# **Privacy Note - Contact**

In the following, we inform you about how your personal data is processed if you contact us using the contact form on our website <a href="https://www.nordicspirit.ch">www.nordicspirit.ch</a> without being registered on our website and therefore do not have a user account. If you register on our website at a later date, our Privacy Policy will apply from that moment on.

#### 1. Controller

- **1.1** The controller within the meaning of the Federal Act on Data Protection is JT International AG Dagmersellen (hereinafter "JTI," "we," "us"), Baselstrasse 65, 6252 Dagmersellen, Switzerland. As the controller, JTI determines the purposes and means of processing your personal data and is responsible for your personal data being processed in accordance with this Privacy Policy.
- **1.2** If you have any questions about data protection and the processing of your personal data, you can contact the controller at the following email address: <a href="mailto:info@nordicspirit.ch">info@nordicspirit.ch</a>

#### 2. Personal data processed

**2.1** When you contact us using the contact form on our website, we process the personal data you provide us with in the contact form, i.e. your first and last name, email address, telephone number and the personal data you provide us with in your message (free text field). We also process the personal data you provide to us by other means while we are processing your request (e.g. by email, post, telephone).

#### 3. Purpose of processing

**3.1** We use and process your personal data to process requests you have submitted using the contact form, and to contact you for this purpose.

#### 4. Recipients of personal data and transfer abroad

- **4.1** JTI ensures that only those employees of JTI who need to process your personal data in order to fulfil the purposes for which it was collected have access to it.
- **4.2** We may appoint third parties to provide us with the technical and/or organisational services we need to carry out our business activities. In this context, these third parties may process your personal data. Third parties appointed are, in particular, the following categories of data recipients:
  - Companies within the JTI Group
  - Service providers who help us provide you with our products and offers, carry out our business activities and/or comply with our legal obligations (e.g. hosting providers, age verification services, email delivery providers, market research service providers, etc.)

- Business partners and suppliers who support us in fulfilling our contractual obligations (e.g. sellers of our products, advertising agencies, courier services, etc.)
- **4.3** The third parties that process your personal data are contractually obliged to process you it solely on our behalf and in accordance with our instructions. We also oblige the third parties to comply with technical and organisational measures that ensure your personal data is protected in accordance with the applicable data protection regulations.
- **4.4** By consenting to this Privacy Policy you expressly agree that your personal data may be disclosed to the countries listed herein. Irrespective of your consent, in the event of disclosure to these countries we will always ensure that appropriate data protection is guaranteed for disclosure and processing, or that disclosure is absolutely necessary. In particular, this is ensured in the following ways:
  - the FDPIC or the Federal Council has certified that the country provides adequate protection;
    and/or
  - standard data protection clauses approved, issued or recognised by the FDPIC in advance have been agreed; and/or
  - disclosure is directly related to the conclusion or processing of a contract between us and you or between us and one of our service providers in your interest.
- **4.5** Your personal data is currently processed in the following countries:
  - Switzerland
  - EU and EEA countries
  - USA
- **4.6** If your personal data is disclosed to other countries, we will notify you in advance in the Privacy Policy. Disclosure of your personal data to other countries within the European Economic Area is an exception to such prior notification. This is provided that the FDPIC or the Federal Council has certified the countries in question provide an adequate level of data protection.

# 5. Retention period of personal data

**5.1** Your personal data processed in connection with making contact is stored for ten years and then deleted.

# 6. Data security

**6.1** We take technical and organisational measures to ensure that your personal data is protected against unauthorised and/or unlawful loss, alteration, disclosure or access – and contractually oblige all of our recipients of your personal data to do likewise. Please note that it is unfortunately not possible to guarantee complete security when transferring personal data and information in general over the internet or by other electronic means.

# 7. Rights

- **7.1** You may exercise any rights to which you are entitled under the Federal Act on Data Protection at any time. In particular, you have the right to obtain information about your stored personal data, rectify or supplement it, object to it being processing or request it be deleted at any time.
- **7.2** To delete or rectify your personal data or for any other issues relating to exercising your rights, you can contact us at any time at the following email address: <a href="mailto:info@nordicspirit.ch">info@nordicspirit.ch</a>.
- **7.3** Please note that the rights mentioned in Section 7.1 may be restricted or excluded in individual cases, e.g. if there are doubts about your identity or this is necessary to protect other people, protect legitimate interests or comply with legal obligations. Please also note that we reserve the right to request a copy of your passport or other identification document in cases of doubt.

#### 8. Amendments to the Privacy Note

**8.1** We reserve the right to change, supplement, amend or otherwise update this Privacy Note at any time. Amendments are published on the website. Amendments apply from the time they are published on the website. This does not apply to amendments for which we ask for your consent. These only apply from the time you give your consent.

Dagmersellen, June 2024

# **Privacy Note - Newsletter**

In the following, we inform you about how your personal data is processed if you contact us using the contact form on our website <a href="https://www.nordicspirit.ch">www.nordicspirit.ch</a> without being registered on our website and therefore do not have a user account. If you register on our website at a later date, our Privacy Policy will apply from that moment on.

#### 1. Controller

- **1.1** The controller within the meaning of the Federal Act on Data Protection is JT International AG Dagmersellen (hereinafter "JTI," "we," "us"), Baselstrasse 65, 6252 Dagmersellen, Switzerland. As the controller, JTI determines the purposes and means of processing your personal data and is responsible for your personal data being processed in accordance with this Privacy Policy.
- **1.2** If you have any questions about data protection and the processing of your personal data, you can contact the controller at the following email address: <a href="mailto:info@nordicspirit.ch">info@nordicspirit.ch</a>

#### 2. Personal data processed

**2.1** When you subscribe to the newsletter, we process your contact information, in particular your email address.

## 3. Processing purposes

**3.1** We use and process your personal data to send you information about our products and other offers by email and to market them.

#### 4. Recipients of personal data and transfer abroad

- **4.1** JTI ensures that only those employees of JTI who need to process your personal data in order to fulfil the purposes for which it was collected have access to it.
- **4.2** We may appoint third parties to provide us with the technical and/or organisational services we need to carry out our business activities. In this context, these third parties may process your personal data. Third parties appointed are, in particular, the following categories of data recipients:
  - Companies within the JTI Group
  - Service providers who help us provide you with our products and offers, carry out our business activities and/or comply with our legal obligations (e.g. hosting providers, email delivery providers, etc.)
  - Business partners and suppliers who support us in fulfilling our contractual obligations (e.g. advertising agencies, courier services, etc.)

- **4.3** The third parties that process your personal data are contractually obliged to process you it solely on our behalf and in accordance with our instructions. We also oblige the third parties to comply with technical and organisational measures that ensure your personal data is protected in accordance with the applicable data protection regulations.
- **4.4** By consenting to this Privacy Note, you expressly agree that your personal data may be disclosed to the countries listed herein. Irrespective of your consent, in the event of disclosure to these countries we will always ensure that appropriate data protection is guaranteed for disclosure and processing, or that disclosure is absolutely necessary. In particular, this is ensured in the following ways:
  - the FDPIC or the Federal Council has certified that the state is adequately protected; and/or
  - standard data protection clauses approved, issued or recognised by the FDPIC in advance have been agreed; and/or
  - disclosure is directly related to the conclusion or processing of a contract between us and you or between us and one of our service providers in your interest.
- 4.5 Your personal data is currently processed in the following countries:
  - Switzerland
  - EU and EEA countries
  - USA
- **4.6** If your personal data is disclosed to other countries, we will notify you in advance. Disclosure of your personal data to other countries within the European Economic Area is an exception to such prior notification. This is provided that the FDPIC or the Federal Council has certified the countries in question provide an adequate level of data protection.

## 5. Retention period of personal data and unsubscribing from the newsletter

**5.1** Your personal data will be stored for as long as you are registered for the newsletter. Please note that it may take up to 30 days to unsubscribe from the newsletter. This is because your personal data may already be included in an upcoming mailshot and cannot be removed from it individually.

# 6. Data security

**6.1** We take technical and organisational measures to ensure that your personal data is protected against unauthorised and/or unlawful loss, alteration, disclosure or access – and contractually oblige all of our recipients of your personal data to do likewise. Please note that it is unfortunately not possible to guarantee complete security when transferring personal data and information in general over the internet or by other electronic means.

# 7. Rights

- **7.1** You may exercise any rights to which you are entitled under the Federal Act on Data Protection at any time. In particular, you have the right to obtain information about your stored personal data, correct or supplement it, object to it being processing or request it be deleted at any time.
- **7.2** To delete your personal data, to object to the use of your personal data for marketing communication purposes (sending newsletters), to rectify your personal data and all other enquiries or to assert your rights, you can contact us at any time at the following email address: <a href="mailto:info@nordicspirit.ch">info@nordicspirit.ch</a>.
- **7.3** Please note that the rights mentioned in Section 7.1 may be restricted or excluded in individual cases, e.g. if there are doubts about your identity or this is necessary to protect other people, protect legitimate interests or comply with legal obligations. Please also note that we reserve the right to request a copy of your passport or other identification document in cases of doubt.

#### 8. Amendments to the Privacy Note

**8.1** We reserve the right to change, supplement, amend or otherwise update this Privacy Note at any time. Amendments are published on the website. Amendments apply from the time they are published on the website. This does not apply to amendments for which we ask for your consent. These only apply from the time you give your consent.

Dagmersellen, March 2024