

# Privacy policy

Thank you for your interest in our websites and the information and offers of ORLEN Trading Switzerland GmbH (hereinafter "we" or "us"). The protection of your personal data during your visit to our websites is important to us. This privacy policy applies to all of our websites through which this privacy statement is made available, as well as to our other services, performances and processing operations explained in this privacy policy. Different information may be provided for other websites and processing operations. The following policy fulfils our legal obligation to inform you about the storage of data, the type of data, its purpose, the legal basis for processing, your rights in relation to the processing of personal data and our identity.

## I. Controller of Processing

The data controller for the website is:

ORLEN Trading Switzerland GmbH

Neuhofstrasse 24, 6300 Zug

Email: [contact@orlentradng.ch](mailto:contact@orlentradng.ch)

## II. GENERAL INFORMATION ON DATA PROCESSING

As a matter of principle, we only process the personal data of our users insofar as this is necessary in order to provide a functional website, as well as our contents and services. Further processing generally only takes place if you yourself have initiated this processing, for example by sending us an inquiry, or if you have consented to the respective processing. In doing so, we comply with the legal requirements, in particular the revised Swiss Data Protection Act (revFADP) and the European General Data Protection Regulation (GDPR) and other relevant legal provisions.

We process personal data in accordance with the statutory provisions for the purposes presented here in each case, and only for as long as the personal identification of the person concerned is necessary for the respective purpose. Afterward, the data is deleted or anonymized in accordance with data protection regulations.

If we collect personal data when you visit our website, we will only pass this on if this is permitted in the individual case. Possible recipients of your personal data are, for example, companies that act on our behalf and that we have carefully selected, such as technical service providers who provide and maintain these internet pages for us on their servers. In addition, we pass on personal data if this is necessary in the respective individual case for the respective purpose, for example, if we transfer your data to a shipping service in order to send you ordered products.

Unless we specifically indicate otherwise, you are not obliged to provide personal data. However, personal data may have to be provided in connection with some of our services, for example for contacting us, for the use of personalised functions on our website and for your participation in application procedures. Unless indicated separately, there are no automated decisions in individual cases within the meaning of Article 21 revFADP and Article 22 GDPR.

## III. PROVISION OF THE WEBSITE AND CREATION OF LOG FILES

### 1. Description and scope of data processing

Each time our website is accessed, our system automatically collects data and information from the computer system of the accessing computer.

The following data is collected:

- Information about the browser type and version used
- The operating system of the user
- The IP address of the user
- Date and time of access
- Websites from which the user's system accesses our website

The data is also stored in the log files of our system. Not affected by this are the IP addresses of the user or other data that allow the data to be assigned to a user. This data is not stored together with other personal data of the user. The temporary storage of the IP address by the system is necessary to enable the transmission of the website to the user's computer. For this purpose, the user's IP address must remain stored for the duration of the session. These purposes are also our legitimate interest in data processing in terms of the legal basis of Article 31 revFADP and Article 6 para. 1 letter f) GDPR. The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. In the case of the collection of data for the provision of the website, this is the case when the respective session has ended.

#### **IV. OTHER WEB SERVICES**

##### **1. Cookies**

###### a) Use of cookies

Our websites use cookies and similar technologies. Cookies are small text files that are stored by the internet browser on the user's terminal device. A cookie usually contains a characteristic string of characters that enables the browser to be uniquely identified when the website is called up again.

Cookies are used to make the website more user-friendly, to optimise the functions and services of the website and to provide you with content tailored to you. The purpose of using technically necessary cookies is to enable and simplify the use of the website and functions provided with it. Some functions of this website cannot be offered without the use of cookies. The user data collected through technically necessary cookies are not used to create user profiles.

In addition, with your separate consent, cookies may be used to provide external media such as films and maps, as well as to analyse the use of the website and other functions. You can deactivate or restrict the use of cookies by changing the settings in your internet browser. Cookies that have already been saved can be deleted at any time. This can also be done automatically. If cookies are deactivated for the website, it may no longer be possible to use all the functions of the website to their full extent.

The legal basis for the processing of personal data using technically necessary cookies is Article 31 revFADP and Article 6 para. 1 letter f) GDPR, whereby the legitimate interest of the controller is the secure, stable, efficient provision of the functions of the website and the information that can be accessed thereby. If the controller fulfils a contractual obligation to you with the respective function, the legal basis is Article 31 revFADP and Article 6 para. 1 letter b) GDPR.

The legal basis for the processing of personal data using cookies for analysis purposes, as well as for other non-technically necessary processing purposes, is Article 31 revFADP and Article 6 para. 1 letter a) GDPR, where the user has given his consent in this regard.

###### b) Cookiebot

Our websites use a web service provided by Cybot A/S, Havnegade 39, 1058 Copenhagen, DK (hereinafter: cookiebot.com). We use this data to ensure the full functionality of our website. In this context, your browser may transmit personal data to cookiebot.com. The legal basis for the data processing is Article 31 revFADP and Article 6 para. 1 letter f) GDPR in connection with our legitimate interest in a user-friendly, secure and efficient administration of cookie settings and, in addition, Article 31 revFADP and Article 6 para. 1 letter c) GDPR in connection with our legal obligation to make the consents of data subjects transparent, verifiable and revocable. The legitimate interest lies in the error-free functioning of the website. The data is deleted as soon as the purpose for collecting it has been fulfilled. Further information on the handling of the transmitted data can be found in the privacy policy of cookiebot.com: [www.cookiebot.com/de/privacy-policy](http://www.cookiebot.com/de/privacy-policy). You can prevent the collection as well as the processing of your data by cookiebot.com by deactivating the execution of script code in your browser or by installing a script blocker in your browser (you can find this, for example, at [www.noscript.net](http://www.noscript.net) or [www.ghostery.com](http://www.ghostery.com)). With the services of Cookiebot, you can call up information on the cookies used here on these internet pages as part of a cookie declaration, and can give, revoke and manage consent to cookies.

## **2. Google Analytics**

### a) Use of Google Analytics

Our websites use functions of the web analysis service Google Analytics. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland. Google Analytics enables the website operator to analyse the behaviour of website visitors. In doing so, the website operator receives various usage data, such as page views, length of stay, operating systems used and the origin of the user. This data may be summarised by Google in a profile that is assigned to the respective user or their end device. Google Analytics uses technologies that enable the recognition of the user for the purpose of analysing user behaviour (e.g. cookies or device fingerprinting). The information collected by Google about the use of this website is usually transferred to a Google server in the USA and stored there. This analysis tool is used exclusively on the basis of Article 31 Para. 1 revFADP and Article 6 Para. 1 letter a) GDPR; for this purpose, we request your consent to the storage of cookies. This consent can be revoked at any time with effect for the future.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. Details can be found here: <https://business.safety.google/adsprocessorterms/sccs/p2p-intra-group/>.

There is a data processing agreement with Google, which includes the EU's standard data protection clauses as the basis for data transfers to third countries. You can find out more details at: <https://business.safety.google/adsprocessorterms>.

### b) IP anonymisation

We have activated the IP anonymisation function on this website. This means that your IP address is shortened by Google within Member States of the European Union or in other contracting states to the Agreement on the European Economic Area and Switzerland before being transmitted to the USA. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity and providing other services relating to website activity and internet usage to the website operator. The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data.

### c) Browser plugin

You can prevent the collection and processing of your data by Google by downloading and installing the browser plugin available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=de>

You can find more information on how Google Analytics handles user data in Google's privacy policy: <https://support.google.com/analytics/answer/6004245?hl=de>

#### d) Storage period

Data stored by Google at user and event level that are linked to cookies, user identifiers (e.g. user ID) or advertising IDs (e.g. DoubleClick cookies, Android advertising ID) are anonymised or deleted after 14 months. Details can be found under the following link: <https://support.google.com/analytics/answer/7667196?hl=de>

### **3 . Google Ads and Google Conversion Tracking**

a) We use Google Ads. Google Ads is an online advertising programme of Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland. Google Ads enables us to display advertisements in the Google search engine or on third-party websites when the user enters certain search terms on Google (keyword targeting). Furthermore, targeted advertisements can be played on the basis of the user data available at Google (e.g. location data and interests) (target group targeting). As the website operator, we can evaluate this data quantitatively by analysing, for example, which search terms have led to the display of our advertisements and how many advertisements have led to corresponding clicks. The use of Google Ads is based on Article 31 revFADP and Article 6 para. 1 letter f) GDPR. The website operator has a legitimate interest in marketing its service products as effectively as possible. Data transfer to the USA is based on the standard contractual clauses of the EU Commission. Details can be found here: <https://privacy.google.com/businesses/controllerterms/mccs/>

b) We use Google Conversion Tracking. The provider of this service is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland. With the help of Google conversion tracking, Google and we can recognise whether the user has performed certain actions. For example, we can evaluate which buttons on our website were clicked how often and which products were viewed or purchased particularly frequently. This information is used to create conversion statistics. We learn the total number of users who clicked on our ads and what actions they took. We do not receive any information with which we can personally identify the user. Google itself uses cookies or comparable recognition technologies for identification. The use of Google conversion tracking is based on Article 31 revFADP and Article 6 para. 1 letter f) GDPR. The website operator has a legitimate interest in analysing user behaviour in order to optimise both its website and its advertising. If a corresponding consent has been requested (e.g. consent to store cookies), the processing is carried out exclusively on the basis of Article 31 Para. 1 revFADP and Article 6 Para. 1 letter a) GDPR; the consent can be revoked at any time. More information on Google conversion tracking can be found in Google's privacy policy: <https://policies.google.com/privacy?hl=de>

### **4. Facebook Custom Audiences / Facebook Pixel**

On some of our websites, we use what is known as "Facebook pixel" of the company "Facebook" (Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland). The Facebook pixel allows us to classify visitors to our website into specific target groups in order to display corresponding advertisements ("ads") to you on Facebook. The data collected (e.g. IP addresses, information on the web browser, the location of the website, buttons clicked, pixel IDs if applicable and other characteristics) are not visible to us, but can only be used in the context of displaying certain advertisements. The cookies are also set as part of the use of the Facebook pixel code. If you have a Facebook account and are logged in, your visit to this website will be assigned to your Facebook user account. In part, we also use the remarketing function "Custom Audiences" of the company "Facebook". This enables users of the website to be shown interest-based advertisements ("Facebook ads") when visiting Facebook or other websites that also use this procedure. In this way, we pursue the interest of showing you advertisements that correspond to your interests in order to make our website more interesting for you. In order to exchange the respective data, your browser automatically establishes a direct connection with the Facebook server. We have no influence on the scope and further use of the data collected by Facebook through the use of this tool and therefore inform you according to our state of knowledge: Through the integration of Facebook Custom Audiences, Facebook receives the information that you have called up the corresponding web page of our website or clicked on an advertisement from us. If you are registered

with a "Facebook" service, "Facebook" can assign the visit to your account. Even if you are not registered with Facebook or have not logged in, it is possible that the provider may obtain and store your IP address and other identifying features.

You can find out how the Facebook pixel is used for advertising campaigns at <https://www.facebook.com/business/learn/facebook-ads-pixel>.

More information on Facebook's data policy can be found at <https://www.facebook.com/policy.php>.

For more information on Facebook's data processing, please visit <https://www.facebook.com/about/privacy>.

We use these functions to be able to provide you with advertising offers that correspond to your interests. We process your data because you have consented to this, Article 31 revFADP and Article 6 para. 1 letter a) GDPR. We store your data as long as we need it for the respective purpose (display of interest-based advertising), or as long as you have not objected to the storage of your data or revoked your consent.

- Deactivating the "Facebook Custom Audiences" function is possible for logged-in users at

<https://www.facebook.com/settings/?tab=ads#>.

- You can change your Facebook ad settings at

[https://www.facebook.com/ads/preferences/?entry\\_product=ad\\_settings\\_screen](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen) as long as you are logged into Facebook.

## **5. LinkedIn Pixel**

We place ads on the social network "LinkedIn" (LinkedIn Ireland Unlimited, Company Wilton Plaza, Wilton Place, Dublin 2 Ireland). We have our ads delivered to target groups by LinkedIn. We determine within the planning of our LinkedIn advertisements which criteria the target group should fulfil. We can choose from the options of locations, companies, age or gender, education, work experience and interests. In this context, we do not process or get access to any personal data of the members. Consent can be revoked at any time with effect for the future. When the user clicks on one of our ads, they are redirected to our website. If you call up our website, the LinkedIn pixel is triggered when you call up our website after giving your consent and a cookie is set by us on your end device (known as a first-party cookie). The legal basis for this processing results from your consent pursuant to Article 31 (1) revFADP and Article 6 (1) para. 1 lit. a) GDPR. LinkedIn is responsible for data processing in connection with the delivery of our ads within the social network. You can find more information on data processing by LinkedIn here: <https://www.linkedin.com/legal/privacy-policy>

## **6. YOUTUBE with enhanced data protection**

We embed YouTube videos on our websites. The operator of YouTube is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland. We use YouTube in the extended data protection mode. According to YouTube, this mode means that YouTube does not store any information about visitors to this website before they watch the video. However, the disclosure of data to YouTube partners is not necessarily excluded by the extended data protection mode. Thus, YouTube – regardless of whether you watch a video – establishes a connection to the Google DoubleClick network. As soon as you start a YouTube video on this website, a connection to YouTube's servers is established. This tells the YouTube server which of our pages you have visited. If you are logged into your YouTube account, you enable YouTube to assign your surfing behaviour directly to your personal profile. You can prevent this by logging out of your YouTube account. Furthermore, after starting a video, YouTube may save various cookies on your end device or use comparable recognition technologies (e.g. device fingerprinting). In this way, YouTube can obtain information about visitors to this website. This information is used, among other things, to collect video statistics, improve the user experience and prevent fraud attempts. If necessary, further data processing processes may be triggered after the start of a YouTube video, over which we have no control. YouTube is used in the interest of an appealing presentation of our online offers. This constitutes a

legitimate interest within the meaning of Article 31 revFADP and Article 6 para. 1 letter f) GDPR. Insofar as a corresponding consent has been requested, the processing is carried out exclusively on the basis of Article 31 para. 1 revFADP and Article 6 para. 1 letter a) GDPR; the consent can be revoked at any time. Further information on data protection at YouTube can be found in their privacy policy at: <https://www.google.de/intl/de/policies/privacy>

## **V. EMAIL CONTACT**

It is possible to contact us via the email address provided. In this case, the user's personal data transmitted with the email will be stored. In this context, the data is not passed on to third parties. The data is used exclusively for processing the conversation. The purpose of the processing of personal data in the context of the contact options is the communication initiated by the user and/or the provision of the information requested by the user. The legal basis for the processing of the data is Article 31 revFADP and Article 6 para. 1 letter f) GDPR in conjunction with our legitimate interest in being able to answer and process your enquiry efficiently, appropriately and in a targeted manner. If the contact is made in the context of the preparation, implementation or processing of a contractual relationship, the legal basis is Article 31 revFADP and Article 6 para. 1 letter b) GDPR. The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. For personal data sent by email, this is the case when the respective conversation with the user has ended. The conversation is ended when the circumstances indicate that the matter in question has been conclusively clarified. The additional personal data collected during the sending process will be deleted after a period of seven days at the latest.

## **VI. CUSTOMER SERVICE AND CUSTOMER COMPLAINTS**

In the case of possible customer complaints and service questions, in addition to the specific details of the complaint (content, type, location, time), we also collect the name and, if necessary, the address and telephone number of the customer or other person making the complaint/communicating. We will store this information if this becomes necessary according to the content of the complaint. Your complaint and its contents will only be passed on to third parties if this is necessary for the appropriate processing of your request, for example to insurance companies in the case of possible damage claims. Your data will be used exclusively for processing the customer complaint and for the other purposes mentioned below. The legal basis for this data processing is Article 31 revFADP and Article 6 para. 1 lit. b) GDPR (fulfilment of contract/execution of pre-contractual measures), Article 6 para. 1 letter c) GDPR (fulfilment of legal obligations such as retention periods under tax law) as well as Article 6 para. 1 letter f) GDPR in connection with our legitimate interests in:

- optimising our services and products
- improving our customer service
- pursuing any legal claims arising in connection with the complaint
- the documentation and evidence relating to the complaint or the facts referred to therein

We delete your personal data collected in the context of complaints and other submissions or their processing in accordance with the statutory provisions in each case after the respective purpose has been fulfilled. We delete data stored on the basis of statutory retention periods after the end of the relevant retention periods, and we delete personal data required for evidence purposes after the expiry of the relevant limitation periods.

## **VII. RIGHTS OF THE DATA SUBJECT**

You have the right to:

- revoke consent given to us or object to the processing of your data
- receive information about your data stored with us
- demand that incorrect data about you be corrected
- demand that data about you that is no longer required be deleted
- demand that, under certain conditions, the processing of your data be restricted. This may be the case, for example, if deletion is not possible but the data may not be processed further
- demand that your data be transferable. This right applies in particular if you have given your consent to the processing of your data or if the processing of the data is necessary to perform a contract.

If you wish to exercise a right, please contact us or our responsible person (email: [piotr.sliwinski@orlentradings.ch](mailto:piotr.sliwinski@orlentradings.ch))

We would like to point out that in certain cases we may request additional information from you in order to establish your identity. For example, in exercising the right of access, we may ensure that information not be disclosed to unauthorised persons. You also have the right to complain to a supervisory authority if you believe that our processing of your personal data is in breach of the law.

We reserve the right to change this privacy policy or adapt it to new processing methods at any time.

**Status: 8.05.2023**