Data Protection Statement of TimeStatement AG

Version effective as of 08.11.2026

With this Data Protection Statement we, the TimeStatement AG (hereinafter **TimeStatement**, **we** or **us**), describe how we collect and further process personal data. This Data Protection Statement is not necessarily a comprehensive description of our data processing. It is possible that other data protection statements or General Terms and Conditions, Conditions of Participation or similar documents are applicable to specific circumstances.

The term "personal data" in this Data Protection Statement to shall mean any information that identifies, or could reasonably be used to identify any person.

If you provide us with personal data of other persons (such as family members, work colleagues), please make sure the respective persons are aware of this Data Protection Statement and only provide us with their data if you are allowed to do so and such personal data is correct.

This Privacy Notice is aligned with the EU General Data Protection Regulation («**GDPR**»), the Swiss Data Protection Act («**DPA**») and the revised Swiss Data Protection («**revDPA**»). However, the application of these laws depends on each individual case.

1. Controller / Data Protection Officer / Representative

The "controller" of data processing as described in this data protection statement (i.e. the responsible person) TimeStatement AG, Oberneuhofstrasse 10, 6340 Baar, Switzerland unless we have informed you differently in certain cases. You can notify us of any data protection related concerns using the following contact details: dataprotection@timestatement.com

2. Collection and Processing of Personal Data

We primarily process personal data that we obtain from our clients and other business partners as well as other individuals in the context of our business relationships with them or that we collect from users when operating our websites, apps and other applications.

Insofar as it is permitted to us, we obtain certain personal data from publicly accessible sources (e.g., debt registers, land registries, commercial registers, press, internet) or we may receive such information from affiliated companies of TimeStatement, from authorities or other third parties (such as e.g., credit rating agencies, address brokers). Apart from data you provided to us directly, the categories of data we receive about you from third parties include, but are not limited to, information from public registers, data received in connection with administrative or court proceedings, information in connection with your professional role and activities (e.g., in order to conclude and carry out contracts with your employer), information about you in correspondence and discussions with third parties, credit rating information (if we conduct business activities with you personally), information about you given to us by individuals associated with you (family,

consultants, legal representatives, etc.) in order to conclude or process contracts with you or with your involvement (e.g. references, your delivery-address, powers of attorney), information regarding legal regulations such as anti-money laundering and export restrictions, bank details, information regarding insurances, our distributors and other business partners for the purpose of ordering or delivering services to you or by you (e.g., payments made, previous purchases), information about you found in the media or internet (insofar as indicated in the specific case, e.g. in connection with job applications, media reviews, marketing/sales, etc.), your address and any interests and other socio-demographic data (for marketing purposes), data in connection with your use of our websites (e.g., IP address, MAC address of your smartphone or computers, information regarding your device and settings, cookies, date and time of your visit, sites and content retrieved, applications used, referring website, localization data).

3. Purpose of Data Processing and Legal Grounds

We primarily use collected data in order to conclude and process contracts with our clients and business partners, in particular in connection with apps, software development, IT services, support, nearshoring and web portals to our clients and the procurement of products and services from our suppliers and subcontractors, as well as in order to comply with our domestic and foreign legal obligations. You may be affected by our data processing in your capacity as an employee of such a client or business partner.

In addition, in line with applicable law and where appropriate, we may process your personal data and personal data of third parties for the following purposes, which are in our (or, as the case may be, any third parties') legitimate interest, such as:

- providing and developing our products, services and websites, apps and other platforms, on which we are active;
- communication with third parties and processing of their requests (e.g., job applications, media inquiries);
- review and optimization of procedures regarding needs assessment for the purpose of direct customer approach as well as obtaining personal data from publicly accessible sources for customer acquisition;
- advertisement and marketing (including organizing events), provided that you have not objected to the use of your data for this purpose (if you are part of our customer base and you receive our advertisement, you may object at any time and we will place you on a blacklist against further advertising mailings);
- market and opinion research, media surveillance;
- asserting legal claims and defense in legal disputes and official proceedings;
- prevention and investigation of criminal offences and other misconduct (e.g. conducting internal investigations, data analysis to combat fraud);
- ensuring our operation, including our IT, our websites, apps and other appliances;

— video surveillance to protect our domiciliary rights and other measures to ensure the safety of our premises and facilities as well as protection of our employees and other individuals and assets owner by or entrusted to us (such as e.g. access controls, visitor logs, network and mail scanners, telephone recordings);

— acquisition and sale of business divisions, companies or parts of companies and other corporate transactions and the transfer of personal data related thereto as well as measures for business management and compliance with legal and regulatory obligations as well as internal regulations of TimeStatement.

If you have given us your consent to process your personal data for certain purposes (for example when registering to receive newsletters or carrying out a background check), we will process your personal data within the scope of and based on this consent, unless we have another legal basis, provided that we require one. Consent given can be withdrawn at any time, but this does not affect data processed prior to withdrawal.

4. Cookies / Tracking and Other Techniques Regarding the Use of our Website

We typically use "cookies" and similar techniques on our websites and apps, which allow for an identification of your browser or device. A cookie is a small text file that is sent to your computer and automatically saved by the web browser on your computer or mobile device, when you visit our website or install our app. If you revisit our website or use our app, we may recognize you, even if we do not know your identity. Besides cookies that are only used during a session and deleted after your visit of the website ("session cookies"), we may use cookies in order to save user configurations and other information for a certain time period (e.g., two years) ("permanent cookies"). Notwithstanding the foregoing, you may configure your browser settings in a way that it rejects cookies, only saves them for one session or deletes them prematurely. Most browsers are preset to accept cookies. We use permanent cookies for the purpose of saving user configuration (e.g., language, automated log in),in order to understand how you use our services and content, and to enable to show you customized offers and advertisement (which may also happen on websites of other companies; should your identity be known to us, such companies will not learn your identity from us; they will only know that the same user is visiting their website has previously visited a certain website). Certain cookies are sent to you from us, others from business partners with which we collaborate. If you block cookies, it is possible that certain functions (such as, e.g., language settings, shopping basket, ordering processes) are no longer available to you.

In accordance with applicable law, we may include visible and invisible image files in our newsletters and other marketing e-mails. If such image files are retrieved from our servers, we can determine whether and when you have opened the e-mail, so that we can measure and better understand how you use our offers and customize them. You may disable this in your e-mail program, which will usually be a default setting.

Where applicable law requires consent for cookies, tracking technologies or similar tools, we use these technologies only after you have given your consent. You can withdraw your consent at any time with effect for the future through the cookie settings on our website. Where processing without consent is permitted, we inform you about the relevant purposes and your options to object.

We may use Google Analytics or similar services on our website. These are services provided by third parties, which may be located in any country worldwide (in the case of Google Analytics Google Ireland Ltd. (located in Ireland), Google Ireland relies on Google LLC (located in the United States) as its sub-processor (both «**Google**»), www.google.com) and which allow us to measure and evaluate the use of our website (on an anonymized basis). For this purpose, permanent cookies are used, which are set by the service provider. We have configured the service so that the IP addresses of visitors are truncated by Google in Europe before forwarding them to the United States and then cannot be traced back. We have turned off the «Data sharing» option and the «Signals» option. Although we can assume that the information we share with Google is not personal data for Google, it may be possible that Google may be able to draw conclusions about the identity of visitors based on the data collected, create personal profiles and link this data with the Google accounts of these individuals for its own purposes. If you have registered with the service provider, the service provider will also know your identity. In this case, the processing of your personal data by the service provider will be conducted in accordance with its data protection regulations. The service provider only provides us with data on the use of the respective website (but not any personal information of you).

In addition, we use plug-ins from social networks such as Facebook, Twitter, Youtube, Pinterest or Instagram on our websites. This is visible for you (typically based on the respective symbols). We have configured these elements to be disabled by default. If you activate them (by clicking on them), the operators of the respective social networks may record that you are on our website and where on our website you are exactly and may use this information for their own purposes. This processing of your personal data lays in the responsibility of the respective operator and occurs according to its data protection regulations. We do not receive any information about you from the respective operator.

5. Datatransfer and Transfer of Data Abroad

In the context of our business activities and in line with the purposes of the data processing set out in Section 3, we may transfer data to third parties, insofar as such a transfer is permitted and we deem it appropriate, in order for them to process data for us or, as the case may be, their own purposes. In particular, the following categories of recipients may be concerned:

- our service providers (within the TimeStatement group or externally, such as e.g. banks, insurances), including processors (such as e.g. IT providers);
- dealers, suppliers, subcontractors and other business partners;
- clients;
- domestic and foreign authorities or courts;
- the media;
- the public, including users of our websites and social media;
- competitors, industry organizations, associations, organizations and other bodies;

- acquirers or parties interested in the acquisition of business divisions, companies or other parts of the TimeStatement group;
- other parties in possible or pending legal proceedings;
- affiliates of the TimeStatement group;

all together **Recipients**.

Certain Recipients may be within Switzerland but they may be located in any country worldwide. In particular, you must anticipate your data to be transmitted to any country in which the TimeStatement-Group is represented by affiliates, branches or other offices as well as to other countries in Europe and the USA where our service providers are located (such as Microsoft, Amazon, Google).

If a recipient is located in a country without adequate statutory data protection, we require the recipient to undertake to comply with data protection (for this purpose, we use the revised European Commission's standard contractual clauses, which can be accessed here: https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?), unless the recipient is subject to a legally accepted set of rules to ensure data protection and unless we cannot rely on an exception. An exception may apply for example in case of legal proceedings abroad, but also in cases of overriding public interest or if the performance of a contract requires disclosure, if you have consented or if data has been made available generally by you and you have not objected against the processing.

6. Retention Periods for your Personal Data

We process and retain your personal data as long as required for the performance of our contractual obligation and compliance with legal obligations or other purposes pursued with the processing, i.e. for the duration of the entire business relationship (from the initiation, during the performance of the contract until it is terminated) as well as beyond this duration in accordance with legal retention and documentation obligations. Personal data may be retained for the period during which claims can be asserted against our company or insofar as we are otherwise legally obliged to do so or if legitimate business interests require further retention (e.g., for evidence and documentation purposes). As soon as your personal data are no longer required for the above-mentioned purposes, they will be deleted or anonymized, to the extent possible. In general, shorter retention periods of no more than twelve months apply for operational data (e.g., system logs).

7. Data Security

We have taken appropriate technical and organizational security measures to protect your personal data from unauthorized access and misuse such as [internal policies][, training][, IT and network security solutions, access controls and restrictions, encryption of data carriers and transmissions.

8. Pflicht zur Bereitstellung von Personendaten

In the context of our business relationship you must provide us with any personal data that is necessary for the conclusion and performance of a business relationship and the performance of our contractual obligations (as a rule, there is no statutory requirement to provide us with data). Without this information, we will usually not be able to enter into or carry out a contract with you (or the entity or person you represent). In addition, the website cannot be used unless certain information is disclosed to enable data traffic (e.g. IP address).

9. Profiling and Automated Individual Decision-Making

We may partially process your personal data automatically with the aim of evaluating certain personal aspects (profiling). In particular, profiling allows us to inform and advise you about products possibly relevant for you more accurately. For this purpose, we may use evaluation tools that enable us to communicate with you and advertise you as required, including market and opinion research.

In establishing and carrying out a business relationship, we generally do not use any fully automated individual decision-making (such as pursuant to article 22 GDPR). Should we use such procedures in certain cases, we will inform you separately on this and advise you of your relevant rights if required by law.

10. Your Rights

In accordance with and as far as provided by applicable law (as is the case where the GDPR is applicable), you have the right to access, rectification and erasure of your personal data, the right to restriction of processing or **to object to our data processing, in particular for direct marketing purposes, for profiling carried out for direct marketing purposes and for other legitimate interests in processing** in addition to right to receive certain personal data for transfer to another controller (data portability). Please note, however, that we reserve the right to enforce statutory restrictions on our part, for example if we are obliged to retain or process certain data, have an overriding interest (insofar as we may invoke such interests) or need the data for asserting claims. If exercising certain rights will incur costs on you, we will notify you thereof in advance. We have already informed you of the possibility to withdraw consent in Section 3 above. Please further note that the exercise of these rights may be in conflict with your contractual obligations and this may result in consequences such as premature contract termination or involve costs. If this is the case, we will inform you in advance unless it has already been contractually agreed upon.

In general, exercising these rights requires that you are able to prove your identity (e.g., by a copy of identification documents where your identity is not evident otherwise or can be verified in another way). In order to assert these rights, please contact us at the addresses provided in Section 1 above.

In addition, every data subject has the right to enforce his/her rights in court or to lodge a complaint with the competent data protection authority. The competent data protection authority of Switzerland is the Federal Data Protection and Information Commissioner (http://www.edoeb.admin.ch).

11. Amendments of this Data Protection Statement

We may amend this Data Protection Statement at any time without prior notice. The current version published on our website shall apply. If the Data Protection Statement is part of an agreement with you, we will notify you by e-mail or other appropriate means in case of an amendment.

12. Source and conversion measurement upon registration

When you register for a trial account, we store the source of your registration in your customer account:

– UTM parameters from the URL (utm_source, utm_medium, utm_campaign and, where present, utm_content and utm_term)

– If you have consented to the Advertising category, the advertising platform's click ID (currently Google gclid), the associated timestamp and the conversion event (registration and, where applicable, a subsequent purchase).

The purpose is to measure and optimise our advertising activities, in particular to determine which advertisement led to registration (including, where applicable, an offline conversion upload to the advertising platform).

Legal bases: For storing and using click IDs and transmitting them to Google, consent under Art. 6(1)(a) GDPR and, where applicable, relevant cookie or telecommunications legislation (in particular Section 25(1) TDDDG in Germany and Section 165(3) TKG 2021 in Austria). For UTM parameters, our legitimate interests under Art. 6(1)(f) GDPR or overriding private interests under Art. 31(1) of the Swiss Federal Act on Data Protection (FADP) in attributing our marketing activities. In Switzerland, cookies and similar technologies are subject in particular to the information and objection requirements of Art. 45c of the Telecommunications Act (FMG), as well as other applicable data protection provisions.

Recipients: Google Ireland Limited / Google LLC (Google Ads). Data is transmitted only where you have consented to the Advertising category and only for conversions covered by valid consent.

Third-country transfers: Google LLC in the United States may receive personal data. Where Google participates in the EU–U.S. Data Privacy Framework and/or the Swiss–U.S. Data Privacy Framework and the applicable conditions are met, transfers are based on that framework. Suitable contractual safeguards, in particular Standard Contractual Clauses, may also apply as supplementary or alternative safeguards.

Retention: We delete click IDs no later than 90 days after the click or after the last offline upload to the advertising platform. If you withdraw your consent or delete your account, we delete the click IDs without delay. UTM parameters may remain in the customer account for up to 24 months and are thereafter evaluated only in aggregated form.

Withdrawal and objection: You may withdraw your consent at any time with effect for the future by opening the cookie settings on our website and disabling the Advertising category. Withdrawal does not affect the lawfulness of processing carried out before withdrawal. You may object at any time to the processing of UTM parameters based on legitimate interests (Art. 21 GDPR or Art. 30(2)(b) FADP).

13. "ts_attr" cookie

For attribution, we store UTM parameters and, where applicable, campaign source information in a signed first-party cookie named "ts_attr" (HttpOnly, SameSite=Lax, retention period of 30 days). Except on designated Swiss (CH) paths, we set this cookie only after you have consented to the Advertising category. Outside Switzerland (in particular in DE, AT, FR and IT), the legal basis is consent under the applicable cookie or telecommunications legislation and Art. 6(1)(a) GDPR. For visitors on CH paths, information and an opportunity to object under Art. 45c FMG apply insofar as these suffice legally for the specific processing activity. We store click IDs in this cookie and in the customer account only if you have consented to the Advertising category.

* * * * *

This Data Protection Statement is based on a template created by David Rosenthal and Katrina Frame and published under the Creative Commons Attribution 4.0 International License (CC BY 4.0). The specialist editing was carried out by David Rosenthal and David Vasella. Attribution: "Based on DSAT.ch." The full licence is available at: https://creativecommons.org/licenses/by/4.0/deed.de