the data will not be passed on to third parties. Data such as pages accessed or names of files accessed, date and time are stored on the server for statistical purposes without this data being directly related to your person.

By means of this data protection declaration, our enterprise would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

As the controller, Rochester-Bern Executive Programs has implemented numerous technical and organizational measures to ensure the most complete protection of personal data processed through this website. However, Internet-based data transmissions may in principle have security gaps, so absolute protection of data against access by third parties may not be guaranteed. For this reason, every data subject is free to transfer personal data to us via alternative means, e.g. by telephone.



1. Definitions

The data protection declaration of Rochester-Bern Executive Programs is based on the terms used by the Swiss and the European legislator for the adoption of the General Data Protection Regulation (GDPR) Swiss Data Protection Act (DSG). Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners. To ensure this, we would like to first explain the terminology used. In this data protection declaration, we use, inter alia, the following terms:

a. Personal Data

Personal data means any information relating to an identified or identifiable natural person (“data subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

b. Data Subject

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

c. Processing

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

d. Restriction of Processing

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

e. Profiling

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

f. Pseudonymisation

Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

g. Controller or Controller Responsible for the Processing

Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

h. Processor

Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

i. Recipient

Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

j. Third Party

Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

k. Consent

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

2. Processing purpose

a. Communication

We would like to stay in contact with you and respond to your individual needs. We therefore process personal data for the purpose of communicating with you.

The purpose of communication includes, in particular:

- Answering inquiries
- Contacting you with questions
- Customer care
- Communication related to fulfilling contracts or related contractual issues
- Status notifications or updates
- Quality assurance and training

b. Contractual Processing and Performance

We wish to fulfill our contract with you to your utmost satisfaction. Therefore, we process personal data for the fulfillment of the contract and all directly or indirectly related areas, such as support, maintenance, repair, information about innovations, product adjustments, etc. The purpose of contract performance generally includes everything that is necessary or expedient to conclude, execute and fulfill a contract. Contract execution may also include agreed personalization of services.

c. Information and Marketing

We also process personal data for relationship management and marketing purposes, such as sending written or electronic communications. Our communications outreach may be personalized and can include the following communications channels:

- Newsletters
- Promotional emails
- In-app messages
- Electronic messages
- Information by mail
- Advertising brochures, magazines, and other printed materials
- Invitations to events, contests, and competitions

You may decline that we contact you for marketing purposes at any time.

To receive newsletters and other electronic communications, you must explicitly opt-in.

3. Cookies

The Internet pages of Rochester-Bern Executive Programs use cookies. Cookies are text files that are stored in a computer system via an Internet browser.

Many Internet sites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string through which Internet pages and servers can be assigned to the specific Internet browser in which the cookie was stored. This allows visited Internet sites and servers to differentiate the individual browser of the data subject from other Internet browsers that contain other cookies. A specific Internet browser can be recognized and identified using the unique cookie ID.

Through the use of cookies, Rochester-Bern Executive Programs can provide the users of this website with more user-friendly services that would not be possible without the cookie setting.

By means of a cookie, the information and offers on our website can be optimized with the user in mind. Cookies allow us, as previously mentioned, to recognize our website users. The purpose of this recognition is to make it easier for users to utilize our website. The website user that uses cookies, e.g. does not have to enter access data each time the website is accessed, because this is taken over by the website, and the cookie is thus stored on the user's computer system.

The data subject may, at any time, prevent the setting of cookies through our website by means of a corresponding setting of the Internet browser used, and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time via an Internet browser or other software programs. This is possible in all popular Internet browsers. If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of our website may be entirely usable.



4. Collection of General Data and Information

The website of Rochester-Bern Executive Programs collects a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files. Collected may be (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Internet site, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, Rochester-Bern Executive Programs does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimize the content of our website as well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, Rochester-Bern Executive Programs analyzes anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

5. Cooperation with Processors and Third Parties

If we disclose data to other persons and companies (processors or third parties) within the scope of our processing, transmit it to them or otherwise grant them access to the data, this shall only take place on the basis of a legal permission (e.g. if a transmission of the data to third parties, such as payment service providers, in accordance with Art. 6 Para. 1 lit. b DSGVO for contract fulfilment is necessary), if you have consented, if a legal obligation provides for this or on the basis of our legitimate interests (e.g. when using agents, web hosts, etc.).

If we commission third parties with the processing of data on the basis of a so-called "order processing contract", this is done on the basis of Art. 28 DSGVO.

A non-exhaustive list of processors that we are sharing selected data with to fulfill our services are:

a. University of Bern and University of Rochester (USA)

University of Bern, Hochschulstrasse 6, 3012 Bern, Switzerland, <https://www.unibe.ch/>

The following information is provided for registration or enrolment at the Universities of Bern and for issuing diplomas: Name, first name, address, telephone, e-mail, date of birth, grades and passport or ID copy.

a. Alumni UniBE – The Alumni Association of the University of Bern

Alumni UniBE, Hochschulstrasse 6, 3012 Bern, Switzerland, <https://myalumni.unibe.ch/>

This is the official alumni association of the University of Bern. We share information such as first name, last name, address, email address, telephone number and year of graduation of alumni who are eligible to join the Alumni UniBE in order for the association to provide services for its members.

Alumni UniBE will store your personal data such as email, first and last name which we provide them with as well as any additional data you might provide them yourselves by making use of their respective online offering.



b. Alumni Platform

To manage the alumni data, we work with the platform alumni from TalentWerk AG. TalentWerk AG, Rosenbergstrasse 60, 9000 St. Gallen, <https://talentwerk.ch/>

<https://robealumni-ae.ch/en/privacy-policy/>
<https://robealumni-ae.ch/en/user-agreement/>

c. Server Log Files

The provider of this website automatically collects and stores information in so-called server log files, which your browser automatically transmits to us. These are:

- Browser type and Browser version
- Operating system used
- referrer URL
- Host name of the accessing computer
- Time of the server request

This data cannot be assigned to specific persons. This data is not merged with other data sources. We reserve the right to check this data retrospectively if we become aware of specific indications of illegal use.

d. Google Services

This website uses Google Maps for embedding maps, Google Invisible reCAPTCHA for protection against bots and spam, and YouTube for embedding videos.

These services of the American Google LLC use cookies, among other things, and as a result, data is transferred to Google in the USA, although we assume that no personal tracking takes place in this context solely through the use of our website.

Google has undertaken to ensure adequate data protection in accordance with the US-European and the US-Swiss Privacy Shield.

Further information can be found in [Google's privacy policy](#).

6. With SSL/TLS Encryption

This website uses SSL/TLS encryption for security reasons and to protect the transmission of confidential content, such as requests that you send to us as the site operator. You can recognize an encrypted connection by the fact that the address line of the browser changes from "http://" to "https://" and by the lock symbol in your browser line.

If SSL or TLS encryption is activated, the data you transmit to us cannot be read by third parties.

7. Sharing Data with Third Parties Abroad

a. Switzerland and the EU

We process and store personal data in Switzerland and in the European Union. The GDPR grants a level of data protection equivalent to that in Switzerland.

In certain cases, however, we may also disclose personal data to service providers and other recipients who are located outside this area or who process personal data outside this area, in principle in any country in the world.

Personal data may only be transferred abroad (or become accessible from abroad) if the country in question has a level of protection that is adequate from a Swiss perspective.

The countries concerned outside the EU often do not have laws that protect your personal data to the same extent as in Switzerland or the EU. If we transfer your personal data to such a country, we will ensure the protection of your personal data in an appropriate manner.

One means of ensuring adequate data protection is by contract, which ensures the required level of data protection for your personal data abroad. Standard contractual clauses (approved by the Federal Data Protection and Information Commissioner) are often used. Contractual arrangements often do not fully compensate for weaker or missing legal protection, in which case your consent would be necessary.

b. Third Country Transfer (e.g. USA)

Our website integrates the services of companies based in the USA or with relations to the USA. You must consent to our processing of this data. In this case, unrestricted access to your personal data by US authorities cannot be ruled out. Legal action cannot be taken. In the following cases, we cannot adequately ensure the protection of your personal data, not even by means of standard data protection clauses.

These are not exhaustive of the following services and service providers:

Google

- Google Analytics
- Google Ads
- Google Maps
- YouTube

Service provider: Google Ireland Limited, Dublin/Ireland
Parent company: Google LLC, Mountain View/USA

Facebook

www.facebook.com
Privacy policy: www.facebook.com/privacy/policy

Instagram

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

YouTube

www.youtube.com
Privacy Policy: <https://policies.google.com/privacy?hl=de>



LinkedIn

www.linkedin.com

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

Twitter

www.twitter.com

Privacy policy: <https://twitter.com/de/privacy>

The accuracy of the above address and group information is not guaranteed and may change in the dynamic economic environment.

However, it cannot be ruled out that all of the aforementioned companies may have to grant the US authorities access to your personal data (US-CLOUD Act), even if the data is not stored in the USA.

Therefore, such data processing will only take place with your explicit consent.

Information regarding the USA is provided subject to the proviso that Switzerland still does not have an EU-US Data Protection Framework or an adequate equivalent in the sense of a Swiss-US Data Privacy Framework with the USA.

c. Data will be transferred to the following countries:

- Germany
- USA

8. Registration on Our Website

The data subject has the possibility to register on the website of the controller with the indication of personal data. Which personal data are transmitted to the controller is determined by the respective input mask used for the registration. The personal data entered by the data subject are collected and stored exclusively for internal use by the controller, and for his own purposes. The controller may request transfer to one or more processors that also uses personal data for an internal purpose which is attributable to the controller.

By registering on the website of the controller, the IP address—assigned by the Internet service provider (ISP) and used by the data subject—date, and time of the registration are also stored. The storage of this data takes place against the background that this is the only way to prevent the misuse of our services, and, if necessary, to make it possible to investigate committed offenses. Insofar, the storage of this data is necessary to secure the controller. This data is not passed on to third parties unless there is a statutory obligation to pass on the data, or if the transfer serves the aim of criminal prosecution.

The registration of the data subject, with the voluntary indication of personal data, is intended to enable the controller to offer the data subject contents or services that may only be offered to registered users due to the nature of the matter in question. Registered persons are free to change the personal data specified during the registration at any time, or to have them completely deleted from the data stock of the controller.

The data controller shall, at any time, provide information upon request to each data subject as to what personal data are stored about the data subject. In addition, the data controller shall correct or erase personal data at the request or indication of the data subject, insofar as there are no statutory storage obligations. The entirety of the controller's employees is available to the data subject in this respect as contact persons.



9. Subscription to Our Newsletters

On the website of Rochester-Bern Executive Programs, users are given the opportunity to subscribe to our enterprise's newsletter. The input mask used for this purpose determines what personal data are transmitted, as well as when the newsletter is ordered from the controller.

Rochester-Bern Executive Programs informs its customers and business partners regularly by means of a newsletter about enterprise news and offers. The enterprise's newsletter may only be received by the data subject if (1) the data subject has a valid email address and (2) the data subject registers for the newsletter shipping. A confirmation email will be sent to the email address registered by a data subject for the first time for newsletter shipping, for legal reasons, in the double opt-in procedure. This confirmation email is used to prove whether the owner of the email address as the data subject is authorized to receive the newsletter.

During the registration for the newsletter, we also store the IP address of the computer system assigned by the Internet service provider (ISP) and used by the data subject at the time of the registration, as well as the date and time of the registration. The collection of this data is necessary in order to understand the (possible) misuse of the email address of a data subject at a later date, and it therefore serves the aim of the legal protection of the controller.

The personal data collected as part of a registration for the newsletter will only be used to send our newsletter. In addition, subscribers to the newsletter may be informed by email, as long as this is necessary for the operation of the newsletter service or a registration in question, as this could be the case in the event of modifications to the newsletter offer, or in the event of a change in technical circumstances. The personal data entered will be transferred to the TÜV-certified software Sendinblue (Brevo) <https://www.sendinblue.com/legal/privacypolicy> for the technical delivery. The subscription to our newsletter may be terminated by the data subject at any time. The consent to the storage of personal data, which the data subject has given for shipping the newsletter, may be revoked at any time. For the purpose of revocation of consent, a corresponding link is found in each newsletter. It is also possible to unsubscribe from the newsletter by communicate this to the controller in a different way.

10. Contact Possibility via the Website

The website of Rochester-Bern Executive Programs contains information that enables a quick electronic contact to our enterprise, as well as direct communication with us, which also includes a general address of the so-called electronic mail (email address). If a data subject contacts the controller by email or via a contact form, the personal data transmitted by the data subject are automatically stored. Such personal data transmitted on a voluntary basis by a data subject to the data controller are stored for the purpose of processing or contacting the data subject. There is no transfer of this personal data to third parties.

11. Customer Database

Like many other companies Rochester-Bern Executive Programs also uses a Customer Relationship Management (CRM) system to help effectively and efficiently provide customer service to our clients. The personal data we collect is related to the contact details of our customers and are provided to us by you when you contact us (see points 6, 7 and 8) or request information about our services. We use a cloud-based CRM provider to allow authorized employees within our company to access the stored data. There is no transfer of this personal data to third parties. The cloud-based CRM provider saves our customer's data in a high security IT center in Munich which complies with German security directives and data protection regulations.

12. Comments Function in the Blog on the Website

Rochester-Bern Executive Programs offers users the possibility to leave individual comments on individual blog contributions on a blog, which is on the website of the controller. A blog is a web-based, publicly accessible portal, through which one or more people called bloggers or web-bloggers may post articles or write down thoughts in so-called blogposts. Blogposts may usually be commented by third parties.



If a data subject leaves a comment on the blog published on this website, the comments made by the data subject are also stored and published, as well as information on the date of the commentary and on the user's (pseudonym) chosen by the data subject. In addition, the IP address assigned by the Internet service provider (ISP) to the data subject is also logged. This storage of the IP address takes place for security reasons, and in case the data subject violates the rights of third parties, or posts illegal content through a given comment. The storage of these personal data is, therefore, in the own interest of the data controller, so that he can exculpate in the event of an infringement. This collected personal data will not be passed to third parties, unless such a transfer is required by law or serves the aim of the defense of the data controller.

13. Subscription to Comments in the Blog on the Website

The comments made in the blog of Rochester-Bern Executive Programs may be subscribed to by third parties. In particular, there is the possibility that a commenter subscribes to the comments following his comments on a particular blog post.

If a data subject decides to subscribe to the option, the controller will send an automatic confirmation email to check the double opt-in procedure as to whether the owner of the specified email address decided in favor of this option. The option to subscribe to comments may be terminated at any time.

14. Routine Erasure and Blocking of Personal Data

The data controller shall process and store the personal data of the data subject only for the period necessary to achieve the purpose of storage, or as far as this is granted by the European legislator or other legislators in laws or regulations to which the controller is subject to.

If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements.

15. Rights of the Data Subject (Article 25 ff. DSG)

a. Right of Confirmation

Each data subject shall have the right granted by the Swiss and European legislator to obtain confirmation from the controller as to whether or not personal data concerning him or her are being processed. If a data subject wishes to avail himself of this right of confirmation, he or she may, at any time, contact any employee of the controller.

b. Right of Access (Art. 25 DSG)

Each data subject shall have the right granted by the Swiss and European legislator to obtain information free of charge from the controller about his or her personal data stored at any time and a copy of this information. Furthermore, the Swiss and European directives and regulations grant the data subject access to the following information:

the purposes of the processing;

the categories of personal data concerned;

the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;

where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;

the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;

the existence of the right to lodge a complaint with a supervisory authority;

where the personal data are not collected from the data subject, any available information as to their source;

the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

Furthermore, the data subject shall have the right to obtain information as to whether personal data are transferred to a third country or to an international organisation. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

If a data subject wishes to avail himself of this right of access, he or she may, at any time, contact any employee of the controller.

We kindly ask you to submit any request for information together with a proof of identity.

c. Right to Rectification

Each data subject shall have the right granted by the Swiss and European legislator to obtain the immediate rectification of inaccurate personal data concerning him or her from the controller. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a data subject wishes to exercise this right to rectification, he or she may, at any time, contact any employee of the controller.

d. Right to Erasure (Right to be Forgotten)

Each data subject shall have the right granted by the Swiss and European legislator to obtain the immediate erasure of personal data concerning him or her from the controller, and the controller has the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary:

The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.

The data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR and Articles 25ff. DSG, and where there is no other legal ground for the processing.

The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.

The personal data have been unlawfully processed.



The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If one of the above reasons applies, and a data subject wishes to request the erasure of personal data stored by Rochester-Bern Executive Programs, he or she may, at any time, contact any employee of the controller. An employee of Rochester-Bern Executive Programs shall promptly ensure that the erasure request is complied with immediately.

Where the controller has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required. An employees of Rochester-Bern Executive Programs will arrange the necessary measures in individual cases.

e. Right of Restriction of Processing

Each data subject shall have the right granted by the Swiss and European legislator to obtain restriction of processing from the controller where one of the following applies:

The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.

The processing is unlawful and the data subject opposes the erasure of the personal data and requests instead the restriction of their use instead.

The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise, or defence of legal claims.

The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

If one of the above conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by Rochester-Bern Executive Programs, he or she may at any time contact any employee of the controller. The employee of Rochester-Bern Executive Programs will arrange the restriction of the processing.

f. Right to Data Portability

Each data subject shall have the right granted by the Swiss and European legislator, to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used and machine-readable format. He or she shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as long as the processing is based on Article 28 DSG or on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, the data subject may at any time contact any employee of Rochester-Bern Executive Programs.

g. Right to Object

Each data subject shall have the right granted by the Swiss and European legislator to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

Rochester-Bern Executive Programs shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

If Rochester-Bern Executive Programs processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to Rochester-Bern Executive Programs to the processing for direct marketing purposes, Rochester-Bern Executive Programs will no longer process the personal data for these purposes.

In addition, the data subject shall have the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by Rochester-Bern Executive Programs for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In order to exercise the right to object, the data subject may contact any employee of Rochester-Bern Executive Programs. In addition, the data subject is free in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

h. Automated Individual Decision-Making, Including Profiling

Each data subject shall have the right granted by the Swiss and European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, Rochester-Bern Executive Programs shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and contest the decision.

If the data subject wishes to exercise the rights concerning automated individual decision-making, he or she may, at any time, contact any employee of Rochester-Bern Executive Programs.



i. Right to Withdraw Data Protection Consent

Each data subject shall have the right granted by the Swiss and European legislator to withdraw his or her consent to processing of his or her personal data at any time.

If the data subject wishes to exercise the right to withdraw the consent, he or she may, at any time, contact any employee of Rochester-Bern Executive Programs.

16. Data Protection for Applications for Further Education Programs and the Application Procedures

The data controller shall collect and process the personal data of applicants for the purpose of the processing of the application procedure for further education programs. The processing may also be carried out electronically. This is the case, in particular, if an applicant submits corresponding application documents by email or by means of a web form on the website to the controller. If the data controller concludes a further education contract with an applicant, the submitted data will be stored for the purpose of processing the work relationship in compliance with legal requirements. If no further education contract is concluded with the applicant by the controller, the application documents shall be automatically erased two months after notification of the refusal decision, provided that no other legitimate interests of the controller are opposed to the erasure. Other legitimate interest in this relation is, e.g. a burden of proof in a procedure under the General Equal Treatment Act (AGG).

17. Data Protection for Applications and the Application Procedures

The data controller shall collect and process the personal data of applicants for the purpose of the processing of the application procedure. The processing may also be carried out electronically. This is the case, in particular, if an applicant submits corresponding application documents by email or by means of a web form on the website to the controller. If the data controller concludes an employment contract with an applicant, the submitted data will be stored for the purpose of processing the employment relationship in compliance with legal requirements. If no employment contract is concluded with the applicant by the controller, the application documents shall be automatically erased two months after notification of the refusal decision, provided that no other legitimate interests of the controller are opposed to the erasure. Other legitimate interest in this relation is, e.g. a burden of proof in a procedure under the General Equal Treatment Act (AGG).

18. Further Services We are Using with Respect to Your Data on Our Website or by Third Party Services

a. Hosting and Email Dispatch

To provide our website and online services, we are using the service of the hosting provider Infomaniak, Technoparkstrasse 3, 8406 Winterthur Switzerland. The data protection regulations of the hosting provider can be viewed here: <https://www.infomaniak.com/de>.

The hosting services we use serve to provide the following services: Infrastructure and platform services, computing capacity, storage space and database services, security services, and technical maintenance services that we use for the purpose of operating this online offer.

We or our hosting provider process inventory data, contact data, content data, contract data, usage data, meta- and communication data of customers, interested parties and visitors of this online offer on the basis of our legitimate interests in an efficient and secure provision of this online offer according to Art. 6 Para. 1 lit. f DSGVO in conjunction with Art. 28 DSGVO (conclusion of order processing contract).

Our email provider is Metanet, Josefstrasse 218, 8005 Zürich, Switzerland. The data protection regulations of the provider can be viewed here: <https://www.metanet.ch/de/>.



b. Collection of Access Data and Log Files

We, or our hosting provider, collect the following data on the basis of our legitimate interests within the meaning of Art. 6 para. 1 lit. f. DSGVO data on each access to the server on which this service is located (so-called server log files). Access data includes the name of the accessed website, file, date and time of access, transferred data volume, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited page), IP address and the requesting provider.

Log file information is stored for a reasonable number of days for security reasons (e.g. to investigate misuse or fraud) and then deleted. Data whose further storage is required for evidentiary purposes are excluded from deletion until the respective incident has been finally clarified.

c. Google Analytics (with anonymization function)

On this website, the controller has integrated the component of Google Analytics (with the anonymizer function). Google Analytics is a web analytics service. Web analytics is the collection, gathering, and analysis of data about the behavior of visitors to websites. A web analysis service collects, inter alia, data about the website from which a person has come (the so-called referrer), which sub-pages were visited, or how often and for what duration a sub-page was viewed. Web analytics are mainly used for the optimization of a website and in order to carry out a cost-benefit analysis of Internet advertising.

The operator of the Google Analytics component is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

For the web analytics through Google Analytics the controller uses the application "_gat._anonymizeIp". By means of this application the IP address of the Internet connection of the data subject is abridged by Google and anonymised when accessing our websites from a Member State of the European Union or another Contracting State to the Agreement on the European Economic Area.

The purpose of the Google Analytics component is to analyze the traffic on our website. Google uses the collected data and information, inter alia, to evaluate the use of our website and to provide online reports, which show the activities on our websites, and to provide other services concerning the use of our Internet site for us.

Google Analytics places a cookie on the information technology system of the data subject. The definition of cookies is explained above. With the setting of the cookie, Google is enabled to analyze the use of our website. With each call-up to one of the individual pages of this Internet site, which is operated by the controller and into which a Google Analytics component was integrated, the Internet browser on the information technology system of the data subject will automatically submit data through the Google Analytics component for the purpose of online advertising and the settlement of commissions to Google. During the course of this technical procedure, the enterprise Google gains knowledge of personal information, such as the IP address of the data subject, which serves Google, inter alia, to understand the origin of visitors and clicks, and subsequently create commission settlements.

The cookie is used to store personal information, such as the access time, the location from which the access was made, and the frequency of visits of our website by the data subject. With each visit to our Internet site, such personal data, including the IP address of the Internet access used by the data subject, will be transmitted to Google in the United States of America. These personal data are stored by Google in the United States of America. Google may pass these personal data collected through the technical procedure to third parties.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Google Analytics from setting a



cookie on the information technology system of the data subject. In addition, cookies already in use by Google Analytics may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to a collection of data that are generated by Google Analytics, which is related to the use of this website, as well as the processing of this data by Google and the chance to preclude any such. For this purpose, the data subject must download a browser add-on under the link <https://tools.google.com/dlpage/gaoptout> and install it. This browser add-on tells Google Analytics through a JavaScript, that any data and information about the visits of Internet pages may not be transmitted to Google Analytics. The installation of the browser add-ons is considered an objection by Google. If the information technology system of the data subject is later deleted, formatted, or newly installed, then the data subject must reinstall the browser add-ons to disable Google Analytics. If the browser add-on was uninstalled by the data subject or any other person who is attributable to their sphere of competence, or is disabled, it is possible to execute the reinstallation or reactivation of the browser add-ons.

Further information and the applicable data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/> and under <http://www.google.com/analytics/terms/us.html>. Google Analytics is further explained under the following Link <https://www.google.com/analytics/>

d. Google Remarketing

On this website, the controller has integrated Google Remarketing services. Google Remarketing is a feature of Google Ads, which allows an enterprise to display advertising to Internet users who have previously resided on the enterprise's Internet site. The integration of Google Remarketing therefore allows an enterprise to create user-based advertising and thus shows relevant advertisements to interested Internet users.

The operating company of the Google Remarketing services is the Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The purpose of Google Remarketing is the insertion of interest-relevant advertising. Google Remarketing allows us to display ads on the Google network or on other websites, which are based on individual needs and matched to the interests of Internet users.

Google Remarketing sets a cookie on the information technology system of the data subject. The definition of cookies is explained above. With the setting of the cookie, Google enables a recognition of the visitor of our website if he calls up consecutive web pages, which are also a member of the Google advertising network. With each call-up to an Internet site on which the service has been integrated by Google Remarketing, the web browser of the data subject identifies automatically with Google. During the course of this technical procedure, Google receives personal information, such as the IP address or the surfing behaviour of the user, which Google uses, inter alia, for the insertion of interest relevant advertising.

The cookie is used to store personal information, e.g. the Internet pages visited by the data subject. Each time we visit our Internet pages, personal data, including the IP address of the Internet access used by the data subject, is transmitted to Google in the United States of America. These personal data are stored by Google in the United States of America. Google may pass these personal data collected through the technical procedure to third parties.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Google from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Google may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to the interest-based advertising by Google. For this purpose, the data subject must call up the link to www.google.de/settings/ads and make the desired settings on each Internet browser used by the data subject.

Further information and the actual data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/>.

e. Google Ads

On this website, the controller has integrated Google conversion tracking. Google Ads is a service for Internet advertising that allows the advertiser to place ads in Google search engine results and the Google advertising network. Google Ads allows an advertiser to pre-define specific keywords with the help of which an ad on Google's search results only then displayed, when the user utilizes the search engine to retrieve a keyword-relevant search result. In the Google Advertising Network, the ads are distributed on relevant web pages using an automatic algorithm, taking into account the previously defined keywords.

The operating company of Google Ads is Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The purpose of Google Ads is the promotion of our website by the inclusion of relevant advertising on the websites of third parties and in the search engine results of the search engine Google and an insertion of third-party advertising on our website.

If a data subject reaches our website via a Google ad, a conversion cookie is filed on the information technology system of the data subject through Google. The definition of cookies is explained above. A conversion tracking cookie loses its validity after 30 days and is not used to identify the data subject. If a data subject visits certain pages of our website and the cookie has not expired, the conversion cookie is used to check whether certain sub-pages, e.g. the shopping cart from an online shop system, were called up on our website. Through the conversion cookie, both Google and the controller can understand whether a person who reached an ad on our website generated sales, that is, executed or cancelled a sale of goods. Each Google Ads customer receives a different cookie. Cookies can therefore not be tracked across Ads customers' websites.

The data and information collected through the use of the conversion cookie is used by Google to create visit and conversion statistics for Ads customers who have opted in to conversion tracking. These statistics are used in order to determine the total number of users who have been served through Google Ads to ascertain the success or failure of each ad and to optimize our Google Ads in the future. Neither our company nor other Google Ads advertisers receive information from Google that could identify the data subject.

The conversion cookie stores personal information, e.g. the Internet pages visited by the data subject. Each time we visit our Internet pages, personal data, including the IP address of the Internet access used by the data subject, is transmitted to Google in the United States of America. These personal data are stored by Google in the United States of America. Google may pass these personal data collected through the technical procedure to third parties.

The data subject may, at any time, prevent the setting of cookies by our website, as stated above, by means of a corresponding setting of the Internet browser used and thus permanently deny the setting of cookies. Such a setting of the Internet browser used would also prevent Google from placing a conversion cookie on the information technology system of the data subject. In addition, a cookie set by Google Ads may be deleted at any time via the Internet browser or other software programs.

Please note that you may not delete the opt-out cookies as long as you do not want any measurement data to be recorded. If you have deleted all your cookies in the browser, you must set the respective opt-out cookie again.

The data subject has a possibility of objecting to the interest based advertisement of Google. Therefore, the data subject must access from each of the browsers in use the link www.google.de/settings/ads and set the desired settings.

Further information and the applicable data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/>.

f. Google Tag Manager

Google Tag Manager is a solution with which we manage so-called website tags via an interface (and thus integrate Google Analytics and other Google marketing services into our online offering, for example). The Tag Manager itself (which implements the tags) does not process any personal data of the users. With regard to the processing of users' personal data, reference is made to the following information on the Google services. Usage guidelines: <https://www.google.com/intl/de/tagmanager/use-policy.html>.

Unless otherwise stated in our privacy policy, we process the data of users who communicate with us within social networks and platforms, e.g. write articles on our websites or send us messages.

g. Google reCAPTCHA

This website uses the reCAPTCHA service of Google Ireland Limited, Gordon House, Barrow Street Dublin 4, Ireland. The query serves the purpose of distinguishing whether the input is made by a human or by automated, machine processing. The query includes the sending of the IP address and possibly other data required by Google for the reCAPTCHA service to Google. For this purpose, your input is transmitted to Google and further used there. However, your IP address will be shortened beforehand by Google within member states of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information to evaluate your use of this service. The IP address transmitted by your browser as part of reCaptcha will not be merged with other data from Google. Your data may also be transmitted to the USA in the process. For data transfers to the USA, there is an adequacy decision of the European Commission, the "Privacy Shield". Google participates in the "Privacy Shield" and has submitted to the requirements. By pressing the query, you consent to the processing of your data. The processing is based on Art. 6 (1) lit. a DSGVO with your consent. You can revoke your consent at any time without affecting the lawfulness of the processing carried out on the basis of the consent until revocation.

You can find more information about Google reCAPTCHA and the associated privacy policy at:

<https://policies.google.com/privacy?hl=de>

h. Google Maps

This website uses the offer of Google Maps. This allows us to display interactive maps directly on the website and enables you to comfortably use the map function. By visiting the website, Google receives the information that you have accessed the corresponding subpage of our website. This occurs regardless of whether Google provides a user account through which you are logged in or whether there is no user account. If you are logged in to Google, your data will be directly assigned to your account. If you do not want the assignment with your profile at Google, you must log out before activating the button. Google stores your data as usage profiles and uses them for the purposes of advertising, market research and/or demand-oriented design of its website. Such an evaluation is carried out in particular (even for users who are not logged in) to provide needs-based advertising and to inform other users of the social network about your activities on our website. You have the right to object to the creation of these user profiles, whereby you must contact Google to exercise this right. For



more information on the purpose and scope of data collection and processing by Google, as well as further information on your rights in this regard and settings options for protecting your privacy, please visit: www.google.de/intl/de/policies/privacy.

i. OpenStreetMap

We integrate the maps of the service "OpenStreetMap" (<https://www.openstreetmap.de>), which are offered on the basis of the Open Data Commons Open Database License (ODbL) by the OpenStreetMap Foundation (OSMF). Privacy Policy: https://wiki.openstreetmap.org/wiki/Privacy_Policy.

As far as we know, OpenStreetMap will only use the user's data for the purpose of displaying the map functions and temporarily storing the selected settings. This data may include in particular the IP addresses and location data of users, which, however, may not be collected without their consent (as a rule within the framework of the settings of their mobile devices).

The data can be processed in the USA. For more information, please see the OpenStreetMap Privacy Policy: https://wiki.osmfoundation.org/wiki/Privacy_Policy.

j. Google Business Profile (Google MyBusiness)

We use Google Business Profile from Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. When the data subject visits and interacts with our Google Business Profile entry, Google also collects the IP address as well as other information that is collected in the form of cookies on the terminal device of the data subject. This information is collected for statistical purposes. The data collected about the data subject in this context will be processed by Google and may also be transferred to the USA. The use of Google Business Profile is the data subject's own responsibility.

For further details, please refer to the Google privacy policy: <https://policies.google.com/privacy>.

k. Google WebFonts

This website uses so-called web fonts provided by Google for the uniform display of fonts. When you call up a page, your browser loads the required web fonts into its browser cache in order to display texts and fonts correctly. If your browser does not support web fonts, a standard font is used by your computer.

You can find more information on Google Web Fonts at <https://developers.google.com/fonts/faq?hl=en> and in Google's privacy policy: <https://www.google.com/policies/privacy/>

l. Hotjar

We use Hotjar to better understand the needs of our users and to optimize the offering and experience on our website. With the help of Hotjar's technology, we gain a better understanding of our users' experiences (e.g. how much time users spend on which pages, which links they click, what they like and what they don't) and this helps us align our offering with user feedback.

Hotjar uses cookies and other technologies to collect data about the behavior of our users and their devices, in particular the IP address of the device (which is only collected and stored in anonymized form during your website usage), screen size, device type (unique device identifiers), information about the browser used, location (country only), and the preferred language for displaying our website. Hotjar stores this information on our behalf in a pseudonymized user profile. Hotjar is contractually prohibited from selling the data collected on our behalf.

For more information, please refer to the 'about Hotjar' section on [Hotjar's help page](#).



m. Online Presence in Social Media

We maintain online presences within social networks and platforms in order to communicate with active customers, interested parties and users and to inform them about our services. When accessing the respective networks and platforms, the terms and conditions and the data processing guidelines of their respective operators apply. Examples are: Twitter, LinkedIn, Facebook, Instagram, Xing and others.

Unless otherwise stated in our privacy policy, we process the data of users who communicate with us within social networks and platforms, e.g. write articles on our websites or send us messages.

n. LinkedIn

The controller has integrated components of the LinkedIn Corporation on this website. LinkedIn is a web-based social network that enables users with existing business contacts to connect and to make new business contacts. Over 400 million registered people in more than 200 countries use LinkedIn. Thus, LinkedIn is currently the largest platform for business contacts and one of the most visited websites in the world.

The operating company of LinkedIn is LinkedIn Corporation, 2029 Stierlin Court Mountain View, CA 94043, UNITED STATES. For privacy matters outside of the UNITED STATES LinkedIn Ireland, Privacy Policy Issues, Wilton Plaza, Wilton Place, Dublin 2, Ireland, is responsible.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which a LinkedIn component (LinkedIn plug-in) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to the download of a display of the corresponding LinkedIn component of LinkedIn. Further information about the LinkedIn plug-in may be accessed under <https://developer.linkedin.com/plugins>. During the course of this technical procedure, LinkedIn gains knowledge of what specific sub-page of our website was visited by the data subject.

If the data subject is logged in at the same time on LinkedIn, LinkedIn detects with every call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-page of our Internet page was visited by the data subject. This information is collected through the LinkedIn component and associated with the respective LinkedIn account of the data subject. If the data subject clicks on one of the LinkedIn buttons integrated on our website, then LinkedIn assigns this information to the personal LinkedIn user account of the data subject and stores the personal data.

LinkedIn receives information via the LinkedIn component that the data subject has visited our website, provided that the data subject is logged in at LinkedIn at the time of the call-up to our website. This occurs regardless of whether the person clicks on the LinkedIn button or not. If such a transmission of information to LinkedIn is not desirable for the data subject, then he or she may prevent this by logging off from their LinkedIn account before a call-up to our website is made.

LinkedIn provides under <https://www.linkedin.com/psettings/guest-controls> the possibility to unsubscribe from email messages, SMS messages and targeted ads, as well as the ability to manage ad settings. LinkedIn also uses affiliates such as Eire, Google Analytics, BlueKai, DoubleClick, Nielsen, Comscore, Eloqua, and Lotame. The setting of such cookies may be denied under <https://www.linkedin.com/legal/cookie-policy>. The applicable privacy policy for LinkedIn is available under <https://www.linkedin.com/legal/privacy-policy>. The LinkedIn Cookie Policy is available under <https://www.linkedin.com/legal/cookie-policy>.

o. Facebook

On this website, the controller has integrated components of the enterprise Facebook. Facebook is a social network.



A social network is a place for social meetings on the Internet, an online community, which usually allows users to communicate with each other and interact in a virtual space. A social network may serve as a platform for the exchange of opinions and experiences, or enable the Internet community to provide personal or business-related information. Facebook allows social network users to include the creation of private profiles, upload photos, and network through friend requests.

The operating company of Facebook is Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

With each call-up to one of the individual pages of this Internet website, which is operated by the controller and into which a Facebook component (Facebook plug-ins) was integrated, the web browser on the information technology system of the data subject is automatically prompted to download display of the corresponding Facebook component from Facebook through the Facebook component. An overview of all the Facebook Plug-ins may be accessed under <https://developers.facebook.com/docs/plugins/>. During the course of this technical procedure, Facebook is made aware of what specific sub-site of our website was visited by the data subject.

If the data subject is logged in at the same time on Facebook, Facebook detects with every call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-site of our Internet page was visited by the data subject. This information is collected through the Facebook component and associated with the respective Facebook account of the data subject. If the data subject clicks on one of the Facebook buttons integrated into our website, e.g. the "Like" button, or if the data subject submits a comment, then Facebook matches this information with the personal Facebook user account of the data subject and stores the personal data.

Facebook always receives, through the Facebook component, information about a visit to our website by the data subject, whenever the data subject is logged in at the same time on Facebook during the time of the call-up to our website. This occurs regardless of whether the data subject clicks on the Facebook component or not. If such a transmission of information to Facebook is not desirable for the data subject, then he or she may prevent this by logging off from their Facebook account before a call-up to our website is made.

The data protection guideline published by Facebook, which is available at <https://facebook.com/about/privacy/>, provides information about the collection, processing and use of personal data by Facebook. In addition, it is explained there what setting options Facebook offers to protect the privacy of the data subject. In addition, different configuration options are made available to allow the elimination of data transmission to Facebook. These applications may be used by the data subject to eliminate a data transmission to Facebook.

p. Twitter

On this website, the controller has integrated components of Twitter. Twitter is a multilingual, publicly-accessible microblogging service on which users may publish and spread so-called 'tweets,' e.g. short messages, which are limited to 280 characters. These short messages are available for everyone, including those who are not logged on to Twitter. The tweets are also displayed to so-called followers of the respective user. Followers are other Twitter users who follow a user's tweets. Furthermore, Twitter allows you to address a wide audience via hashtags, links or retweets.

The operating company of Twitter is Twitter International Unlimited Company, One Cumberland Place, Fenian Street, Dublin 2, Ireland.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which a Twitter component (Twitter button) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to download a display of the corresponding Twitter



component of Twitter. Further information about the Twitter buttons is available under <https://about.twitter.com/de/resources/buttons>. During the course of this technical procedure, Twitter gains knowledge of what specific sub-page of our website was visited by the data subject. The purpose of the integration of the Twitter component is a retransmission of the contents of this website to allow our users to introduce this web page to the digital world and increase our visitor numbers.

If the data subject is logged in at the same time on Twitter, Twitter detects with every call-up to our website by the data subject and for the entire duration of their stay on our Internet site which specific sub-page of our Internet page was visited by the data subject. This information is collected through the Twitter component and associated with the respective Twitter account of the data subject. If the data subject clicks on one of the Twitter buttons integrated on our website, then Twitter assigns this information to the personal Twitter user account of the data subject and stores the personal data.

Twitter receives information via the Twitter component that the data subject has visited our website, provided that the data subject is logged in on Twitter at the time of the call-up to our website. This occurs regardless of whether the person clicks on the Twitter component or not. If such a transmission of information to Twitter is not desirable for the data subject, then he or she may prevent this by logging off from their Twitter account before a call-up to our website is made.

The applicable data protection provisions of Twitter may be accessed under <https://twitter.com/privacy?lang=en>.

q. Instagram

On this website, the controller has integrated components of the service Instagram. Instagram is a service that may be qualified as an audiovisual platform, which allows users to share photos and videos, as well as disseminate such data in other social networks.

The operating company of the services offered by Instagram Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which an Instagram component (Insta button) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to the download of a display of the corresponding Instagram component of Instagram. During the course of this technical procedure, Instagram becomes aware of what specific sub-page of our website was visited by the data subject.

If the data subject is logged in at the same time on Instagram, Instagram detects with every call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-page of our Internet page was visited by the data subject. This information is collected through the Instagram component and is associated with the respective Instagram account of the data subject. If the data subject clicks on one of the Instagram buttons integrated on our website, then Instagram matches this information with the personal Instagram user account of the data subject and stores the personal data.

Instagram receives information via the Instagram component that the data subject has visited our website provided that the data subject is logged in at Instagram at the time of the call to our website. This occurs regardless of whether the person clicks on the Instagram button or not. If such a transmission of information to Instagram is not desirable for the data subject, then he or she can prevent this by logging off from their Instagram account before a call-up to our website is made.

Further information and the applicable data protection provisions of Instagram may be retrieved under <https://help.instagram.com/155833707900388> and <https://www.instagram.com/about/legal/privacy/>.

r. Integration of Third-Party Services and Content

Within our online offer based on our legitimate interests (i.e. interest in the analysis, optimisation and economic operation of our online offer within the meaning of Art. 6 para. 1 lit. f. DSGVO) we make use of content or service offerings of third parties to incorporate their content and services, such as videos or fonts (hereinafter uniformly referred to as "content").

This always presupposes that the third party providers of this content perceive the IP address of the users, since without the IP address they could not send the content to their browser. The IP address is therefore required for the display of this content. We make every effort to use only those contents whose respective providers use the IP address only for the delivery of the contents. Third-party providers may also use so-called pixel tags (invisible graphics, also known as "web beacons") for statistical or marketing purposes. Pixel tags" can be used to evaluate information such as visitor traffic on the pages of this website. The pseudonymous information may also be stored in cookies on the user's device and may include technical information about the browser and operating system, referring websites, visiting time and other information about the use of our online offer, as well as be linked to such information from other sources.

s. Vimeo

Plugins of the video portal Vimeo of Vimeo, LLC,, 555 West 18th Street New York, New York 10011, USA are integrated on this website. Each time you visit a page that offers one or more Vimeo video clips, a direct connection is established between your browser and a Vimeo server in the USA. In the process, information about your visit and your IP address are stored there. Through interactions with the Vimeo plugins (e.g. clicking the start button), this information is also transmitted to Vimeo and stored there. The privacy policy for Vimeo with more detailed information on the collection and use of your data by Vimeo can be found in the privacy policy of Vimeo: <https://vimeo.com/privacy>.

If you have a Vimeo user account and do not want Vimeo to collect data about you via this website and link it to your membership data stored with Vimeo, you must log out of Vimeo before visiting this website.

In addition, Vimeo calls up the Google Analytics tracker via an iFrame in which the video is called up. This is Vimeo's own tracking, to which we have no access. You can prevent tracking by Google Analytics by using the deactivation tools that Google offers for some Internet browsers. You can also prevent the collection of data generated by Google Analytics and related to your use of the website (including your IP address) to Google and the processing of this data by Google by downloading and installing the browser plugin available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=de>

t. YouTube

On this website, the controller has integrated components of YouTube. YouTube is an Internet video portal that enables video publishers to set video clips and other users free of charge, which also provides free viewing, re-view and commenting on them. YouTube allows you to publish all kinds of videos, so you can access both full movies and TV broadcasts, as well as music videos, trailers, and videos made by users via the Internet portal.

The operating company of YouTube is Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which a YouTube component (YouTube video) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to download a display of the corresponding YouTube component. Further information about YouTube may be obtained under <https://www.youtube.com/yt/about/en/>. During the course of this technical procedure, YouTube and Google gain knowledge of what specific sub-page of our website was visited by the data subject.

If the data subject is logged in on YouTube, YouTube recognizes with each call-up to a sub-page that contains a YouTube video, which specific sub-page of our Internet site was visited by the data subject. This information is collected by YouTube and Google and assigned to the respective YouTube account of the data subject. YouTube and Google will receive information through the YouTube component that the data subject has visited our website, if the data subject at the time of the call to our website is logged in on YouTube; this occurs regardless of whether the person clicks on a YouTube video or not. If such a transmission of this information to YouTube and Google is not desirable for the data subject, the delivery may be prevented if the data subject logs off from their own YouTube account before a call-up to our website is made.

YouTube's data protection provisions, available at <https://www.google.com/intl/en/policies/privacy/>, provide information about the collection, processing, and use of personal data by YouTube and Google.

u. Audio and Video Conferencing

We use audio and video conferencing services to communicate with our users and others. In particular, we can use them to conduct audio and video conferences, virtual meetings, and training sessions such as webinars.

We only use services for which an appropriate level of data protection is guaranteed. In addition to this privacy policy, any terms and conditions of the services used, such as terms of use or privacy statements, also apply.

In particular, we use Teams, a service of Microsoft and Zoom, a service of the American Zoom Video Communications Inc. Both grant the rights under the European General Data Protection Regulation (GDPR) to users in Switzerland. Further information about the type, scope and purpose of data processing can be found in the data protection guidelines:

Zoom: <https://explore.zoom.us/en/gdpr/>

Teams: <https://www.microsoft.com/en-us/microsoft-365/blog/2020/04/06/microsofts-commitment-privacy-security-microsoft-teams/>

v. LinkedIn Conversion Tracking

Through LinkedIn's conversion tracking and website analytics features, you can understand what happens after a LinkedIn user clicks on your Ad by using analytics methods and systems provided by LinkedIn (e.g., Insight tags, pixels and APIs) that allow you to send data to LinkedIn about actions that people take on your website or mobile application ("Event Data"). Through LinkedIn Audience Matching, you can target Ads to audiences based on data you provide to LinkedIn or a third party authorized by LinkedIn (e.g., company lists, hashed emails or Event Data like web pages visited on your website) (such data, "Audience Data").

For more information, please see LinkedIn's conversion tracking Privacy Policy: <https://www.linkedin.com/legal/ads-policy>.

19. Contradiction Mail

The use of contact data published within the framework of the imprint obligation to send advertising and information materials not expressly requested is hereby prohibited. The operators of the pages expressly reserve the right to take legal action in the event of the unsolicited sending of advertising information, such as spam emails.

20. Chargeable Services

For the provision of chargeable services, we request additional data, such as payment details, in order to be able to execute your order. We store this data in our systems until the statutory retention periods have expired.



21. Agency Services

We process the data of our customers in accordance with the data protection provisions of the Federal (Data Protection Act, DSG) and the EU-DSGVO in the context of our contractual services.

In doing so, we process inventory data (e.g., customer master data, such as names or addresses), contact data (e.g., email, telephone numbers), content data (e.g., text entries, etc.), contract data (e.g., subject matter of the contract, term), payment data (e.g., bank details, payment history), usage data and metadata (e.g., in the context of evaluating and measuring the success of marketing measures). Data subjects include our customers, prospective customers as well as their customers, users, website visitors or employees as well as third parties. The purpose of the processing is the provision of contractual services, billing and our customer service. The legal basis for the processing results from Art. 6 para. 1 lit. b DSGVO (contractual services), Art. 6 para. 1 lit. f DSGVO (analysis, statistics, optimization, security measures). We process data that are necessary for the justification and fulfillment of contractual services and indicate the necessity of their disclosure. Disclosure to external parties only takes place if it is necessary in the context of an order. When processing the data provided to us as part of an order, we act in accordance with the instructions of the client as well as the legal requirements of a commissioned processing pursuant to Art. 28 DSGVO and do not process the data for any other purposes than those specified in the order.

We delete the data after expiry of legal warranty and comparable obligations. The necessity of keeping the data is reviewed at irregular intervals. In the case of legal archiving obligations, deletion takes place after their expiry. In the case of data disclosed to us by the client as part of an order, we delete the data in accordance with the specifications of the order, generally after the end of the order.

22. Legal Basis for Processing Data

The processing of personal data is based on different legal grounds depending on the purpose of the processing. In Switzerland, data processing is primarily permitted unless it is prohibited by law (DSG or DSGVO).

Data processing is permissible in fulfillment of a contract independently or even against the will of the data subject.

Furthermore, legitimate interests allow us to process data. Legitimate interests can be idealistic as well as economic in nature. Direct advertising, for example, is a recognized purpose. This includes addressing persons with advertising information, e.g. by telephone, email or letter.

Furthermore, any data processing is permissible that is based on your consent or is required to comply with domestic or foreign legal provisions.

Art. 6 DSG or 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services. Is our company subject to a legal obligation by which processing of personal data is required, such as for the fulfillment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a visitor were injured in our company and his name, age, health insurance data or other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on Art. 6(1) lit. d GDPR. Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which

require protection of personal data. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. He considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR).

23. The Legitimate Interests Pursued by the Controller or by a Third Party

Where the processing of personal data is based on Article 6(1) lit. f GDPR our legitimate interest is to carry out our business in favor of the well-being of all our employees and the stakeholders.

24. Period for Which the Personal Data Will Be Stored

The criteria used to determine the period of storage of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfillment of the contract or the initiation of a contract.

According to University of Bern guidelines, Rochester-Bern is required to retain the following files and related personal data:

- All files used to grade performance assessments will be retained until diplomas and diploma supplements are legally valid.
- Final papers such as master's theses and diploma theses are kept for a minimum of 10 years.
- Diplomas and diploma supplements are kept for at least 20 years from the legal date of completion. After that, they are handed over to university or state archives.

25. Provision of Personal Data as Statutory or Contractual Requirement; Requirement Necessary to Enter into a Contract; Obligation of the Data Subject to Provide the Personal Data; Possible Consequences of Failure to Provide such Data

We clarify that the provision of personal data is partly required by law (e.g. tax regulations) or can also result from contractual provisions (e.g. information on the contractual partner). Sometimes it may be necessary to conclude a contract that the data subject provides us with personal data, which must subsequently be processed by us. The data subject is, for example, obliged to provide us with personal data when our company signs a contract with him or her. The non-provision of the personal data would have the consequence that the contract with the data subject could not be concluded. Before personal data is provided by the data subject, the data subject must contact any employee. The employee clarifies to the data subject whether the provision of the personal data is required by law or contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and the consequences of non-provision of the personal data.

26. Existence of Automated Decision-Making

As a responsible company, we do not use automatic decision-making or profiling.

27. Copyrights

The copyright and all other rights to the content, images, photos or other files on the website belong exclusively to the operator of this website or the specifically named copyright holders. For the reproduction of all files, the written consent of the copyright holder must be obtained in advance.

Anyone who commits a copyright infringement without the consent of the respective copyright holder may be liable to prosecution and possibly to damages.

28. Disclaimer and Changes

All information on our website has been carefully checked. We make every effort to ensure that the information we provide is up-to-date, correct and complete. Nevertheless, the occurrence of errors can not be completely excluded, so we can not guarantee the completeness, accuracy and timeliness of information, including journalistic-editorial nature. Liability claims regarding material or immaterial damage caused by the access, use

or non-use of any information provided, including any kind of information which is incomplete or incorrect, the misuse of the connection or the technical malfunctions will therefore be rejected.

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This Privacy Policy has been generated by the Privacy Policy Generator of the [DGD – Your External DPO](#) that was developed in cooperation with German Lawyers from WILDE BEUGER SOLMECKE, Cologne and the Privacy Policy Generator of [brainbox.swiss](#).

Bracher & Partner ADVOKATUR reviewed the data protection policy for its accuracy and completeness.

It will be adapted periodically.
Last modified: March 22, 2024