

PRIVACY POLICY

In accordance with Article 19 of the new Federal Act on Data Protection (nFADP), we provide you with the necessary information regarding the processing of personal data collected **during your experience on our website** lfa.ch.

Privacy is important to us, and we are committed to being open and transparent at all times regarding how we process the data of our clients, suppliers, collaborators, and users who visit our website or who receive our communications.

This Privacy Policy explains what personal data we collect, why we collect it, and how we process it. We also explain how you can control, rectify, or remove personal data if you so wish.

We collect personal data to provide you with better services: for example, to optimize our services, to tailor our product offerings to your needs, and to personalize communication and offers to you. That way, you can find out what's most relevant to you and receive fewer ads.

1. IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER

The entity that determines the purposes and means of this processing of personal data is **LFA SA**, a company incorporated under Swiss law with a registered office in **Via F. Pelli 3 6900 Lugano, Switzerland** (hereinafter also referred to as "LFA" or "Data Controller" or "Company").

The contact details of the Data Controller are as follows: privacy@lfa.ch

2. CATEGORIES OF PERSONAL DATA SUBJECT TO PROCESSING | DEFINITIONS

The personal data provided – or otherwise acquired in accordance with the legal and contractual provisions in force – inherent, connected, and/or instrumental to the evaluation of your experience on our site, will be processed following the FADP and confidentiality obligations.

Personal data: any information relating to an identified or identifiable person.

Data Subjects: natural or legal persons whose data are processed (hereinafter also referred to as "You").

Processing: any operation relating to personal data, regardless of the means and procedures adopted, and in particular the collection, storage, use, review, disclosure, archiving or destruction of data.

Communication: i.e. making personal data accessible, for example by allowing access, transmission, or publication of personal data.

3. PURPOSE OF THE PROCESSING

	PURPOSE OF THE PROCESSING	DATA RETENTION PERIOD
A	Activities that are strictly necessary for the user's navigation on this website and to check its correct functioning.	The data will be stored until the end of the browsing session. For data processed with technical cookies, please consult our Cookie Policy lfa.ch/cookie-policy
B	Obtain anonymous statistical information on the use of the site.	Cookie Policy lfa.ch/cookie-policy
C	Verify the requests received through the "Contacts" area or forms on this site.	The data will be stored for the time necessary to achieve the purpose and may be stored for up to 10 years if a contractual commercial relationship is established
D	Direct Marketing activities by automated means (sending newsletters via the Hubspot platform)	The data will be stored until the consent given is revoked
E	Sending your CV by e-mail (recruitment@lfa.ch) or the dedicated area or dedicated form	Please request our Privacy Policy for Recruiting

The processing will be carried out in automated and/or manual form, with methods and tools aimed at ensuring maximum security and confidentiality, by specially trained subjects. The personal data collected will be stored in a form that allows the identification of the data subjects for a period of time not exceeding the achievement of the purposes for which the personal data are processed.

4. RECIPIENTS OF PERSONAL DATA

We may share personal information with employees and/or personnel acting under the authority of the Data Controller (duly instructed to do so), as well as third parties bound to **LFA SA** by contractual relationship, to fulfill contractual obligations and fulfill one or more of the aforementioned purposes of the processing. These third parties will process the data provided as data processors or independent data controllers.

Specifically, we may share the personal data we collect with the following categories of recipients:

- a) entities that provide services related to the operation of this website, the IT system of **LFA SA**, and telecommunications networks (e.g., hosting providers, webmasters);
- b) assistance and consultancy companies
- c) competent authorities for compliance with legal obligations and/or the provisions of public bodies, upon request;
- d) group companies.

5. TRANSFER OF PERSONAL DATA OUTSIDE THE CONFEDERATION

The site is based in Switzerland (hosting) and personal data is not disclosed outside the Swiss territory.

It should be noted that, if the disclosure of data outside Switzerland is envisaged, this will be done following the provisions of the FADP and the associated Ordinance on the following basis:

- in the presence of adequate safeguards, in this case, contractual measures, aimed at ensuring adequate protection abroad;
- the processing is directly related to the conclusion or performance of a contract and the data being processed relates to the other party;
- The communication takes place within the same legal entity or company or between legal entities or companies under single management, provided that the issuer and the receiver comply with rules aimed at ensuring adequate data protection.

6. RIGHTS OF THE DATA SUBJECT

In accordance with the FADP, the Data Controller grants you, as a data subject, the following rights (non-exhaustive list):

- obtain the rectification of inaccurate or outdated personal data;
- be informed in writing and free of charge whether personal data concerning you are being processed;
- revoke any consent to the processing of data that may have been previously provided;
- prevent the disclosure of any sensitive personal data to third parties;
- obtain portability of your personal data or request that it be transferred to a third party;
- request the restriction or blocking of data processing, the prevention of the communication of data to third parties, or the rectification or destruction of personal data;
- request the prohibition of a specific processing of personal data and a specific communication of personal data to third parties or the deletion or destruction of certain personal data;
- if neither the correctness nor the inaccuracy of the personal data can be proved, request the addition of a note to indicate the dispute;
- request that the rectification, destruction, blocking, especially communication to third parties, as well as the note on the objection or judgment be communicated to third parties or published;
- have the processing of personal data declared unlawful.

You can exercise your rights under the nFADP by contacting the Data Controller at privacy@lfa.ch. For processing carried out with cookies and other similar technologies, please consult our Cookie Policy.

7. ADDITIONAL INFORMATION | UPDATES

The Data Controller reserves the right to revise, update, add, or remove any part of this privacy policy at its discretion at any time. If there are any changes, the date of the update will be indicated.

Updated: 13/11/2023