

## Principles for processing Personal Data

The Principles for processing Personal Data (“**Principles**”) describe how the Tschudi Group generally process customer, supplier and associate Personal Data. A more specific description might be incorporated in agreements, service related documents and on the website of Tschudi Group [www.tschudigroup.com](http://www.tschudigroup.com).

Tschudi Group undertakes to guarantee the confidentiality of personal data, within the framework of applicable law, and has implemented appropriate technical and organizational measures to safeguard personal data from unauthorized access, unlawful processing or disclosure, accidental loss, modification or destruction.

### 1. Definitions

**Data Subject** is a natural person or the representative of legal person, who a) seeks to use or uses the services provided by any of the company in the Tschudi Group or is otherwise involved in the use of service (“customer”); b) provides a product or a service to Tschudi Group or is otherwise involved in the service provision (“supplier”); c) is involved in Tschudi Group business activity as partner (“associate”); d) is applying for vacancy in the Tschudi Group.

**Personal Data** is any information directly or indirectly relating to an identified or identifiable natural person.

**Processing** is any operation carried out with Data Subject’s Personal Data, including collection, recording, storing, alteration, granting of access to, making enquiries, transferring, etc.

**Tschudi Group** is all legal entities directly controlled by Glarona AS.

**Third Person** is any person, who is not a Data Subject or Tschudi Group.

**Service** is a transportation, logistics, ship(ping) related, financial, production or any other related activity rendered by Tschudi Group to its customers.

### 2. Processing of Personal Data

- 2.1. Tschudi Group shall Process Personal Data according to the legal acts of the place of service and the principles for the legitimate purpose and to the extent that is necessary for the performance of its obligations under the agreement, protection of Data Subject and/or Tschudi Group rights or in order to meet the requirements stipulated by law of place of service.
- 2.2. Tschudi Group shall Process the Personal Data within the period of business relationship with the Data Subject and shall continue to Process in order to meet any obligation stipulated by law of the place of service and for settling disputes with the Data Subject (if any) after the expiry or termination of business relationships.
- 2.3. Tschudi Group may use authorized processors of Personal Data, who shall Process Personal Data under the instructions of Tschudi Group and in compliance with applicable law using adequate security measures.

### 3. Categories of Personal Data to be Processed

- 3.1. Tschudi Group Processes the following Personal Data:
  - 3.1.1. Data Subject personal data, such as name, personal ID code, date of birth, language of communication, job title;
  - 3.1.2. Data Subject contact data, such as phone number, address, e-mail address;
  - 3.1.3. Data of the Data Subject’s residency for tax purposes, such as country of residence;
  - 3.1.4. Other data, that may be needed for provision of services, such as payment information;
  - 3.1.5. Information about customer satisfaction, such as survey responses;
  - 3.1.6. Any data that the Data Subject gives in direct communication with Tschudi Group or its representative;
  - 3.1.7. Job applicants’ personal data, based on applicant’s CV or formulas available on our web-page(s);

### 4. The purposes and basis of Processing Personal Data

- 4.1. Tschudi Group shall Process Personal Data primarily to:

- 4.1.1. Manage customer relations in general and administrate the Services provided to customers, including responding the enquiries and questions, deliver service requests, process service orders and payment transactions.  
To conclude and execute an agreement with the customer, for example for provision of transportation services and to update, correct or verify data, which is based on: performance of an agreement or in order to enter into agreement with customer or compliance with a legal obligation.
- 4.1.2. Provide additional services, perform customer surveys, market analyses and statistics, including improving the Services and responding to customer complaints.  
To offer customer the services of Tschudi Group; to get the feedback of the quality of Services, to analyse and forecast customer needs in order to offer more suitable Services, based on: consent from customer or Tschudi Group's legitimate interest to offer additional and new services.
- 4.1.3. Co-operate with suppliers in order to provide the Services to customers. Develop business activities and co-operation with associates and possible business partners.  
Establish, manage and develop the business relationship and activities with suppliers and associates, based on: performance of an agreement or in order to enter into an agreement or Tschudi Group legitimate interest to perform and develop commercial activities.
- 4.1.4. Protect the interests of Data Subject and/or Tschudi Group.  
To examine the quality of Services provided by Tschudi Group and for the purpose of providing a proof of a business transaction or communication, based on: performance of an agreement or in order to enter into an agreement or compliance with a legal obligation or consent from customer or Tschudi Group legitimate interests to prevent, limit and investigate any misuse or unlawful use of any of our Services or products.
- 4.1.5. Guarantee the security of Data Subject and / or Tschudi Group, protect life and health of Data Subject and Tschudi Group employees, based on: Tschudi Group legitimate interest to protect its customers, suppliers, associates, employees and assets.
- 4.1.6. Manage job applications and requests for vacancies.  
To fulfill the vacant positions in Tschudi Group and make job offers, based on: consent from applicant or in order to enter into agreement with potential employee.
- 4.1.7. Comply with legal obligations and establish, exercise and defend legal claims.  
To comply with applicable law, e.g. tax and bookkeeping regulations, and to establish, exercise and defend legal claims, based on: performance of an agreement or in order to enter into agreement or compliance with a legal obligation or Tschudi Group's legitimate interests to exercise legal claims.

## **5. Recipients Personal Data**

- 5.1. Tschudi Group may pass the Personal Data to Third Party service providers contracted or associated with Tschudi Group in the course of providing the Services. Any Third Party, that Tschudi Group may share the Personal Data with, is obliged to keep the information securely and to use it only to respond to requests, service requirements, complaints etc. on behalf of Tschudi Group. When this data is no longer needed, it will be disposed in the line with Tschudi Group procedures and legal requirements.
- 5.2. Tschudi Group may share sensitive Personal Data with Third Party only, if the Data Subject's explicit consent has obtained in prior or in compliance with legal obligation.
- 5.3. Tschudi Group shall share Personal Data with other recipients, such as:
  - 5.3.1. Legal entities in the Tschudi Group;
  - 5.3.2. Service providers and subcontractors of Tschudi Group, such as IT service;
  - 5.3.3. Authorities, such as law enforcement authorities, bailiffs, notary offices, tax authorities, supervision authorities;
  - 5.3.4. Auditors, legal and financial consultants, insurance companies;
  - 5.3.5. Debt collectors upon assignment of claims, courts and bankruptcy or insolvency administrators;
  - 5.3.6. Any other person or authority stated by the law of the place of service.

## **6. Geographical area of Personal Data Processing**

- 6.1. As a general rule, Personal Data is processed with EU/EEA, but in some cases it might be necessary to transfer and Process this outside the EU /EEA. If this is done, the Tschudi Group will take all reasonable measures to safeguard the transfer of Personal Data to Third Parties in a manner that complies with the GDPR.
- 6.2. Upon the request of Data Subject, further details of Personal Data transfers to countries outside the EU/EEA can be provided.

## **7. Retention periods**

Tschudi Group shall not Process Personal Data longer than necessary, i.e. as needed to fulfill the purposes for which the Personal Data was collected. The length of retention period is based on agreement, legitimate interest or applicable law, such as the laws related to bookkeeping, statute of limitations, civil law, etc.

## **8. Data Subject's rights**

- 8.1. Data Subject has rights regarding the data Processing that is classified as Personal Data under applicable law. Such rights are in general to:
  - 8.1.1. Require the Personal Data to be corrected, if it is inadequate, incomplete or incorrect, or deleted;
  - 8.1.2. Withdraw the consent to Process Personal Data;
  - 8.1.3. Require the erasure of the Personal Data, except if the right and obligation of Tschudi Group to Process Personal Data is foreseen by law of the place of Service or if it is necessary for Tschudi Group to perform or to ensure the performance of agreement;
  - 8.1.4. Restrict the Processing of Personal Data under applicable law, e.g. during the time when Tschudi Group assesses whether the Customer is entitled to request his/her Personal Data erased;
  - 8.1.5. Receive the information if the Personal Data is being Processed by Tschudi Group and if so, then to access it;
  - 8.1.6. Lodge complaints pertaining to the use of Personal Data to local [supervisory authority](#).
- 8.2. Data Subjects may exercise their rights regarding the use of Personal Data by sending a written request to [privacy@tschudigroup.com](mailto:privacy@tschudigroup.com). The request will be directed to the appropriate Tschudi Group company.
- 8.3. If we receive a request from Data Subject to exercise any of the above rights, we shall ask the Data Subject to verify his/her identity before acting on the request; this is to ensure that the Personal Data is protected and kept secure.
- 8.4. If Personal Data is erased at Data Subject's request, Tschudi Group will only retain such copies of the information as are necessary to protect our or Third Party legitimate interests, comply with governmental orders, resolve disputes, troubleshoot problems, or enforce any agreement that the Data Subject has entered into with Tschudi Group.

## **9. Contact details**

The controller of Personal Data is Tschudi Group or its subsidiary. The contact details of Tschudi Group companies are available [here](#).