

# Data Protection Policy

Digicomp Academy AG, Zürich

Version 2.3



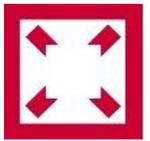
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**Beratung & Schulung**  
Informationssicherheit  
Datenschutz  
IT-Sicherheit  
Krisenmanagement  
BCM

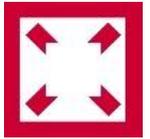
Luzern  
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## Content

<b>1</b>	<b>Contact</b> .....	<b>3</b>
1.1	Responsible Entity	3
1.2	Data Protection Consultant	3
<b>2</b>	<b>Data Protection: An Overview</b> .....	<b>3</b>
<b>3</b>	<b>Data Protection in Details</b> .....	<b>4</b>
3.1	Personal Data Processed by Us	4
3.2	Purposes for Which We Process Personal Data and Legal Basis for Processing	5
3.3	Third-Parties to Whom We Disclose Personal Data	5
3.4	Duration of Data Processing	5
<b>4</b>	<b>Visiting Our Website</b> .....	<b>5</b>
4.1	Server Logfiles	6
4.2	Getting in Touch	6
4.2.1	Zendesk Chat	6
4.3	Digicomp Blog	7
4.4	Newsletter	7
4.5	Jobs	8
4.6	Course Registrations / MyDigicomp	8
4.6.1	Registering a MyDigicomp Account	8
4.6.2	Course Delivery: Services from Partner Companies	9
4.7	Cookies	9
4.8	Google Services	9
4.8.1	Google Tag Manager	10
4.8.2	Google Analytics	10
4.8.3	Google Marketing Platform	11
4.8.4	Google Ads	11
4.8.5	Google reCAPTCHA	11
4.8.6	Google Fonts	12
4.8.7	YouTube	12
4.9	Meta Pixel	12
4.10	X Analytics (formerly Twitter Analytics)	13
4.11	Microsoft Advertising	13
4.12	Microsoft Clarity	14
4.13	LinkedIn Services	14
4.13.1	LinkedIn Marketing Solutions	14
4.13.2	LinkedIn Conversion Tracking	14
4.14	Criteo	15
4.15	Social Media Presence	15
4.16	Links to Third-Party Websites	15



# Data Protection Policy

Digicomp appreciates your interest in our website. The protection of your personal data during the collection, processing and use on the occasion of your visit to our website is an important concern for us. Therefore, we operate the web activities in accordance with the laws on data protection and data security. In order for Digicomp to be able to provide its services in a customer-oriented and appropriate manner, it must be able to collect and use user data.

In the introduction, you will find our outline «Data Protection: An Overview», which gives you the most important information about our data processing. If you would like to know more, we will of course provide you with more detailed information afterwards.

## 1 Contact

### 1.1 Responsible Entity

Digicomp Academy AG  
Limmatstrasse 50  
8005 Zürich

Tel.: +41 44 447 21 21

E-Mail: [datenschutz@digicomp.ch](mailto:datenschutz@digicomp.ch)

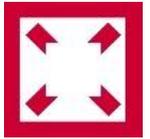
### 1.2 Data Protection Consultant

Swiss Infosec AG  
Centralstrasse 8A  
6210 Sursee

## 2 Data Protection: An Overview

Hereinafter, we inform you about the most important key points of our data processing. Subsequently, you will find more detailed information about our processing.

- **What kind of data do we process and where does it come from?**  
Digicomp uses personal information that you provide to us, that we collect about you, or that we have received from third parties. The most important are:
  - Contact and identification data
  - Personal data
  - Contract data
  - Financial data
  - Interaction and usage data
  - Website information
- **For what purposes is the processing carried out?**  
Digicomp processes personal data primarily to fulfill our legal and contractual obligations. In addition, we process personal data to optimize our services and for marketing purposes.
- **Is there any disclosure to third parties?**  
In the course of our business activities, we are dependent on and sometimes obliged to transmit certain data to specific third parties. However, in no case do we sell your data.
- **Where is the data processed?**  
We generally process personal data in Switzerland or in an EU/EEA country or in another country that has adequate data protection. However, with regard to certain processing of personal data, you must expect in particular the transfer of your data to other countries within and outside Europe, where some of the IT service providers we use are located. If the processing takes place in a country that does not have an adequate legal level of data protection, we require the recipient to take appropriate measures to protect your privacy, in particular by concluding EU standard contractual clauses (current version available here) or other suitable guarantees.
- **How long do we store your data?**  
Digicomp processes personal data as long as it is necessary for the fulfillment of our contractual obligations or otherwise for the purposes pursued with the processing, for example, for the duration of the entire business



relationship and beyond that in accordance with the statutory retention and documentation obligations. In this context, it is possible that personal data will be retained for the time during which claims can be asserted against us and insofar as we are otherwise legally obligated to do so or legitimate interests require this (e.g. for evidence and documentation purposes). As soon as your personal data is no longer required for the above-mentioned purposes, it will generally be deleted or anonymized.

- **How is your data protected?**

Digicomp takes appropriate technical and organizational security measures to protect your personal data and continuously improves them in line with technological developments. This includes protection against accidental or intentional manipulation, loss, destruction or unauthorized access by third parties, such as the use of recognized encryption methods (e.g. encryption using SSL/TLS). Digicomp employees as well as service companies commissioned by us are obliged to maintain confidentiality and to comply with data protection regulations and are only granted access to your personal data to the extent necessary.

- **Which rights do you have?**

In principle, you are entitled to the rights of access, rectification, deletion, restriction, data portability, objection to processing and revocation of consent with regard to your personal data.

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, have an overriding interest in doing so (insofar as we are entitled to invoke it) or require it for the assertion of claims.

Please note that the exercise of these rights may conflict with contractual agreements and may have consequences such as the premature termination of the contract or cost consequences. We will inform you in advance if this is not already contractually regulated.

If you believe that the processing of your personal data violates data protection law or that your data protection rights have been violated in any other way, you can also complain to the competent supervisory authority. In Switzerland, this is the [Federal Data Protection and Information Commissioner](#) (FDPIC).

The exercise of your rights under data protection law generally 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 assert your rights, please contact us at the (e-mail) address designated in section 1.1.

## 3 Data Protection in Details

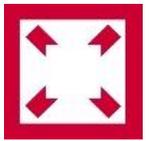
### 3.1 Personal Data Processed by Us

Digicomp processes various personal data. These are in particular personal data:

- which we receive in the course of our business relationships from customers, prospective customers, interested parties, service providers, suppliers, business partners or other persons involved in the business relationships;
- which we receive from job applicants;
- which we are legally or contractually obligated to collect;
- which we collect during the use of our website;
- which we receive from authorities and other third parties (address dealers, credit agencies).

Depending on the nature of the relationship, we process personal data from you such as:

- **Contact and identification data** such as last name, first name, address, email address, phone number;
- **User account information** such as username, password, user account number;
- **Contract data** such as contract type, contract content, type of products and services, consumption groups, consumption types, forecast data, applicable terms and conditions, contract start date, contract term, billing data;
- **Financial data** such as account information, payment information, payment history, average revenue, credit rating data, income, purchasing power;
- **Edge data** from telecommunications traffic such as telephone number, premium rate service numbers, date, time and duration of connection, connection type, location data, IP address, device identification numbers such as MAC address;
- **Interaction and usage data:** Correspondence, preferences and audience information, terminal device type, device settings, operating system, software, information from assertion of rights;
- **Website information:** IP address, cookie information, browser settings, frequency of visits to the website, duration of visits to the website, search terms, clicks on content, originating website.



### 3.2 Purposes for Which We Process Personal Data and Legal Basis for Processing

We use the personal data we collect primarily to conclude and process contracts with our customers and business partners.

We also rely on the processing of personal data for the purchase of products and services from our suppliers and subcontractors. If you work for a customer or business partner, your personal data may of course also be affected in this capacity.

In addition, we also process personal data of yours and other persons, to the extent permitted and deemed appropriate, for the following purposes in which we (and sometimes third parties) have a legitimate interest corresponding to the purpose:

- Offer and further development of our products, services and website and other platforms on which we are present;
- Communication and processing of inquiries (e.g. via email, telephone, media inquiries);
- Advertising and marketing (including the realization of events and competitions), insofar as you have consented/not objected to the use of your data (if we send you advertising as an existing customer of ours, you can object to this at any time; we will then put you on a blacklist against further advertising mailings);
- Market research, media monitoring;
- Assertion of legal claims and defense in connection with legal disputes and official proceedings;
- Prevention and investigation of criminal offenses and other misconduct (e.g., conducting internal investigations, data analysis to combat fraud);
- Ensuring our operations, in particular IT, our website and other platforms.

Insofar as you have given us consent to process your personal data for certain purposes, we process your personal data within the scope of and based on this consent, insofar as we have no other legal basis and we require such a basis. Consent given can be revoked at any time, but this has no effect on data processing that has already taken place. You can send us a revocation by email or by post to the (email) address mentioned in section 1.1.

### 3.3 Third-Parties to Whom We Disclose Personal Data

We also disclose personal data to third parties within the scope of our business activities and for the above-mentioned purposes, insofar as this is permitted and appropriate, either because they process it for us (order data processing) or because they want to use it for their own purposes (data disclosure). This concerns in particular:

- Service providers, including order processors;
- IT service providers (e.g., web hosting providers email delivery service providers, online tools);
- Suppliers;
- Authorities;
- Insurance companies;
- Banking institutions and payment service providers;
- Government offices and courts.

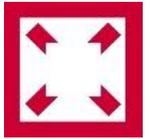
The recipients are partly in Switzerland, but some are abroad. In particular, you must expect the transfer of your data to other countries in Europe and the USA, where some of the IT service providers we use are located. If we transfer data to a country where there is no adequate legal level of data protection, we require that the recipient takes appropriate measures to protect personal data (e.g. by means of the agreement of so-called EU standard clauses, current version available [here](#), other precautions or based on justification grounds).

### 3.4 Duration of Data Processing

We process personal data as long as it is necessary for the fulfillment of our contractual obligations or otherwise for the purposes pursued with the processing, for example, for the duration of the entire business relationship (from the initiation, processing to the termination of a contract) and beyond that in accordance with the statutory retention and documentation obligations. In this context, it is possible that personal data will be retained for the time during which claims can be asserted against us and insofar as we are otherwise legally obligated to do so or legitimate interests require this (e.g. for evidence and documentation purposes). As soon as your personal data is no longer required for the above-mentioned purposes, it will generally be deleted or anonymized.

## 4 Visiting Our Website

As a rule, you can use our website without providing any information about yourself. This does not apply to areas and services that naturally require your name, address or other personal data, e.g. course registrations.



## 4.1 Server Logfiles

When you visit our website, our servers temporarily store each access in a log file, the so-called server log files.

For example, your IP address, the date and time of your visit, the approximate location of access to our website, the web browser and operating system used, as well as other similar information, are collected in order to avert danger in the event of attacks on our information technology systems.

The purpose of processing this information is to display our website and its content and offers correctly and to ensure data traffic, to optimize our website, content and offers, to ensure the stability and security of our website and systems on a permanent basis, and to enable the detection, prevention and prosecution of cyber-attacks, spam and other illegal activities relating to our website and systems and to enforce claims in this regard.

We delete your personal data as soon as it is no longer necessary to achieve the purpose for which it was collected. In the case of the collection of data for the provision of our website, the deletion takes place when the respective session has ended.

For the hosting of the website, we may use services of third parties in Switzerland and abroad, which carry out the above processing on our behalf. Currently, our website is hosted exclusively by Swiss hosting providers and on servers in Switzerland.

## 4.2 Getting in Touch

On our website, you have the option of contacting us via email, online form, chat and/or telephone. Your information will be stored for the purpose of processing your request (e.g. room rental), its handling and in case of follow-up questions with us and will not be disclosed to unauthorized third parties without your consent. This also applies, of course, to requests that you send to us by post.

You can object to this data processing at any time. Please send your objection to the (email) address mentioned in section 1.1 and we will examine your request. In such a case, your reaching out will not be processed further.

Your personal data will be deleted as soon as the request you have made has been dealt with. This is the case if the circumstances indicate that the matter in question has been conclusively resolved and the deletion does not conflict with any statutory retention obligations.

### 4.2.1 Zendesk Chat

You have the option to chat directly with a customer service representative on our website. To provide you with the chat function, we use Zendesk Chat, a live chat service provided by Zendesk Inc. based in the USA («Zendesk»).

When you use the chat function, among other things, the chat history is logged and your IP address is recorded. The IP address will be anonymized. You have the option to log in to the chat if you wish to do so. To do so, enter your name or a pseudonym in the registration mask as well as an email address and telephone number. Providing your name and contact information is voluntary and allows our customer service representative to address you by name and offers you the option to send the chat history to your email address.

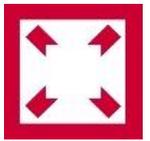
Zendesk uses so-called cookies (see section 4.7). The information generated by the cookie about your use of our website (including your anonymized IP address) may be transmitted to and stored by Zendesk on servers located primarily in the United States, Asia Pacific or the European Union. An overview of all subcontracted processors used by Zendesk can be found on [Zendesk's website](#).

To ensure an adequate level of data protection when transferring data to the countries with inadequate data protection, we have entered into an order processing agreement with Zendesk, including EU standard contractual clauses. In addition, Zendesk is certified under the [EU-U.S. as well as the Swiss-U.S. Data Privacy Framework](#).

You may refuse the use of cookies by selecting the appropriate settings on your browser. However, we would like to point out that in this case you may not be able to use all functions of our website or the Zendesk chat to their full extent. Alternatively, you can prevent processing by Zendesk by contacting us otherwise and not using the chat function.

Your personal data will be deleted as soon as the matter you have raised has been resolved. This is the case if the circumstances indicate that the matter in question has been conclusively resolved and the deletion does not conflict with any legal obligations to retain data.

For more information on data processing, please refer to [Zendesk's privacy policy](#).



### 4.3 Digicomp Blog

In our blog, you will find current news, tips & tricks, technical articles, events, cool gadgets, stories and «Read for you» - simply fast and uncomplicated.

If you particularly like one of our articles or if you have questions for the author, you are welcome to comment on our blog articles. To do so, we need your first name/last name or a pseudonym and a valid email address. We need this information to promote a more transparent and individual communication between blog authors and commentators. The purpose of providing your email address is to notify you when the blog author or another commenter responds to your message.

If you comment on a blog, information about the time of your comment as well as your name or the pseudonym you have chosen will be stored and published. However, we do not publish your email address. Furthermore, your IP address will be logged. This is done for security reasons and in case someone leaves illegal content in comments. The storage of this data is therefore in our own interest, so that we can provide evidence in the event of a violation of the law. The personal data you provide will not be disclosed to third parties, unless such disclosure is required by law or serves the legal defense.

If you wish to object to the processing of your personal data transmitted via the comment function, please send your objection to the email address stated in section 1.1. In the event of a revocation, your personal data that was stored by you as part of the comment function will be deleted as a matter of principle. This also includes all comments from you on our blog.

In addition, we offer you the opportunity to share blog posts directly on Facebook, X (formerly Twitter) or LinkedIn (so-called social plugins). When you activate the share function, a new window opens in which you can log in to the respective social network if you are not already logged in. This establishes a direct connection between your browser and the server of the relevant social network. The content of the plugin is transmitted directly to the browser by the social network and integrated into the website by the browser. This provides the network with the information that you have visited our website. If you interact with the plugins, the corresponding information is transmitted from the browser directly to the social network and stored there.

By using the sharing function, a cookie with an identifier is set. Since your browser sends this cookie with every connection to a server of the respective networks without being asked, the social networks could in principle use it to create a profile of which websites the user belonging to the identifier has called up.

Without interaction with the social plugins by you, no transmission to the social networks takes place.

For more information on the purpose and scope of data collection and the further processing and use of your personal data, please refer to the privacy statements of the respective networks (section 4.15). There you will also find further information about your rights in this regard and setting options for protecting your privacy as well as your right to object to the creation of user profiles.

### 4.4 Newsletter

If you would like to subscribe to our free newsletter, in addition to selecting your areas of interest, you are required to provide a valid email address and your first and last name. We need this information to send you our newsletter, to address you personally in our newsletter and to send you exciting expert insights according to your needs, as well as to inform you about attractive course offers and events.

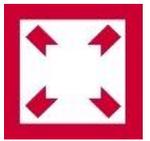
The registration for the newsletter takes place in a so-called double opt-in process. This means that after registration you will receive an email in which you must click on a link to confirm your registration.

Our newsletters may contain, in part and to the extent permitted, graphics and/or web links that record on a personal basis whether, when and how often an individual newsletter was opened in an email application and which web links were clicked on. Such graphics and/or web links record the use of newsletters to ensure quality and to enable improvements to the newsletter. You can block the setting of such graphics and/or web links in your email application.

We use Salesforce Marketing Cloud, a marketing automation service provided by Salesforce.com Inc. based in the USA («Salesforce»), to send and evaluate our newsletters as described above.

In the process, the evaluations and in particular your email address may be disclosed to countries in which Salesforce (see [10-K SEC filing](#)) or contract processors used by Salesforce maintain facilities.

To protect your privacy, we have concluded a «[Data Processing Addendum](#)» with Salesforce, in which Salesforce



undertakes to comply with the EU standard contractual clauses and its «[Processor Binding Corporate Rules](#)» when transferring data outside the European Economic Area. Salesforce is also certified under the [EU-U.S. and Swiss-U.S. Data Privacy Framework](#).

For further information on data protection at Salesforce, please refer to their «[Information on data protection](#)».

You have the option to unsubscribe from the newsletter at any time and to revoke the consent you have given. To do so, click on the unsubscribe link at the end of each of our newsletters or send your revocation to the (email) address mentioned in section 1.1.

#### **4.5 Jobs**

Would you like to drive change with us and help shape the future of sustainable learning or teach our course participants individually, practically and passionately as a trainer? If so, we look forward to receiving your application.

When you apply for a position with us, we process the personal data that we receive from you as part of the application process. In addition to your personal details, education, work experience and skills, this includes the usual correspondence data such as postal address, email address and telephone number. In addition, all documents submitted by you in connection with the application, such as cover letters, curriculum vitae and references, will be processed. Moreover, applicants may voluntarily provide us with additional information. This data is stored, evaluated, processed or forwarded internally exclusively in connection with your application. Furthermore, they may be processed for statistical purposes (e.g. reporting). In this case, no conclusions can be drawn about individual persons.

Processing may also take place by other electronic means. This is particularly the case if you send us the relevant application documents electronically, for example by email or via our online forms.

Your applicant data will be processed to fulfill our (pre)contractual obligations in the application process.

You can object to this data processing at any time and withdraw your application. Please send your objection to [hr@digicomp.ch](mailto:hr@digicomp.ch).

If we conclude an employment contract with you, the transmitted data will be stored for the purpose of processing the employment relationship in compliance with the statutory provisions.

If the application process ends without employment, your data will be stored for another 6 months for documentation purposes and will then be deleted, unless you have given us permission to use your information for further application processes with us and to contact you if necessary. You have the possibility to revoke this consent subsequently at any time. You can send your revocation to [hr@digicomp.ch](mailto:hr@digicomp.ch).

#### **4.6 Course Registrations / MyDigicomp**

If you would like to participate in one of our courses, it is necessary to provide various personal data, in particular your name and contact details. We need this data to invoice you and for the purpose of processing your registration and course realization. If you do not object, we will also use your contact data to send you our newsletter tailored to your needs (see section 4.4).

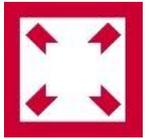
You can object to this data processing and/or the receipt of our newsletter at any time. Please send your objection to the email address stated in section 1.1. Please note that we will not process your registration any further and course participation will no longer be possible.

We will forward some of your personal data, in particular your first name/last name, to the respective course instructors so that they can get a picture of the participants and prepare the course accordingly. In addition, service providers we use (such as providers of digital course materials) may receive your personal data that they need to fulfill their services to us.

When you book a course, we automatically create a login for your personal «MyDigicomp Account», unless you have already registered an account on your own. We ask you to change the initial password, which we have sent you by email, in your account settings. You will find more information about MyDigicomp in section 4.6.1 below.

##### **4.6.1 Registering a MyDigicomp Account**

You have the possibility to register a MyDigicomp account. To do so, enter the required data, such as email address, first and last name and a password of your choosing, in the corresponding form. We need this information to provide you with password-protected direct access to your data stored with us, in particular your orders and the courses and events you have attended.



You can cancel your customer account at any time by sending us an email to the email address stated in section 1.1.

If you cancel your customer account, the associated data will be deleted, subject to legal retention obligations. It is your responsibility to secure your personal data upon termination. We are entitled to irretrievably delete all data stored during the term of the contract.

#### **4.6.2 Course Delivery: Services from Partner Companies**

We use services from partner companies for certain courses. These include the Digicomp app, a digital learning platform that allows you to access your course information and materials and collaborate with other participants at any time and from any device. The Digicomp app is provided by Max Brain AG, based in Switzerland («Max-Brain»). In order to use MaxBrain, you need to register an account. Our partner has sent you an e-mail with a link for this purpose. To register, you will need to enter various data, such as your e-mail address, first name and surname, as well as a password of your choice. This information is necessary to give you password-protected direct access to your course information and documents. Please note that if you upload data to MaxBrain or make contact with other course participants (e.g. via the chat function), this data may be stored on MaxBrain's servers or transmitted to its subcontractors.

We also use the services of Virsoft Solutions, a provider of online labs based in the Netherlands («Virsoft»). Virsoft is an official «Authorized Lab Hoster» for all «Microsoft Instructor-led Trainings» (formerly: «Microsoft Official Curriculum (MOC)»), which we use for certain courses so that participants can apply/try out what they have learned in realistic practice environments (online labs). To enable course participants to access the online labs, their e-mail addresses and first and last names are transmitted to Virsoft. Virsoft requires this information in order to identify the course participants and to set up access to the online labs for them. Access to the online labs is via a dedicated link, which is provided to the respective course participants by Virsoft.

To protect your privacy, we have concluded an order processing contract with MaxBrain and Virsoft, in which they undertake, among other things, to process your personal data only in accordance with our instructions and not to use it for their own purposes or for the purposes of third parties.

Further information on data protection and data security at MaxBrain can be found in their [Privacy policy](#) and [General Terms and Conditions](#).

Information about Virsoft can be found on their [website](#).

#### **4.7 Cookies**

We use so-called cookies on our website. Cookies are small text files that are placed and stored on your end device (laptop, tablet, smartphone or similar) with the help of the browser. They serve to make our website more user-friendly and effective overall and to make your visit to our website as pleasant as possible. Cookies do not cause any damage to your end device. They cannot execute programs or contain viruses.

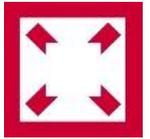
Most of the cookies we use are so-called session cookies. These are automatically deleted when you log out or close the browser. Other cookies remain stored on your terminal device beyond the respective usage process and enable us or our partner companies (third-party cookies) to recognize your browser on your next visit. Insofar as other cookies (e.g. cookies to analyze your surfing behavior) are stored, these are treated separately in this data protection declaration.

You can set your browser so that it informs you about the setting of cookies and you allow the acceptance of cookies for certain cases only in individual cases or generally exclude. However, we would like to point out that you may then not be able to use all the functions of our website.

#### **4.8 Google Services**

On our website, we use various services of Google LLC, based in the USA, or, if you have your habitual residence in the European Economic Area (EEA) or Switzerland, Google Ireland Ltd, based in Ireland («Google»). Google LLC is always responsible for the processing of personal data when using «YouTube». We use the following Google services on our website:

- Google Tag Manager
- Google Analytics
- Google Marketing Platform
- Google Ads
- Google Fonts



- YouTube

You can find more information about the individual services below.

Google uses technologies such as cookies, web storage in the browser and tracking pixels that enable an analysis of your use of our website. The thereby information generated about your use of our website may be transmitted to a Google server in the USA or other countries and stored there. Information about the locations of Google's data centers can be found [here](#).

We use tools provided by Google that Google claims can process personal data in countries where Google or its [subcontractors](#) maintain facilities. Google promises in its "[Data Processing Addendum for Products where Google is a Data Processor](#)" to ensure an adequate level of data protection by relying on the EU standard contractual clauses.

For more information about Google's processing and privacy settings, please refer to Google's [privacy policy](#) or [privacy settings](#).

#### **4.8.1 Google Tag Manager**

Our website uses Google Tag Manager («GTM»). With GTM, website tags can be managed efficiently. Website tags are placeholders that are stored in the source code of the respective website, e.g. to record the inclusion of frequently used website elements, such as code for web analytics services. GTM takes care of triggering other tags, which in turn may collect data. GTM does not access this data. If a deactivation has been made at the domain or cookie level, it will remain in place for all tracking tags implemented with GTM.

For more information, please refer to the [Google Tag Manager Terms of Use](#).

#### **4.8.2 Google Analytics**

For the purpose of analyzing our website and its visitors, as well as for marketing and advertising purposes, we use the web analytics service Google Analytics 4.

Google Analytics uses cookies that are stored on your terminal device (laptop, tablet, smartphone or similar) and enables an analysis of your use of our website. This allows us to evaluate the usage behavior on our website and to design our offer in a more interesting way using the statistics/reports obtained.

We use the User ID function. With the help of the User ID, we can assign a unique, permanent ID to one or more sessions (and the activities within these sessions) and analyze user behavior across devices.

We use Google Signals. This allows Google Analytics to collect additional information about users who have enabled personalized ads (interests and demographics) and ads can be delivered to those users in cross-device remarketing campaigns.

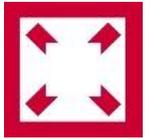
In Google Analytics 4, the anonymization of IP addresses is activated by default. This means that your IP address is shortened by Google within Switzerland or the EU/EEA before transmission. Only in exceptional cases will the full IP address be transmitted to a Google server and shortened there.

Google uses this information to evaluate your use of our website, to compile reports on website activity and to provide us with other services related to website and internet use. The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data, according to Google. When you visit our website, your user behavior is recorded in the form of events (such as page views, interaction with the website or your «click path») as well as other data such as your approximate location (country and city), technical information about your browser and the end devices you use or the referrer URL, i.e. via which website / advertising material you came to our website.

You can prevent the collection and transmission of data generated by the cookie and related to your use of our website (including your IP address) to Google and the processing of this data by Google by downloading and installing the [browser add-on to disable Google Analytics](#). If you wish to object to interest-based advertising by Google, you can use the [settings and opt-out options provided by Google](#).

An overview of the data usage in Google Analytics and the measures taken by Google to protect your data can be found in the [Google Analytics Help](#).

For more information on the [terms of service of Google Analytics](#) and [privacy policy at Google](#), please refer to the respective documents.



### 4.8.3 Google Marketing Platform

The Google Marketing Platform («GMP») uses cookies to serve ads that are relevant to users, to improve campaign performance reports, or to prevent a user from seeing the same ads more than once. Through a cookie ID, Google records which ads are served in which browser and can thus prevent them from being displayed more than once.

In addition, GMP can use cookie IDs to record so-called conversions, i.e. whether a user sees a GMP ad and later calls up the advertiser's website and makes a purchase there. According to Google, GMP cookies do not contain any personal information.

Your browser automatically establishes a direct connection with Google's server. We have no influence on the scope and further usage of the data collected by Google through the use of this service. According to Google, by integrating GMP, Google receives the information that you have called up the relevant part of our website or clicked on an advertisement from us. If you are registered with a Google service, Google can assign the visit to your user account. Even if you are not registered with Google or have not logged in, it is possible that the provider may obtain and store your IP address.

For more information on GMP, please visit the [Google Marketing Platform website](#).

### 4.8.4 Google Ads

Our website uses the online advertising program Google Ads, which is part of Google Marketing Services, to draw attention to our attractive offers with the help of advertising media on external websites. We can determine how successful the individual advertising measures are in relation to the data of the advertising campaigns.

With Google Ads, a cookie is set on your computer («conversion cookie») if you have reached our website via a Google ad. These cookies usually lose their validity after 30 days and are not intended to identify you personally.

These cookies enable Google to recognize your browser. Provided that you visit our website and the cookie has not yet expired, Google and we can recognize that you clicked on the ad and were thus redirected to our website. A different cookie is assigned to each Google Ads customer. Cookies can therefore not be tracked across the websites of Google Ads customers. We ourselves do not collect or process any personal data in the aforementioned advertising measures. We only receive statistical evaluations from Google. Based on these evaluations, we can see which of the advertising measures used are particularly effective. We do not receive any further data from the use of the advertising media; in particular, we cannot identify you on the basis of this information.

Based on the collected information, interest-relevant categories are assigned to your browser. These categories are used for the placement of interest-related advertising.

By using Google Ads, we reach users who have already visited our website. This allows us to present our advertising to target groups who are already interested in our services.

You can prevent participation in this tracking process in various ways, including:

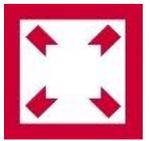
- by adjusting your browser's software settings accordingly; in particular, suppressing third-party cookies will result in you not receiving third-party ads;
- by disabling cookies for conversion tracking by adjusting the relevant [settings for personalized advertising from Google](#);
- by disabling the interest-based ads of the providers that are part of the self-regulatory campaign "YourAdChoices";

For more information on how Google Ads works and your privacy, please see the [Google Ads Privacy Policy and Terms of Use](#).

### 4.8.5 Google reCAPTCHA

The reCAPTCHA function serves to distinguish whether an input (e.g. in a contact form) is made by a human or automated by a computer program (so-called [bots](#)). In this way, we want to ensure the security of our website and protect it in particular from automated entries (or attacks) and from spam.

For this purpose, reCAPTCHA analyzes the behavior of the website visitor based on various characteristics. These analyses run entirely in the background and begin automatically as soon as you visit our website. To differentiate between humans and bots, Google analyzes various information, such as the IP address of the end device used, time spent on the website, the browser and operating system used or mouse movements made by the website visitor.



For more information on the usage of data collected by Google in this way, please refer to Google's [privacy policy](#) and the [terms of use](#).

#### 4.8.6 Google Fonts

To display fonts and to display our content correctly and graphically appealing across browsers, we use the script and font library Google Fonts on our website. Google Fonts are transferred to the cache of your browser to avoid multiple loading. If your browser does not support Google Fonts or prevents access, content is displayed in a standard font. Calling up script or font libraries automatically triggers a connection to the operator of the library. In doing so, it is theoretically possible – although it is currently also unclear whether and, if so, for what purposes – that the operator, in this case Google, collects data.

We do not collect any personal data through the integration of Google Fonts.

You can object to the data processing by Google Fonts by deactivating the execution of JavaScript in your browser or installing a JavaScript blocker. Please note that this may result in functional restrictions on the website.

For more information on Google Web Fonts, please see the [Google Web Fonts FAQ](#) and [Google's privacy policy](#).

#### 4.8.7 YouTube

To integrate videos, we use the services of the provider YouTube LLC, based in the USA («YouTube»), a subsidiary of Google LLC («Google»).

When you start a YouTube video on our website, a connection to the YouTube servers is established. This tells the YouTube servers which of our pages you have visited. This information (including your IP address) may be transmitted to a Google server in the USA and stored there. If you are logged into your YouTube account at the same time, you enable YouTube to assign your surfing behavior directly to your personal profile. You can prevent this by logging out of your YouTube account before visiting our website.

For more information, please refer to [YouTube's terms of use](#) and [Google's privacy policy](#).

#### 4.9 Meta Pixel

We use Meta Pixel on our website, if you are habitually resident in the European Economic Area (EEA) or Switzerland, a service provided by Meta Platforms Ireland Ltd, based in Ireland. The parent company is Meta Platforms Inc., based in the USA («Meta»). Instagram is also a service provided by Meta.

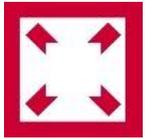
The information generated by the Meta Pixel may be transmitted to a Meta server in the USA and may also be processed in countries in which Meta or its [subcontractors](#) maintain facilities. According to Meta's [«Data Processing Terms and Conditions»](#), the [«Meta Contract Supplement for the Transfer of European Data»](#) applies in this case. Meta promises therein to ensure an adequate level of data protection by relying on EU standard contractual clauses.

In addition, Meta is certified under the [EU-U.S. and Swiss-U.S. Data Privacy Frameworks](#).

With the help of Meta Pixel, it is possible for Meta to determine the visitors to our online offers as a target group for the display of advertisements (so-called «Facebook Ads», or «Instagram Ads»). Accordingly, we use Meta Pixel to display the Facebook and Instagram Ads placed by us only to those Facebook or Instagram users who have also shown an interest in our online offers or who have certain characteristics (e.g. interests in certain products determined on the basis of the websites visited), which we transmit to Meta (so-called «Custom Audiences»). With the help of Meta Pixel, we also want to ensure that our Facebook and Instagram Ads correspond to the potential interest of the users and do not have a harassing effect. With the help of Meta Pixel, we can also track the effectiveness of the Facebook and Instagram ads for statistical and market research purposes by seeing whether users are redirected to our website after clicking on a Facebook or Instagram ad (so-called «conversions»).

Furthermore, we use the additional function «automatic advanced matching» when using Meta Pixel. Here, data such as telephone numbers, email addresses, dates of birth or postal codes are sent to Meta in encrypted form as additional information, provided that you have made this data available to us. This enables us to increase the number of assigned «conversions» and to scale up our «custom audiences». You can find further information on «automatic extended matching» in [Meta's corresponding help section](#).

We also use the «Custom Audiences from File» method. This allows us to upload various customer information, such as email addresses, telephone numbers, first and last names, to Meta in encrypted form. Using this information, Meta can determine whether someone on Facebook or Instagram should be added to our advertising target group. We do this to ensure that ads are only shown to users who have an interest in our information and services.



More information about Customer File Custom Audiences can be found in the [relevant Meta help section](#).

Data processing by Meta takes place within the framework of [Meta's data policy](#). You can find general information about the display of Facebook and Instagram ads in this policy.

Through the use of cookies, Meta can subsequently recognize you in the member area of Facebook or Instagram and optimize the efficiency of advertisements, e.g. by offering advertisements targeted to specific groups. The prerequisite for this is that you have a Facebook and/or Instagram account and are logged into the member area of Facebook or Instagram. If you are not a member of Facebook or Instagram, you are not affected by this data processing.

General information about Meta's usage of data, your rights in this regard, and ways to protect your privacy can be found in [Meta's data policy](#). Specific information and details about Meta Pixel and how it works can be found in [Meta's help section](#). If you generally want to object to the collection by Meta Pixel and the usage of your data for the display of Facebook or Instagram ads, you can do this in [Facebook's advertising settings](#), or the [Instagram's privacy settings](#). To do this, you must be logged in to Facebook, or Instagram.

If you do not have a Facebook or Instagram account, you can also opt out of the use of cookies for reach measurement and advertising purposes via the [Network Advertising Initiative's opt-out page](#) and additionally on the US website [YourAdChoices](#) or the European website [Your Online Choices](#).

#### **4.10 X Analytics (formerly Twitter Analytics)**

Our website uses Twitter Analytics, a web analytics service provided by X Corp., based in the United States, or, if you are a habitual resident of the European Economic Area (EEA) or Switzerland, Twitter International Company, based in Ireland («X»).

X uses cookies. The information generated by the cookie about your use of our website may be transmitted to and stored by X on servers in the United States. X uses this information to evaluate the use of our website, to compile reports on website activity and to provide us with other services related to website and internet usage. Pseudonymous usage profiles can be created from the processed data. The IP address transmitted when using Twitter Analytics is not merged with other X data.

We use X Analytics for marketing and optimization purposes, in particular to analyze the use of our website and to continuously improve individual functions and offers as well as the user experience. Through the statistical evaluation of user behavior, we can improve our offer and make it even more interesting for you as a user.

The advertising services provided by X use cookies, mobile device IDs or hash values (irrevocably encrypted numerical values) for email addresses to recognize visitors to our website on its services and provide them with [advertising tailored to their interests and preferences](#).

You can prevent the installation of cookies by deleting the existing cookies and disabling the storage of cookies in the settings of your browser. We would like to point out that in this case you may not be able to use all the functions of our website. You can also prevent the collection of the above data by Twitter [by changing the settings](#) in your X account.

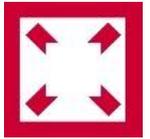
To protect your data, we have concluded a [«Data Processing Addendum»](#) with X. In this, X undertakes to ensure an appropriate level of data protection by applying the EU standard contractual clauses.

For more information on data processing and data protection at X, please see [X's privacy policy](#).

#### **4.11 Microsoft Advertising**

Our website uses Microsoft Advertising, an online marketing service provided by Microsoft Corporation, based in the United States, or, if you are a resident of the European Economic Area (EEA) or Switzerland, Microsoft Ireland Operations Limited, based in Ireland («Microsoft»).

We have embedded Microsoft's universal event tracking (UET) tag on our website. This tag enables us to analyze how you use our website if you arrive at our website via a Microsoft ad (so-called «conversion measurement»). To make this possible, Microsoft stores cookies on your terminal device after you have clicked on a Microsoft ad. In this way, Microsoft and we can recognize that someone clicked on an ad, was redirected to our website and reached a previously determined target page (so-called «conversion page»). We only learn the total number of users who clicked on an ad placed by Microsoft and were then redirected to the conversion page. We do not receive any information with which we can identify you personally.



In addition, Microsoft is certified under the [EU-U.S. as well as the Swiss-U.S. Data Privacy Framework](#).

If you do not wish to participate in the Microsoft Advertising tracking process, you can deactivate the setting of a cookie required for this via browser settings or use Microsoft's opt-out page «[Ad settings](#)».

For more information about privacy and Microsoft Advertising, please see the [Microsoft Privacy Statement](#) and the [Microsoft Advertising website](#).

#### **4.12 Microsoft Clarity**

We also use Clarity, an analysis service from Microsoft (see section 4.11), on our website («Clarity»).

Clarity enables us to better understand the needs of our website visitors and for optimization and marketing purposes as well as the interest-based design of our website. With the help of Clarity, movements on our website can be tracked (so-called "heatmaps") as well as the possibility through the display of animations (so-called «session recordings») to track all these user interactions, including individual sessions.

The information collected includes, in particular, interaction data (e.g. clicks, scrolls and mouse-overs) and diagnostic data (e.g. script and image errors). You can find out what information is processed by Clarity in detail here.

For more information on how Clarity works, see the [Clarity website](#), the [Clarity documentation](#), and the [Clarity FAQ](#). Regarding data protection at Microsoft, we refer you to section 4.11.

#### **4.13 LinkedIn Services**

We use various services on our website provided by LinkedIn Corporation, headquartered in the USA, or, if you are habitually resident in the European Economic Area (EEA) or Switzerland, LinkedIn Ireland Unlimited Company, headquartered in Ireland («LinkedIn»). We use the following LinkedIn services on our website:

- LinkedIn Marketing Solutions
- LinkedIn Conversion Tracking

More information on the individual services can be found below.

LinkedIn uses technologies such as cookies and pixels that enable an analysis of your usage of our website. Due to the structures of LinkedIn, it cannot be ruled out that your data will also be transferred to LinkedIn in the USA or to other countries where [subprocessors](#) of LinkedIn are located. To protect your privacy, we have concluded a «[Data Processing Agreement](#)» with LinkedIn, including EU standard contractual clauses.

For more information about the nature, purpose and scope of data processing, please refer to LinkedIn's [Privacy Policy](#), [Cookie Policy](#) and [Privacy Portal](#). In addition, you can object to personalized (LinkedIn) advertising by installing an [opt-out cookie](#), regardless of whether you are a LinkedIn member or not.

##### **4.13.1 LinkedIn Marketing Solutions**

We use LinkedIn Marketing Solutions («LMS») on our website. LMS stores and processes information about your user behavior on our website. For this purpose, LMS uses, among other things, cookies that are stored locally in the cache of your web browser on the respective end device used by you and enable an analysis of your use of our website.

We use LMS for marketing and optimization purposes, in particular to analyze the use of our website, to continuously improve individual functions and offers as well as the user experience, and to place ads that are relevant and interesting for you.

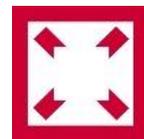
If you are logged into the member area of LinkedIn, LinkedIn can assign the use of our online offer to your profile. If you do not wish this to happen, you must log out of LinkedIn before visiting our website.

You can find more information on how this works on the [LinkedIn Marketing Solutions website](#).

##### **4.13.2 LinkedIn Conversion Tracking**

We use conversion tracking technology from LinkedIn on our website.

We use LinkedIn's technology for marketing and optimization purposes, in particular to analyze the use of our website, to continuously improve individual features and offers as well as the user experience, and to serve ads that are relevant and interesting to you. Furthermore, we receive aggregated and anonymous reports from LinkedIn about ad activities and information about how you interact with our website. To do this, LinkedIn uses a JavaScript code



(Insight tag), which in turn places a cookie in your web browser or uses a pixel.

According to LinkedIn, the LinkedIn Insight tag collects data about the use of our website, including information such as referrer URL, IP address, device and browser properties or time stamp. Data collected via the LinkedIn Insight tag is encrypted, IP addresses are shortened, and members' direct IDs are removed within seven days to pseudonymize the data. This remaining pseudonymized data is deleted within 90 days. LinkedIn does not share any personal data with us, but only provides aggregate reports on website audience and ad performance.

For more information on how LinkedIn Conversion Tracking works, please refer to the relevant [LinkedIn website](#).

#### 4.14 Criteo

We use Criteo, an online marketing service provided by Criteo SA, based in France, on our website («Criteo»).

Criteo enables us to show you personalized ads on the Criteo ad network.

For this to work, it is necessary that we or other partners of Criteo can recognize you. For this purpose, Criteo uses cookies and non-cookie technologies. This makes it possible to identify the device or the browser you are using, which enables targeted advertising. The advertisements displayed to you by Criteo are based, among other things, on the collection of information about your browsing activities. For example, Criteo collects information about which of our courses and/or tutorials you have viewed, added to your shopping cart, or purchased.

This information is transmitted to a Criteo server and processed there. In principle, your data may be disclosed to those countries in which [Criteo, its subsidiaries](#) or [partners](#) operate facilities. According to statements by Criteo, an adequate level of data protection is ensured, if necessary, by Criteo taking a number of measures, such as concluding EU standard contractual clauses with its partners.

If you do not wish to receive personalized advertising via the Criteo advertising network, Criteo offers you the possibility to deactivate the Criteo services on [internet browsers](#) as well as [mobile apps](#).

For more information about how Criteo works and your privacy, please see their [privacy policy](#).

#### 4.15 Social Media Presence

We maintain social media profiles on X, Facebook, Instagram, YouTube as well as LinkedIn.

The data you enter on our social media profiles is published by the social media platform and is not used or processed by us for any other purpose at any time. However, we reserve the right to delete content if this should be necessary. At most, we communicate with you via the social media platform.

This is based on your and our legitimate interest in exchanging information with each other in this way.

Be aware that the operator of the social media platform uses web tracking methods. The web tracking, over which we have no control, can also take place regardless of whether you are logged in or registered with the social media platform.

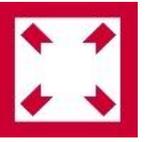
More detailed information on data processing by the provider of the social media platform can be found in the privacy policy of the respective provider:

Social Network	Provider	Data Protection Policy
X (formerly Twitter)	X Corp. (USA)/Twitter International Company (Ireland)	<a href="#">Privacy Policy</a>
Facebook	Meta Platforms Inc. (USA)/Meta Platforms Ireland Ltd. (Ireland)	<a href="#">Privacy Policy</a>
Instagram	Meta Platforms Inc. (USA)/Meta Platforms Ireland Ltd. (Ireland)	<a href="#">Privacy Center   Policy</a>
YouTube	YouTube LLC (USA)	<a href="#">Privacy Policy</a>
LinkedIn	LinkedIn Corporation (USA)/LinkedIn Ireland Unlimited Company (Ireland)	<a href="#">Privacy Policy</a>

We partially use social plugins of the above-mentioned social networks on our websites: With the help of these plugins, you can, for example, share our blog posts (see section 4.3 «Digicomp Blog»"); there you will also find further information on these plugins).

#### 4.16 Links to Third-Party Websites

Some links on this website lead to third-party websites. These are no longer under the influence of Digicomp. Digicomp therefore accepts no responsibility for the correctness, completeness and legality of the content contained therein and links to other websites, nor for any offers, products and services contained therein. The use of linked



websites is your own responsibility.