



Privacy Statement Accell Suisse AG

The protection of Personal Data is important to Accell Suisse AG. We are committed to protecting your information and acting in accordance with your rights and privacy laws. Do read this statement with care. It provides important information about how we use personal data and explains your legal rights.

In this statement, where we say 'you' or 'your', this means either you, any authorised person acting on your behalf or any beneficiaries and other individuals in your household or organisation. Where we say 'we', 'us' or 'our', this means Accell Suisse AG.

Collection of your information and how we use it

The data we collect about you and how we collect it varies depending on how you use our services, interact with us, our website and apps. The personal data we collect or have about you will either be provided by you directly, come from third parties or will be collected from your activity on our website and use of our services.

When purchasing a bicycle or another product, data may be registered with us by the dealer or by yourself. Some products, such as a connected bike, and the use of certain apps, also entail the processing of personal data. Data are also recorded when visiting our (brand) website, such as the IP address, the data of the device used, and the items viewed. Contacting us will also often lead to the processing of personal data. This includes matters such as a request for sending a brochure or submitting a guarantee claim.

A. Buy and use of our products and services (including our website <https://www.accell-suisse.ch/> and mobile apps)

We collect and process the following information about you:

- contact details including your name, home address, contact number(s), email address.

We use your information for the following purposes:

- Contracting, delivery of product and/or service, and administrative processes (including billing and collecting, system provisioning, hardware and software upgrades, credit checks, technical support).

Children: we comply with local laws and do not allow children to register on our websites and/or apps when they are under the legal age limit. We will ask for parental consent for children participating in our experiences and events.

Our use of your information as described above is permitted by applicable privacy laws and in most instances the processing of your personal data is based on the legal basis of contract (our contractual obligation to provide you with our products and/or services). In some cases it is (partly) based on our legitimate interest or consent. Where we rely solely on consent for our processing of your personal data we will collect the necessary consent in accordance with applicable privacy laws.



Should you not agree to the processing of your personal data as described we may not be in a position to offer you our services as described herein.

B. (Online) Quote

We collect and process the following information about you:

- Your name, home address, telephone number, email address, current contract details if you are an existing customer, and a general description of your interests.

We use your information for the following purpose:

- We use your information to provide you with a quote.

Our use of your information as described above is permitted by applicable privacy laws. Our processing of your personal data for providing you with a quote is based on the legal basis of (pre-)contract.

Should you not agree to the processing of your personal data as described we may not be in a position to offer you our services as described herein.

C. From your use of our website

When you visit our website or mobile apps, we do not use advertising, targeting or marketing cookies on our website to collect personal data from you. We only use session cookies which provide you a smooth experience when visiting our website.

Cookies are text files placed on your device to help analyze how users use a website. That information may include your IP address, your operating system, your browser ID, your browsing activity, and other information about how you interacted with our website or other websites. We may collect this information as a part of log files as well as through the use of cookies or other tracking technologies.

D. Marketing

We collect and process the following information about you:

- Your personal details such as your name, home address, telephone number, email address, country of residence

We use your information for the following purposes:

- We use your personal data to send you direct marketing communication about our products and services. This may be in the form of email, post, SMS, telephone or targeted online advertising.



Our use of your information as described above is permitted by applicable privacy laws. In most cases our processing of your personal data for marketing is based on our legitimate interest, although in some cases (such as when required by law) it may be based on your consent.

Information we collect from third parties

We receive lead information from third party partner companies, such as:

- Other Accell Group companies.

We will collect and use your lead information to market our services to you where you have not expressly opted out or previously indicated that you do not want to be contacted for marketing purposes. We will provide you with an easy ability to opt out at any point should you change your mind.

Dealers

Customers largely purchase our products and services via recognised dealers and other resellers. These dealers and resellers are independent parties. We are not responsible for the handling of customer data by recognised dealers and other resellers. Subject to applicable laws, dealers and resellers do provide us with your personal data in connection with the sale of our products and services under their own responsibility. Please read their own privacy statements for further details in this regard. We will process such personal data in compliance with the terms of this privacy statement.

Disclosure of your information

We do not sell your information to third parties. We may, however, share it with other group companies or affiliated companies in the context of the provision of our products and services. As our activities require the skills and resources of other companies, we will further need to share your information with selected recipients, listed below, in order to perform these activities. These companies will have similar legal obligations to us with regards to safeguarding your information. Alternatively, we will remain responsible to you for what they do with your information. The categories of recipients we share your information with include:

- Cloud storage providers (e.g. Microsoft 365), which store your personal data in the European Economic Area ("EEA") and/or Switzerland to store alarm recordings and the personal data you provide and for disaster recovery services, as well as for the performance of any contract we enter into with you.
- Customer support providers (e.g. Sales Representative), which store your personal data in the EEA and/or Switzerland who we use to assist us with providing you with our forms and invoices, and getting in touch with you.
- Payment services providers (e.g. Accounting Department), which store your personal data in the EEA and/or Switzerland, who we use to process your installation and service payments.

- Financial services providers (e.g. Atradius Atrium) debt collection agencies and financial auditors) which store your personal data in the EEA and/or Switzerland, to whom we may assign claims derived from the contract with you, e.g. in the event of failure of timely payment for products and services.
- Local authorities such as the police if it is apparent that a crime is being committed or that emergency services need to be contacted or enforcement authorities to assist with debt collection.
- IT Services providers (e.g. Accell IT B.V.) which store your personal data in the EEA and/or Switzerland, that provide us with Internet Server Services who we use to store our customer relationship management information.

Please note that this list is not exhaustive and can vary over time.

If we or substantially all of our assets are acquired by a third party, then your information will be transferred to the new owner of our business. The new owner will be subject to the same laws concerning your personal information as we are.

Transfers of your information abroad

We store your information within the EEA and/or Switzerland or other countries that have an adequate level of data protection. These countries have equivalent laws to those of Switzerland when it comes to your personal data.

Where we share your information with companies based outside (i) the EEA, (ii) Switzerland or (iii) countries with an adequate level of data protection, we contractually require these companies to handle your information on a similar basis to us. In those cases, we will ensure that the transferred information is protected. Further details of any transfer including copies of the safeguards we use are available from us on request.

How long do we retain personal data?

We process data for as long as necessary for the purpose for which the data are listed in this statement. This may depend on registration by you, such as for an account, newsletter or app. When we no longer need your personal data, we will securely dispose of it in accordance with our Data Retention Policy. In some circumstances when you opt-out of marketing, we may suppress your information so that we know not to contact you in the future.

How do we secure consumer data?

Data security is an important part of our business operations. Various security measures are implemented in order to guarantee this. This includes matters such as a strong password policy, screening internet data, encryption and authorisation procedures for the employees. Consumer data are stored in secure technical rooms. These are cooled computer rooms with emergency power facilities and a combination of electronic doors with badges, object security involving cameras, alarm



systems and surveillance. The abovementioned measures are part of the many measures being implemented by the Accell Group in order to protect the data of our consumers. If you have any questions in this regard or you suspect abuse, you can send an e-mail to security@accell-it-services.com. A copy of our document containing our information security measures can be send on request.

Your rights

You have a number of rights in relation to your personal data.

You have the right to access your data, correct any mistakes in our files, the right to have your personal data erased and to restrict or object to processing. You also have the right to withdraw your consent, opt-out of receiving future marketing, and in some circumstances, you have the right to have your information transferred to you or a third party, and the right to object to profiling and automated decision making.

You can also contact the Swiss Federal Data Protection and Information Commissioner if you believe that our methods of processing your personal data are capable of breaching the privacy of a larger number of persons.

Contact and Complaints

The primary point of contact for all issues from this statement, including request to exercise data subject rights, is our Data Protection Professional. The Data Protection Professional can be contacted in the following way:

privacy@accell-suisse.ch

Accell Suisse AG
Industriestrasse 21
6055 Alpnach
Switzerland

If you have a complaint or concern about how we use your personal data, please contact us in the first instance and we will attempt to resolve the issue as soon as possible.

Status of this privacy statement

This privacy statement was updated in August 2019. We reserve the right to amend it from time to time.