PETHEALTHDATA AG PRIVACY POLICY FOR PHBOOKLETS FOR PET OWNERS

1.   Scope and responsible person

PetHealthData AG (hereinafter "**we**", "**us**" or "**PHD AG**") operates a digital animal health platform (hereinafter "**PHD Platform**") on which both animal owners and veterinarians (hereinafter "**Users**" or "**you**") can digitally manage animal health data (e.g. vaccination data, laboratory data, referral requests, X-rays, veterinary reports, etc.; hereinafter "**Data related to animals**") in so-called PHBooklets.

This privacy policy provides information on how and for what purposes PHD AG processes personal data of animal owners dislosed by them to PHD AG when using the PHD Platform or collected by PHD AG when using the PHD Platform. "**Personal data**" includes all data and information that relate to an identified or identifiable natural person. Data related to animals is generally not considered as Personal data and therefore does not fall under the Federal Act on Data Protection.

PHD AG is responsible for the processing of Personal data in accordance with this privacy policy. Its contact details are as follows:

PetHealthData AG

Domicile address
c/o Tierärztliche Treuhandstelle TVS AG
Bogenstrasse 7
9000 St. Gallen

Office
Hostig 6
8132 Hinteregg

Email: info@phd-ag.ch

2.   Declarations on Personal data processing

This privacy policy is based on the provisions of the Federal Act on Data Protection (hereinafter "**FADP**").

In connection with the use of the PHD Platform, the following Personal data processing may take place in particular:

2.1   Provision of the PHD Platform and creation of log files

Each time the PHD Platform is accessed, a series of user information is collected, which is stored in the server's log files. The information collected includes, among other things, the IP address, the date and time of access, the time zone difference from the GMT time zone, the name and URL of the file accessed, the website from which access is made, the browser used, and the operating system used.

No allocation to a specific person occurs when using this general information. The collection of this information or data is technically necessary to operate the PHD Platform and to ensure its stability and security. This information is also collected to improve the PHD Platform and to analyze its usage. The legal basis for storing the information and the log files is our legitimate interest in being able to offer Users the PHD Platform with a sufficient level of quality and to continuously improve it.

2.2 Registration and use of user account

If they wish to use the PHD Platform, Users must register on the PHD Platform and open a user account. For registration, Users provide a range of Personal data (e.g. name, address, e-mail address, telephone number, information on means of payment, information on their animals, etc.).

We use this Personal data in particular for the following processing purposes:

− Provisioning of your user account and the PHD Platform;

− Conclusion and execution the Agreement with you for the use of the PHD Platform;

− Billing and payment of license fees;

− General communication with Users;

− Communication between pet owners and veterinarians;

− In connection with the use of your Data related to animals for research purposes;

− Improvement of the PHD Platform;

− Transmission of information about animals to you.

The legal bases for this data processing are the fulfillment of the contract with you (including pre-contractual measures), our overriding legitimate interests (in particular with regard to the improvement of the PHD Platform) and, if and to the extent necessary, your consent.

The User expressly consents to PHD AG sending the User information about animals electronically (e.g. by e-mail) and to PHD AG contacting the User electronically or by telephone in connection with the use of the User's Data related to animals for research purposes. Once you have given your consent, you may revoke your consent at any time with future effect. However, this does not affect the lawfulness of the processing carried out on the basis of the consent until the revocation. You can declare your revocation at any time by contacting us via the contact form mentioned under para. 1 of this privacy policy.

2.3 Deletion of the user account

You may request PHD AG to delete your user account at any time. To do so, you must send a registered letter to the above-mentioned PHD AG office. In this case, PHD AG will delete your user account and the data you have uploaded to your user account, unless longer storage is necessary in accordance with the processing purpose concerning you or there is another legal basis for doing so. In particular, we retain Personal data that we hold on the basis of a contractual relationship with you for at least as long as the contractual relationship exists, limitation periods for possible claims are running or legal or contractual retention obligations exist.

Regarding the processing and use of Data related to animals, the *Terms of Use for PHBooklets for Animal Owners* apply.

2.4   Contact form

You can contact us via the contact form available on the PHD Platform. Mandatory information for the use of the contact form is the entry of your name, your e-mail address and your message. The Personal data you provide to us will be stored and processed by us for the purpose of dealing with your request. The legal basis for this Personal data processing is your consent and our legitimate interest in processing your request.

2.5   Cookies

The PHD Platform uses so-called cookies. Cookies are text files that are stored in the Internet browser or by the Internet browser on the computer system of the User or a mobile end device. Cookies contain a characteristic string of characters that enables unique identification of the browser or mobile end device when the PHD Platform is called up again.

The purpose of the use of cookies is to enable and simplify the use of the PHD Platform for Users. Some functions of the PHD Platform cannot be offered without the use of cookies (so-called technically necessary cookies). They usually record important actions, such as the number of requests made, editing your privacy settings or filling out forms. Although you can block these cookies in your browser, some parts of the PHD Platform may then no longer function.

The legal basis for data processing when using technically necessary cookies is our legitimate interest, which lies primarily in ensuring the functionality and improvement of the PHD Platform.

3.   Disclosure of Personal data to recipients and abroad

In addition to the transfers of data to recipients expressly mentioned in this Privacy Policy, we may disclose Personal Data collected pursuant to this Privacy Policy to the following categories of recipients:

- Your veterinarian;
- Universities, research institutes, other veterinarians;
- Providers to whom we have outsourced certain services (e.g. IT and hosting providers; payment processing service providers; banks);
- Suppliers;
- Agents of ours who are involved in the implementation or organization of events and seminars.

Your Personal data may also be transferred abroad in connection with the above-mentionned disclosures to third parties, primarily to member states of the European Union, EFTA, England and the United States, but also to other countries worldwide under certain circumstances.

If your Personal data is transferred to a country without adequate legal data protection, we shall ensure an adequate level of protection as provided for by law by using appropriate contracts (namely on the basis of the so-called standard contractual clauses of the European Commission, which can be accessed here) or invoke the legal exceptions of contract performance, the establishment, exercise or enforcement of legal claims, overriding public interests or because it is necessary to protect the integrity of the data subjects. You may at any time contact the office named in para. 1 to obtain a copy of the contractual guarantees mentioned, unless they are available at the link provided above.

**4.	Storage time**

We process and store your Personal data only for the necessary timeframe according to the processing purpose or for the timeframe provided by law(e.g. legal retention periods). Personal data is retained on the basis of a contractual relationship with you at least as long as the contractual relationship exists and limitation periods for possible claims by us run or contractual retention obligations exist. As soon as your Personal data is no longer required for the above-mentioned purposes, it is generally and as far as possible passively set, deleted or anonymized. For operational data (e.g. system logs, logs), shorter retention periods of twelve months or less apply in principle.

**5.	Your rights**

Within the scope of the data protection law applicable to you and insofar as provided therein, you have the right to information, correction, deletion, the right to restrict data processing and otherwise to object to our data processing as well as to the release of certain Personal data for the purpose of transfer to another body (so-called data portability). Please note, however, that we reserve the right to enforce the restrictions provided for by law, for example if we are obliged to retain or process certain data, if we have an overriding interest in doing so (insofar as we are entitled to rely on this) or if we require the data in order to assert claims.

If data processing is based exclusively on your consent, you can revoke this at any time after giving your consent with effect for the future. However, this does not affect the lawfulness of the processing carried out on the basis of the consent until the revocation of the latter.

The exercise of such rights usually requires that you clearly prove your identity (e.g. by means of a copy of your ID card, where your identity is otherwise not clear or cannot be verified). To exercise your rights, you can contact us at the address specified in sec. 1 of this privacy policy.

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

**6.	Data security**

We take technical and organizational measures to protect your Personal data against unauthorized access, misuse, loss and destruction. In particular, we use encryption for data transmission (SSL/TLS encryption) and have implemented further protective measures to ensure the most complete possible protection of Personal data processed via our website.

**7.	Adjustments to this privacy policy**

We expressly reserve the right to change this Privacy Policy at any time. If such adjustments are made, we will immediately publish the adjusted privacy policy on the PHD Platform. The data protection declaration published on the PHD Platform is in any case valid.	(Version July 2023)