

# Privacy Policy of re:spondelligent GmbH and Respondelligent FZC-LLC

Version of February 2026

In this Privacy Policy, we, re:spondelligent GmbH, Büelstrasse 8, 6442 Gersau, Switzerland, and Respondelligent FZC-LLC, Business Centre, Sharjah Publishing City Free Zone, Sharjah, United Arab Emirates (hereinafter jointly referred to as **re:spondelligent, we** or **us**), explain how we collect and otherwise process personal data. This is not an exhaustive description; any contracts concluded may regulate specific circumstances. Personal Data refers to all information that relates to an identified or identifiable person.

If you provide us with the Personal Data of other persons (e.g. family members, data of work colleagues), please ensure that these persons are aware of this Privacy Policy and only provide us with their Personal Data if you are authorised to do so and if this Personal Data is correct.

This Privacy Policy is designed to meet the requirements of the EU General Data Protection Regulation ("GDPR") and the revised Swiss Data Protection Act ("DPA"). Whether and to what extent these laws are applicable depends on the individual case.

## 1. Controller / Representative

Responsible for the data processing described here are:

- re:spondelligent GmbH, Büelstrasse 8, CH - 6442 Gersau, Switzerland; and
- Respondelligent FZC-LLC, Business Center, Sharjah Publishing City Free Zone, UAE - Sharjah

If you have any data protection concerns, you can contact us by post at one of the above postal addresses, or by email at the following email address:

info@respondelligent.com

for both companies, but please specify which one you are referring to if possible.

Our representative in the European Union pursuant to Art. 27 GDPR is:

VGS Datenschutzpartner GmbH  
Am Kaiserkai 69  
20457 Hamburg  
Germany

info@datenschutzpartner.eu

## 2. Collection and Processing of Personal Data

First and foremost, we collect and process Personal Data that we receive from you, e.g. via a form on our website for offers, contact, newsletters or otherwise in the context of our business relationship with our customers and other business partners from these and other persons involved or that we collect from their users when operating our websites, apps and other applications.

We collect the following Personal Data from our customers: Company name, first names and names of contact persons, email address, billing address, VAT number and content of reviews.

Secondly, we collect and process Personal Data from publicly accessible third-party platforms (e.g. Google, Facebook, other Internet, in particular the content of reviews) as well as data entered on "I want to review" (name, telephone number, e-mail address and message).

We also collect and process Personal Data from other respondent group companies, authorities and other third parties (e.g. public registers, credit reference agencies).

In addition to the data that you provide to us directly, the categories of Personal Data that we receive about you from third parties include information in connection with your professional functions and activities (so that we can, for example to conclude and process transactions with your employer with your help), information about you in correspondence and meetings with third parties, creditworthiness information (insofar as we process transactions with you personally), information about you that people from your environment (family, legal representatives, etc.) provide to us so that we can conclude or process contracts with you or with your involvement (e.g. references, information from banks, insurance companies, contractual partners of ours for the utilisation or provision of services by you (e.g. payments)), information from the media and Internet about your person (insofar as this is appropriate in the specific case, e.g. in the context of an application, press review, marketing/sales, etc.), your addresses and, if applicable, your interests and other socio-demographic data (for marketing), data in connection with the use of the website (e.g. IP address, MAC address of the smartphone or computer, information about your device and settings, cookies, date and time of the visit, pages and content accessed, functions used, referring website, location data).

### **3. Purposes of Data Processing and Legal Basis**

We use the Personal Data we collect primarily to conclude and process our contracts with our customers and business partners, in particular as part of the provision of our review management software and our other services in the areas of customer service, social media, management and responding to customer reviews to our customers, as well as to fulfil our legal obligations at home and abroad. If you work for such a customer or business partner, your personal data may of course also be affected in this function.

In addition, we also process Personal Data of you and other persons, to the extent permitted and deemed appropriate, for the following purposes in which we (and sometimes third parties) have a legitimate interest corresponding to the purpose:

- Offering and further development of our offers, services and websites, apps and other platforms on which we are present;
- Communication with third parties and processing their enquiries (e.g. applications, media enquiries);
- Reviewing and optimising needs analysis procedures for the purpose of direct customer contact and collecting Personal Data from publicly accessible sources for the purpose of customer acquisition;
- Advertising and marketing (including sending newsletters), unless you have objected to this (if we send you advertising as an existing customer, you can object to this at any time and we will then place you on a blacklist against further advertising mailings);
- Assertion of legal claims and defence in connection with legal disputes and official proceedings;
- Prevention and investigation of criminal offences and other misconduct (e.g. conducting internal investigations, data analyses to combat fraud);
- Guaranteeing our operations, in particular IT, our websites, apps and other platforms;
- Implementation of loyalty and voucher programs (e.g., sending rewards for reviews via partner platforms);
- Purchase and sale of business divisions, companies or parts of companies and other transactions under company law and the associated transfer of Personal Data as well as measures for business management and compliance with legal and regulatory obligations.

If you have given us your consent to process your Personal Data for specific purposes (for example, when you register to receive newsletters), we will process your Personal Data within the scope of and based on this consent, unless we have another legal basis and require one. Consent that has been granted can be revoked at any time, but this has no effect on data processing that has already taken place.

#### **4. Cookies / Tracking and other technologies in connection with the use of our website**

We typically use "Cookies" and similar technologies on our websites and apps to identify your browser or device. A Cookie is a small file that is sent to your computer or automatically stored on your computer or mobile device by the web browser you use when you visit our website or install an app. This enables us to recognise you when you return to this website or use our app, even if we do not know who you are. In addition to Cookies that are only used during a session and are deleted after your visit to the website ("Session Cookies"), Cookies can also be used to store user settings and other information for a certain period of time (e.g. two years) ("Permanent Cookies"). However, you can set your browser so that it rejects Cookies, only saves them for one session or otherwise deletes them prematurely. Most browsers are preset to accept Cookies. We use Permanent Cookies so that you can save user settings (e.g. language, autologin), so that we can better understand how you use our offers and content, and so that we can show you customised offers and advertising (which can also happen on websites of other companies; however, we do not tell them who you are, if we know this at all, because they only see that the same user is on their website who was also on a certain page on our website). Some of the Cookies are set by us, some are also set by contractual partners with whom we work. If you block Cookies, certain functions (e.g. language selection, shopping basket, ordering processes) may no longer work.

In some of our newsletters and other marketing emails, we also include visible and invisible image elements, where permitted, which we can retrieve from our servers to determine if and when you have opened the email so that we can measure and better understand how you use our offers and tailor them to you. You can block this in your email programme; most are pre-set to do this.

By using our websites, apps and agreeing to receive newsletters and other marketing emails, you consent to the use of these techniques. If you do not want this, you must set your browser or email programme accordingly, or uninstall the app if this cannot be adjusted via the settings.

We sometimes use Google Analytics, Segment or similar services on our websites. This is a service provided by third parties who may be located in any country in the world (in the case of Google Analytics, it is Google Ireland (based in Ireland)). Google Ireland relies on Google LLC (based in the USA) as a processor (both "**Google**", www.google.com), with which we can measure and analyse the use of the website (non-personal). Permanent Cookies set by the service provider are also used for this purpose. We have configured the service so that the IP addresses of visitors to Google in Europe are truncated before being forwarded to the USA and therefore cannot be traced. We have switched off the settings "Data transfer" and "Signals". Although we can assume that the information we share with Google is not Personal Data for Google, it is possible that Google can use this data for its own purposes to draw conclusions about the identity of visitors, create personal profiles and link this data to the Google accounts of these persons. If you have registered with the service provider yourself, the service provider also knows you. The processing of your Personal Data by the service provider is then the responsibility of the service provider in accordance with its data protection provisions. The service provider only informs us how our respective website is used (no information about you personally).

We also use so-called plug-ins from social networks such as Facebook on our websites. This is visible to you in each case (typically via corresponding icons). We have configured these elements so that they are deactivated by default. If you activate them (by clicking on them), the operators of the respective social networks can register that you are on our website and where and can use this information for their purposes. The processing of your Personal Data is then the responsibility of this operator in accordance with its data protection provisions. We do not receive any information about you from them.

#### **5. Data Disclosure and Data Transfer abroad**

As part of our business activities and for the purposes set out in section 3, we also disclose data to third parties, insofar as this is permitted and appears appropriate to us, either because they process it for us or because they wish to use it for their own purposes. This applies in particular to the following bodies:

- Group companies;
- Our service providers (e.g. banks, insurance companies, accounting software), including contract processors (e.g. IT providers, email and newsletter senders, providers of voucher systems, table reservation systems, debt collection agencies);
- Subcontractors and other business partners;
- Customers;
- Domestic and foreign authorities, official bodies or courts;
- The media;
- Acquirers or parties interested in acquiring business divisions, companies or other parts of re:spondelligent;
- other parties in potential or actual legal proceedings.
- All together, Recipients.

Our group company Respondelligent FZC-LLC is located in the United Arab Emirates. We also ensure appropriate data protection there by obliging Respondelligent FZC-LLC to fully comply with Swiss Data Protection Regulations.

Furthermore, some of the service providers we use (such as Microsoft, Pipedrive, Google, Mailchimp, Twilio, Amazon, CloudTalk) are located in the USA. We have contractually obliged these service providers to comply with the applicable Data Protection Act (we use the revised standard contractual clauses of the European Commission, which are available here: [https://eur-lex.europa.eu/eli/dec\\_impl/2021/914/oj?](https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?)), unless they are already subject to a legally recognised set of rules to ensure data protection and we cannot rely on an exemption clause. An exception may apply in particular in the case of legal proceedings abroad, but also in cases of overriding public interests or if the fulfilment of a contract requires such disclosure, if you have given your consent or if the data in question has been made generally accessible by you and you have not objected to its processing.

## **6. Duration of the Storage of Personal Data**

We process and store your Personal Data for as long as is necessary for the fulfilment of our contractual and legal obligations or otherwise for the purposes pursued with the processing, i.e. for example for the duration of the entire business relationship (from the initiation, processing to the termination of a contract) and beyond that in accordance with the statutory retention and documentation obligations. It is possible that Personal Data may be stored for the period in which claims can be asserted against our company and insofar as we are otherwise legally obliged to do so or legitimate business interests require this (e.g. for evidence and documentation purposes). As soon as your Personal Data is no longer required for the above-mentioned purposes, it will be deleted or anonymised as far as possible. Shorter retention periods of twelve months or less generally apply to operational data (e.g. system protocols, logs).

## **7. Data Security**

We take appropriate technical and organisational security precautions to protect your Personal Data from unauthorised access and misuse, such as internal directives, IT and network security solutions, encryption of data carriers and transmissions, controls.

## **8. Obligation to provide Personal Data**

As part of our business relationship, you must provide the Personal Data that is necessary for the establishment and implementation of a business relationship and the fulfilment of the associated contractual obligations (you do not generally have a legal obligation to provide us with data). Without this data, we will generally not be able to enter into or fulfil a contract with you (or the entity or person you represent). The website can also not be used if certain information to secure data traffic (such as IP address) is not disclosed.

## **9. Rights of the Data Subject**

You have the right to information, correction, deletion, the right to restrict data processing and otherwise to object to our data processing, in particular for the purposes of direct marketing and to the disclosure of certain Personal Data for the purpose of transfer to another organisation (so-called data portability) within the framework of the Data Protection Law applicable to you and to the extent provided for therein. Please note, however, that we reserve the right to assert the restrictions provided for by law, for example if we are obliged to store or process certain data, have an overriding interest in doing so (insofar as we are entitled to invoke this) or require it for the assertion of claims. If you incur costs, we will inform you in advance. We have already informed you about the possibility of withdrawing your consent in section 3. Please note that exercising these rights may conflict with contractual agreements and may have consequences such as premature cancellation of the contract or cost consequences. We will inform you in advance if this is not already contractually regulated.

The exercise of such rights generally requires that you clearly prove your identity (e.g. by means of a copy of your identity card, where your identity is otherwise not clear or cannot be verified). To assert your rights, you can contact us at the address given in section 1.

Every data subject also has the right to enforce their claims in court or to lodge a complaint with the competent Data Protection Authority. The competent Data Protection Authority in Switzerland is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).

## **10. Amendments**

We may amend this Privacy Policy at any time without prior notice. The current version published on our website shall apply. If the Privacy Policy is part of an agreement with you, we will inform you of the change by e-mail or other suitable means in the event of an update.