

GENERAL PRIVACY NOTICE

SUMMARY

The following is a summary of (but not a replacement for) this Privacy Notice. We recommend all users read the notice fully.

- **Our role.** We, Cotecna, are responsible for the processing, as controller, of your personal data (but only for our own activities and not those of third party providers) (see [section 2](#));
- **Data we collect.** We collect the personal data which is provided to us by you, our clients, suppliers, partners, the persons with whom we interact, or which we otherwise lawfully obtain in the course of our activities (see [section 3](#));
- **How we use it.** We process such personal data in compliance with the data protection laws applicable to us, mainly for the purpose of providing our services to our clients, to manage our business, and to comply with our Legal Obligations (see [section 4](#));
- **Control and Access.** We do not share your personal data with third parties or transfer it outside of your geographic region unless this is both necessary for our professional activities or business operations, and permitted by applicable laws. This may for instance be the case when we use service providers to operate our business or must interact with third parties to conduct our professional activities (see [sections 5 and 6](#));
- **Retention and Security.** We do not store your personal data for longer than necessary for us to fulfil the purposes set out in this Privacy Notice. We apply security measures and strive to protect your personal data (see [sections 7 and 8](#)); and
- **Your rights.** You may contact us (dpo@cotecna.com) to exercise your rights pertaining to your personal data (see [section 10](#)).

1. INTRODUCTION

At Cotecna (**we, our or Cotecna**), we recognize the importance of your privacy and of transparency.

This general privacy notice (**Privacy Notice**) describes how we collect and process personal data about:

- the representatives of our clients, prospects, service providers, suppliers, contractors or any person involved with them as well as business partners regulated by the Cotecna Business Ethics and Compliance Code;
- individuals who apply for employment; and
- visitors of our websites.

Please note, this Privacy Notice does not apply to employees, other members of staff, interns, freelancers, officers, directors and/or agents, working on a temporary or permanent basis for Cotecna. We have a separate privacy notice that describes how we process the personal data of such individuals. We may also have additional privacy notices that apply in specific circumstances. If you have any questions as to which notice applies to you, please contact dpo@cotecna.com.

2. WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR PERSONAL DATA?

This Privacy Notice applies to any affiliate of the Cotecna group which is responsible for the processing, as controller, of your personal data. You will find contact details below in [section 10](#), and further a list of all affiliates on our website at the following link <https://www.cotecna.com/en/locations>. We can confirm which processing activities are undertaken by which affiliate, on request.

This Privacy Notice only applies to processing undertaken by or on behalf of us. Whilst we may provide links to third party websites or services, we do not accept any responsibility or liability for their policies in relation to their collection and/or processing of any personal data.

3. HOW WE COLLECT YOUR PERSONAL DATA

3.1. The information we collect from you

We collect the information that you provide to us directly. By doing so, you acknowledge the processing set out in this Privacy Notice.

Whenever we collect personal data from you (e.g. in application forms, online forms and links, email and other communications such as voice or video calls with you), we will indicate whether the provision of such data is mandatory (e.g. with an asterisk in an online form) and the consequences of a refusal to provide the requested data. In general, if mandatory data fields are not completed, we will not be able to provide our services.

3.2. The information we collect from other sources

We might also obtain your personal data from other persons or entities we make contact with in the conduct of our work, such as our business partners, third parties involved with them or the legal entity for whom you work (e.g. if you are the contact person designated by your employer to manage the relationship with us). The information about you that we may collect this way will depend on the context, but can include the following categories:

Category	Examples
Identity Details	Name, gender, date of birth, age, nationality, ID/passport, title, position, etc.
Contact Information	Email address, physical address, phone numbers, or other contact information
Professional Information	Information relating to the education, professional training, certifications, CV, professional status, awards, professional memberships, qualifications, languages, Job title / role,
Payment Information	Billing address and method of payment, such as bank details, credit, debit, or other payment card information

Insofar as it is permitted to us, we may also obtain the categories of personal data listed above from publicly available or private sources, such as public or commercial registries (e.g. debt registers, land registries, commercial registers, sanctions lists and databases), the press, websites, or social media platforms.

Also, if you visit our websites, we may collect personal data in an automated way, including through cookies and other active elements, as further described in this Privacy Notice.

4. HOW WE PROCESS YOUR PERSONAL DATA

We process your personal data in compliance with Swiss data protection laws – and to the extent they apply to us, other data protection legislations, such as the EU and UK General Data Protection Regulation (GDPR) – **for the purposes specified** in our [List of Processing Activities](#).

We will only process your personal data if we have valid legal ground for doing so. Depending on the processing activity carried out, we will therefore only process your personal data based on

Contractual Necessity	The processing is necessary to fulfil our contractual obligations to you or to take pre-contractual steps at your request. When the GDPR applies, our contractual necessity is based on Article 6(1)(b) GDPR;
Legitimate Interest	The processing is necessary for the fulfilment of our legitimate interests, and only to the extent that your interests or fundamental rights and freedoms do not require us to refrain from processing. When the GDPR applies, our legitimate interest is based on Article 6(1)(f) GDPR.
Consent	We have obtained your prior consent in a clear and unambiguous manner. When the GDPR applies, your consent is based on Article 6(1)(a) GDPR.
Legal Obligation	The processing is necessary to comply with our legal or regulatory obligations. When the GDPR applies, our Legal Obligations are based on Article 6(1)(c) GDPR.

In addition, we will only process so-called sensitive data if we have obtained your explicit consent for one or more specified purposes, or if we can rely on another lawful justification in accordance with applicable data protection laws.

We do not process your personal data to create a profile about you (profiling) and do not make decisions exclusively on the basis of automated processing which have legal effects on individuals or affect them significantly (automated individual decisions).

We may combine your personal data with other information (aggregate) or erase any information that allows us to identify you (anonymize), so that it is no longer considered personal data under applicable data protection law, in which case this Privacy Notice will no longer apply and we may use such data for purposes not contemplated by this Privacy Notice (e.g. for benchmarking, internal research and development, analytics purposes, or to develop and market new services). You may object to the anonymization or aggregation of your personal data for this purpose at any time (see section 9 below for additional information on your rights).

5. WHO HAS ACCESS TO PERSONAL DATA AND WITH WHOM ARE THEY SHARED?

We only share your personal data if you Consent, if there is a Legal Obligation, Legitimate Interest, Contractual Necessity or other permission to do so. We mainly share personal data:

Within our group	We may transfer personal data within the Cotecna group only for the purposes set out in Section 4 , in which case relevant affiliates will either act as another independent controller or will process your personal data on our behalf and upon our request (thereby acting as processor). .
With our service providers	<p>We may transfer personal data to selected providers, to achieve the purposes listed in section 4, to the extent they need it to provide services to us and carry out the instructions we have given to them.</p> <p>Such third parties include our (IT) systems, cloud service, database, and other technology providers, tax, financial, payroll and accounting service providers, business partners regulated by the Cotecna Business Ethics and Compliance Code, and background check service providers.</p>
With third parties where we have your Consent, a Legal Obligation or a Legitimate Interest	<p>We may also disclose your personal data where we have your Consent, a Legal Obligation to do so or a Legitimate Interest in doing so, for example:</p> <ul style="list-style-type: none"> ➤ to respond to a request from a judicial authority; ➤ to assert, exercise or defend against a claim or lawsuit; or

- in the context of restructuring, merger, acquisition, joint venture in particular if we transfer our assets, or any of our rights or obligations under a relevant agreement to another company.

6. INTERNATIONAL TRANSFERS

Since Cotecna operates globally, the personal data that we collect from you may be stored and processed in Switzerland, the United Kingdom, and the European Union, or in the region where you reside, or transferred to, stored at or otherwise processed elsewhere by one of our global affiliates or service providers, which may be located outside of Switzerland, the United Kingdom, and the European Union, including in the U.S., India, or any other country which may not necessarily offer an adequate level of data protection as recognized by Switzerland, the United Kingdom, and/or the European Union. A list of all countries where the Cotecna group affiliates are located can be found on our websites at the following link <https://www.cotecna.com/en/locations>, and the personal data we collect from you may be transferred to any one of these locations.

In such cases, we will ensure that suitable safeguards are in place, in accordance with applicable data protection laws, for instance by relying on standard contractual clauses adopted by the European Commission or we will rely on a statutory exceptions such as consent, performance of contracts, the establishment, exercise or enforcement of legal claims, overriding public interests or published personal data.

If you transmit information and data to us, you are expressly deemed to consent to such data transfers. You may request additional information in this regard by sending a request to the contact address indicated in section 10 below.

7. HOW LONG DO WE STORE YOUR DATA?

We will erase or anonymize personal data as soon as it is no longer necessary for us to fulfill the purposes set out in our [List of Processing Activities](#). This period varies, depending on the type of data concerned and the applicable legal requirements. More information on each type of processing can be found in our [List of Processing Activities](#).

In view of the Legal Obligations incumbent upon us, certain information relating in particular to the contractual relationship must be retained for at least 10 years.

8. SECURITY

We are committed to the security of your personal data, and have in place physical, administrative and technical measures designed to keep secure your personal data and to prevent unauthorized access to it. We restrict access to your personal data to those persons who need to know it for the purposes described in this Privacy Notice.

Although we take appropriate steps to protect your personal data, no IT infrastructure is completely secure. Therefore, we cannot guarantee that data you provide to us is safe and protected from all unauthorized third-party access and theft.

The internet is a global environment. As a result, by sending information to us electronically, such data may be transferred internationally over the internet depending upon your location. Internet is not a secure environment and this Privacy Notice applies to our use of your personal data once it is under our control only. Given the inherent nature of the internet, all internet transmissions are done at your own risk.

If we have reasonable reasons to believe that your personal data has been acquired by an unauthorized person, and applicable law requires notification, we will promptly notify you of the

breach by email (if we have it) and/or by any other channel of communication (including by posting a notice on our website).

9. YOUR RIGHTS WITH REGARD TO THE PROCESSING OF YOUR PERSONAL DATA

Within the limits and under the conditions set forth in the law, you have the following rights:

- **Right of access** - you have the right to access your personal data as processed by us and obtain a copy thereof;
- **Right to rectification** - you have the right to request any correction or update of personal data you think is inaccurate or incomplete;
- **Right to erasure** - you have the right to request the erasure of your personal data in certain circumstances;
- **Right to restriction or objection of processing** - you have the right to ask us to cease or to object to any specific processing of personal data in certain circumstances;
- **Right to data portability** - you have the right to ask that we transfer in a structured, commonly used and machine-readable format the personal data you gave us to another organization, or to you, in certain circumstances; and
- to withdraw your consent where we base our processing of your personal data on your consent (without such withdrawal affecting the lawfulness of processing made prior to).

You will find further details of your rights in section 4 of this Privacy Notice in connection with each processing activity we perform. The above does not restrict any other rights you might have pursuant to applicable data protection legislation under certain circumstances. As a general rule, you are not usually required to pay any charge for exercising your rights and we will respond to your request within a reasonable period of time as required under the applicable data privacy laws.

If you want to exercise any of your rights, please contact us using the contact detailed listed below (see section 10).

In addition to your rights outlined above, you may also have the right to lodge a complaint with a competent data protection supervisory authority if you are not satisfied with how we process your personal data. Although this is not required, we recommend that you contact us first (see section 10) as we might be able to respond to your request directly.

10. CONTACT US

If you believe your personal data has been used in a way that is not consistent with this Privacy Notice, or if you have any questions or queries regarding the collection or processing of your personal data, please contact us at dpo@cotecna.com.

11. UPDATES OF THIS POLICY

This Privacy Notice may be subject to amendments. Any changes or additions to the processing of personal data as described in this Privacy Notice affecting you will be communicated to you through an appropriate channel, depending on how we normally communicate with you.

Last updated: April 2025

LIST OF OUR PROCESSING ACTIVITIES OF YOUR PERSONAL DATA

This table describes the purposes for which we process personal data, which personal data we process in relation to each purpose and the duration for which the personal data is retained.

Ref	Purpose	Information collected	Legal Basis	Retention Period
1.	To provide our services to our clients We process the personal data we need to carry out our services, including to conduct our inspection and certification missions, to provide our testing services, and other services. As part of the provision of our services, we may process personal data shared with us using artificial intelligence (“AI”) technology in various ways throughout our business. For example, if a video call is recorded, a transcript may be generated and further processed using AI tools.	The categories of personal data may include: <ul style="list-style-type: none">• Identity Details;• Contact Information;• Professional Information;• Payment Information;• Interactions with us; and• Any other information provided to us by you.	Legitimate Interests Contractual Necessity	The personal data which we must retain for record-keeping, tax or another legal obligation will, as a rule, be kept for the duration of the contractual relationship and thereafter for a period of 10 years (or such other retention period as applicable). Shorter retention periods apply for personal data which must not be retained for the above reasons.
2.	For general client or supplier or service provider management purposes If we are in a business relationship with you, your employer, or are in discussions to enter into one, we process the personal data that is necessary for our client or supplier management, as well as for the following other related purposes:	The categories of personal data may include: <ul style="list-style-type: none">• Identity Details;• Contact Information;• Professional Information;• Payment Information;• Interactions with us and services provided ;	Legitimate Interests Contractual Necessity	Same as under No 1 above.

Ref	Purpose	Information collected	Legal Basis	Retention Period
	<ul style="list-style-type: none"> • in respect of clients, to carry out the transactions in which we are engaged; • in respect of suppliers or services providers, initially to decide whether or not to enter in a business relationship with you, and subsequently to procure products and/or services from our suppliers, service providers, subcontractors, consultants and agents; • for management of the commercial relationship, including to interact with you, reply to your inquiries, account set up and management; • to track our activities (measuring sales, our work time, etc.) and those of our suppliers; • to manage our archiving and records; and • for invoicing purposes. 	<ul style="list-style-type: none"> • Any other information provided to us by you; and • in relation to business partners regulated by the Cotecna Business Ethics and Compliance code, same as item 7. 		
3.	<p>To ensure the security of our infrastructures, our staff members, and for the general management of our organisation</p> <p>We process your personal data when this is required to manage and ensure the security of our infrastructures, including the maintenance of IT infrastructure, preventing fraud or criminal activity, ensuring business continuity, and safeguarding physical and IT security,</p>	<p>The categories of personal data may include:</p> <ul style="list-style-type: none"> • Identity details; • Contact Information • Payment Information • Interactions with us; and • Security footage. 	<p>Legitimate Interests Contractual Necessity</p>	<p>Information collected for this purpose is regularly deleted or anonymized when no longer required in accordance with applicable laws.</p>
4.	<p>To send you our newsletters if you subscribed to it</p>	<p>The categories of personal data may include:</p>	<p>Consent</p>	<p>Until you unsubscribe</p>

Ref	Purpose	Information collected	Legal Basis	Retention Period
	You may unsubscribe from the newsletter service at any time, in which case your contact details will be deleted.	<ul style="list-style-type: none"> • General information (name) • Contact information (email) • Time of registration and your opt-in confirmation 	Legal Obligation (for the proof of opt-in)	
5.	To send you other advertising information Independently from your subscription to our newsletter, we may also contact you by email to inform you about our activities if you have previously purchased similar services or products, if you have not objected to the corresponding use of your email address. You can object to the use of your email address for this purpose at any time by contacting us (see contact detail in section 10).	The categories of personal data may include: <ul style="list-style-type: none"> • General information (name) • Contact information (email) • Business relation records 	Legitimate Interests (to advertise certain sales offers and activities relating to our previous interactions with you)	Same as under No 1 above.
6.	For internal analysis and statistical purposes in order to improve our services and products Unless you object to such processing, we may process your personal data that we access in connection with our services and products, for internal analysis and statistical purposes, in order to better understand the needs of our customers, to optimize their experience, and in general to improve the ergonomics and functionality of the our services and products. You may object to such processing activities at any time (see the Privacy Notice for additional information on your rights).	The categories of personal data include all information collected for another purpose.	Legitimate Interests	Same as under No 1 above.

Ref	Purpose	Information collected	Legal Basis	Retention Period
	We do not use this information to identify you or attempt to link it to you.			
7.	<p>If you apply for a position with us, to process your application</p> <p>If you apply for a position, we will process your personal data exclusively for assessing your application in view of the possible establishment of an employment relationship, including to assess your capabilities and qualifications, and conduct reference checks, if and as authorized by Swiss law.</p>	<p>We will process the personal data you provide (e.g. your contact information, CV, résumé, cover letter, information relating to previous work experiences).</p> <p>In addition, if you provide us with links to your profile on social media platforms (such as LinkedIn) or with contact information for references, we will assume that we may gather information from these sources.</p> <p>Any information you submit must be true, complete and not misleading. Should the information provided be inaccurate, incomplete, or misleading, subject to applicable law, this may lead to a rejection of your application during the application process or disciplinary action including immediate dismissal if you have been employed.</p>	Contractual Necessity (to take pre-contractual steps at your request).	<p>Personal data of applicants who have not been hired is deleted at the end of the recruitment process.</p> <p>If an employment relationship is established following your application, your personal data will be entered into your HR file and further processed in accordance with our HR data processing policies, as detailed in our employee privacy notice.</p>
8.	<p>To operate our website</p> <p>If you visit our website we process your personal data to allow proper functioning of our website and provide you with the requested functionalities, to establish a connection with your device over the internet, to identify you when you use the websites, manage their stability and security,</p>	In addition to the personal data which you provide, we automatically collect certain technical information about your interactions with our websites (such as your IP address, the content that was accessed, date and time of access, information about your web browser/ device, your preferences,	Contractual Necessity (to operate our website and provide the required functionalities)	<p>If you use a service, the retention period is as specified under No 1 above</p> <p>The data collected using cookies is stored for the period indicated in our Cookie Policy.</p>

Ref	Purpose	Information collected	Legal Basis	Retention Period
	and for analytics and statistical purposes, based on our Legitimate Interests in doing so.	or other information related to your interaction with the websites, including your navigation details on the websites). We use cookies on the websites. To find out more about how we use cookies, please see our Cookies Policy .	Legitimate Interest (analytics and statistical)	
9.	To comply with our other Legal Obligations We may further process your personal data if we have a Legal Obligation to do so or for other Legitimate Interests. This will for instance be the case if we need to disclose certain information to public authorities or retain such information for tax or accounting purposes, or for the establishment, exercise or defense of legal claims.	The personal data that we process for this purpose are those that we collected for one the purposes indicated elsewhere in this list.	Legal Obligation	We retain the personal data for the duration of the Legal Obligation imposed on us.

In addition to the above, we may process your personal data if we have obtained your prior unambiguous consent for specific purposes. We will delete your personal data when we no longer need or when you withdrew your consent (whatever comes first). Consent given can be withdrawn at any time, but this does not affect data processed prior to withdrawal.