

We respect the privacy of every person who visits or registers with cpmswitzerland.com (the "**Site**") and who uses the services that we make available from the Site (our "**Services**") and we are committed to ensuring a safe online experience.

1 PURPOSE OF THIS POLICY

This privacy policy ("**Privacy Policy**") explains our approach to any personal information that we might collect from you or which we have obtained about you from a third party and the purposes for which we process your personal information. This Privacy Policy also sets out your rights in respect of our processing of your personal information. For more information **click here**

2 WHO ARE WE AND WHAT DO WE DO?

The Site and our Services are operated by CPM Switzerland AG, Seestrasse 97, 8800 Thalwil, Schweiz ("we", "us" or "our").

3 HOW TO CONTACT US?

If you have any questions about this Privacy Policy or want to exercise your rights set out in this Privacy Policy, please contact us by:

- sending an e-mail to info@cpmswitzerland.ch; or
- calling us on: +41 (0)44 322 20 50

4 WHAT PERSONAL INFORMATION DO WE COLLECT AND HOW DO WE USE IT?

Our primary goal in collecting personal information from you is to: (i) verify your identity; (ii) help us improve our products and services and develop and market new products and services; (iii) carry out requests made by you on the Site; (iv) investigate or settle inquiries or disputes; (v) comply with any applicable law, court order, other judicial process, or the requirements of a regulator; (vi) enforce our agreements with you; (vii) protect the rights, property or safety of us or third parties, including our other clients and users of the Site; (viii) provide support for the provision of our Services; and (ix) use as otherwise required or permitted by law.

In particular, we use your personal information for the following purposes:

- **Fulfilment of products and services.**

We collect and maintain personal information that you voluntarily submit to us during your use of the Site and/or our Services. We use the contact and payment details you have provided to us so that we can fulfil the supply of products and services you have ordered from our Site. This includes your purchase of products, your attendance at events hosted by us or our third party partners, personal shopping appointments, alterations to products and customisations to products, such as engraving and monogramming, processing of returns and refunds and tax free rebates.

- **Who do we share your personal information with for this purpose?**

We will share your personal information with the following categories of third parties:

- **To verify card payments and process refunds** - payment providers;
- **To deliver products and process returns** – delivery and courier companies;
- **Events** – any applicable third party hosting the event; ticketing companies such as Eventbrite;

- **What is our legal basis?**

It is necessary for us to use your personal information to perform our obligations in accordance with any contract that we may have with you.

- **Client service enquiries.**

Our Site uses various user interfaces to allow you to request information about our products and services: these include printed and electronic enquiry forms and a telephone enquiry service. Contact information may be requested in each case, together with details of other personal information that is relevant to your enquiry. This information is used in order to enable us to respond to your requests.

- **Who do we share your personal information with for this purpose?**

We do not share your personal information for this purpose.

- **What is our legal basis?**

It is in our legitimate interest to use your personal information in such a way to ensure that we provide the very best customer service we can to you.

- **Your feedback about our products and services.**

From time to time we will contact you to invite you to provide feedback about our products and services in the form of online, postal or in-store surveys. We use this information to help us improve the quality of service provided by our staff and in our stores. We also use your feedback to monitor the quality of our products and services and to assist with the selection of future product and service lines.

- **Who do we share your personal information with for these purposes?**

We might use a third party service provider to assist us with customer surveys and feedback requests.

Our third party provider is located in the USA and their use of your personal information is governed by [EU Model Contracts] [US Privacy Shield].

- **What is our legal basis?**

It is in our legitimate business interests to use the information you provide to us in your feedback for the purposes described above.

- **Customer insight and analysis.**

We analyse your contact details with other personal information that we observe about you from your interactions with our Site, our email communications to you and/or with our products and services in our stores, such as the products and services you have purchased or

viewed, or from your use of our in-store wifi.

Where you have given your consent (where lawfully required), we use cookies, log files and other technologies to collect personal information from the computer hardware and software you use to access the Sites, or from your mobile. This includes the following:

- an IP address to monitor Sites traffic and volume;
- a session ID to track usage statistics on our Sites;
- information regarding your personal or professional interests, demographics, buying habits, experiences with our products and contact preferences.

Our web pages and e-mails contain “cookies” “web beacons” or “pixel tags.” (“**Tags**”). Tags allow us to track receipt of an e-mail to you, to count users that have visited a web page or opened an e-mail and collect other types of aggregate information. Once you click on an e-mail that contains a Tag, your contact information may subsequently be cross-referenced to the source e-mail and the relevant Tag.

In some of our e-mail messages, we use a “click-through URL” linked to certain websites administered by us or on our behalf. We may track click-through data to assist in determining interest in particular topics and measure the effectiveness of these communications.

Please see our cookie policy for further information.

This information is used to create profiles and insights about your shopping habits and the shopping habits of our other customers.

Where we have your consent to do so, we will also use your location data for customer insight purposes.

By using this information, we are able to measure the effectiveness of our content and how visitors use our Sites and our Services. This allows us to learn what pages of our Site are most attractive to our visitors, which parts of our Sites are the most interesting and what kind of offers our registered users like to see.

We also use this information to help us with the selection of future product and service lines, store and websites design and to remember your shopping preferences such as garment size.

We also use this information for marketing purposes (see the marketing section below for further details).

- **Who do we share your personal information with for these purposes?**

We share your personal information with a variety of third party service providers to assist us with customer insight analytics. These providers include those described in our Cookie Policy.

Some of our third party providers are located in the USA and their use of your personal information is governed by [EU Model Contracts] [US Privacy Shield].

- **What is our legal basis?**

Where your personal information is completely anonymised, we do not require a legal basis to use it as the information will no longer constitute personal information that is regulated under data protection laws. However, our collection and use of such anonymised personal information may be subject to other laws where your consent is required. Please see our Cookie Policy for further details.

Where your personal information is not in an anonymous form, it is in our legitimate interest to use your personal information in such a way to ensure that we provide the very best products and services to you and our other customers.

We will only use your location data for customer insight purposes where we have your consent to do so.

- **Marketing communications.**

We carry out the following marketing activities using your personal information:

- **Postal marketing.**

We use information that we observe about you from your interactions with our Site, our email communications to you and/or with our products and services (see the Customer Insight and Analysis section above for more details of the information collected and how it is collected) and/or your address details, to send you marketing communications by post.

Who do we share your personal information with for these purposes?

We share your personal information with a variety of third party postal providers who assist us in delivering our postal marketing campaigns to you, including the post office.

What is our legal basis?

Where your personal information is completely anonymised, we do not require a legal basis to use it as the personal information will no longer constitute personal information that is regulated under data protection laws. However, our collection and use of such anonymised information may be subject to other laws where your consent is required. Please see our Cookie Policy for further details.

Where your personal information is not in an anonymous form, such as your postal address, it is in our legitimate interest to use your personal information for postal marketing.

We will only use your location data where we have your consent to do so.

- **Email marketing.**

We use information that we observe about you from your interactions with our Site, our email communications to you and/or with our products and services (see the Customer Insight and Analysis section above for more details of the information collected and how it is collected) and/or your email address, to send you marketing communications by email, where you have consented to receive such marketing communications, or where we have another lawful basis to do so.

Who do we share your personal information with for these purposes?

We share your personal information with a variety of third party email marketing providers who assist us in delivering our email marketing campaigns to you.

What is our legal basis?

Where your personal information is completely anonymised, we do not require a legal basis to use it as the personal information will no longer constitute personal information that is regulated under data protection laws. However, our collection and use of such anonymised personal information may be subject to other laws where your consent is required. Please see our Cookie Policy for further details.

Where your personal information is not in an anonymous form,

it is in our legitimate interest to use your personal information for marketing purposes.

We will only send you marketing communications via email where you have consented to receive such marketing communications, or where we have a lawful right to do so.

- **Online personalised advertising.**

We use information that we observe about you from your interactions with our Site, our email communications to you and/or with our products [and services in our stores] (see the Customer Insight and Analysis section above for more details of the information collected and how it is collected) to provide you with personalised online advertising.

Who do we share your personal information with for these purposes?

We share your personal information with a variety of third party service providers who assist us with our online personalised advertising campaigns. These providers are described in our [Cookie Policy](#).

What is our legal basis?

Where your personal information is completely anonymised, we do not require a legal basis to use it as the personal information will no longer constitute personal information that is regulated under data protection laws. However, our collection and use of such anonymised personal information may be subject to other laws where your consent is required. Please see our Cookie Policy for further details.

Where your personal information is not in an anonymous form, it is in our legitimate interest to use your personal information for marketing purposes.

- **Social media remarketing.**

We use information that we observe about you from your interactions with our Sites, our email communications to you and/or with our products and services in our stores (see the Customer Insight and Analysis section above for more details of the information collected and how it is collected) to provide you with personalised advertising on social media channels

operated by Facebook and/or Google where you are a registered user of such services.

We do this using Facebook Customer Audiences and/or Google Customer Match respectively [others?]. Please note that such activity is also subject to the privacy choices you have elected to make on such services.

Who do we share your personal information with for these purposes?

We share your email address with third party service providers who assist us with social media remarketing campaigns.

Your encrypted email address is also shared by us or our third party service providers with Facebook and/or Google under the terms of their Facebook Customer Audiences and/or Google Customer Match services respectively.

What is our legal basis?

Where your personal information is completely anonymised, we do not require a legal basis to use it as the personal information will no longer constitute personal information that is regulated under data protection laws. However, our collection and use of such anonymised personal information may be subject to other laws where your consent is required. Please see our Cookie Policy for further details.

Where your personal information is not in an anonymous form, it is in our legitimate interest to use your personal information for marketing purposes.

We will only engage in social media remarketing where you have consented to us [using your email address] [sharing your email address in an encrypted format with Facebook and/or Google respectively] for marketing purposes.

○ **Social media insight.**

Where you are a registered user of Facebook, or of a Google service, we will use your email address in an encrypted format to enable Facebook and Google to find other registered users of their services that share similar interests to you based on:

- *information that we observe about you from your interactions with our Sites, our email communications to you and/or with our products and services in our stores*

(see the Customer Insight and Analysis section above for more details of the information collected and how it is collected); and

- *the information Facebook and/or Google hold about you.*

We do this using Facebook Lookalike Audiences and/or Google Similar Audience respectively. Please note that such activity is subject to the privacy choices you have elected to make on such services.

Who do we share your personal information with for these purposes?

We share your email address with third party service providers who assist us with social media remarketing campaigns.

Your encrypted email address is also shared by us or our third party marketing consultancies with Facebook and/or Google under the terms of their Facebook Customer Audiences and/or Google Customer Match respectively.

What is our legal basis?

Where your personal information is completely anonymised, we do not require a legal basis to use it as the personal information will no longer constitute personal information that is regulated under data protection laws. However, our collection and use of such anonymised personal information may be subject to other laws where your consent is required. Please see our Cookie Policy for further details.

Where your personal information is not in an anonymous form, it is in our legitimate interest to use your personal information for marketing purposes.

• Business administration and legal compliance.

We use your personal information for the following business administration and legal compliance purposes:

- *to comply with our legal obligations;*
- *to enforce our legal rights;*
- *protect rights of third parties; and*

- *in connection with a business transition such as a merger, acquisition by another company, or sale of all or a portion of our assets.*

- **Who do we share your personal information with for these purposes?**

We will share your personal information with professional advisers such as lawyers and accountants and/or governmental or regulatory authorities.

- **What is our legal basis?**

Where we use your personal information in connection with a business transition, enforce our legal rights, or to protect the rights of third parties it is in our legitimate interest to do so. For all other purposes described in this section, it is our legal obligation to use your personal information to comply with any legal obligations imposed upon us such as a court order.

Where we share your sensitive personal information, we shall obtain your consent to do so.

Any other purposes for which we wish to use your personal information that are not listed above, or any other changes we propose to make to the existing purposes will be notified to you using your contact details.

5 HOW DO WE OBTAIN YOUR CONSENT?

Where our use of your personal information requires your consent, you can provide such consent:

- at the time we collect your personal information following the instructions provided; or
- by informing us by e-mail, post or phone using the contact details set out in this Privacy Policy.

6 OUR USE OF COOKIES AND SIMILAR TECHNOLOGIES

Our Sites use certain cookies, pixels, beacons, log files and other technologies of which you should be aware. [Please see our Cookie](#)

[Policy](#) to find out more about the cookies we use and how to manage and delete cookies.

7 THIRD PARTY LINKS AND SERVICES

Our Sites contain links to third party websites and services. Please remember that when you use a link to go from our Sites to another website or you request a service from a third party, this Privacy Policy no longer applies. For more information **click here**

8 HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR?

We keep your personal information for a period of [3] years from the date of our last interaction with you.

If your information is only useful for a short period e.g. for specific marketing campaigns we may delete it.

9 CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL INFORMATION

We are committed to keeping the personal information you provide to us secure and we will take reasonable precautions to protect your personal information from loss, misuse or alteration. For more information **click here**

10 HOW TO ACCESS YOUR INFORMATION AND YOUR OTHER RIGHTS?

You have the following rights in relation to the personal information we hold about you:

Your right of access. For more information click here

Your right to rectification. For more information click here

Your right to erasure. For more information [click here](#)

Your right to restrict processing. For more information [click here](#)

Your right to data portability. For more information [click here](#)

Your right to object. For more information [click here](#)

**Your rights in relation to automated decision-making and profiling.
For more information [click here](#)**

Your right to withdraw consent. For more information [click here](#)

11 CHANGES TO THIS PRIVACY POLICY

We may make changes to this Privacy Policy from time to time. For more information **[click here](#)**