

# Privacy Policy ePost for business and private customers

## 1. What is this privacy policy about?

ePost Service AG (hereinafter also referred to as 'ePost,' 'we,' 'us') collects and processes personal data that concerns you or other persons (so-called 'third parties'). We use the term 'data' here as a synonym for 'Personal data' or 'personal information'.

In this Privacy Notice, we describe what we do with your data when you use our apps, purchase our services or products, otherwise enter into a contract with us, communicate with us or otherwise interact with us. We may also inform you separately about additional processing activities not mentioned in this Privacy Notice by providing you with a timely written notice. Additionally, we may inform you separately about the processing of your data, e.g. in contractual terms, in additional terms and conditions for specific products or other notices.

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

## 2. Who is responsible for processing your data?

For the data processing described in this Privacy Policy, the data protection law responsible is ePost Service AG, Schölssli Schöneegg, Wilhelmshöhe 1, 6003 Luzern, Switzerland ('ePost'), unless otherwise communicated in individual cases.

You can contact us for your data protection concerns and the exercise of your rights under Section 11 as follows:

ePost Service AG Data  
Protection Officer  
Schölssli Schöneegg  
Wilhelmshöhe 1  
CH-6003 Lucerne  
dataprotection@klara.ch

## 3. What data do we process?

We process various categories of data about you. The main categories are as follows:

**Technical data:** When you use our website or other electronic offerings, we collect the IP address of your terminal device and other technical data to ensure the functionality and security of these offerings. This data also includes logs that record the use of our systems. We generally store technical data for one month, and in connection with banking applications for one year. To ensure the functionality of these offerings, we may also assign an individual code to you or your terminal device (e.g. in the form of a cookie, see section 12). The technical data itself does not generally allow any conclusions to be drawn about your identity. However, it can be linked to other data categories (and thus possibly to you) in the context of user accounts, registrations, access controls or the processing of contracts.

**Registration data:** Our services can only be used with a user account (account). For this purpose, you must provide us with certain data that we need to process our contractual and other business relationships or, if applicable, for marketing and advertising purposes. Depending on the service you use, this includes your username, password, name, company, information about your role and function, authorisations, access rights and declarations of consent, address, email, bank account(s) and information about your relationship with us (customer, supplier and partner). We also collect data about the customer history and use of the offer or services. We process your registration data if you are a customer or other business contact or act on behalf of such a contact (e.g. as a contact person for a business customer) or if we want to contact you for our own purposes or the purposes of a contractual partner (e.g. for marketing and advertising purposes). We generally store registration data for three months after the user account has been terminated.

**Content data:** When using our services, you disclose, import or generate a lot of data. This includes, for example, data about your own activities, your employees or your customers. Depending on the service you use, this can be financial data, personnel data, information about your relationship with your customers, your projects or your electronic and physical mail. The content data is stored encrypted and is fundamentally not accessible to us or

readable, unless it is strictly necessary for the provision of the service, or you agree in individual cases, for example when you use our support. We securely store your content data on your behalf and enable you to use it in our services. For this purpose, you enter into a separate contract for order data processing with us.

If you provide or disclose to us any information about other people such as your customers, employees, family members, etc., we assume that you are authorised to do so and that the information is accurate. By providing information about third parties, you confirm this. Please also ensure that these third parties have been informed of this Privacy Policy.

The content data is stored for the duration of the contract. After termination of all contracts with us and after termination of the user account, all content data is deleted within three months.

**Communication data:** If you contact us via the contact form, by email, by telephone or by chat, by letter or by other means of communication, we collect the data exchanged between you and us, including your contact details and the communication data. If we record or listen to telephone calls or video conferences, for example for training and quality assurance purposes, we will inform you explicitly about this. Such recordings may only be made and used in accordance with our internal guidelines. You will be informed if and when such recordings are made, for example by a notice during the video conference in question. If you do not wish to be recorded, please let us know or end your participation. If you only do not wish to be recorded visually, please switch off your camera. If we need to or want to identify you, for example in the event of a request for information from you, an application for media access, etc., we collect data to identify you (e.g. a copy of an identity document). We generally store communication data for three months after the user account has been terminated. This period may be longer if this is necessary or technically necessary for evidentiary purposes or to comply with legal or contractual requirements.

**Contract data:** This is data that arises in connection with the conclusion of a contract or the performance of a contract, e.g. information about contracts and the services to be provided or provided, payments, reminders, collection information and data from the pre-contractual phase, information and data required or used for the performance of the contract and information about reactions. We usually collect this data from you, from contractual partners and from third parties involved in the performance of the contract, but also from third-party sources (e.g. providers of creditworthiness data) and from publicly accessible sources. We may check your creditworthiness before offering you a purchase on account. We usually store this data for ten years from the last contractual activity, but at least until the end of the contract. This period may be longer if this is necessary or technically necessary for reasons of proof or to comply with legal or contractual requirements.

**Behavioural and preference data in the context of our website:** Depending on the relationship we have with you, we try to get to know you better and to tailor our products, services and offers to your needs. To do this, we collect and use data about your behaviour and preferences. We do this by analysing information about your behaviour in our area and we may also supplement this information with information from third parties, including from publicly accessible sources. This enables us to calculate, for example, the likelihood that you will use certain services or behave in a certain way. The data we process for this purpose is already known to us in some cases (e.g. if you use our services), or we obtain this data by recording your behaviour (e.g. how you navigate on our website). We anonymise or delete this data if it is no longer relevant for the purposes for which it was collected, which may be the case after up to [24] months, depending on the type of data. This period may be longer if this is necessary for evidentiary purposes or to comply with legal or contractual requirements or if it is technically necessary. We explain how tracking works on our website in section 12.

## 4. For what purposes do we process your data?

We process your data for the purposes we explain below. These purposes or the underlying goals represent legitimate interests of us and, if applicable, of third parties. You can find further information on the legal bases of our processing in Section 5.

We process your data to provide the relevant service, in particular in connection with the fulfilment of an underlying contract or legal relationship. In this context, various of our



relevant to the services you use. The data will be processed to fulfil these services (e.g. hybrid letter, Communities etc.).

We process your data for purposes related to communication with you, in particular to answer your enquiries and assert your rights (Section 11) and to contact you in case of follow-up questions. For this purpose, we use in particular communication data and registration data. We store this data to document our communication with you, for training purposes, for quality assurance and for follow-up questions. We process data for the purpose of establishing, managing, fulfilling and processing the contractual relationship with you. This includes in particular the operation of the services you have subscribed to with us.

We process data for marketing and relationship-building purposes, for example to send our customers and other contractual partners personalised advertising for our products and services and those of third parties. This can take the form of newsletters and other regular contacts (electronically, by post, by telephone), via other channels for which we have your contact information, but also as part of individual marketing campaigns (e.g. events, competitions, etc.) and may also include free services (e.g. invitations, vouchers, etc.). You can opt out of such contacts at any time (see the end of this section 4) or refuse or revoke your consent to contact you for marketing purposes. With your consent, we can target our online advertising more specifically to you on the Internet (see our Privacy Policy on website use).

We can provide you with customised offers, including from third parties. No data will be passed on to third parties. If you are interested in such an offer, you can trigger the transfer of data to the third-party provider yourself. We will continue to process your data for market research, to improve our services and operations, for product development and in the context of our internal processes and administration.

We may also process your data for security purposes and for access control to our services.

We process personal data to comply with laws, instructions and recommendations from authorities and internal regulations ('compliance'). We also process data for the purposes of our risk management and prudent corporate governance, including operational organisation and business development.

#### **5. On what basis do we process your data?**

If we ask for your consent for certain processing (e.g. for marketing mailings, for the organisation of competitions), we will inform you separately about the respective purposes of the processing. You can revoke your consent at any time by sending us a written notification or by sending an email to us with effect for the future; our contact details can be found in section 2. As soon as we receive the notification of the revocation of your consent, we will no longer process your data for the purposes to which you originally consented, unless we have another legal basis for doing so. The revocation of your consent does not affect the lawfulness of the processing carried out on the basis of the consent until the revocation.

Where we do not ask for your consent to process your personal data, we will rely on the processing being necessary for the purposes of entering into, or performing, a contract with you (or the entity you represent), or for us or a third party to have a legitimate interest, in particular to pursue the purposes and related objectives described above in section 4 and to be able to take appropriate measures. Our legitimate interests also include compliance with legal requirements, where such requirements are not already recognised as a legal basis by the applicable data protection law (e.g. the right in the EEA under the GDPR). However, this also includes the marketing of our products and services, the interest in better understanding our markets, and the interest in running and developing our business, including the operational management, in a safe and efficient manner.

We may also process your data on other legal bases, for example in the event of disputes due to the necessary processing for a possible legal process or the enforcement or defence of legal claims. In individual cases, other legal bases may apply, which we will notify you separately if necessary.

#### **6. What applies to profiling and automated individual decisions?**

Profiling is understood to mean the automated processing of personal data to analyse or predict certain personal aspects or behaviour. This can, for example, enable customers to be served and advised more individually or offers to be better tailored to individual customer needs.

Automated individual decisions are decisions that are made entirely automatically, i.e. without any relevant human influence, and that have negative legal effects or other similarly negative effects for the customer.

We do not generally carry out profiling and we do not generally make automated individual decisions.

#### **7. To whom do we disclose your data?**

In connection with our contracts, the website, our services and products, our legal obligations or to protect our legitimate interests and the other purposes listed in section 4, we also transfer your personal data to third parties, in particular to the following categories of recipients:

**Service Providers:** We work with service providers in Switzerland and abroad who process data about you on our behalf (e.g. IT providers, postal and shipping companies, printing and scanning services or advertising service providers). We also use services from service providers to enable us to provide our services efficiently (e.g. debt collection companies, credit agencies or address verification services to update address records in the event of a change of address). We enter into contracts with these service providers that include provisions for the protection of data, unless such protection is provided by law. You can find a list of the most important service providers here.

**Partner companies:** Our partner companies such as authorities, insurance companies, banks, the Swiss Post or other companies offer certain services in cooperation with us. If you want to use such an offer, we will share data about you or the necessary content data with these companies. Before such data is transferred, you will always be informed and the data will only be transferred with your consent.

**Authorities:** We may disclose personal data to offices, courts and other authorities at home and abroad if we are legally obliged or authorised to do so or if this appears necessary to protect our interests (e.g. in criminal investigations, police measures, supervisory requirements and investigations, judicial proceedings, reporting obligations and pre- and extra-judicial proceedings and statutory information and cooperation obligations).

**Other persons:** This refers to other cases in which the involvement of third parties is justified by the purposes set out in point 4, e.g. delivery addresses or payment recipients that differ from those provided by you, other third parties also in the context of representation relationships (e.g. when we send your data to your lawyer or bank) or in the context of authorities or court proceedings, as well as to persons involved in debt collection procedures.

As part of corporate development, we may sell or acquire businesses, business units, assets or companies or enter into partnerships, which may also involve disclosing data (including from you, e.g. as a customer or supplier or as a representative of a supplier) to the parties involved in such transactions. The content data is never affected by any such possible disclosure.

All these categories of recipients may in turn engage third parties, so that your data may also become accessible to them. We can limit the processing by certain third parties (e.g. IT providers), but not by other third parties (e.g. authorities, banks, etc.).

#### **8. Where do we process your data?**

As explained in section 7, we also disclose data to other parties, which may not be located in Switzerland only. Your content data is stored and processed in Switzerland. To ensure information security, network traffic may be monitored using analysis tools that can be operated worldwide. You can find a list of our main service providers and the location of data processing here.

If a recipient is located in a country without adequate statutory data protection, we contractually oblige the recipient to comply with the applicable data protection, insofar as he is not already subject to a statutory recognised data protection framework and we cannot rely on an exemption provision.

#### **9. How long do we process your data?**

We process your data for as long as our processing purposes, the statutory retention periods and our legitimate interests in processing for documentation and evidence purposes require it, or as long as storage is technically necessary. Further information on the respective storage and processing periods can be found in the individual data categories in Section 3. Unless there are any legal or contractual obligations to the contrary, we delete or anonymise your data after the storage or processing period has expired as part of our standard processes.

#### **10. How do we protect your data?**

We take appropriate security measures to maintain the confidentiality, integrity and availability of your personal data, to protect it against unauthorised or unlawful processing and to counter the risks of loss, unintentional alteration, unwanted disclosure or unauthorised access. The requirements for information security are particularly high for content data. We have ISO 27001 certification for the operation of our services, which guarantees a high standard of information security.



## 11. What rights do you have?

The applicable data protection law grants you the right, under certain circumstances, to object to the processing of your data, in particular for purposes of direct marketing, and further legitimate interests in the processing.

To make it easier for you to control the processing of your personal data, you also have the following rights in connection with our data processing, depending on the applicable data protection law:

- The right to request information from us about whether and which data we process about you;
- the right to have us correct data if it is inaccurate;
- the right to request the deletion of data;
- the right to request from us the release of certain personal data in a commonly used electronic format or its transfer to another controller;
- the right to withdraw consent, where our processing is based on your consent;
- the right to obtain further information necessary for the exercise of these rights upon request;

**If you wish to exercise the above rights with regard** to us, please contact us by email; our contact details are set out in Section 2. In order to prevent misuse, we may need to identify you (e.g. with a copy of your ID card, unless otherwise possible).

Please note that these rights may be subject to conditions, exceptions or limitations under applicable data protection law (e.g. to protect the rights and freedoms of others or business secrets). We will inform you accordingly if applicable. In particular, we may need to further process and store your Personal Data to fulfil a contract with you, to protect legitimate interests, such as to assert, exercise or defend legal claims, or to comply with legal obligations.

If you are not satisfied with the way we handle your rights or data protection, please let us know (see point 2). In particular, if you are located in the EEA, the UK or Switzerland, you also have the right to contact the data protection supervisory authority in your country and, in connection with data processing within the digital basic postal service contract, the PostCom.

## 12. Do we use online tracking techniques?

We use various technologies to collect information from and about you and your device, and we use some of this information to identify you. We also use third parties to help us collect and process some of this information. This section explains how we do this.

The basic idea is that we can distinguish between your access (via your system) and access by other users, so that we can ensure the functionality of the website and carry out evaluations and personalisations. We do not want to infer your identity, even if we can do so, as far as we or third parties engaged by us can identify you by combining registration data. Even without registration data, the techniques used are designed in such a way that you are recognised as an individual visitor each time you access a page, for example by our server (or the servers of third parties) assigning a specific identification number to you or your browser (so-called cookie).

Other techniques may also be used that allow you to be identified (i.e. distinguished from other users) with a greater or lesser degree of probability, such as 'fingerprinting'. Fingerprinting combines your IP address, the browser you use, your screen resolution, your language settings and other information that your system communicates to each server, resulting in a more or less unique fingerprint. This allows cookies to be avoided.

Whenever you access a server (e.g. when using a website or an app or because an image is integrated in an email, visible or invisible), your visits can therefore be 'tracked'. If we integrate offers from an advertising partner or an analytics tool provider on our website, they can track you in the same way, even if you cannot be identified in individual cases.

We use such techniques on our website and allow certain third parties to do the same. You can programme your browser to block, spoof or delete certain cookies or alternative techniques, or you can add software to your browser that blocks tracking by certain third parties. You can also find more information on the help pages of your browser (usually under the heading 'Privacy') or on the websites of the third parties listed below.

The following cookies are distinguished (techniques with comparable functionalities such as fingerprinting are included here):

**Essential cookies:** Some cookies are necessary for the website to function as such or for certain functions. For example, they ensure that you can switch between pages without losing the information you have entered in a form. They also ensure that you remain logged in. These cookies are only temporary ('session cookies'). If you block them, the website may not work. Other cookies are necessary for the server to be able to store decisions or inputs made by you beyond a session (i.e. a visit to the website), if you use this function (e.g. language chosen, consent given, automatic login function, etc.). These cookies have an expiry date of up to [24] months.

**Performance Cookies:** To optimise our website and to better align it to the needs of users, we use cookies to record and analyse the use of our website, sometimes beyond the session. We do this by using third-party analysis services, which are listed below. Performance Cookies also have a maximum expiry date of up to [24] months. For details, please refer to the websites of the third-party providers.

## 13. Can this privacy policy be changed?

This Privacy Policy is not part of any contract with you. We may update this Privacy Policy at any time. The version published on this website is the current version.

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