

ePost Privacy Notice for business and private customers

Data controller and data protection contact

ePost Service AG
Schlössli Schöneegg
Wilhelmshöhe 1
6003 Luzern
dataprotection@epostservice.ch

1. What is this Privacy Notice about?

ePost Service AG (also referred to below as “ePost”, “we” or “us”) collects and processes personal data relating to you or other persons (“third parties”). In this Notice, we use “data” to mean the same as “personal data”.

This Privacy Notice explains what we do with your data when you use our services, particularly the ePost web client, ePost apps, ePost login, customer service and our additional services. A separate privacy notice for the website applies to visits to epost.ch, our newsletters and marketing offers. We may also inform you separately about the processing of your data, for example in our General Terms and Conditions (“GTC”), supplementary terms and conditions (“STC”) or other notices.

If you provide or disclose data about other people, such as your customers, employees, contacts or family members, we assume that you are authorised to do so and that the data is accurate. By providing data about third parties, you confirm this. Please also ensure that these third parties have been informed of this Privacy Notice. This Privacy Notice is designed to meet the requirements of the Swiss Federal Act on Data Protection (“FADP”).

2. Who is responsible for processing your data?

ePost Service AG is the controller under data protection law for the processing described in this Privacy Notice, unless otherwise communicated in individual cases.

Where business customers use our services and functions under the General Terms and Conditions (“GTC”) to process personal data on their own responsibility, for example documents, data relating to their customers or employees, scanned mail or interactions via Studio or iLetter, the relevant business customer is the controller for that processing under data protection law. ePost processes this data as a processor in accordance with the Data Processing Agreement (“DPA”). In these cases, data subjects should contact the relevant business customer. Senders are also responsible for the content of their items and the data contained in them.

For data protection matters and to exercise your rights under clause 11, you may contact us using the address above.

3. What data do we process?

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

Registration data: Our services can only be used with a user account. You must provide certain details, such as your name, address, email address, telephone number, username and password and, for business customers, also the company, role, powers of attorney and access rights. This includes your declarations of consent, for example to electronic delivery. We generally retain registration data for three months after termination of the user account.

Identification and authentication data: For identification purposes, we process information obtained from postal validation of your residential address or from your identity document. To secure access, we process multi-factor authentication data, device IDs and login logs. We generally retain authentication data and device IDs for 30 days.

Content data: When using our services, you receive, send, import or create letters, documents, attachments, scanned items, messages or electronically signed documents. These may also contain sensitive personal data, such as health data or debt enforcement data. Content data is stored in encrypted form and is generally neither accessible nor readable by us, unless strictly necessary to provide the service or you consent in an individual case, for example when you contact our customer service. Electronic items are deleted from the delivery system 90 days after delivery. Independently of this, items stored in the personal ePost mailbox remain available in accordance with the retention rules applicable to the user account. After termination of the user account, all content data is deleted within three months.

Item and metadata: For each item, we process information such as the sender, recipient, time, routing information, delivery channel, processing status, any reasons for non-delivery, and delivery and retrieval confirmations. Content data and metadata are stored logically separately. To comply with statutory obligations, particularly those relating to the surveillance of postal and telecommunications traffic, we retain metadata for 180 days.

Contract data: This is data arising in connection with entering into or performing a contract, such as details of subscribed services, invoices, payments, reminders and debt collection. We process payment methods only in tokenised form. We may verify company and personal data and creditworthiness and obtain data from third-party sources for this purpose. We generally retain this data for ten years after the last contractual activity.

Communication data: When you contact us through customer service, by email, telephone, chat or post, we process the information exchanged, including your contact details and communication metadata. We generally retain communication data for three months after the enquiry is closed or the user account is terminated.

Address book data: If you enable address book synchronisation, we process your contacts’ contact details in encrypted form to manage recipients, address items correctly and show which contacts already use ePost. You can disable synchronisation at any time in the settings.

Technical and usage data: When you use our services, we collect your device’s IP address and other technical data and logs to ensure the functionality and security of our services. We also analyse usage statistically (see clause 12). We retain security and audit logs for 400 days.

Blocking data: If a user account has been blocked due to misuse or breaches of the GTC, or the contract has been terminated, we record this to prevent renewed misuse. We retain this data for two years.

4. For what purposes do we process your data?

We process your data to provide our services, particularly the receipt, delivery and archiving of items, hybrid delivery involving printing and handover to Post CH Ltd, the Scanning Service, the dispatch service, electronic signing and communication in communities.

To enable full-text search and payment functions, files and items are automatically analysed and indexed. We use the resulting data exclusively for this purpose.

We use artificial intelligence (“AI”) for certain optional additional services and functions, for example to categorise documents or provide assistance functions. These functions do not form part of the universal postal service and their use is voluntary. Processing is automated; this does not give our employees access to your content. Content data is not used to train AI models. AI results may contain errors and should be checked before use. For processing locations, see clause 8.

We process your data to provide senders with delivery confirmations and information about items. Senders receive the item identification, type of receipt, processing status and any reasons for non-delivery. We only disclose more detailed information about your reading behaviour as part of retrieval and non-retrieval confirmations or with your express consent.

We process data to establish, manage and perform our contractual relationship with you, to communicate with you, particularly to respond to enquiries, and for identification, access control and protection of our services against misuse.

We may use your data to inform you about ePost’s own products, services, new developments and offers. You may object to the use of your data for marketing purposes at any time. We never use content data for marketing purposes.

We also process data to improve our services and measure the effectiveness of our advertising (see clause 12); for this, we use only usage and technical data, never content data. We also process data to comply with laws and instructions and recommendations from authorities, particularly postal law requirements and supervision by the Federal Postal Services Commission (PostCom), and as part of our risk management.

5. On what basis do we process your data?

Where we ask for your consent for specific processing (for example, address book synchronisation or disclosure of information about reading behaviour), we inform you separately of the relevant purposes. You may withdraw consent at any time with effect for the future; our contact details are provided in clause 2. Withdrawal does not affect the lawfulness of processing carried out before it.

Where we do not ask for your consent, we rely on the fact that processing is necessary to prepare, enter into or perform a contract with you (or the entity you represent), that we are legally obliged to process the data, or that we or third parties have a legitimate interest in doing so, particularly to pursue the purposes described in clause 4.

6. What applies to profiling and automated individual decisions?

“Profiling” means automated processing of personal data to analyse or predict certain personal aspects or a person’s behaviour. An “automated individual decision” is a decision taken automatically without meaningful human involvement that has legal effects on the data subject or significantly affects them.

As a rule, we do not carry out profiling or make automated individual decisions. If we analyse usage data in future to tailor our offers more closely to you, we will inform you in advance and obtain your consent where required by law. We never use content data for profiling. Where we automatically analyse and categorise documents (see clause 4), this serves only the relevant function, such as search or payment, and not the assessment of you as a person.



7. To whom do we disclose your data?

In connection with our services, legal obligations or the protection of our legitimate interests, we transfer your data to the following categories of recipients:

Service providers: We work with service providers that process data on our behalf (processors), for example for data centres and IT operations, printing and scanning, identification, payment processing, customer service, customer communications and AI functions. We contractually require them to comply with data protection requirements and, for postal items, to preserve postal secrecy. A list of our subprocessors and their processing locations is available at www.epost.ch/en/subcontractor.

Post CH Ltd: For physical delivery of items through the hybrid channel, we hand the items over to Post CH Ltd.

Senders: Senders receive the item information referred to in clause 4. We may also provide senders subject to state supervision (such as banks) with data connected to their items and required for compliance with regulatory requirements. These senders are visible in ePost.

Partner companies: Partners such as authorities, insurers, banks or Swiss Post offer certain services in cooperation with us. If you wish to use such an offer, we share the necessary data with these companies. You will always be informed before such disclosure, which takes place only with your agreement.

Authorities and other persons: We may disclose data to government offices, courts and other authorities where we are legally obliged or entitled to do so, and to persons involved in debt collection, administrative or judicial proceedings.

We disclose address data to third parties only on a statutory basis or with the consent of the person concerned; refusal of consent does not entail any costs. In the course of corporate development, data may be disclosed to persons involved in a transaction; content data is never included.

8. Where do we process your data?

The ePost platform is operated in Switzerland. As a rule, content data is stored and processed exclusively in Switzerland.

Exceptions apply to optional additional services and functions that you use, particularly AI functions. In these cases, content data may be processed in the EU/EEA, but only for the duration of the relevant processing and without permanent storage by the AI provider. Permanent storage also takes place exclusively in Switzerland for these functions.

Other personal data, such as data for customer communications and customer service, is processed in Switzerland or the EU/EEA. For usage analysis and measurement of our advertising (see clause 12), and in exceptional cases, data may also be processed in other countries, particularly the USA.

If a recipient is located in a country without an adequate level of data protection, we safeguard your data by relying on the recipient's certification under the Swiss-U.S. Data Privacy Framework, by contractually obliging the recipient to comply with applicable data protection requirements (standard contractual clauses), or by relying on a statutory exception.

9. How long do we process your data?

We process your data for as long as required by our processing purposes, statutory retention periods, our legitimate interests in processing for documentation and evidential purposes, or technical storage requirements. Details of retention periods for individual data categories are set out in clause 3; the periods specified in the STC apply to certain additional services. Where statutory disclosure or retention obligations exist, deletion is suspended and documented. Once the retention period has expired, we automatically delete or anonymise your data; backups are deleted as part of regular rotation.

User accounts that have not been accessed by the user for more than two years are closed following prior notice.

10. How do we protect your data?

We implement appropriate technical and organisational security measures to preserve the confidentiality, integrity and availability of your data and protect it against unauthorised or unlawful processing, loss, accidental alteration, unintended disclosure or unauthorised access.

Information security requirements are particularly high for content data: content data is stored and transmitted in encrypted form, the unencrypted content of items is not stored permanently, and content data and metadata are stored logically separately with separate access controls. When accepting, processing, delivering and digitising postal items, we and our service providers preserve postal secrecy. ePost Service AG as a whole is certified to ISO/IEC 27001:2022.

11. What rights do you have?

Applicable data protection law gives you the right, in certain circumstances, to object to the processing of your data, particularly for direct marketing and analysis. To make it easier for you to control the processing of your data, you also have the following rights:

- the right to request information on whether and which data we process about you, including the retention period;
- the right to have inaccurate data corrected;
- the right to request deletion of data;

- the right to request the provision of certain data in a commonly used electronic format or its transfer to another controller;
- the right to withdraw consent with effect for the future.

If you wish to exercise these rights, please contact us (clause 2). To prevent misuse, we must verify your identity. Please note that these rights are subject to statutory conditions, exceptions or restrictions; in particular, we may need to continue retaining data to perform a contract, comply with legal obligations or protect legal claims.

If you disagree with how we handle your rights or data protection, please let us know. You also have the right to lodge a complaint with the Federal Data Protection and Information Commissioner (FDPIIC) and, in connection with the universal postal service, to contact the PostCom conciliation body.

12. Do we use cookies and analytics services?

We use technically necessary cookies and similar technologies, for example to keep you logged in or save your settings. Our services cannot function without them.

To improve our services, we analyse their use statistically and measure the effectiveness of our advertising. For this purpose, we use Google analytics services, such as Google Analytics, Google Ads Conversion Tracking and Firebase. We also use error-monitoring services. These services receive only technical information and usage data, but no content data, no information about senders or recipients of your items, no email addresses and no customer numbers. IP addresses are shortened and we do not create advertising profiles. For processing abroad, see clause 8.

If you use ePost within the Swiss Post app, its privacy notice also applies. We process your items exclusively in our own systems. Swiss Post receives only technical usage information from us.

You may object to analysis at any time, for example by blocking or deleting cookies and scripts in your browser, installing the add-on at tools.google.com/dlpage/gaoptout or resetting the advertising ID in your device settings. You can disable personalised Google advertising in "My Ad Centre".

13. Can this Privacy Notice be amended?

This Privacy Notice does not form part of a contract with you. We may amend this Privacy Notice at any time. The version published on our website is the current version in each case.

In the event of discrepancies or contradictions between the different language versions of this Agreement, the German version shall prevail.

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