

Privacy for KLARA

When handling person-related data, KLARA Business AG respects data privacy legislation. In particular, KLARA Business AG is bound by the following principles:

Accumulated data and data processing purpose

KLARA Business AG collects, stores, and processes data needed for rendering its services, for managing and nurturing customer relationships, as well as specifically for assuring a high level of service quality, for the reliability of operations and infrastructure, and for billing purposes (user data).

KLARA Business AG can view data supplied by users (supplied data) only if this is necessary for rendering services and the user explicitly approves this use (support, for example).

Use and forwarding of data

User data is used to handle the rendering of individual services and for communicating with the user. To the extent that agents are enlisted, KLARA Business AG shall assure that they use the data exclusively for rendering the respective services.

If a transfer of data to third parties is necessary (for instance for reporting wage and salary data to social security agencies or insurers), users are notified by the system before the function is activated.

If an application is delivered jointly with a third party or if the user accesses third-party services via KLARA and if the user approves the service, KLARA Business AG may forward the necessary data to such third parties (for instance for postal delivery of payroll statements).

Data analyses are performed for the functional enhancement and further development of the applications.

User data may be used for marketing purposes if approved by the user. If the user approves, the data used for marketing purposes and the marketing purposes themselves will be itemized. For example, the

Version 2.0, April 2020

user may receive customized offers, also from third parties. In this context, no user data is forwarded to third parties. If the users are interested in offers submitted to them, they can initiate a data delivery to the respective third party. On request by government authorities (for example in criminal proceedings), the required data shall be disclosed, provided this is legally mandated and KLARA Business AG is obligated to comply.

Beyond that scope, no data shall be forwarded to third parties.

Data storage

All application-related data is managed and stored in secure facilities in Switzerland. User data reserved explicitly for communication with users may also be stored abroad.

Data security

With adequate organizational measures, the data is protected against unauthorized access. Data transmission is encrypted.

Data deletion

When the account is terminated, the data will be totally deleted within a period of three months. Additionally, the user may require the complete deletion of all data at any time. After the contract is terminated, KLARA will enable customers to export their complete data files.

Recording of user behavior

Tracking systems (such as Adobe Analytics) are used to record anonymized user behavior. This process does not allow any tracing of specific or specifiable users.