

## Privacy notice

This privacy notice governs how IC Products SA (“ICP”, “we”, “our” or “us”) collects, uses, maintains and discloses information from our distributors and clients and information from website visitors on the [icproducts.eu](http://icproducts.eu) website.

### What is personal data?

Personal data encompasses any information that can be directly or indirectly linked to you. Examples include your name, address, email address, telephone number,. Additionally, usage history, IP address, are also considered personal data, as are any other types of information you may provide when contacting us.

### Who is the controller of your personal data?

IC Products SA is responsible for the processing of personal data obtained through the site, directly from you or through your company's order in accordance with the EU General Data Protection Regulation (GDPR) , the Swiss Federal Act on Data Protection (FADP) and other applicable laws and regulations, because we determine how and why your personal data is processed.

### What personal data do we process, for what purposes and on what grounds?

Personal data (categories)	Purposes of processing	Legal basis
Personal information, which consist of: Contact information (First name and last name of the contacts at the client/ distributor side, position title, postal address, e-mail address, phone number)	<ul style="list-style-type: none"><li>• Maintaining an ongoing work relationship with the existing and new clients and distributors related to products, orders or any queries which can arise</li><li>• Managing orders,</li><li>• Collecting and organizing shipping of products</li><li>• Issuing invoices</li><li>• Sending you our newsletters</li><li>• Responding to binding requests or orders from authorities and</li></ul>	Performance of our contract; explicit consent; our legitimate interest to improve the quality of our products and services; or compliance with a legal obligation

	courts, auditors and comply with relevant legal and regulatory requirements.	
Contact information, the question/ text inserted in the form on the website	Managing communications based on the requests coming in from the webform on our website	Explicit consent
Comments, posts, any media content	To manage and maintain our social media activities	Explicit consent
Website Interaction Data, which consists of: Universal Unique identifier (UUID); Google Analytics User ID and IP address	To use cookies, Google Analytics, JavaScript, HTML 5 and other digital technologies to improve site functionality by tracking usage; to measure the effectiveness of our ads and other communications on social media platforms; to provide social media functionality; and to respond to binding requests or orders from authorities and courts and comply with relevant legal and regulatory requirements. You can find more information about Cookies in our Cookie policy	Explicit consent or compliance with a legal obligation

#### **How long will we keep your personal data**

The time for which we will keep your data will depend on the purposes for which we process them, as explained below.

<b>Purpose</b>	<b>Retention period</b>
Management of queries, contacts, orders collected via webform	We will process your data for the duration of the contract with the company up to 5 years after your last placed order or last communication with us

Development, execution of your order, and performance of the contract	Your data will be processed for the duration necessary to manage your orders, including logistics, handling potential returns, complaints, or claims related to your purchases. Some data, such as bank account details, billing and delivery address are stored for future orders
Client support	Your data will be processed for the duration necessary to address your requests
Marketing	We will process your data until you unsubscribe or cancel your newsletter subscription. Additionally, personalized ads will be displayed until you modify your mobile or browser settings to revoke permission. You can find more information about cookies in our Cookie policy.
Legal obligations, dispute resolution, and enforcement of our agreements	Your data will be processed until it is no longer necessary for the intended purpose

The storage period of personal data processed by our service providers and other third parties (see below) who are independent controllers is determined by their respective privacy notices.

#### **Your right to opt-out**

You have the right to opt-out of the use of your personal data by ICP for our mailing list or other direct marketing purposes at any time. You may do so by either clicking the unsubscribe option at the bottom of each email or by making a request to us via the following e-mail [admin@icproducts.ch](mailto:admin@icproducts.ch)

#### **Your rights in relation to your personal data**

It is important to us that your personal data is up to date and that you can exercise your rights under the GDPR. Under the GDPR, as a data subject you have the following rights:

<b>Your right</b>	<b>What does it mean?</b>	<b>Limitations and conditions of your right</b>
Right of access	Subject to certain conditions, you are entitled to have access to your personal data.	If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations.

		We must be able to verify your identity. Your request may not impact the rights and freedoms of other people, e.g., privacy and confidentiality rights of other staff.
Right to data portability	Subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used, machine readable format.	If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations. This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (i.e., not for paper records). It covers only the personal data that has been provided to us by you.
Rights in relation to inaccurate personal or incomplete data	You may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable.	This right only applies to your own personal data. When exercising this right, please be as specific as possible.
Right to object to or restrict our data processing	Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.	As stated above, this right applies where our processing of your personal data is necessary for our legitimate interests.
Right to erasure	Subject to certain conditions, you are entitled to have your personal data erased (e.g., where your personal data is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful).	We may not be in a position to erase your personal data, if, for example, we need it to (i) comply with a legal obligation, or (ii) exercise or defend legal claims.
Right to withdraw consent	As stated above, where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time.	If you withdraw your consent, this will only take effect for future processing.

We aim to deal with your question, request or complaint within 30 calendar days of receipt of such statement. In the unlikely event that the way we have dealt with your question, request or complaint does not meet your expectations, you have the right to file a complaint with the supervisory authority in the country of residence. You can submit a request to us via the following e-mail address: [admin@icproducts.ch](mailto:admin@icproducts.ch) There might also be circumstances in which we cannot accommodate a request, if that would prevent us from fulfilling certain legal obligations under applicable law.

### **Providing and sharing your personal data**

Your personal data is available and accessible only by those who need the data to accomplish the intended processing purpose. We may share your personal data with sub-contractors, partners and other third parties whenever needed to fulfil the intended processing purpose. In case

### **Transfer outside the EEA and Switzerland**

Any transfer of personal data to third parties located outside the European Economic Area (which includes all EU member states, as well as Iceland, Liechtenstein, and Norway) is carried out in accordance with the EU Standard Contractual Clauses to ensure an adequate level of data protection.

### **Services Providers and other Third Parties**

ICP may also receive and/or disclose your personal data from/with third parties including the below:

<b>Purpose</b>	<b>Category of recipients</b>
Order delivery	Logistical and transport services (Postal services, carriers and shipment service suppliers)
Payment processing	Payment service providers
Order fulfilment	Order management system providers
Managing and maintaining our client and distributor database	CRM database provider
Marketing and promotion	Social media platforms, online advertising platforms, newsletter provider
Enhanced conversions	Google Ads, Meta
Management and improvement of our website	Website service provider

To the extent that such third parties are data processors, they are contractually bound by ICP to only process data in accordance with ICP's instructions and applicable legal requirements. Some of these third parties, for example logistics providers, are

independent controllers, meaning that they determine the purposes for which and the way your personal data is processed.

## **Security**

To prevent unauthorized access and transmission, promote data security, and encourage appropriate use of information, we and our data processors use a variety of tools (encryption technologies, passwords, physical and electronic security, procedural safeguards) to assist in the protection of your information

## **Changes to this privacy notice**

ICP has the discretion to update this privacy notice at any time. When this happens, ICP will revise the updated date at the bottom of this page. frequently check this page for any changes.

## **Contacting us**

For questions about this privacy notice or the practices of the Site, you can contact ICP at Via Santa Maria 68a, c.p. 131  
6596 Gordola,

Switzerland or via email at [admin@icproducts.ch](mailto:admin@icproducts.ch)

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