

## Privacy Policy of Ad Mirabiles AG

Your privacy is important to Ad Mirabiles AG (“**Ad Mirabiles**” or “**we**” or “**us**”) so we have developed a privacy policy (the “**Privacy Policy**”) that covers how we collect, use, disclose, transfer and store your personal data.

By accessing this website located at [www.admirabiles.com](http://www.admirabiles.com) (the “**Site**”) you agree to the data processing in compliance with this Privacy Policy. The Site can be accessed without registration.

### 1. Responsible Entity

Ad Mirabiles is responsible for the processing of your personal data under applicable data protection law:

Ad Mirabiles AG  
Weidenweg 15  
4310 Rheinfelden  
Switzerland  
Telephone number: +41 61 813 30 82  
Email: [info@admirabiles.com](mailto:info@admirabiles.com)

### 2. Personal Data

Personal data are all information that relates to an identified or identifiable person. A data subject is a person about whom personal data is processed, e.g., customers, prospective customers, business partners and website users (“**you**” or “**your**”). Processing includes any action involving personal data, irrespective of the means and procedures applied, in particular, the collection, use, storage, disclosure, modification, deletion and destruction of personal data.

The processed data comprise the following categories of personal data: master data (e.g., names and addresses), contact data (e.g., email addresses and telephone numbers), contract data (e.g., contract terms, contractual communication, names of contact persons) and payment data (e.g., bank details, payment history) as well as usage data (e.g., websites visited, interests in content, access hours) and meta data (e.g., device information, IP addresses).

### 3. Purposes and Legal Grounds to Process the Personal Data

#### 3.1 General

We collect your data when you provide them to us. For instance, this can be data that you enter in a form to place an order. Further data are automatically collected by our IT systems when you visit the Site. These are mainly technical data (e.g., internet browser, operating system or access hours).

We process your data within the scope of the ordering process on the Site, via email or telephone, in order to enable you to choose and order the chosen products, their payment and delivery as well as to provide customer services.

We also collect data to ensure that the Site is available without errors. Data can also be used to analyze your user behavior or for marketing purposes.

Furthermore, our legitimate interest in the processing of personal data arises essentially from the maintenance of our business activities, the performance of our obligations and the provision of our services, e.g., in the context of general administration, financial accounting, office organization, archiving of data as well as enforcing our legal claims. The deletion of data in relation to contractual performance and contractual communication corresponds to the data provided for these processing activities. In the context of these activities, we disclose or transfer data to suppliers, consultants, such as, for instance, tax consultants or auditors, as well as other fee agencies and payment service providers.

In addition, we store data on suppliers and other business partners based on our business interests, e.g., for the purpose of contacting them at a later date. We store these mostly company-related data in most cases permanently.

We process personal data in accordance with Swiss data protection law. In addition, we process personal data, to the extent that the General Data Protection Regulation dated April 27, 2016 (*Datenschutz-Grundverordnung*, DSGVO; “**GDPR**”) is applicable, in accordance with the following legal principles pursuant to article 6 paragraph 1 sentence 1 GDPR:

- litera a) Processing of personal data with the consent of the data subject;
- litera b) Processing for the performance of a contract with the data subject or for carrying out appropriate pre-contractual measures taken at the request of the data subject;

- litera c) Processing for compliance with a legal obligation;
- litera d) Processing to protect the vital interests of the data subject or of another natural person;
- litera f) Processing for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

We process personal data for the period of time required for the respective purpose or purposes. In the case of longer-term storage obligations due to applicable legal and other obligations, we will restrict the processing accordingly.

The data will be deleted when the data are no longer required for the performance of contractual or legal obligations and for the purpose of carrying out any warranty or similar obligations. The necessity of storing the data is reviewed at irregular intervals. In all other respects, the statutory storage obligations apply.

### 3.2 Consent

In addition, we process your personal data when and to the extent that you have provided us with your consent. This data will only be used for the purpose and to the extent that you have consented, e.g., we will only inform you about our products and services in accordance with your consent.

The legal ground for data processing based on your consent is article 6 paragraph 1 sentence 1 litera a GDPR, in which case you have the right of revocation for the future. You can send the revocation by letter or email to the contact data of the responsible entity mentioned in section 1 of this Privacy Policy. The legality of the data processing carried out up to the exercise of your rights remains unaffected.

The personal data will be deleted after completion of the purpose for which you provided your consent, in compliance with the statutory storage obligations.

Within the limits of your consent, your personal data may be transferred to third parties.

### 3.3 Automatically Generated Data

Upon each access to the Site, some data are automatically processed in log files, which originate from your end device and may also include personal data. This applies to the following data:

- the operating system of your end device;
- the type of browser you use;
- name of your provider;
- your IP address;
- date and time of the access;
- the websites visited, including any search terms;
- websites from which you have accessed our Site.

We do not process these data together with other personal data about you, i.e., we do not relate the aforementioned data to your person. The legal ground for the processing of automatically generated data is article 6 paragraph 1 sentence 1 litera f GDPR. The processing is necessary to ensure the functionality of the Site as well as to optimize and correctly present the contents of our Site and to provide law enforcement authorities with the information required for criminal prosecution in the event of a cyber attack. This is also where the legitimate interest for data processing lies.

The automatically generated data will be deleted as soon as they are no longer required for the aforementioned purposes.

The processing of the automatically generated data and storage in log files are absolutely necessary for the operation of the Site. There is consequently no possibility of objection.

### 3.4 Disclosure to Third Parties

We disclose the data to third parties to the extent necessary for delivery, payment or within the scope of legal permits and obligations and as required by the services of third parties (see section 7 ff. of this Privacy Policy).

### 3.5 User Account

Customers can optionally create a user account, in particular, to place and manage their orders. During the registration process, customers are notified of the required mandatory data. The user accounts are not public and cannot be indexed by search engines. Once customers have deleted their user account, their data with

regard to the user account will be deleted, subject to their storage is required for commercial or other legal reasons.

Within the scope of registration and renewed logins and use of our online services, we store the IP address along with the time of the respective customer action. The storage is based on our legitimate interests as well as the customers' interests in protection against misuse and other unauthorized use. These data will not be disclosed to third parties, unless it is necessary to pursue our claims or there is a contractual or legal obligation to do so.

## **4. Your Rights**

### **4.1 Right to Access**

You have the right to request information about the personal data we hold on you at any time and we will provide you with your personal data via email.

### **4.2 Right to Portability**

Whenever Ad Mirabiles processes your personal data, you have the right to request that your personal data will be transferred to you or to a third party.

### **4.3 Right to Rectification**

You have the right to request rectification of your personal data if they are incorrect, including the right to have incomplete personal data completed.

### **4.4 Right to Erasure**

You have the right to erase any personal data processed by Ad Mirabiles at any time except for the following situations:

- to comply with a legal obligation,
- for overriding legitimate grounds or
- for the establishment, exercise or defence of legal claims.

### **4.5 Right to Restriction**

You have the right to request that Ad Mirabiles restricts the process of your personal data under the following circumstances:

- If you object to a processing based on Ad Mirabiles' legitimate interest, Ad Mirabiles must restrict all processing of such data pending the verification of the legitimate interest.
- If you have claim that your personal data is incorrect, Ad Mirabiles must restrict all processing of such data pending the verification of the accuracy of the personal data.
- If the processing is unlawful you can oppose the erasure of personal data and instead request the restriction of the use of your personal data.
- If Ad Mirabiles no longer needs the personal data but they are required for you to assert or defend legal claims.

### **4.6 Right to Object to Processing**

You have the right to object to processing of your personal data. Ad Mirabiles will not continue to process the personal data unless we can demonstrate a legitimate ground for the process which overrides your interest and rights, or if the processing serves to assert or defend legal claims.

### **4.7 Right to Revoke a Consent**

You have the right to revoke your consent to the processing of personal data at any time.

### **4.8 Exercising of the Rights Stated Above**

For requests in relation to your rights stated above, you can contact us at any time at [info@admirabiles.com](mailto:info@admirabiles.com) the address given in section 1 of this Privacy Policy, as well as for further queries on the subject of data protection.

#### 4.9 Right to Complain to a Supervisory Authority

If you consider Ad Mirabiles to process your personal data in an incorrect way you can contact us. You also have the right to turn in a complaint to a competent supervisory authority.

The supervisory authority for data protection in Switzerland, where we are registered, is the Federal Data Protection and Information Commissioner (*Eidgenössischer Datenschutz- und Öffentlichkeitsbeauftragter*), Feldeggweg 1, CH-3003 Bern, +41 (0)58 462 43 95.

For the European Economic Area, the supervisory authority is an independent state authority established by a member state in accordance with article 51 GDPR.

#### 5. Cookies

This Site uses cookies. These are small text files that enable the storage on the user's end device of specific user-related information while the user is visiting the Site. Cookies serve to make our Site more user-friendly, effective and safer.

Thus, when the user visits the Site at a later date, the Site recognizes whether or not it has already been accessed with this browser. As a result, the Site can be adapted to the needs of the user when accessed again, in particular, and the use of the Site can be statistically evaluated and the presentation of the displayed content can be varied.

You can configure your browser so that you are informed about the setting of cookies and allow cookies only in specific cases, disable cookies for specific cases or generally, and activate the automatic deletion of cookies upon closing the browser. If you disable cookies, the functionality of our Site may be limited.

Cookies that are required to carry out the electronic communication process or to provide certain functions that you have requested (e.g., shopping basket function) are stored on the basis of article 6 paragraph 1 sentence 1 litera f GDPR. We have a legitimate interest in the storage of cookies for the technically error-free and optimized provision of our services. To the extent that other cookies (e.g., cookies for the analysis of user behavior) are stored, these are collected and used on the basis of your consent. The legal basis is article 6 paragraph 1 sentence 1 litera a GDPR. You have the right to revoke your consent at any time.

#### 6. SSL/TLS Encryption

This Site uses SSL/TLS encryption for security reasons and to protect the transfer of confidential information so that the data you provide to us is not accessible to third parties. You can recognize an encrypted connection by the address line of your browser changing from "http://" to "https://" and by the lock symbol in your browser line.

#### 7. Services by Google

This Site uses services from Google LLC, such as Google reCAPTCHA, Google Analytics and Google Fonts.

Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, D04 E5W5, Ireland, is the entity responsible for data processing in the European Economic Area and Switzerland. Outside the European Economic Area and Switzerland, Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA is responsible for data processing. Google Ireland Limited and Google LLC are hereinafter referred to as "Google".

These services use cookies, among other things, and as a result, data may be transferred not only to servers in the safe states within the meaning of Swiss data protection law, but also to US servers. The USA is not considered a safe country within the meaning of Swiss data protection law. US companies are obliged to surrender personal data to security authorities without you as the data subject being able to take legal action against this. Therefore, it cannot be excluded that US authorities may process, evaluate and permanently store your data on US servers for monitoring purposes. We assume that in this context no personal tracking occurs solely through the use of our Site.

Further information can be found in the Google privacy policy at: <https://policies.google.com/privacy?hl=en>.

#### 8. Google reCAPTCHA

This Site uses the service Google reCAPTCHA. The query serves the purpose of distinguishing whether the input is made by a human being or by automated, machine generated processing, in order to keep malicious software from engaging in abusive activities on the Site and to stop bots and other automated attacks.

The query includes the transmission of the IP address and any other data required for the service reCAPTCHA to Google. For this purpose, your input will be transmitted to Google and used by Google to evaluate your use of this service. The IP address transmitted by your browser while using reCaptcha will not be merged with your other data by Google. Your data may also be transferred to the USA. By activating the query, you agree to the processing of your data. The processing is based on your consent according article 6 paragraph 1 sentence 1 litera a GDPR. You may revoke your consent at any time. The legality of the data processing carried up to the revocation remains unaffected.

You can find more information about Google reCAPTCHA and the corresponding privacy policy at: <https://www.google.com/recaptcha/about/>.

## 9. Google Analytics

This Site uses Google Analytics, a tracking tool used for traffic analysis of websites. We can use the statistics obtained to improve our offer and make it more interesting for you as a user.

The data processing is based on your consent according article 6 paragraph 1 sentence 1 litera a GDPR. You may revoke your consent at any time without affecting the legality of the processing that has taken place on the basis of your consent until revocation. The use of Google Analytics can also be based on article 6 paragraph 1 sentence 1 litera f GDPR. We have a legitimate interest in evaluating your use of the Site and obtaining reports on the Site activity in order to optimize the Site.

Google Analytics uses cookies. The information generated by the cookie about your use of the Site (including your IP address) will be transmitted to and stored by Google. It cannot be excluded that data processing takes place in the USA. The IP address transmitted by your browser using Google Analytics will not be merged with your other data by Google.

You may set your browser to refuse the use of cookies by selecting the appropriate settings, however, please note that you may not be able to use certain features of this Site. You can also restrict the collection of the data generated by the cookie and related to your use of the Site (including your IP address) and the processing of this data by Google by downloading and installing the browser plugin available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>.

You can also use the same link to deactivate the use of Google Analytics. By doing so, a so-called opt-out cookie is stored on your data carrier, which prevents the processing of personal data by Google Analytics. Please note that if you delete all cookies on your end device, these opt-out cookies will also be deleted, which means that you will have to set the opt-out cookies again if you want to continue to block this form of data collection. The opt-out cookies are set per browser and device and must therefore be activated separately for each browser, computer or other device.

You can find more information about Google Analytics and the corresponding privacy policy at: <https://support.google.com/analytics/#topic=9143232>.

## 10. Google Fonts

We use Google Fonts for the visual design of our Site.

To integrate the fonts your browser must connect to a Google server and download the font required for our Site. Google thereby receives the information that our Site was accessed from your IP address.

The IP address transmitted by your browser in the context of Google Fonts will not be merged with your other data by Google.

No cookie is set when the fonts are downloaded from the Google servers.

The data processing is based on article 6 paragraph 1 sentence 1 litera f GDPR in order to ensure a maintenance-free and efficient use of fonts.

You can find more information about Google Fonts and the corresponding privacy policy at: <https://fonts.google.com/about>.

## 11. Copyrights and Trademarks

The Site located at [www.admirabiles.com](http://www.admirabiles.com) is a copyrighted work belonging to Ad Mirabiles.

The trademarks, logos or copyrighted materials displayed on the Site are the property of Ad Mirabiles and/or other parties. Users and customers are prohibited from using any trademark, logo or copyrighted material for any purpose without the prior written consent of Ad Mirabiles or such third party which may own the trademarks, logos or copyrighted materials. Users and customers are prohibited from copying, reproducing, modifying, distributing, transmitting, displaying, publishing, selling, licensing, transferring, creating derivative works or using any information obtained on or through the Site for any commercial or public use. Infringement of copyrights leads to criminal liability and, if applicable, compensation for damages and further legal steps.

## 12. Limitation of Liability

Reasonable efforts have been undertaken to ensure that the information displayed on the Site is current; however, Ad Mirabiles does not warrant the accuracy, reliability or completeness of the information.

Access to, and use of, the Site **and its content is at your own risk.**

Together with our IT partners, we strive to ensure that our Site is free from viruses, worms and other malware. However, we cannot assume any liability for the absence of viruses or other malware on our Site or on linked websites.

Ad Mirabiles shall in no event be liable for any damages (including, but not limited to, direct, indirect and consequential damages, punitive damages, loss of profit or damages resulting from business interruption) resulting from the use or misuse of or inability to use the Site or its content, whether based on contract, tort or any other legal ground, and whether or not Ad Mirabiles is advised of the possibility of such damages, in each case, subject to fraud, willful misconduct or gross negligence.

We also assume no responsibility or liability for the content and availability of third party websites that can be accessed through external links on this Site. For the content of the linked websites, the operators of these websites are solely responsible. We therefore expressly disclaim all third-party content that may be relevant under criminal or liability law.

Ad Mirabiles is entitled to change or delete texts at its own discretion and without prior notice and is not obliged to update the contents of this Site.

### **13. Updates to this Privacy Policy**

We are entitled to update this Privacy Policy at any time. The latest version of the Privacy Policy is always available on the Site. These updates are accepted when using the Site.

### **14. Contact Information**

If you have any questions regarding data protection, please send us an email or contact directly the person responsible for data protection listed in section 1 of this Privacy Policy.

Effective November 12, 2021