

Nuntia GmbH

# **Data Privacy Policy**

Transparent declaration of what personal data is collected, why it is needed, how it is used and protected, who it is shared with and how subjects can control their information.

This document and the information contained herein are for private use only. By accepting it, the recipient acknowledges and agrees that the contents may not be copied, reproduced, distributed, or disclosed to any third party without the prior written consent of Nuntia GmbH.



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## 1. Introduction

Nuntia GmbH (hereafter "Nuntia," "we," or "us") values privacy and is committed to protecting personal data. We recognise the significance of confidentiality and uphold the highest standards regarding the protection of personal data.

This Data Privacy Notice outlines how personal data is collected, stored and processed and is supplemental to any client confidentiality obligations beyond personal data protection regulations.

#### 2. Data Controller

Nuntia GmbH, located at Zugerstrasse 76b, 6340 Baar, Switzerland with IDE number <u>CHE-358.752.952</u>, is the controller of your personal data. We may process your personal data along with data of individuals or entities connected to you (collectively referred to as "Data Subjects" or "you"). You typically provide us with personal data in connection with our business relationship ("Business Relationship") through the use of our services, website or platform.

#### 3. Contact for Queries

For questions or clarifications please contact your usual representative or email info@nuntia.co.

## 4. Types of Personal Data Collected

"Personal Data" refers to any information relating to an identified or identifiable person. The following types of person data may be processed:

- Identification data (e.g. name, date of birth, contact information, nationality);
- Human resources data (e.g. salary, pension details, qualifications, work history);
- Financial information (e.g. tax data, banking details);
- Website data (e.g. cookies).

#### Sources of Data Collection

Personal Data may be collected from:

- Direct interactions with Data Subjects through Business Relationships;
- Indirect sources such as public records and third-party information.

### Purposes and Legal Bases for Processing

Personal Data is processed for the following purposes related to our Business Relationships:

- Contractual obligations & service improvement;
- Legal compliance (e.g. maintaining tax and corporate records);
- Communication (e.g. newsletters);
- Legal rights enforcement.

Processing bases include contract performance, legal obligations and legitimate interests. We may also rely on your consent for specific processing activities.



## 5. Data Sharing with Third Parties

We may share your Personal Data with third parties ("Third Parties") when necessary for our Business Relationships. Transparency is key and we will inform you of such disclosures in our contracts. Data may be shared with regulatory authorities, accountants, IT providers and other service providers as required.

#### 6. International Data Transfers

Personal Data may be transferred outside of Switzerland ("International Transfer"). This will be performed transparently and in compliance with relevant regulations. Transfers are typically to service providers and banks and we ensure appropriate safeguards are in place.

## 7. Your Rights

You have rights regarding your Personal Data, including the right to:

- · Access and receive your data;
- Request corrections or erasure;
- · Limit processing;
- Withdraw consent.

To exercise these rights, contact us as indicated in paragraph 3 above. Please note that some rights may be subject to restrictions under applicable laws.

# 8. Data Security

Nuntia is committed to maintaining high security standards for Personal Data. We utilize strict access controls, technical measures (e.g., firewalls, encryption), and comply with ISO 27001 standards. Data is stored securely on dedicated servers managed by Nuntia, with copies kept only in Switzerland.

#### 9. Data Retention

Personal Data is retained only as long as necessary for the purposes outlined in paragraphs 5 & 6 above, including any legal obligations for record retention. When no longer required, data is securely deleted or anonymized.

## 10. Compliance and Sanctions

Non-compliance with this Data Privacy Notice may result in disciplinary actions as stipulated in employee contracts.

#### 11. Effective Date

This Data Privacy Notice is effective as of December 1<sup>st</sup> 2025 onwards.