







## PRIVACY POLICY - CUSTOMERS





**Privacy Notice pursuant to art. 19 of Data Protection Act (FADP - LPD) of 25 September 2020 (Status as of 1 September 2023).**



In compliance with the provisions of the Federal Act on Data Protection ([FADP](#)), we provide you with the necessary information regarding the processing of your personal data.




	<p><b>WHO IS THE DATA CONTROLLER? HOW CAN I CONTACT HIM?</b></p> <p>The Data Controller is <b>BOFFI INTERNATIONAL AG</b>, with registered office in Dufourstrasse 55 8008, Zürich, represented by the persons with signing authority in accordance with the entries in the Cantonal Commercial Register (<a href="#">link</a>). Contact details: Tel +41 44 206 40 40 E-mail address <a href="mailto:info@boffizurich.com">info@boffizurich.com</a></p>
	<p><b>MAIN DEFINITIONS (art. 5)</b></p> <p><b>Personal data</b> means any information relating to an identified or identifiable natural person; <b>Data subject</b> means a natural person whose personal data is processed;</p> <p><b>Processing</b> means any handling of personal data, irrespective of the means and procedures used, in particular the collection, storage, keeping, use, modification, disclosure, archiving, deletion or destruction of data;</p> <p>By way of example, Boffi International AG may collect, use and disclose:</p> <ul style="list-style-type: none"> <li>❑ Identifiers such as first name, last name, username or other similar identifier, postal address, email address and telephone numbers; customer master data (purchase or account history and information).</li> <li>❑ Personal data involved in communications with us such as the contents and metadata of our communications with you through by email, telephone call and our communications with you by mail.</li> <li>❑ Personal data related to our contractual relationship: payment information (payment details / billing details); purchase or account history; Information relating to your contact or requests (compliments or complaints).</li> </ul>

## PURPOSE OF PROCESSING, GROUNDS FOR JUSTIFICATION, DATA RETENTION, NATURE OF CONFERRAL

 <p>PURPOSE OF PROCESSING</p>	 <p>GROUNDS FOR JUSTIFICATION</p>	 <p>DATA RETENTION</p>	 <p>NATURE OF CONFERRAL</p>
<p><b>A)</b> To <b>perform a contract we have entered into or are trying to enter into with you</b> (contractual and precontractual obligations) and to comply with legal requirements and obligations to which we are subject (legal obligations and administrative/accounting purposes relate to the execution or the ceasing of contract).</p> <p>We collect or use your information to provide services and goods, including delivery; to comply with the operation of customer accounts and guarantees; for dealing your requests (queries, complaints or claims); to communicate with you.</p>	<p><b>Art. 31</b> <b>Overriding private interest</b> – we process personal data relating to a contracting party in direct connection with the conclusion or the performance of a contract</p>	<p>10 years or otherwise stated by law</p>	<p>Data conferral mandatory and it is required due to a contractual relationship.</p> <p>The lack of conferral will prevent the contractual obligation to arise between parties or to be performed by us</p>
<p><b>B)</b> <b>Management of legal aspects</b> relating to our defence in case of precontractual or contractual disputes judgment</p>	<p><b>Art. 31</b> <b>Overriding private interest</b> – we processes personal data relating to our</p>	<p>10 years, except from objection and for the necessary time in case of judgment</p>	<p>Data conferral is necessary. In case of lack, the Data Controller would not achieve this specific purpose.</p>

 PURPOSE OF PROCESSING	 GROUNDS FOR JUSTIFICATION	 DATA RETENTION	 NATURE OF CONFERRAL
	legal defense in case of precontractual or contractual disputes judgment		
<b>C) Management of data subjects' requests, pursuant to art. 25 and following</b> (data subjects' rights)	<b>Art. 31 Law</b> – we process personal data relating to the exercise of your privacy rights, for legal obligation (art. 32 of FADP - LPD and Art. 28, 28a and 28g-28/of the Civil Code)	10 years after closure, except from lawsuits	Data conferral is mandatory. In case of lack, the Data Controller would not achieve this specific legal purpose.

	<b>WHO WE SHARE INFORMATION WITH</b> Personal data may be disclosed to recipients belonging to the following categories: <ul style="list-style-type: none"> <li>Our affiliated companies, group companies (including holding company) and business partners in the supply chain;</li> <li>Service providers and Contractors, including those who provide IT and telecommunications services in connection with e-mails boxes, services, websites, platforms and other professional services such as consulting services (such as professional or legal advisors and consultants; firms or Companies in the context of tax assistance and consultancy as well as administrative/accounting management relationships; business information companies evaluating solvency and payment habits and/or relating to debt collection)</li> <li>Banks;</li> <li>External auditors or inspectors;</li> <li>Subjects providing Audits or other certifications;</li> <li>Organisations and Public bodies we're legally obliged to share personal information with;</li> <li>Competent authorities for compliance with legal obligations and V or provisions of public bodies, upon request.</li> </ul> Subjects belonging to the aforesaid categories act as data Processors (art. 9) or in complete autonomy as separate data Controllers. The complete listing of Data Processors is available by writing us via email <a href="mailto:info@boffizurich.com">info@boffizurich.com</a>
	<b>SHARING INFORMATION OUTSIDE SWITZERLAND</b> (art. 16) Boffi International AG is a corporation located in the Switzerland with related companies in Europe and the holding Company in Italy. Where necessary, we may transfer personal information outside of Switzerland. When doing so, we comply with art. 16 of FADP - LPD, making sure appropriate safeguards are in place. Your personal data, collected for the purposes above indicated, may be transferred to: <b>Organisation name:</b> Boffi s.p.a. <b>Category of recipient:</b> Company of the Group <b>Country the personal information is sent to:</b> Italy. Here your personal information is safe because the EU GDPR applies. Pursuant to art. 16 of FADP, Federal Council has decided that the legislation of Italy guarantees an adequate level of protection ( <a href="#">link</a> ). Disclosures of personal data to States that do not provide adequate data protection under Swiss law and

	<p>European law are therefore excluded, except for disclosures that are based on the express prior consent of the data subject or on his/her explicit instructions or that are carried out on the basis of a legal obligation.</p> <p>For further information or to obtain a copy of the appropriate safeguard for any of the transfers above indicated, please contact us by writing us via email <a href="mailto:info@boffizurich.com">info@boffizurich.com</a>.</p>
	<p><b>DATA PROTECTION RIGHTS</b></p> <p>Under the conditions established by the Federal Act on Data Protection (FADP), the Controller acknowledges, in particular, the following rights (non-exhaustive list):</p> <ul style="list-style-type: none"><li>❓ to obtain the rectification of inaccurate or outdated personal data;</li><li>❓ to be informed in writing and free of charge whether personal data concerning you is being processed;</li><li>❓ to prevent the disclosure of sensitive personal data to third parties;</li><li>❓ to obtain the delivery of your personal data or to request its transfer to third parties;</li><li>❓ to request that the processing of your data be blocked, the disclosure to third parties be prevented, or that personal data be rectified or destroyed;</li><li>❓ to request that a specific processing of personal data, or a specific disclosure to third parties, be prohibited, or that personal data be deleted or destroyed;</li><li>❓ if neither the accuracy nor the inaccuracy of personal data can be proven, to request that a note be added to the data indicating its disputed nature;</li><li>❓ to request that the rectification, destruction, blocking (in particular blocking communication to third parties), the mention of disputed data, or court decisions be communicated to third parties or published;</li><li>❓ to obtain a formal finding that a specific processing of personal data is unlawful</li></ul> <p>To exercise your right under the FADP, please contact us by writing us via email <a href="mailto:info@boffizurich.com">info@boffizurich.com</a>.</p>
	<p><b>HOW TO COMPLAIN</b></p> <p>Without prejudice to any other administrative or judicial remedy, if you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to competent supervisory authority for personal data protection: <b>Federal Data Protection and Information Commissioner</b> (<a href="#">FDPIC</a>)</p> <p><b>FDPIC address:</b> Feldeggweg 1 CH - 3003 Berne Tel. 058 462 43 95.</p>
	<p>We reserve the right to change this Policy. When we do, we will also revise the "Last Review" at the bottom of this Policy. Any changes we may make to this Policy will be effective upon being posted on this page. We encourage you to periodically review this Policy to keep up to date on how we are handling your Personal Information.</p>

**Data Controller**  
**BOFFI INTERNATIONAL AG**