

# MANGEAT

## PRIVACY POLICY

Version: 12 September 2018

This privacy policy prepared by MANGEAT ATTORNEYS AT LAW LLC (“MANGEAT”) describes the use of personal data pertaining to the **visitors** of the website [www.mangeat.ch](http://www.mangeat.ch), the **law firm’s clients** and **prospective clients**, other **contact persons** of the firm (in particular, suppliers of goods or services) and of any **other persons** about whom the firm obtains personal data.

### I. COLLECTION OF PERSONAL DATA BY MANGEAT

#### 1. What is “personal data” for the purpose of this policy?

All information (either in isolation or in combination with other information held by MANGEAT) relating to an identified or identifiable individual or legal entity.

#### 2. When may MANGEAT collect your personal data?

MANGEAT collects data when:

- a new client entrusts the firm (new mandate);
- the firm provides legal services (legal advice, representation before courts, etc.);
- an individual attends an event or a conference organised by the firm;
- a person contacts the firm through the website [www.mangeat.ch](http://www.mangeat.ch);
- a person follows the firm on MANGEAT’s LinkedIn page;
- a supplier of goods or services provides data to the firm.

#### 3. Which personal data may MANGEAT process?

MANGEAT processes the following personal data:

- **Basic information:** name, gender, title, organisation, e-mail address, phone number and other basic information pertaining to clients (and prospective clients) of the firm, persons with whom the firm enters into contractual relationships and pertaining to other persons whose personal data are communicated to the firm by clients or counterparties (e.g. employees of such clients or counterparties);
- **Identification data:** passport or other identifications documents, date of birth, beneficial ownership data and due diligence data pertaining to clients of the firm, persons with whom the firm enters into contractual relationships and pertaining to other persons whose personal data are communicated to the firm by the firm’s clients or counterparties;
- **Job applicant data:** data provided by job applicants or others on our website or otherwise, in connection with employment opportunities;
- **Registration data and marketing data:** data communicated to the firm within newsletter requests and event/seminar registrations, data about participants to conferences and in-person seminars, including association membership;
- **Financial information:** data provided by the concerned person for the provision of the firm’s legal services or for the payment of goods or services by the firm;
- **Client-related data:** data received from clients of the firm in respect of such client’s employees, customers, agents, suppliers or other persons known to such client, as well as invoicing details and payment history;

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- **Sensitive data** (in limited circumstances and when such information is provided by the concerned person or is necessary for the provision of the firm's legal services): data on legal proceedings and criminal convictions, health data, data on social security measures, religious, ideological, or political data, data pertaining to trade union-related views or activities, intimate sphere data, data on racial origin;
- **Other information:** other general information collected by the firm for any new mandate or collected from third parties for the account of clients of the firm, including data enabling conflict checks.

## 4. From what sources may such personal data come from?

MANGEAT collects data from various sources, either directly from the data subjects, clients, suppliers of goods or services, or from publicly available sources. Clients and suppliers of goods or services providing data to MANGEAT about their employees, customers, agents, suppliers or other individuals or legal entities are responsible for ensuring that such transfer is made in compliance with applicable data protection law.

## 5. What are the purposes of MANGEAT's data processing activities?

The main purposes for which MANGEAT processes personal data are the following:

- providing legal services to clients of the firm;
- managing client relationships, including for billing purposes;
- ensuring security and effective functioning of the website [www.mangeat.ch](http://www.mangeat.ch) and the firm's information technology system;
- considering individuals for employment and managing on-boarding procedures;
- considering individuals and legal entities for contractor purposes and managing the related contractual relationship;
- complying with the rules, laws and regulations applicable to MANGEAT.

MANGEAT also collects data for **marketing purposes**:

Subject to consent of the concerned person, MANGEAT may send publications from the firm (newsletters, legal updates, etc.) and other communications on the activities of the firm, conferences, seminars or events organised by the firm, or any other information related to the firm's activities.

You can withdraw your consent to such marketing communication at any time by sending an email to [info@mangeat.ch](mailto:info@mangeat.ch) or to your contact person at the firm. You may also use the [Contact page](#) available on the website.

## 6. With whom MANGEAT may share your personal data?

MANGEAT may share your personal data with the following categories of recipients:

- **Suppliers and service providers:** for the purpose of performing specific tasks or functions entrusted by the firm and under the firm's instructions, in particular in order to carry out the purposes set out above ([see 5. above](#)). They include: infrastructure and IT service providers, accounting firms, auditors, consultants who provides the firm with support relating to marketing, and providers or external venues where we host conferences, events, or other meetings.

MANGEAT requires such third parties to provide reasonable security to ensure confidentiality of your personal data, including against any unauthorised access or use of such personal data as well as against the accidental loss or deletion of such personal data. Furthermore, access to client data is strictly limited and the strictest confidentiality is applied to such data in compliance with professional rules applicable to the firm and its members.

- **Financial institutions:** for the purpose of invoicing and payments.
- **Courts, authorities, bodies, as well as opposing parties, counterparties, legal protection firms:** when and to the extent required for the provision of legal services to specific clients.

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MANGEAT may also share your personal data within the context of a mandatory disclosure and/or a legal claim: in particular, upon a court order, a regulator's or other governmental body or authority's request, or other legally enforceable demand, or for the purpose of protecting the firm's rights, property or safety of the rights, property or safety of others, or for the purpose of defending legal claims.

The firm may transfer personal data to third parties located in Switzerland or abroad. Please note that cross-border transfers may be made to countries that may not provide the same level of data protection than in Switzerland or your domicile, e.g. in the United States. Any transfers of personal data by MANGEAT to a third party is made in compliance with applicable rules governing data protection.

## 7. How long may MANGEAT keep your personal data?

Your personal data are kept for as long they are necessary for the purposes mentioned hereabove ([see 5. above](#)), and beyond provided it is required by legal obligations of MANGEAT.

Personal data collected based on the consent of the data subject are no longer kept by MANGEAT in case of withdrawal of such consent, except in limited circumstances where the processing of such personal data is necessary for exercising or defending a right or for compliance with legal obligations of MANGEAT (in this event, you will be informed accordingly).

The destruction of personal data is made according to MANGEAT's internal process.

## 8. Your rights

According to Swiss law, you are entitled, free of charge, to:

- **Access:** request information from MANGEAT as to whether MANGEAT processes any data concerning you; you may request a copy of such personal data;
- **Deletion or rectification:** request deletion, subject to exceptions (e.g. compliance by MANGEAT with its legal obligations) of your personal data processed by MANGEAT or the amendments of such personal data when inaccurate;
- **Information about transfer:** request information on the transfer of your personal data by MANGEAT to third parties.

As mentioned above, you may also inform us at any time of your **consent withdrawal** for any marketing communication made by the firm to your attention, by sending an email to [info@mangeat.ch](mailto:info@mangeat.ch) or to your contact person at the firm, or by using the [Contact page](#) available on the website.

## II. SECURITY AND ORGANISATIONAL MEASURES; CONFIDENTIALITY OF YOUR PERSONAL DATA

MANGEAT has taken necessary measures to ensure confidentiality of your personal data, including against unauthorised access or use of such personal data as well as against the accidental loss or deletion of such personal data.

## III. COOKIES

Cookies are text files stored on your computer, to enable analysis of usage of the website [www.mangeat.ch](http://www.mangeat.ch).

**Cookies placed by MANGEAT:** None.

No use of first-party cookies, i.e. cookies placed by MANGEAT, as operator of the website.

**Third-party cookies:** This website uses **Google Analytics**, a web analytics service provided by GOOGLE INC. Google Analytics uses cookies. Such cookies collect anonymous information, such as the number of visitors to the website, where they are from, the pages they visit and the length of time they spent on the website. This allows MANGEAT to improve your access to the website. Data associated with the cookies are retained

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for a limited period of time. When data reaches the end of the chosen retention period, it is deleted automatically on a monthly basis.

After closing your browser session, most of such cookies are deleted from your hard disk ("session cookies"). Other cookies remain on your computer ("permanent cookies") and permit its recognition on your next visit to the website.

Information generated by the cookies about your use of the website [www.mangeat.ch](http://www.mangeat.ch) is usually transmitted to a Google server in the United States and stored there.

You can prevent the storage of permanent cookies by choosing a "disable cookies" option in your browser settings.

For more information about the use of cookies for Google Analytics and to exercise choices regarding such cookies, you may visit [Google Analytics Opt-out Browser Add-on](#).

## **CONTACT US**

If you have questions or comments regarding this privacy policy or MANGEAT's privacy practice, please contact us here:

MANGEAT ATTORNEYS AT LAW LLC

Passage des Lions 6

P.O. Box 5653

1211 Geneva 11

[info@mangeat.ch](mailto:info@mangeat.ch)

This privacy policy may be amended from time to time. Any amendment will be included in a new version of this policy, posted on the website [www.mangeat.ch](http://www.mangeat.ch) and will be effective as of the date written in the heading of this privacy policy.