

Data Protection Statement for Clients of Alphacruncher AG

24 May 2018

Identity of Entity collecting data

Alphacruncher AG and its Affiliates and Group Companies

For more information on the Alphacruncher Group of Companies please go to <http://alphacruncher.com/legal>

The specific Alphacruncher entity with which you have contracted will be set out in the Order Form or Agreement signed with you.

What personal data does Alphacruncher collect from its clients?

We collect limited personal information, such as name, email, phone number and address from our Clients in respect of themselves and the Client's authorized users of our products and services;

Why does Alphacruncher collect this personal data from its clients?

To fulfil our contractual obligations to our Clients. We use the personal data to administer and support the contracts we have with Clients and our Client's authorised users, including providing updates about the products and services Clients have bought or licensed, managing and dealing with enquiries Clients make to Alphacruncher, informing Clients of other Alphacruncher products and services that we feel may be of interest, and invoicing Clients.

Is Alphacruncher a "processor" or "controller" of personal data?

Alphacruncher confirms that, in connection with the performance of its obligations or exercise of its rights under the Order Form and / or Agreements it has in place with the Client, it will be processing personal data for its own purposes, and as such will be a data controller under GDPR.

Who has access to client personal data?

Only Alphacruncher staff within the Alphacruncher Group who need access to personal data to perform their roles have access to it and do so in accordance with Alphacruncher's Data Protection Policy. Alphacruncher uses a small number of third parties to provide systems and software for its administrative functions, such as sales processing, accounting / finance management and procurement. In such cases Alphacruncher remains controller of the personal data and the third parties only process the data in accordance with our instructions and we ensure such third parties are compliant with all applicable data protection regulations in relation to their processing activities.

How does Alphacruncher keep personal data secure?

Alphacruncher has in place technical and organisational measures to ensure a level of security appropriate to the nature, scope and purpose of its processing of personal data. Further information about Alphacruncher's security measures is available by contacting privacyenquiries@alphacruncher.com.

How long does Alphacruncher hold client personal data for?

Alphacruncher retains personal data only for as long as necessary to fulfil our contractual obligations. Individual jurisdictions have different tax, accounting, regulatory and legal retention requirements and Alphacruncher is bound to keep certain personal data in accordance with these local requirements.

Does Alphacruncher transfer and / or process data outside of the EU?

Alphacruncher is a global company and does transfer and process personal data outside of the EU for the purposes of fulfilling its contractual obligations to Clients. Alphacruncher ensures it has appropriate safeguards in place to protect the personal data and make available to data subjects enforceability of their rights and effective legal remedies.

How can a data subject contact Alphacruncher to exercise their rights in respect of the personal data held?

GDPR provides data subjects with rights in respect of their personal data, including the right to update or correct data, receive details of the personal data held, ask for the personal data to be erased or to be provided to another controller.

Alphacruncher has in place measures to ensure that these requests can be actioned within the statutory timescales set out under GDPR.

Data subjects should send their access requests to privacyenquiries@alphacruncher.com

Alphacruncher will respond to an access request as soon as possible and no later than within 30 days of request. In some cases, there may be reasons Alphacruncher cannot accede to a particular request, for example where local retention periods require the holding of personal data for a certain period of time or such data is required to perform our obligations or exercise our rights under an Order Form and/or Agreement. If we cannot accede fully to a data subject access request, we will respond as soon as possible with reasons.

Contact details of the Data Protection Officer

If you have any questions or comments about the information contained in this statement and/or any other privacy enquiries, including if you want to complain about Alphacruncher's collection and use of personal data, please contact:

The Data Protection Officer (DPO)
Alphacruncher AG
Via C. Maderno 24
6900 Lugano
Switzerland

Phone: +41 44 585 27 76

Email : privacyenquiries@alphacruncher.com

Right to lodge a complaint with the Regulator (“Data Protection Authority”)

If you have any concerns about Alphacruncher’s information rights practices, we would hope you would contact the DPO in the first instance. However, if you are still dissatisfied, you can complain to the relevant local Data Protection Authority via the links below.

Country	Authority	Website
Denmark	Danish Data Protection Agency (Datatilsynet)	www.datatilsynet.dk
France	Commission Nationale de l’Informatique et des Libertés (CNIL)	www.cnil.fr
Germany	Der Bundesbeauftragte für den Datenschutz und die Informationsfreiheit	www.bfdi.bund.de
Italy	Garante per la Protezione dei Dati Personali	www.garanteprivacy.it
Luxembourg	Commission Nationale pour la Protection des Données	www.cmpd.lu
Netherlands	College Bescherming Persoonsgegevens (CBP)	www.autoriteitpersoonsgegevens.nl
Norway	Datatilsynet	www.datatilsynet.no
Spain	Agencia de Protección de Datos	www.agpd.es
Sweden	Datainspektionen	www.datainspektionen.se
Switzerland	Eidgenössischer Datenschutz- und Öffentlichkeitsbeauftragter (EDÖB)	www.edoeb.admin.ch
UK	The Office of the Information Commissioner (ICO)	www.ico.org.uk https://ico.org.uk/concerns