PRIVACY POLICY

Publication date: 28 November 2022

1. What is it about?

Privacy is important and we are aware of our responsibility when processing your personal data. It is important to us that you know that we protect your data and process it in accordance with the purpose for which you entrusted it to us.

This Privacy Policy (hereinafter the “Policy”) informs you of how Emeria Switzerland (hereinafter the “Agency” or “we”) treats the personal data that we collect from you, that you provide us with, or that we may obtain from other sources. This includes the various ways in which you interact with us, including in person, by post, e-mail or telephone, or through our e-Domicim and e-Brolliet applications or our websites listed below (hereinafter the “Sites”).

Our websites:
https://emeria.ch
https://immosure.ch
https://liegenschafter.ch
https://hammerretex.ch

“Personal data” means any information relating to an identified or identifiable natural or legal person.

Please read the following carefully to understand how we will process your personal data.

2. Who is responsible for processing your personal data?

The Agency is the controller of the personal data covered by this Policy. It can be contacted by e-mail at dataprotection@emeria.ch

The Agency may offer its clients, visitors and all interested persons (hereinafter the “Users”) the purchase, sale, management, administration, valuation, value enhancement, development and rental of real estate, neighbourhood management, insurance and construction site management, as well as advisory and intermediary services in these various situations and access to its Sites (hereinafter the “Services”).

We hope to answer any questions you may have about how we handle your personal data. If you have any concerns in this regard, please do not hesitate to contact us by post or e-mail at dataprotection@emeria.ch

3. What personal data do we collect?

3.1 In general

Below are the different categories of personal data that we process, depending on the type of Services we provide you with.

3.2 When you contact us

When you contact us or communicate with us (for example by e-mail, letter or telephone and by visiting our agencies in person), we may collect the personal data you exchange with us. This personal data includes your full name, the subject of your request, the property concerned, your postal and e-mail address and your telephone number(s).
This personal data is collected for the purpose of providing you with the Services and its processing is justified by the performance of the contract concluded or to be concluded.

3.3 When you use our Sites

We may collect the following personal data when you use our Sites:

- your full name, postal and e-mail address, the name of your company and your telephone numbers;
- information about your use of our Sites, including any information you may share with us or enter on our Sites;
- technical data, including the Internet Protocol (IP) address used to connect your computer to the Internet, the type of mobile device you are using, a unique device identifier (e.g. the IMEI number of your telephone, the MAC address of the network interface or the mobile phone number used by the device), and your location and browsing data.

This personal data is collected via cookies and similar technologies, the use of which is governed by Section 6 of this Policy.

The collection of technical data is based on our legitimate interests in providing you with the best possible experience on our Sites and in tracking your preferences for offers related to the Services we provide. Processing of other personal data is based on your consent.

3.4 When you subscribe to our newsletters

If you sign up to receive our newsletter, we will ask you for your e-mail address, your first name and surname and optional additional information. We process this personal data in order to personalise the information and offers we send you and to better tailor them to your interests.

By registering, you give us permission to process the personal data entered for the purpose of sending you regular newsletters. This authorisation is equivalent to consent and constitutes the legal basis for the processing of your personal data in this context. Where consent is not required by applicable law, the regular sending of newsletters will be justified by our legitimate interest in keeping you informed.

A link is provided at the bottom of each newsletter so that you can unsubscribe at any time.

3.5 When you use a social network

When you allow a third-party social network (such as Instagram, Facebook, Twitter, YouTube, LinkedIn, Pinterest, etc.) to share personal data with us, we may receive any personal data that you share publicly on the social network, that is part of your profile or that you allow the social network to share (e.g. your name, e-mail address, gender, profile picture, list of friends or contacts, unique identifier, occupation, preferences, etc.).

The Agency will also receive personal data about your profile when you use a social network feature that is integrated with the Sites or when you interact with us through a social network or visit our pages on a social network. You must at all times be aware of the terms of use and privacy policy that apply to the social network, which are its sole responsibility.

This personal data is collected in order to personalise and improve your experience and to inform you of offers and news that may be of interest to you. It is processed on the basis of your consent.

3.6 When you rent a property or are looking for a property to rent

When you rent a property or are looking for a property to rent, and in particular when you send us a rental application form or have signed a lease agreement, we may collect the following personal data:

- your identification information (full name, the name of your company, identity card, passport, type of residence permit, place and date of birth, certificate of residence or establishment, legitimation card);
When the 3.9 property. It is processed on the basis of the contract concluded or to be concluded. This personal data is collected in order to identify you and to present buyers to you who may be interested in your
criteria, etc.

3.7 When you entrust us with the management of your property
When you entrust us with the management, valuation or value enhancement of your property or the development
of a real estate project, we may collect the following personal data:
- your identification information (full name, the name of your company, identity card, passport, type of
residence permit, place and date of birth, certificate of residence or establishment, legitimation card);
- your contact details (postal and e-mail address, telephone number);
- your bank or postal details;
- your family and personal situation (and in particular your marital status);
- information about the property (type of property, technical data about the property, joint-ownership
property regulations, accounts, minutes of the general meetings of the last three years).

This personal data is collected for the purpose of identifying you, communicating with you and managing your
property. It is processed on the basis of the contract concluded or to be concluded.

3.8 When you give us a brokerage mandate
When you contact us in order to give us a brokerage mandate, we may collect the following personal data:
- your identification information (full name, the name of your company, telephone number, date of birth,
family record book);
- your family and personal situation (marital status, marital regime);
- information about the property that is the subject of the brokerage mandate (sales price, deposit,
mortgage lender, loan amount, mortgage notes, easements, sales notice, joint-ownership property
regulations, minutes of the general meetings of the last three years).

This personal data is collected in order to identify you and to present buyers to you who may be interested in your
property. It is processed on the basis of the contract concluded or to be concluded.

3.9 When you contact us to purchase a property
When you contact us to purchase a property, we may collect the following personal data:
- your identification information (full name, the name of your company, origins, date of birth, family record
book);
- your family and personal situation (marital status, marital regime);
- information about the property to be purchased (price category, potential location of the property, purchase
criteria, etc.).
This personal data is collected in order to identify you and to offer you a property that corresponds to your expectations. It is processed on the basis of the contract concluded or to be concluded.

3.10 When you contact us to entrust us with neighbourhood management or to benefit from a service for individuals

When you contact us to entrust us with neighbourhood management or to benefit from a service for individuals, we may collect the following personal data:
- your identification information (full name, the name of your company, identity card, passport, type of residence permit, place and date of birth, certificate of residence or establishment, legitimation card);
- your contact details (postal and e-mail address, telephone number);
- your bank or postal details;
- your family and personal situation (and in particular your marital status);
- information about the neighbourhood (maps of the neighbourhood and the properties);
- energy consumption of the properties;
- information needed to deliver services for individuals (personal preferences, absences).

This personal data is collected in order to identify you, to communicate with you, to manage your neighbourhood or to offer you services for individuals. It is processed on the basis of the contract concluded or to be concluded.

3.11 When you contact us to carry out work

When you contact us to carry out work, we may collect the following personal data:
- your identification information (full name, the name of your company, identity card, passport, type of residence permit, place and date of birth, certificate of residence or establishment, legitimation card);
- your contact details (postal and e-mail address, telephone number);
- your bank or postal details;
- your family and personal situation (and in particular your marital status);
- information about the property (type of property, joint-ownership property regulations, plans, etc.).

This personal data is collected in order to identify you, to communicate with you, and to offer you work that corresponds to your expectations. It is processed on the basis of the contract concluded or to be concluded.

3.12 When you contact us to take out insurance

When you contact us to take out insurance, we may collect the following personal data:
- your identification information (full name, the name of your company, identity card, passport, type of residence permit, place and date of birth, certificate of residence or establishment, legitimation card, age, gender);
- your contact details (postal and e-mail address, telephone number);
- your bank or postal details;
- your family and personal situation (and in particular your marital status);
- data relating to the insurance offer such as, for example: insured risks, insurance models and coverage, contractual duration;
- for mortgage financing, your financial situation (income, financial capacity, equity, debt, etc.);
- for building insurance, information about the property (category of property, purchase price, year of construction, surface area, plans, joint-ownership property regulations, etc.);
- for motor vehicle insurance, information such as the vehicle registration number, data about your vehicle, mileage, vehicle financing and vehicle owner and driver data;
- for property insurance, information such as the make and model, sum insured, value and age of the insured object;
- for household insurance, information such as the composition of the accommodation, number of rooms, value of household furniture, number of persons in the household;
EMERIA SWITZERLAND

- for liability insurance, information such as the living and housing conditions, number of people in the household;
- for life insurance, data on your family and financial situation, e.g. number of people in the household, data on potential beneficiaries and other parties to the contract.

This personal data is collected in order to identify you, to communicate with you, and to offer you insurance that corresponds to your expectations. It is processed on the basis of the contract concluded or to be concluded.

4. How long do we retain your personal data?

We will retain your personal data until it is no longer required to provide our Services or to fulfil the purposes set out in this Policy, unless we are required by law to retain it for a longer period. The decision is made on a case-by-case basis depending on aspects such as the nature of the personal data, the reason for its collection and processing, and the applicable legal or operational retention requirements.

In certain circumstances, we may anonymise your personal data so that it can no longer be associated with you, in which case we may use this information without giving you any further notice.

5. Who do we share your personal data with?

5.1 With our subcontractors

We may disclose your personal data to persons and companies who provide services to us as subcontractors, in particular providers of marketing analysis services, advertising services, computer hosting services, maintenance services, call centre services and companies contracted to perform work.

Our subcontractors are subject to a confidentiality obligation and may only use your personal data in accordance with our instructions and this Policy.

5.2 With third parties

Your personal data may also be shared with third parties depending on the Services requested. This is the case in particular:
- when you want to purchase a property: with property owners;
- when you want to rent a property: with property owners;
- when you entrust us with the management of a property: with energy monitoring companies;
- when you give us a brokerage mandate: with candidates;
- when you want to take out insurance: with insurance companies;
- when you want to obtain mortgage financing: with banks and insurance companies.

In addition, your personal data may be disclosed to companies within the Emeria Switzerland group, to market research companies for solvency verification purposes, and to other third parties when required to protect our legitimate interests or those of third parties.

6. What kind of cookies do we use?

6.1 Our cookies

The types of cookies (including those of our subcontractors) that we may use on our Sites and the purposes for which they are used are set out below:

Category 1: Strictly necessary cookies
These cookies are essential to enable you to navigate on our Sites and to use their functions. Without these cookies, many of the features of our Sites may be blocked and/or not function properly.

We use these cookies to enable you to access the services we offer on our Sites. The personal data collected by these cookies is processed on the basis of our legitimate interest in ensuring the proper functioning of our Sites.

**Category 2: Performance cookies**

These cookies collect information about how you or other Users use our Sites, for example which pages you visit most often, and whether you obtain error messages from web pages.

We may use these cookies to maintain the efficiency and ease of use of our Sites and to learn how they are used.

In most cases, these cookies do not collect information that identifies the User.

If personal data is collected by these cookies, it is processed on the basis of our legitimate interest in being aware of and optimising the use of our Sites.

**Category 3: Functional cookies**

These cookies allow our Sites to remember the choices you have made (such as your username, language or the region where you are located) and may also be used to provide the Services you have requested.

We may use these cookies to maintain the efficiency and ease of use of our Sites and to provide you with a smooth browsing experience.

The personal data collected by these cookies is processed on the basis of our legitimate interest in providing you with Sites that are pleasant to use.

**Category 4: Targeting and advertising cookies**

These cookies are used to get to know the Users of our Sites better, to adapt their content, to compile statistics relating to the use of our Sites and to show you tailored advertisements on third-party sites based on the interest in our Services that you have shown during your visit to our Sites. In some cases, they allow us to provide advertisements that are more relevant to you and your interests.

You can refuse these cookies at any time by adjusting your browser settings. If required by applicable law, these cookies are only placed with your consent. We track your consent using a technical cookie; if you delete cookies from your devices, we will therefore have to ask you again if you consent to this type of cookie.

Among the audience verification tools, we may use Google Analytics to anonymously track usage and activity on our Sites. Google Analytics is a web analysis service provided by Google LLC (hereinafter "Google"). Google Analytics uses cookies to analyse how you use the Sites. You can consult the website [https://policies.google.com/technologies/partner-sites?hl=en](https://policies.google.com/technologies/partner-sites?hl=en) to find out how Google uses the personal data it collects about you. You may refuse the use of these cookies by downloading and installing the browser plug-in available at [https://tools.google.com/dlpage/gaoptout?hl=en](https://tools.google.com/dlpage/gaoptout?hl=en). An opt-out cookie will be activated on your computer to prevent future collection of your personal data. Further information on terms of use and privacy can be found at [https://policies.google.com/technologies/partner-sites?hl=en](https://policies.google.com/technologies/partner-sites?hl=en).

**6.2 Cookies issued by third parties**

Our Sites may incorporate computer applications from third parties that allow you to share content from our Sites with others or to let others know what you have seen or what you think about content on our Sites.

The creation and use of cookies by third parties is subject to the privacy policies of those third parties. These cookies are not under our control. Please refer to the privacy policies of the relevant social media to determine how their cookies work.
7. **Transfer abroad**

Your personal data will mainly be processed in Switzerland, but may also be processed in other countries if so required for the performance of your contract or if we outsource services to a hosting provider, in particular in France or in Germany, for the data you provide us with. We will comply with the applicable rules and take all necessary measures before transferring personal data abroad.

You can obtain a copy of these measures by using the contact information provided in Section 2 of this Policy.

8. **How do we protect the security of your personal data?**

In order to protect your personal data as effectively as possible, we take security measures in accordance with industry standards. These include access restrictions as well as technical and organisational measures. All our employees are subject to confidentiality obligations with regard to the personal data they are privy to in the course of their activities. Please note, however, that we cannot guarantee absolute security for your personal data, as the storage and electronic transmission of personal data involves certain risks.

9. **What are your rights?**

You have a number of rights under data protection legislation. These rights may be limited, particularly if they infringe on the rights and freedoms of others. We will inform you of the applicable exceptions when we respond to any request you may make.

These rights include:

- **the right of access:** you have the right to know what personal data we hold about you and to submit a written request to consult your personal data. We will provide you with this information as soon as possible, at the latest within one month, unless the request is complex. We may require proof of identity before we can disclose personal data. Please use the contact details set out in Section 2 of this Policy.

- **the right to information:** you have the right to be informed about how your personal data will be used. This Policy, and any additional information or notices made available to you either when you provide your details or at another time, is intended to give you the necessary information.

- **the right to withdraw consent:** when we process your personal data on the basis of your consent (e.g. to send you marketing SMS or e-mails), you can withdraw your consent at any time. To do so, please use the contact information provided in Section 2 of this Policy.

- **the right to object to processing:** you also have the right to object to the processing of personal data when we use it for our legitimate interests. In some cases, and if the applicable law so provides, you also have the right to request the restriction of the processing of your personal data because you disagree with its accuracy or legitimate use. To do so, please use the contact information provided in Section 2 of this Policy.

- **the right to be forgotten:** in certain cases, and if the applicable law so provides, you have the right to have your personal data erased. If you have requested not to receive marketing material from us, we will need to retain certain information to ensure that you are not contacted in the future.

- **the right of rectification:** if you believe that your personal data is inaccurate, you have the right to ask for it to be updated. To do so, please use the contact information provided in Section 2 of this Policy.
- the right to data portability: if the applicable law so provides, you have the right to request the transfer or your personal data from one service provider to another, where we process your personal data on the basis of consent or where the processing is necessary for the performance of the contract.

- the right to complain: if you are not satisfied with the way we have handled your personal data, you have the right to complain to the Federal Data Protection and Information Commissioner (FDPIC) or, where the GDPR applies, to the supervisory authority in your country of residence or workplace.

In all cases, your application must be accompanied by proof of identity.

10. How will we notify you of changes to our Privacy Policy?
We may update this Policy from time to time without notice. We recommend that you check it regularly. However, we will seek to draw your attention to any significant changes.

11. Jurisdiction and applicable law
The Policy and all matters arising from or relating to the Policy, as well as the use of the Sites and Services, are governed by Swiss law, excluding conflict of laws rules.

You accept the exclusive jurisdiction of the courts of the Agency’s headquarters.