

I. General Provisions

The following Privacy Policy is intended to provide information on the nature, scope and purpose of the collection and processing of personal data by Viollier AG and the companies belonging to the Viollier Group (hereinafter collectively referred to as "**Viollier**" and not covered by the term "**third parties**") within the scope of their business activities and in particular with reference to the services and offers provided by Viollier. Furthermore, the General Terms and Conditions ("**GTC**") and the Viollier electronic Terms of Use, in the current applicable version, shall also apply. In the event of a discrepancy between the language versions, the German version shall be decisive.

By using the website and Viollier's electronic and Internet-based services via web browser or app (each individually and collectively referred to as "**Internet services**"), the User agrees to his/her personal data being collected and processed in accordance with this Privacy Policy.

In addition, the User acknowledges that Viollier may, in its sole discretion and without notice, modify, amend, add to, remove or otherwise update this Privacy Policy at any time. The changes apply from the time the Privacy Policy is published on viollier.ch. By continuing to use the website or Viollier's Internet services, the User agrees to the changes.

Viollier complies with the provisions of the Federal Act on Data Protection ("**FADP**") and is guided by Regulation (EU) 2016/679 of the European Parliament and of the Council dated 27 April 2016 on the protection of individuals with regard to the processing of personal data, on the free movement of such data and repealing Directive 95/46/EC ("**GDPR**").

Viollier takes appropriate technical and organizational measures to ensure the security of the personal data collected and processed by Viollier, in particular to protect it from unauthorized access by third parties and misuse. These safety measures are always updated to reflect the current state of the art. Viollier is certified according to the internationally recognized data protection seal of quality 'Good Priv@cy®'. This certification is a protected certification mark of the Swiss Association for Quality and Management Systems 'SQS' (www.sqs.ch) and ensures the secure handling of personal data as well as the effective fulfillment of the data protection law and contractual basis, which includes appropriate information security. An audit takes place each year and a re-certification takes place every three years to ensure the standard continues to be met. Additionally, Viollier is certified according to IQNet (www.iqnet-certification.com), a worldwide certification network and SQS partner.

All employees who have access to confidential data or information are subject to a duty of confidentiality. Either they are subject to a duty of confidentiality due to their professional position (e.g. medical confidentiality according to Art. 321 of the Swiss Criminal Code (Strafgesetzbuch)) or they have to sign a confidentiality agreement in respect of the data and information. The confidentiality obligation shall also apply to external employees, any third parties involved and visitors to Viollier. These individuals must sign a confidentiality agreement before visiting Viollier.

Except for applicant data (see Section II. 3. below), Viollier stores all personal data in electronic form on its own servers located in Switzerland. Viollier will only disclose data abroad if this is necessary for the provision of the service and the data protection standard of the respective country corresponds to that of Switzerland. If the data protection provisions are not equivalent, Viollier has obtained consent from the data subjects. The medical professionals acting as contractual parties undertake not to access reports from a country whose data protection standard does not correspond to that of Switzerland, or via a server in such a country, without first obtaining the consent of the patient concerned.

Every individual has the right to receive information on their data, correct incorrect data, block and delete their data, as long as this does not conflict with a legal duty to preserve the data, or the data is absolutely necessary for the fulfillment of a contract. As well as this, consent to data processing can be revoked at any time with effect for the future.

In accordance with Art. 11a para. 5 let. e FADP, Viollier has appointed an in-house Data Protection Officer who is registered with the Federal Data Protection and Information Commissioner (FDPIC). This means that data collection by Viollier is not registered with the FDPIC.

If you have any questions, or wish to modify, revoke or delete data, please contact the Data Protection Officer directly:

Viollier AG	datenschutz@viollier.ch
Data Protection Officer	T +41 61 486 11 11
Hagmattstrasse 14	
4123 Allschwil	

II. Processing of Personal Data by Viollier in the Context of its Offerings, the Provision of its Services and the Job Application Process

1. Patient data

Patient data is the data of patients that Viollier requires in order to provide a laboratory medicine service, or data of patients that is transferred to Viollier by a User who has opted to use Viollier's Internet services. The following patient data are usually collected: surname, first name, gender, date of birth, address, language, insurances, invoice recipient and identification number of the patient, social security/accident insurance number. The attending doctors, medical practices, hospitals and clinics shall ensure that the patient concerned has been adequately informed and has expressly consented in advance and voluntarily to the processing of his/her patient data by Viollier for the provision of the services claimed, or for the transfer of his/her patient data.

Purpose. Viollier uses the patient data for the purpose of processing the contract and, if necessary, to fulfill mandatory legal obligations (e.g. transfer of patient data to the cantonal cancer registry).

Transmission. Viollier is hereby authorized to disclose patient data within the company and to third parties for the purpose of providing services, as long as these third parties agree to comply with this Privacy Policy and applicable data protection law. As a matter of principle, patient data will not be passed on to third parties beyond this unless the patient has given his/her consent, there is a legal obligation (e.g. in case of COVID-19 test), there is a corresponding official or court order, or this is necessary for the provision of the service or the execution of the contract. The attending doctors, medical practices, hospitals and clinics shall ensure that express consent to disclosure is obtained from the patient in advance.

Storage. Unless otherwise agreed in writing, all reports, order forms and sample materials will be stored for as long as necessary for Viollier to provide the current service, but at least for as long as required by law. Subject to the patient's right to request deletion, reports may also remain stored for as long as medically appropriate for the provision of future services, if applicable. After the patient's death, the data may continue to be used in a limited form for scientific purposes.

2. Prescriber Data

Prescriber data is the data that Viollier requires in order to ensure the execution of a contract. The following data are usually collected: prescriber no., surname, first name, address, telephone number and language. This may vary depending on the service requested.

Purpose. Viollier uses the prescriber data only for the purpose of processing the contract. Since certain prescriber data are also patient data, these data are processed in accordance with the provisions concerning patient data.

Transmission. Viollier is hereby authorized to disclose prescriber data within the company and to third parties for the purpose of providing services, as long as these third parties agree to comply with this Privacy Policy and applicable data protection law. As a matter of principle, prescriber data will not be passed on to third parties beyond this unless the prescriber has given his/her consent, there is a legal obligation, there is a corresponding official or court order, or this is necessary for the provision of the service or the execution of the contract.

Storage. The Prescriber data will be stored as long as it is necessary to execute the contract and provide future services. If the prescriber data also forms part of the patient data, the retention periods for patient data apply.

3. Applicant Data

Applicant data is data needed by Viollier for a complete job application and its processing. Usually, the following data is being collected irrespective of whether the application occurs by registering online or by other means: surname, first name, address, language, e-mail address, password, information from the CV and additional documents (e.g. certificates).

Purpose. Viollier uses the applicant data for the purpose of processing the application. In principle, the applicant data will not be used for any further purposes. Viollier is hereby authorized to consider other currently vacant positions at Viollier when it comes to processing applications. Otherwise, the data will under no circumstances be used for any other purpose.

Storage. The application platform is provided and operated by a service company commissioned by Viollier. The applicant data is stored and managed on the service company's own servers located in Switzerland. When a position is filled, the applicant data, or at most an excerpt of this, is stored in the personnel file. If the applicant has applied for a specific position or submitted a spontaneous application but received a negative response, Viollier reserves the right to assign the application to its candidate pool. The applicant will receive a notification in this case. If he/she does not agree or is no longer interested, he/she has the option of deleting his/her personal data independently at any time. If the application is assigned to this candidate pool, the data is generally stored for 12 months and then deleted. The applicant is not informed about the deletion of the data. The period starts over again each time the data is updated by the applicant. With regard to the use of the applicant data by the service company commissioned by Viollier, Viollier refers the job applicants to the relevant privacy policy of this service company.

Transmission. A transfer of data to third parties is in principle not permitted except for storage purposes and if the involvement of external specialists should be required to process the application documents.

4. User Data, Cookies, Google Tools, Links, Social Plugins

User data is the data that Viollier requires from the User of the Internet services in order to ensure smooth access and operation. Viollier collects data about each access. This may vary depending on the service requested. Viollier collects user data in particular during the one-time registration (for clear identification) for Internet services (e.g. usually surname, first name, address, e-mail address and client no. or AHV no.), and each time the Viollier website or another Internet service is accessed (i.e. usually name of the website accessed, file, date, time, amount of data transferred, notification of successful retrieval, browser type along with version, operating system, referrer URL, IP address and requesting provider).

Purpose. User data is processed, stored and used by Viollier to the extent necessary for the use of the Internet services.

When using the Internet services, accesses (date/time) and the associated user data are recorded in a log. Viollier reserves the right to check the user data retrospectively if there is a justified suspicion of unlawful use on the basis of specific evidence.

Transmission. Viollier is hereby authorized to disclose user data within the company and to third parties for the purpose of providing services, as long as these third parties agree to comply with this Privacy Policy and applicable data protection law. As a matter of principle, user data will not be passed on to third parties beyond this unless the User has given his/her consent, there is a legal obligation, there is a corresponding official or court order, or the transfer is necessary for the provision of the service or the execution of the contract.

Storage. User data, unless this also refers to prescriber data, are stored for as long as it is necessary to run the Internet services, e.g. until the user indicates that he/she will refrain from using the Internet services. As a matter of principle, Viollier does not retain any user data from visitors to the website.

Cookies. When a User accesses the website or the online accessible Internet service contained on it, one or more cookies are stored on his/her computer. A cookie is a text file that is stored on a User's computer and allows the use of the website to be analyzed. The information generated by the cookie about the use of this website (including the IP address) is usually transmitted to a server and stored there.

With the help of cookies, Viollier improves the convenience and quality of Internet services by storing user preferences, for example. It is also possible to use the Internet services without cookies. The User can deactivate the storage of cookies in his/her browser, limit it to certain websites or set his/her browser to notify him / her before a cookie is stored. Cookies can be deleted from the computer's hard drive at any time using the browser's privacy function. In this case, the functions and usability of the Internet services may be limited.

Embedding of Links and Services of Third-Parties. Third-party services are offered as part of the Internet services, such as videos from YouTube, map material from Google Maps, graphics. This always requires that these providers are aware of the User's IP address. Viollier endeavors to only use those services whose respective providers use the IP address solely for the delivery of the content. Viollier assumes no responsibility for the collection and treatment of personal data by these third parties. Depending on the integration of third-party services, the respective data protection provisions of the third parties are applicable.

Google Analytics. Viollier uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies and usually stores them outside the EU/EFTA area. Google uses this information to evaluate the use of the website for Viollier and to compile reports on website activity and Internet usage. Furthermore, Google transfers this information to third parties according to its own information, insofar as this is required by law or insofar as third parties process this data on behalf of Google. The IP address transmitted by the browser as part of Google Analytics is not combined with other data from Google. The User can prevent cookies from being stored (see "Cookies" above). Additionally, the User can prevent the transfer of the data generated by the cookie and related to his/her use of the website (including the IP address) to Google and the processing of this data by Google by downloading and installing the browser plugin available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=de>

Social Plugins. Plugins from social networks, which are exclusively operated by Facebook (Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA) and Twitter (Twitter Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA), can be recognized by the logo of the respective social network. When calling up a website that integrates one or more of the previously mentioned plugins, the browser establishes a direct connection with the servers of the social networks. The button is transmitted directly to the browser by the social networks and integrated into the website by the browser. By integrating the buttons, the social networks receive the information that the corresponding website has been accessed. If the User is logged in to the social networks at the time of his/her visit, the social networks can assign the visit to the account the User has with them. If the User clicks the button, the corresponding information is transmitted from the browser directly to the social network and stored there. The purpose and scope of the data collection, the further processing and use of the data by the social networks, as well as the User's right in this regard and the setting options for protecting the User's privacy can be found in the privacy policies of Facebook and Twitter. The User can prevent social networks from collecting data about the websites visited by logging out before visiting the website.
