

# Privacy policy

Status June 2023

## General

Consular Service Worldwide GmbH (hereinafter referred to as CSW GmbH) is active in the field of obtaining visas and certifications.

CSW GmbH is aware that it works with sensitive personal data daily and undertakes to comply with Swiss data protection law, in particular the Federal Data Protection Act (FADP), as well as applicable foreign data protection law, such as the General Data Protection Regulation (GDPR) of the European Union (EU). CSW GmbH undertakes to handle your personal data with particular care.

## Definitions

Personal data is any information relating to an identified or identifiable natural person.

Data subject is a person about whom personal data is processed.

Processing includes any operation in connection with personal data, in particular the disclosure, retention, acquisition, deletion, storage, modification, destruction and use of personal data, irrespective of the means and procedures used.

## Processing of personal data

CSW GmbH processes your personal data in accordance with the following legal principles:

### Proportionality

CSW GmbH processes personal data in principle for the purpose of fulfilling contracts, in particular obtaining visas and certifications for documents as well as their legalisation at various embassies and authorities, such as chambers of commerce, notaries or state chancelleries. To protect the general right of personality, CSW GmbH only uses personal data if the purpose of the use is in reasonable proportion to the impairment of the legal position of the person concerned. If there is no verifiable legitimate interest in processing the data, CSW GmbH will only process the data after obtaining consent from the client.

### Data economy

CSW GmbH always ensures that as little personal data as possible is processed and that the data collected is limited to what is necessary for the purposes of processing (principle of data economy).

### Transparency

CSW GmbH presents the data processing to the data subjects in a comprehensible manner. This includes the traceability of the origin of the data and its forwarding.

## Confidentiality

CSW GmbH protects the personal data of its customers technically and organisationally against unauthorised processing or alteration and against theft or destruction.

## Earmarking

In accordance with the principle of purpose limitation, CSW GmbH collects personal data only for previously defined purposes. Once collected, CSW GmbH does not process data later for another purpose without the consent of the customer.

## Collection and storage of personal data

### Visit the website

When visiting the website, the identification data of the users are automatically collected by name (as is standard when accessing any website),

- IP address
- Date and time of access
- Name and URL of the retrieved file
- Website from which the access is made (referrer URL)
- Browser used and, if applicable, the operating system of your computer as well as the name of your access provider,

temporarily stored in a so-called log file. CSW GmbH requires this general information to deliver the website, to keep it permanently functional and to be able to continuously improve it. Under no circumstances does CSW GmbH use the collected data for the purpose of drawing conclusions about your person.

### Contact form

Your entries in the contact form are saved in the database. Your data record will be deleted upon request.

### Payment

CSW GmbH works together with PAYREXX AG to process your payment. PAYREXX AG ensures that your personal data is processed in accordance with the data protection regulations applicable to PAYREXX AG, in particular the Swiss Data Protection Act (FADP) and the General Data Protection Regulation (GDPR). The data protection declaration of PAYREXX AG can be accessed at the following link: <https://www.payrex.ch/de/rechtliches/>

### Duration of storage

Personal data is processed by CSW GmbH only for the duration required for the respective purpose (obtaining visas, obtaining legalisation, fulfilment of contracts with the person concerned). If the data is subject to a retention obligation due to statutory provisions to which CSW GmbH is subject, it shall retain the data in accordance with the statutory retention obligation.

## Passing on data

CSW GmbH will only pass on your personal data if you have expressly consented to this, if there is a legal obligation to do so or if this is necessary to enforce our rights, to enforce claims arising from the contractual relationship. Furthermore, we pass on your data to third parties insofar as this is necessary within the framework of the use of the website and the processing of contracts (also outside the website), namely for the processing of your orders.

## Transfer of data abroad

By forwarding your applications (visas, certifications) to the respective consulate, CSW GmbH passes on your personal data abroad.

Depending on the order, CSW GmbH may be forced to disclose personal data to countries that only guarantee inadequate data protection in connection with obtaining visas or certifications.

The legal basis for such a procedure is found in Art. 17 para. 1 FADP. Accordingly, personal data may be disclosed abroad even if this does not guarantee adequate data protection. The prerequisite for this is, among other things, that the disclosure is directly related to the conclusion or execution of a contract.

## Links

On the website of CSW GmbH you will find hyperlinks to websites of other providers. If you activate such a hyperlink, you will be redirected from the CSW GmbH website to the linked third-party websites. Third party websites are not subject to this privacy policy. CSW GmbH is neither responsible for their content nor for the handling of personal data.

## Rights of data subjects

### Right to information

The data subject has the right to obtain, free of charge, confirmation that personal data concerning him or her are being processed or that no data are being processed. If data are being processed, he or she has the right to obtain access to these personal data.

### Right to rectification, restriction, and deletion

The data subject has the right to request that his/her data be corrected, supplemented, or blocked as soon as possible. The person in charge of CSW GmbH is obliged to notify the data subject of any correction, deletion, or restriction of data processing.

### Right to data portability

The data subject has the right to data portability insofar as the GDPR applies.

### Right of objection

The data subject has the right to object to the processing of his/her personal data at any time.

### Right to notification of data protection breaches

The data controller of CSW GmbH is obliged to inform the data subject about personal data breaches if they involve a high risk for the personal rights and freedoms.

### Right of appeal

Persons about whom we process personal data have a right of appeal to a competent supervisory authority for data protection. The supervisory authority for data protection in Switzerland is the Federal Data Protection and Information Commissioner (FDPIC).

### **Technical and organisational measures**

Access to the CSW GmbH website takes place via transport encryption (SSL).

CSW GmbH uses appropriate technical and organisational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, destruction or against unauthorised access by third parties. Our security measures are continuously improved in line with technological developments.

Despite organisational and technical measures, the processing of personal data on the Internet can have security gaps, so that absolute data protection and data security cannot be guaranteed. For this reason, every person concerned is free to provide CSW GmbH with personal data by other means, by letter post.

### **Contact addresses and responsibility**

If you have any data protection concerns, you can send them to us at the following contact address:

Consular Service Worldwide CSW GmbH  
Thunstrasse 46  
PO Box 162  
3000 Bern 6

[info\(at\)ruh-gertsch.ch](mailto:info(at)ruh-gertsch.ch)

Enquiries from supervisory authorities and data subjects usually reach us by e-mail but are also possible by letter post.

We have a data protection representative in the EU as a point of contact vis-à-vis supervisory authorities and data subjects in accordance with Art. 27 GDPR.

### VGS Datenschutzpartner UG

Am Kaiserkai 69  
20457 Hamburg  
Germany

[info\(at\)datenschutzpartner.eu](mailto:info(at)datenschutzpartner.eu)

In the event of any inconsistency between the English and German versions of this Privacy Policy, the German version alone shall prevail.