

# PRIVACY POLICY

## 1 DATA PROTECTION OFFICER

Responsible body in terms of data protection laws, in particular the EU General Data Protection Regulation (GDPR) as well as the revDSG (CH), is:

<b>Address</b>	Real Estate Digital AG, Data Protection Officer, Badenerstrasse 16, CH-8004 Zurich
<b>Phone</b>	+41 44 50 96 30
<b>E-mail</b>	dataprotection@realmatch360.com
<b>Website</b>	<a href="https://www.realmatch360.com">https://www.realmatch360.com</a>

## 2 GENERAL NOTE

This Privacy Policy is designed to meet the requirements of the EU General Data Protection Regulation ("GDPR"), the Federal Act on Data Protection ("FADP") and the revised Swiss Data Protection Act ("revFADP"). However, whether and to what extent these laws are applicable depends on the individual case.

Based on Article 13 of the Swiss Federal Constitution and the federal data protection provisions (revised Data Protection Act, revDSG, see <https://www.fedlex.admin.ch/en/cc/internal-law/23>), every person is entitled to the protection of his or her privacy and to protection against misuse of his or her personal data.

The operators of these pages take the protection of your personal data very seriously. We treat your personal data confidentially and in accordance with the statutory data protection regulations and this privacy policy.

In cooperation with our hosting providers, we make every effort to protect the databases as well as possible from unauthorized access, loss, misuse or falsification.

We would like to point out that data transmission on the Internet (e.g. unencrypted communication by e-mail) may have security gaps. A complete protection of the data against access by third parties is not possible.

By using these websites, you consent to the collection, processing and use of data as described below. These websites can generally be visited without registration. Data such as pages accessed or the name of the file accessed, date and time are stored on the server for statistical purposes without this data being directly related to your person. Personal data, in particular name, address or e-mail address are collected as far as possible on a voluntary basis. Without your consent, the data will not be passed on to third parties.

The internal risk analysis of Real Estate Digital AG shows that the risk of a violation of personal rights or the provisions of data protection law within the framework of the websites currently operated and against the background of the installed protective mechanisms are to be considered as rather low. The processing of personal data is limited to the minimum necessary for the purpose of use, unless the data subject specifies otherwise.

There is no export of personal data.

These websites and the corresponding products are basically part of a B2B business model.

## 3 SCOPE

The FADP / revFADP applies to the processing of personal data of natural persons. However, the regulation does not apply to the processing of personal data of legal persons. The mere processing of customer data in business-to-business transactions with companies does not fall under the provisions of the DPA.

This Privacy Policy applies to the following Real Estate Digital websites and apps:

- Newsletter Realmatch360 Quarterly
- Website [realmatch360.com](https://www.realmatch360.com)
- Website App Online [app.realmatch360.com](https://app.realmatch360.com)

## 4 PROCESSING OF PERSONAL DATA

Personal data is any information that relates to an identified or identifiable person. A data subject is a person about whom personal data is processed. Processing includes any handling of personal data, regardless of the means and procedures

used, in particular the storage, disclosure, acquisition, deletion, modification, destruction and use of personal data.

We process personal data in accordance with Swiss data protection law. In addition, we process personal data - to the extent and insofar as the EU GDPR is applicable - in accordance with the following legal bases in connection with Art. 6 (1) GDPR:

Processing of personal data with the consent of the data subject.

Processing of personal data for the fulfillment of a contract with the data subject as well as for the implementation of corresponding pre-contractual measures.

Processing of personal data to comply with a legal obligation to which we are subject under any applicable law of the EU or under any applicable law of any country where the GDPR applies in whole or in part.

Processing of personal data to protect vital interests of the data subject or another natural person.

Processing of personal data to protect the legitimate interests of us or of third parties, unless the fundamental freedoms and rights and interests of the data subject override these. Legitimate interests are in particular our business interest in being able to provide our websites, information security, the enforcement of our own legal claims and compliance with Swiss law.

We process personal data for the duration required for the respective purpose or purposes. In the case of longer-term retention obligations due to legal and other obligations to which we are subject, we restrict processing accordingly.

## **5 DATA COLLECTION IN THE CONTEXT OF THE USE OF REALMATCH360 SERVICES**

Realmatch360 protects the privacy and personal information of its users. Realmatch360 collects the following personal information about its users within its Internet portal:

- Login information (username and password)
- Name and address

- E-mail address and business phone numbers
- Statistical information
- Demographic information
- Details on the use of our services

This also applies to any new user data transmitted to Digital Real Estate AG from existing cooperations with partner services. Realmatch360 uses the personal information to personalize the content and appearance of [www.realmatch360.com](http://www.realmatch360.com), to create and maintain user profiles, to deliver subscribed services, to deliver requested marketing information, to process, order and provide services, to create reports and statistics. Realmatch360 discloses identifying or sensitive information in collaboration with third parties solely for the purpose of fulfilling Users' orders. Data may be transmitted in encrypted or unencrypted form. The behavior of logged-in users is stored and analyzed within [www.realmatch360.com](http://www.realmatch360.com). Realmatch360 reserves the right to distribute data in aggregated form (e.g. as statistics) or to make it available to third parties.

Data from search subscriptions from various Swiss real estate search portals embody the data basis of the services offered by Realmatch360. This data is already delivered pseudonymized and encrypted and is accordingly protected from unwanted access and misuse.

## **6 MAINTENANCE OF THE DATA**

The user can adjust or delete his profile or log out from [www.realmatch360.com](http://www.realmatch360.com) at any time. The User's personal data can be edited only by the User. Upon the user's request, Realmatch360 may reset the user's password. Realmatch360 reserves the right to delete accounts with obviously incorrect or untrue information at any time.

## **7 PRIVACY STATEMENT FOR COOKIES**

These websites use cookies. These are small text files that make it possible to store specific information related to the user on the user's terminal device while the user is using the websites. Cookies make it

possible, in particular, to determine the frequency of use and number of users of the pages, to analyze behavior patterns of page use, but also to make our offer more customer-friendly. Cookies remain stored beyond the end of a browser session and can be retrieved when you visit the site again. If you do not wish this to happen, you should set your Internet browser so that it refuses to accept cookies.

A general objection to the use of cookies for online marketing purposes can be declared for a large number of services, especially in the case of tracking, via the U.S. site <http://www.aboutads.info/choices/> or the EU site <http://www.youronlinechoices.com/>. Furthermore, the storage of cookies can be achieved by disabling them in the browser settings. Please note that in this case not all functions of this online offer can be used.

For the analysis of the use as well as for the optimization of [www.realmatch360.com](http://www.realmatch360.com) and the instances mentioned above, Real Estate Digital AG uses Google Analytics. Google Analytics uses anonymized cookies that are stored on the user's computer. The resulting information (including the user's IP address) is forwarded to a Google server in the USA and stored there. Google uses this information to evaluate the use of the online portal [www.realmatch360.com](http://www.realmatch360.com) or [app.realmatch360.com](http://app.realmatch360.com) and compiles reports on website activity for website operators for the purpose of providing other services relating to website activity and internet usage. Google may share this information with third parties if required to do so by law, or if third parties are contracted to process this data. By using [www.realmatch360.com](http://www.realmatch360.com), users consent to the processing of data about them by Google in the manner and for the purposes set out above. Further information can be found in Google's privacy policy.

## 8 DATA TRANSMISSION SECURITY

Please note that data transmitted over an open network such as the Internet or an e-mail service without SSL encryption can be viewed by anyone. You can recognize an unencrypted connection by the fact that the address line of the browser shows "http://" and no lock symbol is displayed in the browser line. Information transmitted over the Internet and content received online

may be transmitted over third-party networks. We cannot guarantee the confidentiality of any communications or materials transmitted over such open or third-party networks.

If you disclose personal information via an open network or third-party networks, you should be aware of the fact that your data can be lost or third parties can potentially access this information and consequently collect and use the data without your consent. While in many cases the individual data packets are transmitted in encrypted form, the names of the sender and recipient are not. Even if the sender and the recipient reside in the same country, the data transfer via such networks often takes place without controls even via third countries, i.e. also via countries that do not offer the same level of data protection as your country of domicile. We assume no responsibility for the security of your data during transmission over the Internet and disclaim any liability for direct or indirect losses. We ask you to use other means of communication should you consider this necessary or reasonable for security reasons.

Despite extensive technical and organizational security precautions, it is possible that data may be lost or intercepted and/or manipulated by unauthorized persons. As far as possible, we take appropriate technical and organizational security measures to prevent this within our system. However, your computer is located outside the security area under our control. It is your responsibility as a user to inform yourself about the necessary security precautions and to take appropriate measures in this regard. As the website operator, we are in no way liable for any damages that you may incur as a result of data loss or manipulation.

Data that you provide in online forms may be passed on to third parties for the purpose of order processing and may be viewed and possibly processed by them.

## 9 PRIVACY POLICY FOR SERVER LOG FILES

The provider of these websites automatically collects and stores information in so-called server log files,

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which your browser automatically transmits to us. These are:

- Browser type and version
- Operating system used
- Referrer URL
- Host name of the accessing computer
- Time of the server request

This data cannot be assigned to specific persons. A combination of this data with other data sources is not made. We reserve the right to check this data retrospectively if we become aware of concrete indications of illegal use.

### 10 PRIVACY POLICY FOR CONTACT FORM

If you send us inquiries via the contact form, your data from the inquiry form including the contact data you provided there will be stored by us for the purpose of processing the inquiry and in case of follow-up questions. We do not pass on this data without your consent.

### 11 PRIVACY POLICY FOR NEWSLETTER DATA

If you would like to receive the newsletter (Quarterly) offered on [realmatch360.com](https://realmatch360.com), we require an e-mail address from you as well as information (last name, first name, company) that allows us to verify that you are the owner of the e-mail address provided and that you agree to receive the newsletter. Further data will not be collected. We use this data exclusively for sending the requested information and do not pass it on to third parties.

You can revoke your consent to the storage of data (e-mail address, last name, first name, company) and its use for sending the newsletter at any time, for example via the "unsubscribe link" in the newsletter.

## 12 THIRD PARTY SERVICES

### 12.1 PRIVACY POLICY FOR YOUTUBE

These websites may use Youtube for embedding videos.

These services of the American Google LLC use, among others,

as a result, data is transferred to Google in the USA, although we assume that no personal tracking takes place in this context solely through the use of our websites.

Google has committed to ensuring adequate data protection in accordance with the U.S.-European and U.S.-Swiss Privacy Shields. As of July 2023, the Privacy Shield agreement is in a terminated state and successor solutions are currently being worked out.

Further information can be found in [Google's privacy policy](https://policies.google.com/privacy) (<https://policies.google.com/privacy>).

### 12.2 NEWSLETTER AND ACCOUNT ACTIVATION EMAILS WITH CUSTOMER.IO

The newsletter is sent using the mailing service provider 'customer.io', a newsletter mailing platform located at 2175 NW Raleigh St Ste 110, Portland, OR 97210, United States. You can view the shipping service provider's privacy policy here: <https://customer.io/security/>. Customer.io is GDPR compliant. In July 2020, the European Union's highest court invalidated the Privacy Shield, which had previously helped protect data transfers between the EU and the US. In response to this new ruling, the shipping service provider has published its standard contractual clauses for the immediate protection of data, as well as established an EU region for the storage of Customer.io data.

The messaging platform is used on the basis of our legitimate interests pursuant to Art. 6 para. 1 lit. f DSGVO and a contract processing agreement pursuant to Art. 28 para. 3 p. 1 DSGVO.

The dispatch service provider may use the data of the recipients in pseudonymous form, i.e. without assignment to a user, to optimize or improve its own services, e.g. for the technical optimization of the dispatch and the presentation of the newsletter or for statistical purposes. However, the mailing service provider does not use the data of our newsletter recipients to write to them itself or to pass the data on to third parties.

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### 12.3 Performance measurements with Sentry.io

Sentry is used on these websites for application monitoring, which allows developers to detect, monitor, and report errors, bugs, and other performance issues in the applications. IP address data is collected and analyzed here.

The product is distributed by the following registered company: Functional Software, Inc, 45 Fremont Street, 8th Floor, San Francisco, CA 94105.

The sentry.io service itself is hosted in the Google Cloud.

Functional Software, Inc. participates in and complies with the EU-U.S. Privacy Shield Framework and Privacy Shield Principles with respect to the collection, use, and retention of data transferred from the European Union or the United Kingdom (as applicable) to the United States. Ensuring that the Privacy Shield Principles apply to all collected Personal Data subject to this Policy and received from the European Union or the United Kingdom.

The privacy policy of this service can be found here: <https://sentry.io/security/#data-security-and-privacy>

### 12.4 AUDIO AND VIDEO CONFERENCING

We use audio and video conferencing services to communicate with our users and others. In particular, we may use them to conduct audio and video conferences, virtual meetings, and training such as webinars.

We only use services for which an appropriate level of data protection is guaranteed. In addition to this privacy policy, any terms and conditions of the services used, such as terms of use or privacy statements, also apply.

In particular, we use Google Meet. Google Meet is a service provided by Google LLC, 1600 Amphitheatre Parkway Mountain View, CA 94043. Google Meet's privacy policy can be found here: <https://support.google.com/meet/answer/9852160>

### 12.5 SCHEDULING WITH COALENDAR

We use scheduling services for training, demonstration and sales purposes via Koalendar. The privacy policy of Koalendar can be found here:

<https://koalendar.com/privacy>. The requirements of the DSGVO are implemented by this provider without exception. No data from shared calendars will be stored or shared. The user is free to decline Koalendar's request for their personal data, with the understanding that this may prevent some of the requested services from being offered.

### 12.6 STRIPE FOR CREDIT CARD PAYMENTS

For credit card payments the processing service provider 'Stripe' is used. Here, email address, address and credit card data are collected for processing the transaction. The headquarters of the company Stripe is located in:

1 Grand Canal Street Lower, Grand Canal Dock, Dublin, D02 H210, Ireland

Stripe has privacy policies in effect. This Stripe Privacy Shield Policy describes the privacy practices that Stripe applies to personal data it receives from the EEA, the United Kingdom, or Switzerland, in accordance with the Privacy Shield.

You can find Stripe's privacy policy here:

<https://stripe.com/en-ch/privacy>

### 12.7 SOCIAL MEDIA PLUGINS

We also use so-called plug-ins from social networks such as Facebook, Twitter, YouTube, Pinterest or Instagram on our websites. This is apparent to you in each case (typically via corresponding icons). We have configured these elements so that they are disabled by default. If you activate them (by clicking on them), the operators of the respective social networks can register that you are on our website and where and can use this information for their purposes. The processing of your personal data is then the responsibility of this operator according to its data protection regulations. We do not receive any information about you from this process.

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### 13 RIGHTS OF PERSONS CONCERNED

#### 13.1 RIGHT TO CONFIRMATION

Every data subject has the right to request confirmation from the operator of these websites as to whether personal data relating to him or her are being processed. If you wish to exercise this right of confirmation, you may contact the data protection officer at any time.

#### 13.2 RIGHT TO INFORMATION

Every person affected by the processing with personal data has the right to receive information free of charge from the operator of these websites about the personal data stored about him or her and a copy of this information at any time. Furthermore, information may be provided about the following information, if applicable:

- the processing purposes
- the categories of personal data that are processed
- the recipients to whom the personal data have been or will be disclosed
- if possible, the planned duration for which the personal data will be stored or, if this is not possible, the criteria for determining this duration
- the existence of a right to obtain the rectification or erasure of personal data concerning them or to obtain the restriction of processing by the controller or a right to object to such processing
- the existence of a right of appeal to a supervisory authority
- if the personal data are not collected from the data subject: any available information on the origin of the data

Furthermore, the data subject shall have the right to obtain information as to whether personal data have been transferred to a third country or to an international organization. If this is the case, the data subject also has the right to obtain information about the appropriate safeguards in connection with the transfer.

If you wish to exercise this right to information, you can contact our data protection officer at any time.

#### 13.3 RIGHT OF RECTIFICATION

Every person affected by the processing of personal data has the right to demand that inaccurate personal data concerning him or her be corrected without delay.

Furthermore, the data subject has the right to request the completion of incomplete personal data - also by means of a supplementary declaration - taking into account the purposes of the processing.

If you wish to exercise this right of correction, you can contact our data protection officer at any time.

#### 13.4 RIGHT TO ERASURE (RIGHT TO BE FORGOTTEN)

Any person concerned by the processing of personal data has the right to obtain from the controller of these websites the erasure without delay of personal data concerning him or her, where one of the following reasons applies and insofar as the processing is not necessary:

- The personal data were collected or otherwise processed for purposes for which they are no longer necessary
- The data subject withdraws the consent on which the processing was based and there is no other legal basis for the processing
- The data subject objects to the processing on grounds relating to his or her particular situation and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing in the case of direct marketing and related profiling
- The personal data have been processed unlawfully
- The deletion of the personal data is necessary for compliance with a legal obligation under Union or Member State law to which the controller is subject
- The personal data was collected in relation to information society services offered, made directly to a child

If one of the above reasons applies, and you wish to arrange for the deletion of personal data stored by the operator of these websites, you can contact our data

protection officer at any time. The data protection officer of these websites will arrange for the deletion request to be complied with immediately.

### 13.5 RIGHT TO RESTRICT PROCESSING

Any person concerned by the processing of personal data has the right to obtain from the controller of these websites the restriction of the processing if one of the following conditions is met:

- The accuracy of the personal data is contested by the data subject for a period enabling the controller to verify the accuracy of the personal data.
- The processing is unlawful, the data subject objects to the erasure of the personal data and requests instead the restriction of the use of the personal data.
- The controller no longer needs the personal data for the purposes of processing, but the data subject needs it for the assertion, exercise or defense of legal claims.
- The data subject has objected to the processing on grounds relating to his or her particular situation, and it is not yet clear whether the legitimate interests of the controller override those of the data subject.

If one of the aforementioned conditions is met and you wish to request the restriction of personal data stored by the operator of these websites, you may contact our data protection officer at any time. The data protection officer of these websites will arrange the restriction of the processing.

### 13.6 RIGHT TO DATA PORTABILITY

Every person affected by the processing of personal data has the right to receive the personal data concerning him or her in a structured, common and machine-readable format. He or she also has the right to have this data transferred to another controller if the legal requirements are met.

Furthermore, the data subject has the right to obtain that the personal data be transferred directly from one controller to another controller, insofar as this is technically feasible and provided that this

does not adversely affect the rights and freedoms of other persons.

To assert the right to data portability, you can contact the data protection officer of these websites directly.

### 13.7 RIGHT OF APPEAL

Any person concerned by the processing of personal data has the right to object at any time, on grounds relating to his or her particular situation, to the processing of personal data concerning him or her.

The operator of these websites shall no longer process the personal data in the event of the objection, unless the operator can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or if the processing serves the purpose of asserting, exercising or defending legal claims.

To exercise the right to object, you can contact the data protection officer of these websites directly.

Right to revoke consent under data protection law

Every person affected by the processing of personal data has the right to revoke a given consent to the processing of personal data at any time.

If you wish to exercise your right to withdraw consent, you can contact our data protection officer at any time.

## 14 PRIVACY POLICY FOR OBJECTION ADVERTISING MAILS

The use of contact data published within the framework of the imprint obligation for the purpose of sending advertising and information material not expressly requested is hereby prohibited. The operator of the corresponding pages expressly reserves the right to take legal action in the event of the unsolicited sending of advertising information, such as spam e-mails.

## 15 SERVICES SUBJECT TO A CHARGE

For the provision of chargeable services, we request additional data, such as payment

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details, in order to be able to execute your order. We store this data in our systems until the statutory retention periods have expired.

### 16 PRIVACY POLICY FOR THE USE OF GOOGLE WEB FONTS

These websites use so-called web fonts provided by Google for the uniform display of fonts. When you call up a page, your browser loads the required web fonts into the browser cache in order to display texts and fonts correctly. If your browser does not support web fonts, a standard font is used by your computer.

For more information on Google Web Fonts, please visit <https://developers.google.com/fonts/faq> and see Google's privacy policy: <https://www.google.com/policies/privacy/>

### 17 PRIVACY POLICY FOR LINKEDIN

We use the marketing services of the social network LinkedIn of LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland ("LinkedIn") within our online offer.

These use cookies, which are text files that are stored on your computer. This allows us to analyze your website usage. For example, we can measure the success of our ads and show users products that you were previously interested in.

This includes, for example, information about the operating system, the browser, the website you previously visited (referrer URL), which websites you visited, which offers you clicked on, and the date and time of your visit to our websites.

The information generated by the cookie about your use of these websites is transferred pseudonymously to a LinkedIn server in the USA and stored there. LinkedIn therefore does not store the name or email address of the respective user. Rather, the above-mentioned data is only assigned to the person for whom the cookie was generated. This does not apply if the LinkedIn user has allowed processing without pseudonymization or has a LinkedIn account.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. You can also object to the use of your data directly at LinkedIn:

<https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

We use LinkedIn Analytics to analyze and regularly improve the use of our websites. The statistics obtained enable us to improve our offer and make it more interesting for you as a user. All LinkedIn companies have adopted the standard contractual clauses to ensure that the data traffic to the USA and Singapore necessary for the development, implementation and maintenance of the services takes place in a lawful manner. If we ask users for consent, the legal basis for processing is Art. 6 (1) lit. a DSGVO. Otherwise, the legal basis for the use of LinkedIn Analytics is Art. 6 para. 1 p. 1 lit. f DSGVO.

Third-party provider information: LinkedIn Ireland Unlimited Company Wilton Place, Dublin 2 Ireland; [User Agreement](#) and [Privacy Policy](#).

### 18 CHANGES

We may amend this privacy policy at any time without prior notice. The current version published on our websites applies. Insofar as the data protection declaration is part of an agreement with you, we will inform you of the change by e-mail or other suitable means in the event of an update.

### 19 QUESTIONS TO THE DATA PROTECTION OFFICER

If you have any questions about privacy, please write to us at [dataprotection@realmatch360.com](mailto:dataprotection@realmatch360.com).