Engenius.

Privacy Notice

Third-Party Data

Confidentiality PUBLIC

Document Number	NGNS-GDPR-0021
Revision / Version	4 / 1.2
Revision Date	01.06.2026
Created by	Pascal Rohner
Approved by	Dirk Engberg (CEO)
Status	Released

1 Document History / Change Log

Date	Revision / Version	Created by	Description of change
01.11.2020	1 / 1.0	Pascal Rohner	Initial Document Version
01.11.2022	2 / 1.1	Dirk Engberg	Periodic Review: added data storage location, changed Harvestapp owner, added Microsoft as Email Provider, added Zoho for CRM
01.11.2024	3 / 1.2	Dirk Engberg	Periodic Review: change revision period, company address
01.06.2026	4 / 1.2	Dirk Engberg	Updated phone number

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3 Scope

This Privacy Notice applies to the exchange of personal data between Engenius GmbH (further on referred to as the "Company") and all companies and individuals with an actual or potential business relationship to the Company, except for employees (permanent, temporary or contractors) of the Company: actual or prospect customers, actual or prospect suppliers, actual or prospect partners (further on referred to as "Third-Party" in this document)

4 What we need

Our Personal Data Protection Policy governs the use and storage of your data. You can request the Personal Data Protection Policy via Email dpo@engenius.ch. Engenius is a Controller of the personal data you (data subject) provide us. We collect the following types of personal data from you:

- Personal data, which are needed for an offer or a contract:
  full name, company address, company Email, company phone number, mobile number, company bank details
- Personal data for CRM management:
  full name, company address, company Email, company phone number, company mobile number, company bank details, sales prospects existing in connection with your person
- Proposed and signed offers and contracts
- Correspondence log:
  E-mail and correspondence via mail or other electronic channels

5 Why we need it

We need your personal data in order to provide you with the following services:

- Creation of offers and contracts
- Managing the Third-Party relationship with sales activities and sales prospects
- Creation and sending of marketing campaigns or newsletters
- Creation and sending of service update notifications
- Cooperation within the scope of projects or consulting services
- Business administration (Accounting; creditor management: issuing and tracking of invoices; debitor management: processing of invoices and issuing of payments)

6 What we do with it

Your data is stored in the respective cloud data services, that the Company is using for their respective purpose:

6.1 Email

The following services are used for managing, sending and receiving Emails:

- Google Workspace
- Microsoft 365

The data is stored on internationally distributed servers. Accordingly, this infrastructure is not intended for storing personal data. However, both services are GDPR compliant and default data location selected for Engenius is Switzerland.

If a Third Party engages in data exchange with us via Email, it is the responsibility of that Third Party to assure that no personal or sensitive data is transmitted via this channel. As Email transport by (technical) nature can be routed internationally and intercepted by others than the communicating parties, the Third Party accepts that the Company cannot be held responsible for any leak or loss of data sent via Email channel to the Company.

If the Third Party sends its own personal data via Email to the Company, it automatically waves any rights for the protection of that data by the Company.

If the Third Party sends personal data of others without their consent, that it controls via Email to the Company and this is recognized as such by an employee of the Company, a data security breach incident will be triggered, and the controlling party of that personal data is notified. The legal obligation to inform the owner i.e. the concerned of that personal data breach remains with the Third Party (the Data Controller) in such case.

For further information on Google's or Microsoft's personal data handling, refer to their latest privacy notice and their various published certifications and compliance documentation.

6.2 Project Related Data

Data that contains project related artefacts is stored in the "Engenius Secure Data Exchange" (further on referred to as the "Engenius Data Cloud"). Project related artefacts may contain the following personal data of the Third Party or its employees:

- Full Name
- Company Email-Address
- Company Phone Number
- Mobile Phone Number
- Position
- Information about presence at a given time at a given place (e.g. via Meeting Minutes)

The Engenius Data Cloud is hosted in Swiss hosting centres and managed by eqipe GmbH, all data is stored encrypted and not accessible by eqipe itself. Access to the data is regulated according to the need to know principle. This means that the data can only be accessed by those employees of the Company who need access in order to fulfil their role.
For further information on eqipe's personal data handling, see their privacy policy under:
https://eqipe.ch/impressum/
Upon request, project related data can be stored in the "Engenius Sensitive Data Store" instead.

6.3 Contract Related Data, CRM Data, Business Administration

Data that contains personal data relevant to contracts and contract fulfilment, as well as for accounting purposes and creditor/debitor management processes, are stored in the in the "Engenius Sensitive Data Store". Personal data may contain:

- Full Name
- Company Email-Address
- Company Phone Number
- Mobile Phone Number

- Position
- Information about presence at a given time at a given place (e.g. via Meeting Minutes)
- Scanned version of Signatures (on Contracts)
- Photos (for access control / authentication)
- Bank account details

The "Engenius Sensitive Data Store" is hosted in hosting centres managed by Tresorit AG, all data is stored end-to-end encrypted and not accessible by anyone not holding the primary key for decryption. Access to the data is regulated according to the need to know principle. This means that the data can only be accessed by those employees of the Company who need access in order to fulfil their role. Data storage location is enforced to SWITZERLAND. For further information on Tresorit's personal data handling, see their privacy policy under: https://tresorit.com/legal/privacy-policy

Engenius uses "Zoho" as Customer Relationship Management software. Personal data stored therein may contain:

- Full Name
- Company Email-Address
- Company Phone Number
- Mobile Phone Number
- Position
- Information about presence at a given time at a given place (e.g. via Meeting Minutes)
- Notes from communication via Telephone
- Email correspondence in relation to account management or lead preparation

Data is Zoho is stored in data centers in the EEA and is compliant to GDPR. For further details, see their privacy policy under: https://www.zoho.com/privacy.html

Business administration related data to manage and process invoices is stored within the cloud service "Harvestapp" by Bending Spoons US Inc, d/b/a Harvest, New York. Following personal data is stored:

- Company name and address of the Third Party
- Full name and email address of representatives of the Third Party

For further information on Tresorit's personal data handling, see their privacy policy under: https://www.getharvest.com/privacy-policy

7 How long we keep it

Under Swiss law, we are required to keep your documents (concerns financially relevant accounting documents and related business correspondence) for 10 Years according to the Data Retention Policy. After this period, your personal data will be irreversibly destroyed. Any personal data held by us for marketing and service update notifications will be kept by us until such time that you notify us that you no longer wish to remain in a business relationship with us.

8 What are your rights

Should you believe that any personal data we hold on you is incorrect or incomplete, you have the ability to request this information, rectify it or have it deleted (as far as permitted by applicable law). Please contact us via dpo@engenius.ch.

In the event that you wish to complain about how we have handled your personal data, please contact Data Protection Officer at dpo@engenius.ch. Our Data Protection Officer will then look into your complaint and work with you to resolve the matter.

9 Validity and document management

This document is valid as of 01.06.2026 and replaces all previous version.
The owner of this document is the Data Protection Officer (DPO), who must check and, if necessary, update the document at least once every two years.