



## Privacy Notice for Oettingerdavidoff.com

Last updated: August 31, 2023

Please note that other privacy policies may apply in relation to our use of your personal data other than in connection with the types of interaction listed above.

Please read this Privacy Notice carefully to find out about:

1. Who we are
2. Personal data we collect about you, how it is used and why, including the legal basis for our processing
3. Press communications
4. Who we share your personal data with
5. How we use cookies
6. How long we keep your personal data for
7. Your rights
8. Links to other websites
9. Changes to this Privacy Notice
10. How you can contact us
11. Details of the personal data we collect about you, how it is used and why, including the legal basis for our processing.

You have the right to object to certain types of processing, including processing for direct marketing (which we do only with your consent). For more information, please see the section “Your rights”.

If you have any questions about this Privacy Notice or you wish to exercise any of your rights in relation to your personal data, please contact us at [privacy\(at\)davidoff.com](mailto:privacy(at)davidoff.com)

### 1. Who we are

When you interact with Oettinger Davidoff AG for one or more of the reasons set out at the start of this Privacy Notice, the personal data that Oettinger Davidoff AG collects from you, or that you provide to Oettinger Davidoff AG, is controlled by the Oettinger Davidoff AG.

References in this Privacy Notice to “we” or “us” are to Oettinger Davidoff AG.

We are committed to protecting your privacy and are (depending on the reason for your interaction with us, as explained above) the data controller of your personal data within the meaning of data protection laws applicable in Switzerland and the European Economic Area (“EEA”).

### 2. Personal data we collect about you, how it is used and why, including the legal basis for our processing

The table at the end of this Privacy Notice describes the types of personal data we collect about you, how it is used and why. It also sets out the legal basis for us processing personal data about you in this way.

We may combine the personal data we collect about you through the different channels you use to interact with us (for example, browsing our Site, contacting us). In addition, we may combine the information we hold about you with information about you held by our partners where you have agreed that they can share your information with third parties. It is in our legitimate interests to do this so that we can form a clearer picture about our customer base and as a result improve our services and Public Relations activities (which could also benefit you).

If you ask that we stop using your personal data (see the section “Your rights”) then we will not be able to provide you with the service of being part of our press distribution list.

### 3. Press communications

In order to provide you with all of the benefits of Oettinger Davidoff AG, we ask for your permission to send you press releases with information about the latest Corporate and Brand news, products, special events, offers, promotions and other benefits (as applicable depending on what you have registered for) at Oettinger Davidoff AG. We also ask for your permission to send you our press newsletter. We will use your email address to contact you with this information.

You can choose to withdraw your permission at any time by clicking on the opt out link in any newsletter email you receive from us or by sending an email to us at [info@oettingerdavidoff.com](mailto:info@oettingerdavidoff.com)

### 4. Who we share your personal data with

For the purposes set out in the section “Personal data we collect about you, how it is used and why, including the legal basis for our processing”, we sometimes provide your personal data to certain service providers who perform certain business operations on our behalf. These are:

- SAP AG: Our CRM software provider for application hosting, platform support and operations.
- Pagnos GmbH: Our CRM service partner for consulting, application development and consumer data management.

- Amazon Web Services: Our Email service partner to distribute email campaigns to recipients.

In some cases, the personal data we collect from you may also be accessed or processed outside Switzerland and the EEA, for example where we use service providers who are located abroad, or who process your data or have it processed outside these territories. Such destinations may not have laws which protect your information to the same extent as in Switzerland or the EEA. We have obligations to ensure that your personal data is only accessed or processed from territories outside Switzerland or the EEA where the competent authorities have decided that the territory in question ensures an adequate level of protection (known as a ‘whitelisted’ territory) or, in the absence of such a decision, there are appropriate safeguards in place to protect your personal data. For example, if your personal data is accessed or processed from a territory outside the EEA which is not white listed, the appropriate safeguards may be provided by standard data protection clauses adopted by the European Commission (known as ‘model clauses’), a copy of which can be found [here](#). In certain cases, we may transfer data without such safeguards, for example if you have provided consent to the disclosure, or if it is necessary in relation with a contract or to defend, exercise or enforce legal claims.

Please ask us if you would like more information about the safeguards that are used to protect your personal data when it is processed outside the EEA (see the section “How you can contact us”).

In addition, we may share your personal data with other organizations in the following circumstances:

- if we are required by applicable law or a public authority to share information about you;
- if we need to share information about you in order to establish, exercise, defend or protect the rights, property or safety of our business, our customers, or others. This includes, in specific cases, exchanging information with other organizations for the purposes of fraud protection; and
- to successors in title or replacement operators of all or part of our respective businesses.

### 5. How we use cookies

We use cookies to enable our systems to recognize your device so that we can personalize and improve your customer experience whilst using our Site and provide you with relevant online advertising. Please see the section “Personal data we collect about you, how it is used and why, including the legal basis for our processing” and our Cookie Policy available at [oettingerdavidoff.com/pages/cookie-policy](https://oettingerdavidoff.com/pages/cookie-policy) to find out more.

### 6. How long we keep your personal data for

We retain your personal data for no longer than is necessary for the purposes for which the information is collected (see the section “Personal data we collect about you, how it is used and why, including the legal basis for our processing” for details of the relevant purposes). When determining the relevant retention periods, we will take into account factors including:

- legal obligation(s) under applicable law to retain data for a certain period of time;
- statute of limitations under applicable law;
- (potential) disputes; and
- guidelines issued by relevant national data protection regulators.

Otherwise, we securely erase your information once this is no longer needed for the purposes for which the information is collected.

## 7. Your rights

By law, you have the following rights with regard to your personal data, subject to certain conditions and limitations.

<b>Rights</b>	<b>What does this mean?</b>
1. Right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights. This is why we are providing you with the information in this Privacy Notice.
2. Right of access	You have the right to obtain access to your personal data (if we are processing it) and certain other information (similar to that provided in this Privacy Notice). This is so you are aware and can check that we are using your personal data in accordance with data protection law.
3. Right to rectification	You are entitled to have your personal data corrected if it is inaccurate or incomplete.
4. Right to erasure	This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your personal data where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
5. Right to restrict processing	You have rights to 'block' or suppress further use of your personal data. When processing is restricted, we can still store your personal data, but may not use it further. We keep lists of people who have asked for further use of their personal data to be 'blocked' to make sure the restriction is respected in future.
6. Right to data portability	You have rights to obtain and reuse your personal data for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your personal data between our IT systems and theirs safely and securely, without affecting its usability.
7. Right to object to processing	<b>You have the right to object to our processing, including processing for direct marketing</b> (which we do only with your consent).
8. Right to withdraw consent	If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for direct marketing. As noted above, if you withdraw consent then we may not be able to provide you with services that depend on the use of your personal data.

## Rights

### What does this mean?

9. Right to lodge a complaint      You have the right to lodge a complaint about the way we handle or process your personal data with your national data protection regulator.

We are required by law to act on requests and provide information free of charge, except where your requests are manifestly unfounded or excessive (in particular because of their repetitive nature) in which case we may charge a reasonable fee (taking into account the administrative costs of providing the information or communication or taking the action requested) or refuse to act on the request. Please consider your request responsibly before submitting it. We will respond to your request as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we will let you know.

To find out how to submit a request, please see the section “How you can contact us”.

### 8. Links to other websites

The Site may contain links to other websites operated by unrelated companies and persons (“Third Party Website”). These links are provided for your information only. The inclusion on the Site of any link to a Third-Party Website does not mean that we accept any responsibility for that Third-Party Website, its content or use, or the use of any features, products and/or services made available through that Third-Party Website. We have no control over Third Party Websites, or any information or materials contained on them and have not investigated, monitored, or checked any Third-Party Websites for accuracy, completeness or conformance with applicable laws and regulations. We are not responsible for any damages or injuries caused as a result of your use of, or reliance on, Third-Party Websites or any information or materials contained on them. You access and use Third-Party Websites at your own risk.

### 9. Changes to this Privacy Notice

We reserve the right to make changes to this Privacy Notice at any time, so please check our Site regularly to keep informed of changes.

### 10. How you can contact us

If you have any questions about this Privacy Notice or you wish to exercise any of your rights in relation to your personal data, please contact us at [privacy\(at\)davidoff.com](mailto:privacy(at)davidoff.com).

### 11. Details of the personal data we collect about you, how it is used and why, including the legal basis for our processing

Type of interaction with us	Types of personal data we collect	Purpose of processing (how and why we use your personal data)	Legal basis for processing	Controller(s) of your personal data
Accessing and using our Site	We collect cookies from your device when you visit our Site. Please see our Cookie Policy available at <a href="https://oettingerdavidoff.com/pages/cookie-policy">oettingerdavidoff.com/pages/cookie-policy</a> to find out more.	Cookies enable our systems to recognize your device so that we can: <ul style="list-style-type: none"><li>• provide important features and functionality on our Site;</li><li>• improve the way our Site works by providing you with personalised access and an enhanced Site;</li></ul>	Visiting our Site with your browser settings adjusted to accept cookies tells us that you want to use our Site and that you consent to our use of cookies as described in this Privacy Notice and our Cookie Policy available at <a href="https://oettingerdavidoff.com/pages/cookie-policy">oettingerdavidoff.com/pages/cookie-policy</a>	Oettinger Davidoff AG

Type of interaction with us	Types of personal data we collect	Purpose of processing (how and why we use your personal data)	Legal basis for processing	Controller(s) of your personal data
		<ul style="list-style-type: none"> <li>• monitor and analyze usage of our Site to improve its performance;</li> <li>• deliver online advertising that we believe is most relevant to you; and</li> </ul> Please see our Cookie Policy available at <a href="http://oettingerdavidoff.com/pages/cookie-policy">oettingerdavidoff.com/pages/cookie-policy</a> to find out more, including how to accept or reject new cookies and to delete existing cookies.		
Press Newsletter (if you sign up to receive it by itself)	We collect the information you provide to us when you sign up to receive our newsletter and any further information you provide to update your registration details from time to time. This information includes your email address, first name, last name, postal address, country, preferred language, date of birth, publication, company.	We process your personal data to: <ul style="list-style-type: none"> <li>• provide you with our press newsletter; and</li> <li>• administer our database of users who have signed up to receive our newsletter: We use your personal data so that we can notify you about changes to our newsletter service. We also process your personal data to ensure that the information we hold about you is kept up to date and accurate.</li> </ul>	We process your personal data after obtaining your consent to do so for the purposes of sending you press releases with information about the latest news at the Oettinger Davidoff AG. Please see the section “Press communications” to find out more about your choices when it comes to Public Relation communications. In addition, it is in our legitimate interests to collect and use the personal data referred to in the column to the left so that we can: <ul style="list-style-type: none"> <li>• provide you with a service that is as useful and beneficial to you as possible; and</li> <li>• better understand our user base so that we can improve our services and communication activities (which could also benefit you).</li> </ul>	Oettinger Davidoff AG
Events	We collect the information you provide to us when you register to events organized or	We need your personal data in order to send you event invitations, save-the-dates, tickets,	It is in our legitimate interests to collect and use the personal data	Oettinger Davidoff AG

Type of interaction with us	Types of personal data we collect	Purpose of processing (how and why we use your personal data)	Legal basis for processing	Controller(s) of your personal data
	<p>enabled by Oettinger Davidoff AG or one of the companies defined in the section "Who we are". The information we collect may differ depending on the type of event but is likely to include your first name, last name, email address, preferred language, publication, company, phone number and postal address.</p>	<p>reminders and other information in case that event details might change.</p>	<p>referred to in the column to the left so that we can:</p> <ul style="list-style-type: none"> <li>• provide you with a service that is as useful and beneficial to you as possible; and better understand our customer base so that we can improve our services and marketing activities (which could also benefit you).</li> </ul>	
Contacting us	<p>If you contact us regarding this Privacy Notice by, for example, email, we may keep a record of that correspondence and any personal data that you provide, such as your name and email address.</p>	<p>We use your personal data so that we can respond to your communications.</p>		