

# GEMS AND LADDERS

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## DATA PRIVACY POLICY

Uster/ Switzerland, June 2014

Gems and Ladders AG (hereinafter referred to as "GEMS AND LADDERS", "we" or "us") works to ensure your privacy is protected when you are using our services online. We therefore have a policy setting out how your personal data will be processed and protected. Any changes we have made to this data policy can be found by visiting our website.

### 1. PERSONAL DATA

Personal data are any information relating to an identified or identifiable person visiting our website and/ or that enters into a customer relationship with us (hereinafter referred to as "data"). For example, this includes data such as a user's name, e-mail address, residential address, telephone number, gender or date of birth.

These data are collected, stored, used, revised, disclosed, archived or destroyed by GEMS AND LADDERS in compliance with the Federal Act on the Swiss Data Protection (FADP). In order to protect the privacy and the fundamental rights of persons when their data is processed GEMS AND LADDERS processes your data only in Switzerland and in accordance with the FADP.

We are committed to ensuring that all of your data is kept private so we provide security for all purchases you make with us. Your data will be transmitted in encrypted form and will only be processed lawfully, in particular in accordance with the FADP and our Data Privacy Policy. As the contents of this policy will be updated from time to time in compliance with the FADP, please remember to re-read it on your next visit to our website.

Processing data must be carried out in good faith and must be proportionate. Data may only be processed for the purpose indicated at the time of collection that is evident from the circumstances or that is provided for by law. The collection of data and in particular the purpose of its processing must be evident to you, i.e. the data subject. Furthermore, any consent requested pursuant to the FADP is valid only if given voluntarily on the provision of adequate information.

We take the importance of Data Privacy seriously and ensure to our best effort that your privacy is protected while using the advantages of our online-services offered by GEMS AND LADDERS. Therefore, we have devised this Data Privacy Policy in which we explain in the most transparent way how we process your personal data.

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2.

## WHY DO WE COLLECT DATA?

In providing your data you consent to us using the data collected in order to meet our commitments to you and provide the service you expect when shopping at GEMS AND LADDERS online. Your details may be used to monitor traffic to and from our website to help us improve the design and layout of the site. In the event of any problem with delivery of your items, we will use the information to get in contact with you.

3.

## WHO HAS ACCESS TO THE DATA?

- a. For the purposes of a credit check, identity verification, credit control and debt recovery, GEMS AND LADDERS will share your data with credit information agencies (such as Swiss SIX Payment Services).
- b. For newsletter subscription, GEMS AND LADDERS will process and save your data as long as you have subscribed for our newsletter.
- c. We undertake to ensure at our best efforts that we will only process your data for the intended purposes. There will be no further unauthorized sharing of data with other companies or organizations.

4.

## WHAT KIND OF DATA DO WE PROCESS AND FOR WHAT PURPOSE IS IT FURTHER USED?

We require your data for the following purposes:

- REGISTRATION* – To register at gemsandladders.com (we need your email address, name and address);
- PLACING ORDERS* – To process your orders via gemsandladders.com (we need your name and address);
- NEWSLETTER* – To subscribe to our newsletter (we need your email address and your name);
- CONTACT DETAILS* – To answer your queries (we need your email address);
- PERSONALIZING OFFERS* – To optimize our services, we will save cookies on your computer (for more detailed information on this, see below);

5.

## WHERE WILL YOUR DATA BE STORED AND PROCESSED?

Your data will in general be stored and processed in Switzerland.

6.

## FOR HOW LONG WILL THE DATA BE STORED?

Your data will only be stored for as long as it is required for the provision of our services or as long as is prescribed according to statutory or legal requirements, in particular in compliance with FADP.

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## CREDIT CARD PURCHASES – HOW DO WE PROTECT YOUR DATA?

Credit Card information will be handled by SIX Payment Services AG through their secure e-payment platform Saferpay. No personal credit card information will be either processed or stored by GEMS AND LADDERS.

8.

## WHERE CAN I TURN TO FIND OUT WHAT DATA IS PROCESSED?

You have the right to request any and all information we have processed on you at all times. We will not charge you a fee for providing this information. Should your data be incorrect or stored in error, we will be happy to correct, block or delete it. We also request you to inform us of any changes to your data. You can withdraw your consent to us further using your data for marketing purposes (e.g. sending magazines, newsletters or offers) whenever you like. Please direct your information requests, questions, complaints or suggestions on data privacy to [info@gemsandladders.com](mailto:info@gemsandladders.com).

9.

## COOKIES

A cookie is a small text file sent from a web server to a browser, which the browser sends back to the server whenever it visits the website again. It is saved locally on your computer's hard drive. We use cookies to optimize GEMS AND LADDERS online to meet your needs as they make navigation easier and more user-friendly. You can select the "do not allow cookies" setting in your browser. You can find the procedure in instructions from your browser's manufacturers. We would like to remind you that if you do not accept the cookies, then the functionalities on GEMS AND LADDERS online and our websites will be extremely limited and some services do not work at all.

10.

## LINKS

[gemsandladders.com](http://gemsandladders.com) may contain links to other websites beyond our control. We cannot be held liable for breaches of integrity or content on these websites – we simply provide the links to make it easier for people visiting our site to find more information within specific areas.

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## COPYRIGHT

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