

# SNABLIND Privacy Policy

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# 1. General information

## 1.1. What is the privacy policy about?

It is possible that we (SNABLIND) will process your personal data.

This can happen, for example, if:

- You obtain products or services from us, for example, via our online shop or our employees.
- You offer or sell us your own products or services.
- You are interested in our products or services and make contact with us for that reason.
- You visit one of our websites to find out about us, our products and our services.
- You subscribe to one of our newsletters or to “tactuel”, our specialist magazine, so that you can stay up to date with the latest developments.
- You find out about us or connect with us on a social media platform.
- You apply for a job with us and send us personal information, such as your CV.
- We obtain your data to make contact with you and to encourage you to become a donor or to subscribe to our newsletter.
- You are or would like to become one of our donors.
- You are an attendee or an instructor on one of our courses.
- You ask us for advice and/or use our services.
- You are a member of a committee or a board.
- You register with us as a volunteer.
- You would like to become more visible as a specialist in the field.

In this privacy policy, we use the term “applications” to refer to this (non-exhaustive) list of possible points of contact and the related data processing.

In this privacy policy, our aim is to inform you about what we do with your data in the different applications and which data this can be. Or to use data protection jargon: We are transparent about our data processing, the purposes of the processing and other important points that are necessary to enable you to exercise your rights.

As you can tell from the list of applications above, there are many different reasons for processing data. Depending on which of the applications apply to you, different information in the privacy policy will be relevant for you. To make this clearer for you, we have broken our privacy policy down into the following areas or “applications”:

- [General information](#)
  - This is information that applies to all applications, such as the question “Who is responsible for data processing?”.
  - It also includes an overall summary of information that is explained in more detail in the individual applications and uses examples to make it easier to understand.
  - For instance, the general information lists all the possible categories of data recipients (such as IT service providers). If necessary, we then describe the individual categories and individual recipients in greater detail in the applications.

- [Additional information for committees and boards](#)
  - This information may apply to you if you are a member of a board or a committee or want to become a member.
  - You will find the basic information under the heading "[General information](#)". In this section "Information for committees and boards", the information is described in more detail or expanded in relation to the contract applications.
- [Additional information for donors, interested parties and newsletter subscribers](#)
  - This area may be relevant for you if your data is stored in our donor database or newsletter tool.
  - This may be the case, for example, if we have obtained your data from a publicly available source (such as the telephone directory) and stored it in our database.
  - Here you can find out which data, sources and data processing this concerns and what it may mean for you.
  - This information may be relevant for you if you have subscribed to one of our newsletters or would like to subscribe.
  - Here you can find out how we process your data in the context of the newsletter subscription and what you can do if you do not want your data to be processed (any longer).
  - This information may be relevant for you if you have subscribed to "tactuel", our specialist magazine, or would like to subscribe.
  - Here you can find out how we process your data in the context of the "tactuel" subscription and what you can do if you do not want your data to be processed (any longer).
  - Here you can find out how we process your information and data in the context of a donation.
  - You will find the basic information under the heading "[General information](#)". In this section "Information for donors, interested parties and newsletter subscribers", the information is described in more detail or expanded in relation to the marketing applications.
- [Additional information for specialists and specialist groups](#)
  - This area may interest you if you have registered with us as a volunteer. Here you can find out how we process your information and data.
  - This may also apply to you if you work with us as a communication assistant.
  - You will find the basic information under the heading "[General information](#)". In this section "Information for specialists and specialist groups", the information is described in more detail or expanded in relation to the specialist applications.
- [Additional information for website visitors](#)
  - This area may be of interest to you if you want to visit one of our websites.
  - It can also apply to you if you want to find out about us or connect with us on a social media platform.
  - Here you can find out which data we obtain about you and how we process it.

- You will find the basic information under the heading "[General information](#)". In this section "Information for website visitors (including social media)", the information is described in more detail or expanded in relation to the relevant website and social media applications.
- [Additional information on training and courses for specialists](#)
  - This may apply to you if you are interested in taking a course or if you register for one.
  - You will find the basic information under the heading "[General information](#)". In this section "Information on training and courses for specialists", the information is described in more detail or expanded in relation to the relevant courses.
- [Additional information for recipients of advice and services](#)
  - This area may be of interest to you if you are a client of the specialist centre for deafblindness or a customer of the specialist centre for products and services. Here you can find out how we process your information and data in the context of providing advice or a service.
  - This may be when we (would like to) offer or sell you our products or services, in other words, when you become a customer, a client or an interested party.
  - You will find the basic information under the heading "[General information](#)". In this section "Information for recipients of advice and services", the information is described in more detail or expanded in relation to the service applications.
- [Additional information for job applicants](#)
  - This area may interest you if you want to apply for a job with us and provide us with information about yourself (for example, your CV).
  - Here you can find out how we process your information and data in the context of a job application.
  - You will find the basic information under the heading "[General information](#)". In this section "Information for job applicants", the information is described in more detail or expanded in relation to job applications.

## 1.2. Who is responsible for processing your personal data?

SNABLIND ("we", "us") is responsible for the data processing described in this privacy policy, unless information to the contrary is provided in individual cases. If you have questions or if you want to exercise your rights under data protection law (in particular the right to request information about your data), you can contact us at the following address:

### Contact for your data protection questions:

SNABLIND  
 Schützengasse 4  
 CH-9001 St. Gallen  
 dataprotection@snab.ch  
 +41 71 223 36 36

## 1.3. Which personal data do we process?

We may process different categories of data about you, including current and, if necessary, past information, if individual details change (for example, a change of address). The most important categories are as follows:

- **Master data:** Master data is basic data such as your first name, last name and e-mail address.
- **Extended master data:** Extended master data includes more detailed basic information such as your home address, employer's address, date of birth, salary data, family members, children, nationality, place of origin, emergency contact, OASI number etc.
- **Sensitive master data:** This includes any impairments, marital status and date, residence status, further education, recommendations and employment references, extract from the register of convictions, withholding tax information etc.
- **Payment data:** Examples include bank details and account information in the event of a payment etc.
- **Photos:** We may receive or create photos, videos and audio recordings where you can be identified (for example, at events, from security cameras etc.). In addition, we may take portrait photos or group photos or hold photo shoots.
- **Technical data:** If you use our website or other online offerings, we may collect the IP address of your device and other technical data. To ensure that our website functions correctly and, where applicable, to record your behaviour, we may also assign an individual code to you and your device (for example, in the form of a cookie, see section 5.2.4). Technical data may be linked with data from other categories (and, where applicable, with you) in the context of user accounts, registrations, the implementation of contracts and the provision of our products and services.

You inform us about much of the data referred to in this [section 1.3](#) and so we receive it directly from you (for example, via forms, in your communications with us, in connection with contracts and services, when you use the website etc.). You are often not obliged to provide us with information, except in some individual cases, for example, in the context of legal obligations. However, if you enter into a contract with us or want to make use of our services, you are required by your contractual obligations in the relevant contract to provide us with data, in particular, master data, contract data and registration data. We will inevitably process your technical data if you use our website. If you want to access specific systems, you need to give us your registration data.

We also take data from publicly available sources (for example, the media and the internet, including social media) where this is permitted.

In addition, we obtain certain data from public bodies and companies (for example, dialogue marketing service providers etc.). We also collect data from service providers, processors and from third-party sources (for example, credit reference agencies) and other external sources (for example, the nonprofit fundraising platform RaiseNow, the direct marketing service provider KünzlerBachmann Directmarketing AG etc.).

You can find further information about the data we process in the additional information for the individual applications under the heading "Which of your data do we process and for how long?".

- [Additional information for committees and boards](#)
- [Additional information for donors, interested parties and newsletter subscribers](#)
- [Additional information for specialists and specialist groups](#)

- [Additional information for website visitors](#)
- [Additional information on training and courses for specialists](#)
- [Additional information for recipients of advice and services](#)
- [Additional information for job applicants](#)

#### **1.4. How long do we process your personal data for?**

We process your data for as long as required for the purposes of processing, for statutory retention periods and for our legitimate interests in processing (including for the purposes of documentation and evidence) or for as long as it must be stored for technical reasons. You can find further details of the duration of data storage and processing under the individual applications and the accompanying data categories. We will delete or anonymise your data at the end of the storage or processing period as part of our normal business processes, unless legal or contractual obligations prevent us from doing so. You can find further information about the data we process in the additional information for the individual applications under the heading “Which of your data do we process and for how long?”.

- [Additional information for committees and boards](#)
- [Additional information for donors, interested parties and newsletter subscribers](#)
- [Additional information for specialists and specialist groups](#)
- [Additional information for website visitors](#)
- [Additional information on training and courses for specialists](#)
- [Additional information for recipients of advice and services](#)
- [Additional information for job applicants](#)

#### **1.5. For what purposes do we process personal data?**

We process your data for some fundamental purposes that we explain below (you will find further information about the purposes of the individual applications in the corresponding sections). These purposes represent our legitimate interests and, where applicable, those of third parties. You can find more information about the legal bases for our processing in [section 1.6](#).

- We process your data for the purpose of **communicating** with you.
- We process your data to provide you with professional advice.
- We process your data to enable you to volunteer or be a communication assistant for us.
- We process data for the purpose of entering into, managing and processing contractual and employment relationships.
- We process data for marketing and advertising purposes, for surveys and for relationship management.
- We process data for market research, to improve our services and processes and for product development.
- We can also process your data for safety and security purposes.

- We process personal data in order to comply with legislation, instructions and recommendations from public bodies and internal regulations (compliance).
- We process data for the purposes of our own risk management and of prudent corporate governance, including business organisation and development.
- We can use the data we collect to produce sales statistics for our products and services.
- We can process your data for other purposes, for example, as part of our internal processes and administration and for training and quality assurance purposes.
- We process your data to manage your donations and our relationship with you.

You can find further information about the purposes of data processing in the additional information for the individual applications under the heading “What purpose do we process your data for?”.

- [Additional information for committees and boards](#)
- [Additional information for donors, interested parties and newsletter subscribers](#)
- [Additional information for specialists and specialist groups](#)
- [Additional information for website visitors](#)
- [Additional information on training and courses for specialists](#)
- [Additional information for recipients of advice and services](#)
- [Additional information for job applicants](#)

## 1.6. On what basis do we process personal data?

One possible basis for processing data is your consent. If we ask **for your consent** to process specific data, we will inform you separately about the processing. You can withdraw your consent to future processing at any time by notifying us in writing (you can find our contact details in [section 1.2](#)). If you have a user account, you can also withdraw your consent or make contact with us via the relevant website or other service. As soon as we receive notification of the withdrawal of your consent (minor delays are possible because of the processing), we will no longer process your data for the purposes that you originally consented to, unless we have another legal basis for doing so. Your withdrawal of your consent does not affect the lawfulness of the processing that took place on the basis of your consent before it was withdrawn.

In cases where we **do not ask for your consent** to process your data, we base the processing of your personal data on the fact that it is necessary for the purpose of entering into and implementing a contract with you (or the body that you represent) or that we or third parties have a legitimate interest in doing so, in particular for the purposes described in each case. These include, for example, processing quotations and contracts, direct marketing, fund-raising, optimising our website and improving our services, but also complying with the provisions of legislation, where compliance is not already recognised as a legal basis by the applicable data protection laws.

If we receive sensitive data (for example, health data or information about political, religious or philosophical beliefs), we can also process your data on other legal bases, for example, in the case of disputes because of the need to process the data for a legal case or the assertion of or defence against legal claims.



## **1.7. What happens in the case of profiling and automated individual decision-making?**

We may carry out an automated assessment of certain personal characteristics for the purposes referred to above using your data (profiling). For example, we do this when we want to identify preferences, but also to determine payment and creditworthiness risks and to carry out statistical evaluations. We may also create profiles for the same purposes. This means that we may combine preference data and other data to gain a better understanding of you as a person with your various interests and other characteristics.

In certain situations, it may be necessary for us to automate specific decision-making processes for reasons of efficiency. This is described as automated individual decision-making. In this case, we will inform you and take the necessary measures required by the applicable legislation.

## **1.8. Who do we disclose personal data to?**

In the context of our data processing and the corresponding purposes, we transfer your personal data to third parties and, in particular, to the following categories of recipients:

- Public bodies: We may pass your data on to public offices, courts and other public bodies in Switzerland, if we are legally obliged or entitled to do so or if this seems necessary to protect our or your interests. The public bodies process the data about you that they receive from us at their own responsibility.
- Other people: This refers to other cases where the involvement of third parties is necessary for the purposes listed in [section 1.5](#) and the purposes of the individual applications. (Examples include recipients of meeting minutes, an external secretariat, committee members, stakeholders, management, the executive board, working groups, specialists, customers, clients, course participants, course instructors, exam experts, universities, communication assistants etc.).
- Service providers: We work with service providers both inside and outside Switzerland who process your data on our behalf or are jointly responsible for processing or who receive data about you from us and process it at their own responsibility (for example, IT and cloud service providers, courier companies, advertising service providers, login service providers, banks, interpreters, media partners, project juries, specialists, credit reference agencies, debt collection companies and credit information agencies etc.).

All these categories of recipients can also bring in third parties and make your data available to them. We can restrict processing by certain third parties (for example, IT service providers), but not others (for example, public bodies, banks etc.).

We also allow certain third parties to collect your personal data on our website and at our events (for example, media photographers, providers of tools that we have incorporated into our website etc.). Provided that we do not play a decisive part in collecting the data, these third parties are solely responsible for it. If you have concerns or want to exercise your data protection rights, please contact the third parties directly.

You can find further information about the possible transfer of personal data in the additional information for the individual applications under the heading “Who do we disclose your data to?”.

- [Additional information for committees and boards](#)
- [Additional information for donors, interested parties and newsletter subscribers](#)
- [Additional information for specialists and specialist groups](#)
- [Additional information for website visitors](#)
- [Additional information on training and courses for specialists](#)
- [Additional information for recipients of advice and services](#)
- [Additional information for job applicants](#)

## **1.9. Is personal data transferred abroad?**

As explained in [section 1.8](#), we disclose data to other organisations. These are sometimes based outside Switzerland. Therefore, your data can be processed in Europe and in other countries outside Europe, such as the USA.

Foreign recipients are often based in a country with adequate legal data protection (see [here](#) for Switzerland and [here](#) for the EU). If a recipient is in a country without adequate legal data protection, we impose a contractual commitment on the recipient to comply with data protection regulations (for this purpose we normally use the standard contractual clauses of the EU Commission which are available [here](#)), unless the recipient is already subject to legally recognised regulations for data protection and we cannot rely on an exemption clause. An exemption may apply in the case of legal proceedings outside Switzerland, but also in cases of overriding public interest or when the fulfilment of a contract requires a disclosure of this kind, when you have given your consent or when this concerns data that you have made generally available and you have not objected to it being processed.

Please note that data which is shared over the internet often passes through third countries. Your data may therefore be transferred abroad even if the sender and the recipient are in the same country. You can find further information about the possible transfer of personal data to other countries in the additional information for the individual applications under the heading “Is your personal data also transferred abroad?”.

## **1.10. How do we protect personal data?**

We take appropriate security measures to preserve the confidentiality, integrity and availability of your personal data, to protect it against unauthorised or unlawful processing and to prevent the risk of loss, accidental alteration, unwanted disclosure or unauthorised access.

In the case of sensitive master data, we also restrict the internal access to ensure that only people who need this data can access it.

## **1.11. What rights do you have?**

The applicable data protection legislation entitles you, under certain circumstances, to object to your data being processed or to require the processing to be restricted, in particular for purposes of direct marketing, profiling for direct advertising and other legitimate interests in processing the data. In order to make it easier for you to control the processing of your personal data, you also have the following rights in relation to our processing of data, depending on the applicable data protection legislation:

- The right to request information from us about whether we are processing your data and if so, which data
- The right to have incorrect personal data corrected
- The right to request the deletion of data
- The right to request the publication of certain personal data in a commonly used digital format
- The right to withdraw your consent if our processing is based on your consent
- The right to obtain further information on request that will help you to exercise these rights
- The right in the case of automated individual decisions ([section 1.7](#)) to express your point of view and to require the automated individual decision to be reviewed by a natural person

If you want to exercise one of the rights listed above, you can make contact with us at any time using the details in [section 1.2](#). We normally ask you to provide us with identification (for example, a copy of your identity card) to enable us to prevent the system being abused.

Please note that these rights are subject to requirements, exceptions and restrictions under the applicable data protection legislation (for example, for the protection of third parties or of business secrets). We will inform you about this where applicable.

If you do not agree with the way we manage your rights or the protection of data, please inform us or our data protection officer ([section 1.2](#)). If you are in the EEA, the United Kingdom or Switzerland, you also have the right to complain to the data protection authority in your country.

## **1.12. Will this privacy policy be amended?**

This privacy policy does not form part of a contract with you. We can amend the privacy policy at any time. The version published on this website is the current version.

Last updated 20 March 2024

## **2. Additional information for committees and boards**

### **2.1. Which data do we process and for how long?**

Please note the general information about this question in [sections 1.3.](#) and [1.4.](#)

For boards and committees, we use master data and extended master data (for example, controlling, support for the simple partnership under art. 74 of the Invalidity Insurance Act of the regional providers of services for the blind (EG74), administration and organisation of committees, address management etc.). In some cases we also process sensitive master data, payment data and other master data (for example, expense claims, information published on our website, feedback on the development of new aids etc.).

In general the data is stored for 10 years after the member leaves the board or committee (for example, administrative data concerning the committee/board).

Certain data is stored for up to 10 years after the expiry of a contract or the end of a project (for example, coordination of the simple partnership under art. 74 of the Invalidity Insurance Act of the regional providers of services for the blind (EG74), feedback on the development of new aids etc.). There are exceptions where the storage period is five years after leaving office (for example, address management, identification of affected people for inspections and assessments).

### **2.2. What purpose do we process your data for?**

We process your data for the purposes described below. These purposes represent our legitimate interests and, where applicable, those of third parties. You can find more information about the legal bases of our processing in [section 1.6.](#) Please also note the general information in [section 1.5.](#)

We process your data as part of the administrative and organisational tasks of SNABLIND (for example, address management, preparation for meetings etc.). We also need the data for communication and coordination (for example, support for the simple partnership under art. 74 of the Invalidity Insurance Act of the regional providers of services for the blind (EG74), publishing information on our website).

We need current data from you for these purposes.

### **2.3. Do we use profiling? Do we make automated individual decisions?**

We do not use profiling or automated individual decision-making for committees or boards.

### **2.4. Who do we disclose your data to?**

We may disclose your data to processors (for example, the administration system my-time, the web hosting provider METANET etc.). Please also note the general information in [section 1.8.](#)

In the context of committees and boards, it is also worth noting that the public may have access to some of your data via our website.

## 2.5. Is personal data transferred abroad?

As explained in [section 2.4](#), we disclose data to other organisations. These are sometimes based outside Switzerland. Therefore, your data can be processed in Europe and in other countries. You can find more detailed information about the legal bases for our processing and the measures taken in [section 1.9](#).

## 3. Additional information for donors, interested parties and newsletter subscribers

### 3.1. Which data do we process and for how long?

Please note the general information about this question in [sections 1.3](#) and [1.4](#).

For donors, interested parties and newsletter subscribers, we process master data and extended master data (for example, the foundation database, the newsletter for distribution centres, sending out invitations, advertising etc.). In some cases we also process sensitive master data and payment data (for example, receiving requests for support and spending the money as the donor wants, sending out the "tactuel" magazine in different formats, donation database, transferring the donation to the SNABLIND bank account etc.).

This data is stored until the termination of the donations or subscription or until a request to delete it is received (for example, foundation database, newsletter for distribution centres, donor data, subscriptions etc.).

There are exceptions where the data is stored for up to five years after it was last used (for example, people interested in rehabilitation etc.).

Other exceptions include advertising and surveys, for example, where the data is stored for up to 10 years after it was last used.

The details concerning the deletion of donors' data are as follows: When we receive a request to delete the data, all the data will be deleted, with the exception of the data stored in the donor database. Here the donor's name and address will be blocked to prevent the donor from being selected in future by SNABLIND's address broker. The data can, of course, be permanently deleted in the donor database on request, but the donor may then receive a mailing from SNABLIND at a later date.

### 3.2. What purpose do we process your data for?

We process your data for the purposes described below. These purposes represent our legitimate interests and, where applicable, those of third parties. You can find more information about the legal bases for our processing in [section 1.6](#). Please also note the general information in [section 1.5](#).

In the context of our newsletter, we process your personal data so that we can send you a personalised newsletter with your agreement. This means that you receive relevant information and offers from us and we can address you personally (in other words, by name).

We also use your data for statistical purposes and to improve the content and structure of the newsletter. This allows us to ensure that the information and offers in our newsletter

better correspond to the individual interests of the recipients.

The data provided with donations can be used for other purposes such as our e-mail newsletter and requests for donations etc.

We process your data as part of the administrative and organisational tasks of SNABLIND, for fund-raising and for collecting donations (for example, sending out information, processing requests from foundations, transferring donations etc.). We also need the data for communication and coordination (for example, sending out magazines, advertising, surveys etc.).

We need current data from you for these purposes.

### **3.3. Do we use profiling? Do we make automated individual decisions?**

We may use profiling, for example, if we divide donors into categories and if they receive different mailings on this basis. This allows us to provide you with the information that corresponds to your interests.

We do not use automated individual decision-making.

### **3.4. Do we use online tracking in our newsletter?**

Yes, this is possible. For example, our newsletter may contain a web beacon (tracking pixel) or other similar technical features. A web beacon is an invisible graphic that is 1x1 pixel in size and is linked to the user ID of the newsletter subscriber.

The web beacon is deleted when you delete the newsletter. To prevent the web beacon in our newsletter from being used, you can change the settings in your e-mail application (for example, Outlook) so that no HTML is displayed in e-mails.

Our newsletters often contain links to other sources of information. These include our own and external websites and articles in social media. When you click on these links, we may record this and save information about your behaviour. If the link leads to one of our own sources (for example, one of our own websites), under certain circumstances we may follow and analyse your behaviour on this source of information. You can find more information about this in [section 5](#). If a link leads to a third-party website, it is also possible that the third party will evaluate your behaviour on the website.

### **3.5. Who do we disclose your data to?**

We may disclose your data, including tracking information, to processors (for example, the nonprofit fundraising platform RaiseNow, the direct marketing service provider KünzlerBachmann Directmarketing AG etc.). Please also note the general information in [section 1.8](#).

### **3.6. Is personal data transferred abroad?**

As explained in [section 3.5](#), we disclose data to other organisations. These are sometimes based outside Switzerland. Therefore, your data can be processed in Europe and in other countries. You can find more detailed information about the legal bases for our processing and the measures taken in [section 1.9](#).



## **4. Additional information for specialists and specialist groups**

### **4.1. Which data do we process and for how long?**

Please note the general information about this question in [sections 1.3.](#) and [1.4.](#)

For specialists and specialist groups, we generally process master data, extended master data and sensitive master data (for example, assessments of the needs of customers and clients, collecting data in research projects, lists of specialist groups, administration, coordination and organisation of volunteers etc.). In some cases we also process payment data (for example, coordination and communication with course instructors, fees for experts, administration, coordination and organisation of communication assistants and volunteers etc.).

In a few cases we only process master data and extended master data (for example, market research, evaluation of aids etc.).

The data is stored for up to 10 years after the end of the project, the last use or the person's departure from the organisation (for example, coordination and communication with course instructors, lists of specialist groups etc.).

Certain data is stored until the termination of the contract (for example, in market research, in assessments of the needs of customers and clients etc.).

### **4.2. What purpose do we process your data for?**

We process your data for the purposes described below. These purposes represent our legitimate interests and, where applicable, those of third parties. You can find more information about the legal bases for our processing in [section 1.6.](#) Please also note the general information in [section 1.5.](#)

We process your data as part of the administrative and organisational tasks of SNABLIND (for example, administration and organisation of courses, checking technical qualifications, organising courses for volunteers, statistics for annual reports etc.).

We also need the data for communication and coordination (for example, supporting and providing communication assistants and volunteers to our clients, coordinating the expert groups etc.).

In addition, we use certain data for market research (for example, investigating the need for potential products/services, identifying the specific requirements of customers and clients, etc.).

We need current data from you for these purposes.

### **4.3. Do we use profiling? Do we make automated individual decisions?**

We do not use profiling or automated individual decision-making for specialist groups.

### **4.4. Who do we disclose your data to?**

We may disclose your data to processors (for example, the administration system my-time, the web hosting provider METANET, the e-mail marketing software company CleverReach etc.). Please also note the general information in [section 1.8.](#)



The following people and organisations in particular receive your data if you are a specialist or specialist group: customers, clients, course participants, universities, research institutes, specialists, members of the expert groups, communication assistants etc. The lists of specialist groups are also seen by the invalidity insurance (IV). We process the personal data of volunteers primarily internally in the specialist centre for deafblindness.

#### **4.5. Is personal data transferred abroad?**

As explained in [section 4.4](#), we disclose data to other organisations. These are sometimes based outside Switzerland. Therefore, your data can be processed in Europe and in other countries. You can find more detailed information about the legal bases for our processing and the measures taken in [section 1.9](#).

### **5. Additional information for website visitors**

#### **5.1. General information**

This area may be of interest to you if you are visiting one of our websites. It can also apply to you if you want to find out about us or connect with us on social media networks or a social media platform. In these cases, it is not always obvious which data about you is collected and processed (sometimes in the background). For this reason, this section contains information about this kind of data processing. As a result, you can make an informed decision about whether and how you want to interact with us on our websites or on social media.

#### **5.2. Which data do we process and for how long?**

You can find the general answers to the question “Which data do we process and for how long?” in [section 1.3](#) and [section 1.4](#) of this privacy policy. In this section, we want to provide more specific answers about the way we process data in an online context.

##### **5.2.1. Log files**

When people visit our websites, the server temporarily stores data about each access in a log file. Until the file is automatically deleted, the IP address of the computer making the request, the data and time of the access, the name and URL of the file accessed, the website that the access came from, the operating system of the user’s computer, the user’s browser and the country where the user accessed the website from are automatically stored. This data is generally collected and processed in anonymised form, in other words, without a reference to a specific person. However, if our network infrastructure is attacked or if we suspect that our website is being used in an unlawful or improper way, we can assess the IP address for clarification and defence purposes and, if necessary, use it in a criminal case for identification and to take civil and criminal proceedings against the relevant users.

##### **5.2.2. Contact form**

On some pages of our website you will find a button or a link that takes you to our contact form. We use the data you enter in the form to answer the questions you ask us or to provide the services you want and, if necessary, to contact you by phone.

##### **5.2.3. Services provided by third parties**

For certain digital services and infrastructure, we use the services of third parties. For

example, our websites and other digital offerings are hosted by external service providers, including METANET. As a result, personal data may be stored on METANET's servers in this context. We also use the services of third parties to provide media and other display features on our websites. For example, we include content on the website that is translated into sign language and use the Frutiger font from fonts.com. This may also involve the disclosure of certain data.

#### **5.2.4. Online tracking and online advertising (including cookies)**

We use a variety of methods on our website to enable us and the third parties we employ to recognise you when you use our website and, under certain circumstances, to track your use of the website over several visits. This section contains information about this. In essence, this is about distinguishing your accesses to our website (via your system) from other users' accesses. We do not want to discover your identity, even if we can, in cases where we or the third parties we employ can identify you in combination with your registration data. But even without registration data, the methods we use are designed to allow you to be identified as an individual visitor with every page view, for example, when our server (or a server belonging to a third party) assigns a cookie to you or your browser. Cookies are data files that your web browser stores on your computer's hard drive when you visit our website. Cookies can contain the following information, for example:

- Browser type/version
- Operating system
- Referrer URL (the page you visited before)
- Host name of the computer accessing the website (IP address)
- Time of the server request
- Device type

We use cookies on our website and allow certain third parties to do so. Depending on the purpose of the cookies, we ask for your consent before using them. You can set your browser to block specific cookies or equivalent technologies or to delete existing cookies. You can also use browser add-ins to block tracking by specific third parties. You can find more information about this in your browser's online help (generally under the heading "Data protection") or on the websites of the third parties listed below. You can also use a plug-in to prevent the data generated by the cookie being collected and processed. A distinction is made between the following types of cookies (and other similar technologies):

- **Functional cookies (absolutely necessary):** Some cookies are necessary for the functioning of the website itself and for specific functions. For example, they ensure that you can move from one webpage to another without losing the information you have entered in a form. They also make sure that you stay logged in. These cookies are temporary (they are known as session cookies). If you block them, the website may no longer function. Other cookies are needed to allow the server to store decisions you have made or data you have entered from one session (in other words, one visit to our website) to the next, if you use this function (for example, your choice of language, your consent, the automatic login function etc.). These cookies are often deleted when you end a session or close your browser. Otherwise they expire after a period of up to 24 months.

- **Statistical cookies:** We use cookies to record and analyse the use of our website, sometimes over more than one session, so that we can optimise our website and our other offerings and make sure that they better meet users' needs. This often involves the use of analysis services from third-party providers (see for example, [section 5.2.5](#)). Statistical cookies also expire after a period of up to 24 months. You can find details on the websites of the third-party providers.
- **Marketing cookies:** We and potential future contractual advertising partners have an interest in directing advertising at specific target groups, in other words, only showing adverts to people who may be interested in it. We could make use of Google Analytics Remarketing for this in the future. If you give your consent, we and potential future contractual advertising partners may also use cookies for this purpose which allow us to record the content you have accessed or the contracts you have concluded. Depending on the situation, these cookies expire after a few days or up to 24 months. If you give your consent to the use of these cookies, you will see the corresponding adverts. If you do not consent to the cookies, you will see no advertising.

### **5.2.5. Google Analytics and Tag Manager**

We currently use the following solutions to analyse our online tracking and, in some cases, also our online advertising:

**Google Analytics:** The provider of the Google Analytics service is Google LLC. For the purposes of the EU General Data Protection Regulation (GDPR) and the Swiss Data Protection Act (FADP), Google Ireland is responsible (both referred to as "Google"). Google tracks the behaviour of visitors to our website with statistical cookies (see above), including the duration, frequency, pages accessed, geographical origin of the access etc. On this basis it creates reports for us concerning the use of our website and how you found our website (via Google Ads, impressions on the Google Display Network, organic searches etc.). Google supplies us with reports and can therefore be regarded as our processor. However, Google also processes data for its own purposes and may in some circumstances, on the basis of the data that it has collected, be able to draw conclusions about the identity of the website visitors, create personal profiles and link this data with the Google accounts of these people. You should assume that your data will be processed in this way if you consent to the use of statistical cookies. You can find information about data protection in Google Analytics [here](#). If you have a Google account, you can find further information about Google's data processing [here](#). Our websites may also use Google Tag Manager. This tool triggers other programs and services that may under certain circumstances collect data, in particular for Google Analytics (see above). Google Tag Manager does not access this data. If tracking tags are deactivated on a domain or cookie level, this applies to all tracking tags implemented with Google Tag Manager. You can find information from Google about data protection in this tool [here](#).

## **5.3. Which data do we process on our pages on social media networks?**

We may have pages and other types of online presence (fan pages, channels, profiles etc.) on social media networks and other platforms operated by third parties and we may collect the data about you described in [section 1.3](#) and the following sections. We obtain this data from you and from the platforms if you contact us via our online presence (for example, if you communicate with us, comment on our posts or visit our pages).

At the same time, the platforms evaluate your use of our online presence and link this data with other data relating to you that is available to the platforms (for example, information about your behaviour and your preferences). The platforms also process this data for their own purposes and at their own responsibility, in particular for marketing and market research (for example, to personalise adverts) and to manage their services (for example, the content that they show you). We can reproduce (in our adverts on the platform and elsewhere) the content that you publish yourself (for example, comments on an announcement). We and the operators of the platforms can delete or restrict access to content provided by you or about you (for example, inappropriate comments) in accordance with the guidelines on using the platform. More information about the processing carried out by the operators of the platforms can be found in their privacy policies. There you can also learn which countries the operators process your data in, which rights of information and deletion and other data subjects' rights you have, how you can exercise them and where you can find further information. We currently use primarily the following platforms:

- Facebook:  
Here we have the following pages: <https://www.facebook.com/szblind> and <https://www.facebook.com/UCBAVEUGLES>. For users from Europe, the organisation responsible for operating the platform is Facebook Ireland Ltd., Dublin, Ireland. Its privacy policy is available [here](#).
- YouTube:  
Here we have a channel for SNABLIND. The organisation responsible for providing the YouTube service is Google. For the purposes of the GDPR and the Swiss Data Protection Act (FADP), Google Ireland Ltd. Dublin, Ireland, is responsible. Its privacy policy is available [here](#).
- LinkedIn:  
Here we have the following profile: <https://www.linkedin.com/company/szblind/mycompany>. The organisation responsible for operating the platform is LinkedIn Ireland Unlimited Company, Dublin, Ireland. Its privacy policy is available [here](#) and you can find its cookie policy [here](#).
- Instagram:  
Here we have the profile szblind. For users from Europe, the organisation responsible for operating the platform is Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. Its privacy policy is available [here](#).

#### **5.4. What purpose do we process your data for?**

We process your data for the overall purposes listed in [section 1.5](#). On our website and in our social media profiles, we process your data in particular for the following purposes:

- To allow our website to be used (establishing a connection) and to guarantee the long-term security and stability of the system
- To evaluate the use of our website, compile reports about website activities and provide further services relating to the use of the website and the internet for purposes of market research and to design the website to meet users' needs

- To design our website and social media profile in accordance with users' requirements and to optimise them on an ongoing basis
- To address our (potential) customers and clients personally and in a personalised way and to offer them ideal, individual solutions
- To respond to contact enquiries
- For marketing and communication purposes
- To manage online advertising on websites and social media platforms and to reduce overexposure

## 5.5. Who do we disclose your data to?

You can find a list of the possible categories of data recipients in [section 1.8](#). Here in section 5.5, we also mention specific recipients and to give a better overview, we also refer again to the possible recipients described in [section 5.4](#).

METANET (Switzerland)

Google including YouTube (Ireland/USA)

fonts.com (USA)

Facebook (Ireland/USA)

LinkedIn (Ireland/USA)

Instagram (Ireland/USA)

Getunik (Zurich, Switzerland)

CleverReach (Germany)

RaiseNow (Switzerland and Germany)

Please note that when you visit our website and our social media profiles, we may transfer certain data to the recipients listed above, but this is not necessarily the case. This list is not exhaustive. Please refer to the categories of data recipients in [section 1.8](#).

## 5.6. Is your personal data also transferred abroad?

On our website we use Google Analytics and equivalent services. This is a service provided by third parties that may be located anywhere in the world (in the case of Google Analytics it is Google Ireland (with headquarters in Ireland), Google Ireland uses Google LLC (with headquarters in the USA) as its processor (both referred to as "Google"), [www.google.com](http://www.google.com)) that allows us to measure and evaluate the use of the website (not on a personal basis). The service provider also uses permanent cookies. We have disabled data sharing and Google Signals. Although we assume that the information which we share with Google does not constitute personal data from Google's perspective, it is possible that Google uses this data for its own purposes to draw conclusions about the identity of the visitors, create personal profiles and link this data with the Google accounts of these people. If you have registered with the service provider, the service provider will be familiar with your identity. In this case, the processing of your personal data by the service provider is the responsibility

of the service provider and is governed by its privacy policy.

## **6. Additional information on training and courses for specialists**

### **6.1. Which data do we process and for how long?**

Please note the general information about this question in [sections 1.3.](#) and [1.4.](#)

For training and courses for specialists, we process master data, extended master data and sensitive master data (for example, administration and organisation of module exams and rehabilitation courses, qualification checks etc.). In some cases we also process payment data (for example, paying course instructors and exam experts, course registration for specialists, course instructors etc.).

In case studies in courses we may also show a photo or a video.

In a few cases, only master data and extended master data is processed (for example, eduQua certification, contact list for people interested in rehabilitation etc.).

The data is stored for 10 years after it is last used/the training has ended (for example, administration of courses, list of people interested in rehabilitation, qualification checks, administration of diploma exams etc.). Certain data, such as case studies, is stored either for one year after the end of the training or two years after the appeal period.

### **6.2. What purpose do we process your data for?**

We process your data for the purposes described below. These purposes represent our legitimate interests and, where applicable, those of third parties. You can find more information about the legal bases for our processing in [section 1.6.](#) Please also note the general information in [section 1.5.](#)

We process your data as part of the administrative and organisational tasks of SNABLIND (for example, administration and organisation of courses and exams, checking specialist qualifications etc.), but also to provide you in good time with information that may be interesting to you and so that you can contribute your ideas to the course development process (for example, notification of the low vision conference, annual survey on course ideas etc.).

We need current data from you for these purposes.

### **6.3. Do we use profiling? Do we make automated individual decisions?**

We do not use profiling or automated individual decision-making for training and courses for specialists.

### **6.4. Who do we disclose your data to?**

We can also transfer your data to processors and service providers (for example, the administration system my-time, the web hosting provider METANET, the survey tool Findmind, the Padlet online pinboard tool, the State Secretariat for Education, Research and Innovation (SERI) etc.). Please also note the general information in [section 1.8.](#)

## 6.5. Is personal data transferred abroad?

As explained in [section 6.4](#), we disclose data to other organisations. These are sometimes based outside Switzerland. Therefore, your data can be processed in Europe and in other countries. You can find more detailed information about the legal bases for our processing and the measures taken in [section 1.9](#).

## 7. Additional information for recipients of advice and services

### 7.1. Which data do we process and for how long?

Please note the general information about this question in [sections 1.3](#) and [1.4](#).

For recipients of advice and services, we process master data, extended master data and sensitive master data (e.g. specialist assessments, annual reports etc.). In some cases we also process payment data (for example, payments at the specialist centre for deafblindness, sales of aids and repairs etc.).

In a few cases, only master data and extended master data is processed (for example, sending out information, working with distribution centres for aids, sending out media on loan, payment reminders etc.).

The data is stored for up to 10 years after the support decision, invoice, expiry of the contract, closure of the file, last contact, end of the cooperation or last use (for example, library loans, agreements with sales partners, sending out aids, administration of clients, reporting to the Federal Social Insurance Office, issuing invoices etc.). Certain data, such as data relating to the sending of information material, is stored until a request is made for it to be deleted.

In particular, data relating to order processing for IV rulings under the provisions of Article 21 is stored. This data is kept for 15 years after the last contact.

### 7.2. What purpose do we process your data for?

We process your data for the purposes described below. These purposes represent our legitimate interests and, where applicable, those of third parties. You can find more information about the legal bases for our processing in [section 1.6](#). Please also note the general information in [section 1.5](#).

We process your data for the provision of services and advice, including administrative and organisational work at SNABLIND (for example, specialist evaluations, annual reports, sales of aids and information material, sending out media on loan etc.). We also need the data for communication and coordination (for example, spending the money as the donor wants, advice on social work and rehabilitation, managing the cooperation with distribution centres for aids etc.).

We need current data from you for thes

### 7.3. Do we use profiling? Do we make automated individual decisions?

We do not use profiling or automated individual decision-making for recipients of advice and services.

## 7.4. Who do we disclose your data to?

We may disclose your data to processors (for example, the sales partner Abacus Softwaresystem, the administration system my-time, the web hosting provider METANET etc.) It is possible that the Federal Social Insurance Office will be given access to your data as part of an audit. Please also note the general information in [section 1.8](#).

## 7.5. Is personal data transferred abroad?

As explained in [section 7.4](#), we disclose data to other organisations. These are sometimes based outside Switzerland. Therefore, your data can be processed in Europe and in other countries. You can find more detailed information about the legal bases for our processing and the measures taken in [section 1.9](#).

# 8. Additional information for job applicants

Are you interested in working for us? We're very pleased to hear it! When you send us a job application, we process your personal data. In this section, we would like to inform you about possible processing of your data in connection with a job application.

Please also note the general information in [section 1](#) of this privacy policy.

In each case, the current version of the privacy policy at the start of the application process is applicable.

## 8.1. Which data do we process and for how long?

When you apply for a job, we process the personal data that we need to assess your suitability for the vacancy that has been advertised. This includes the following information:

- The information in the documents that you submit (for example, the letter, the CV, the references etc.).
- If you have worked for us or applied for a job in the past, we may use information that we already have as a result of this.
- If necessary, we may refer to information from third-party sources (this may include information from official registers or from recruitment companies, reference data and other professional, public information on the internet, for example, a LinkedIn or Facebook profile).

If you provide us with particularly sensitive personal data (for example, health data), we may also process this data.

You are not obliged to supply us with personal data. However, it is not normally possible for us to process a job application without collecting and processing the necessary personal data.

We store your personal data for as long as it is needed for the specific application process or for compliance with legal regulations and as long as we have a legitimate interest in storing it, for example, for the purposes of documentation and preserving evidence and to protect and defend ourselves against legal claims. If we consider you for the position that you have applied for, we also store your personal data for the purposes of the employment



relationship. If we do not conclude an employment contract with you, your data is deleted or anonymised. Otherwise, we only store your personal data if you have given your consent to a longer storage period, for example, so that we can keep your application for possible future vacancies.

You can find further general answers to the question “Which data do we process and for how long” in [section 1.3](#) and [section 1.4](#) of this privacy policy.

## **8.2. What purpose do we process your data for?**

We process personal data in accordance with this privacy policy only for the purpose of receiving and evaluating the application documents and assessing your suitability for the relevant position and, where applicable, preparing and concluding an employment contract. Depending on the requirements profile, this may also include evaluating references and carrying out background checks. This processing is necessary for preparing and concluding an employment contract, where applicable; for fulfilling legal obligations; for exercising rights; for protecting our interests, in particular in a well-organised human resources function. We also use your personal data to contact you again in relation to other positions or to pass your application to other organisations within the group if we are unable to offer you a suitable position. We obtain your consent for this, if we are required to by law.

You can find further general information about the purpose of our data processing in [section 1.5](#).

## **8.3. Who do we disclose your data to?**

Only those people who are involved with filling the position will see your personal data, in particular HR specialists and your potential managers in the organisation responsible. We may also transfer your data to our service providers, in particular IT service providers and external recruitment companies. When we choose our service providers and enter into contractual agreements with them, we ensure that they meet our data protection requirements.

You can find further general information about possible data recipients in [section 1.8](#) of this privacy policy.

## **8.4. Is personal data transferred abroad?**

It is possible that your data will be transferred to third parties outside Switzerland (for example, group companies or service providers) in the context of your application or for the purposes described above.

# You can find further general information about the transfer of

**personal data abroad in [section 1.9](#) of this privacy policy.**