

PRIVACY POLICY

1. Introduction

- 1.1. This Privacy Policy describes how the Ascom Holding AG and all its subsidiaries and branches (together "**Ascom**") Process Personal Data (as defined subseq.).
- 1.2. Ascom is committed to guarantee a high level of data protection (as required by the EU General Data Protection Regulation ("**GDPR**")) for all its subsidiaries and branches, inclusive the ones located outside of the EU.
- 1.3. This Privacy Policy is not necessarily a comprehensive description of the Processing within Ascom. It is possible that other data protection statements are applicable (e.g. employee information) or that the Processing is evident from the circumstances or is provided for by applicable law.

2. Identity of the controller

- 2.1. The person which determines the purposes and means of the processing of Personal Data is deemed as the controller according to the GDPR. The controller is mainly responsible for the Processing.
- 2.2. For the purpose of this Privacy Policy, the controller is the respective subsidiary or affiliate of Ascom that obtains the Personal Data from its Customers (as defined below) by email, letter, telephone, personal contact etc. or operates the website or social media channel.
- 2.3. Further information about the Ascom group and the country locations can be found on Ascom's website:
<https://www.ascom.com/ch/de-ch/about-us/locations.html>

3. Processing of Personal Data

- 3.1. The term "**Personal Data**" shall mean all information relating to an identified or identifiable person, as set out section 3.5 hereinafter.
- 3.2. The term "**Process**" respectively "**Processing**" shall mean any operation which is performed on Personal Data (such as collection, recording, storage, adaptation, use, restriction, disclosure etc.).
- 3.3. Ascom Processes Personal Data of:
 - users of websites and social media channels of Ascom ("**User**");
 - parties (including their employees) purchasing and receiving or otherwise benefiting from products and services of Ascom;
 - suppliers (including their employees) delivering products and services to Ascom;
 - other collaborating parties (including their employees) of Ascom;
 - potential parties (including their employees) interested in products and services of Ascom;
 - recipients of newsletters or other electronic or printed information of Ascom;
 - participants of courses, seminars or other events organized by Ascom;
 - users of WIFI provided at Ascom locations;
 (all together "**Customer**").
- 3.4. Ascom collects the Personal Data generally directly from its Customer, meaning during the course of their use of the websites or other IT systems of Ascom or during their communication via email, telephone or in any other way with Ascom respectively its employees. However, Personal Data can also be collected indirectly, namely through distributors or resellers of Ascom or through other third party data sources (e.g. social media, address brokers etc.).
- 3.5. In particular, Ascom Processes the following categories of Personal Data of its Customers:
 - **Personal Data and contact information** including, but not limited to, first and last name, maiden name, address, telephone number, email address, age, date of birth, gender, marital status, relatives, information regarding emergency contact, picture, place of birth, nationality, information regarding debt prosecution and regarding sanction lists, work permits and residence permits etc.;
 - **data pertaining to orders and purchases** including, but not limited to, payment information, credit card details and other payment details, billing and shipping address, Customer name and number, VAT registration number, services ordered and purchased, information connected to queries, complaints and disagreements relating to products and services or respective contracts entered into such as warranty claims, rescissions and disputes etc.;
 - **data in connection with marketing** including, but not limited to, information such as newsletter opt-ins and opt-outs, documents received, invitations to and participations at events and special activities, personal preferences and interests, photos, videos etc.;
 - **data concerning the use of Ascom's websites** including, but not limited to, IP address and other identification such as e.g. user name of social

media, mac (media-access-control) address of smartphones or computers, cookies, date and time of website visits, visited sites and contents, referring websites etc.;

- **data in connection with communication** including, but not limited to, preferred means of communication, correspondence and communication (both in writing or orally disclosed) with Ascom etc.;
- **data in connection with job applications and recruitment** including, but not limited to, first and last name, title, curriculum vitae, graduation, associate degree, education etc.

4. Purposes of the Processing

- 4.1. In accordance with applicable law, Ascom may Process Personal Data namely for, but not limited to, the following purposes:
 - offering of products and services, conclusions and executions of contracts;
 - maintenance and development of customer relationships, communication, customer service and support (e.g. repair request took);
 - promotions, advertisement, events and marketing (including newsletters and mailing of promotional materials);
 - operation of websites, social media channels and further IT systems of Ascom;
 - security reasons, work place safety, safety and security of premises including entrance controls, system security;
 - statistics;
 - applicant management and recruitment, inclusive finding of suitable candidates;
 - compliance with legal and regulatory requirements and internal rules of Ascom, audits and controlling, financial accounting, enforcement and exploitation of legal rights and claims, defense against legal claims, litigation, complaints, engaging in legal investigations and proceedings and responding to inquiries of public authorities;
 - sale or acquisitions of business divisions, companies or parts of companies and other corporate transactions and the transfer associated therewith;
 - other purposes as far as a legal obligation requires the Processing and such Processing was evident from the circumstances or indicated at the time of the collection;
 (all together "**Purposes**").
- 4.2. Each Purpose for the Processing shall be applicable for the entire Ascom group, i.e. not only for the company which initially collected the Personal Data.

5. Legal grounds for the Processing

- 5.1. Ascom Processes the Personal Data on the following legal grounds:
 - compliance with legal obligations of Ascom;
 - performance of contracts;
 - consent of the Customer (only insofar as Personal Data is Processed after specific queries, can be withdrawn at any time, namely the receipt of newsletters for which the Customer has registered for);
 - legitimate interests of Ascom, including but not limited to
 - the protection of Customers, employees and other individuals as well as protection of data, secrets and assets of or entrusted to Ascom, security and safety of systems and premises of Ascom;
 - advertisement and marketing activities;
 - customer support, maintenance of contact and other communication with prospective Customers or other persons;
 - statistics and understanding of customer behavior, activities, concerns, market studies;
 - development and improvement of both existing and new products and services;
 - ensuring and maintenance of business operations, websites and other IT systems;
 - corporate governance and development;
 - successful sale and acquisition of business units, companies or parts of companies and other corporate transactions;
 - compliance with legal and regulatory requirements and internal rules of Ascom, concerns regarding the prevention of fraud, offences and crimes as well as investigation in connection with such offences and other improper conduct, handling of claims and actions against Ascom, cooperation in legal proceedings and with public authorities as well as the prosecution, exercise of and defense against legal actions;
- 5.2. Ascom may rely on one or several legal grounds for each individual Processing.

6. Disclosure of the Personal Data

- 6.1. In accordance with applicable data protection laws, Ascom may disclose Personal Data to the following categories of third parties:
- service providers (within Ascom as well as external), including processors;
 - dealers, suppliers and other business partners;
 - Customers of Ascom;
 - local, national and foreign authorities;
 - media, public, including visitors of websites and social media of Ascom;
 - stock exchange;
 - industry organizations, associations, organizations and other committees;
 - competitors;
 - acquirers and prospective acquires of business divisions, companies and other parts of Ascom;
 - other parties in potential or actual legal proceedings;
- (all together “**Third Parties**”).

- 6.2. The Third Parties Process the Personal Data in accordance with the Purposes on behalf of Ascom or for their own Purposes.

7. Transfer of Personal Data

We may disclose your Personal Data within Ascom as well as to Third Parties in every country worldwide, including namely all countries in which Ascom is represented by companies, affiliates or other offices and representatives as well as to countries in which service providers of Ascom Process their data. If Personal Data is disclosed to countries that do not guarantee adequate protection, we will ensure adequate protection of Personal Data by way of putting adequate contractual guarantees in place, namely on the basis of EU standard clauses, binding corporate rules or it bases the transfer on the exceptions of consent, conclusion or performance of contract, the establishment, exercise or defense of legal claims, overriding public interests or it discloses the data in order to protect the integrity of these individuals.

8. Storage of the Personal Data

As a rule, Ascom retains the Personal Data as long as the contractual relationship is ongoing and for ten years after the termination of the contractual relationship unless a longer statutory store obligation is applicable on a case-by-case basis. For operational data containing Personal Data (e.g. protocols, logs) shorter retention periods are applicable in general. Business records (including communication) will be retained as long as Ascom has an interest in them (namely an interest for reasons of proof in case of claims, documentation of compliance with certain legal or other requirements, an interest in non-personalized analysis) or is obligated to do so (by way of contract, law or other provisions).

9. Access, rectification or erasure of Personal Data

- 9.1. Any affected Customer may request information from Ascom regarding the Processing of the Personal Data. In addition, the Customers have the right to request the correction, destruction or restriction as well as to object to the Processing of Personal Data (“**Subject Rights**”).
- 9.2. Should the Processing of Personal Data be based on consent by Customer, the Customer may withdraw the consent at any time. However, such withdrawal shall not have retroactive effect.
- 9.3. In countries of the EU and EEA, the Customer may, in certain cases, has the right to obtain Personal Data generated during the use of online services in a structured, common and machine-readable format which allows for further use and transfer. Request in this respect shall be submitted to the data protection officer of Ascom (see para 11. subseq.).
- 9.4. Ascom reserves the right to restrict the Subject Rights in accordance with applicable law (e.g. not to disclose comprehensive information or not to delete data).
- 9.5. Ascom reserves the right to restrict the Subject Rights in accordance with applicable law (e.g. not to disclose comprehensive information or not to delete data).
- 9.6. Any requests and queries regarding data protection shall be submitted to Ascom’s data protection officer (see para. 11 subseq.).

10. Cookies and newsletters

- 10.1. Ascom uses cookies within the legal framework to track User preferences and to improve the design of its websites. Cookies are a widespread technique that allocates an identification to the browser of the User of a websites which the User saves and shows upon request. The User may block the application of

cookies on his browser or delete cookies there which may, however, impair the use of the website.

- 10.2. In accordance with applicable law, Ascom may send newsletters or other commercial communications in connection with its products and services to Customers. The respective Customer may object to a further mailing of newsletters or other commercial communications at any time by a link indicated in the mailing.

11. Google Analytics

Ascom may use Google Analytics (or similar services) on its website. These applications are third party services which allow Ascom to measure and analyse the use of its website. The provider of such such services may be located in any country worldwide (e.g. in the U.S.). The service provider uses permanent cookies for these applications. Ascom will not disclose any personal data to the service provider. However, the service provider may monitor the use of the website by the User and combines this data with data from other websites monitored by the same service provider which the User has visited and the services may use these findings for its own benefits. The service provider knows the identity of the User who has registered with the service provider. The service provider will provide data on the use of the website to Ascom.

12. Data Protection Officer and Customer requests

- 12.1. Ascom has appointed a data protection officer according to the provisions of GDPR.
- 12.2. Any requests and queries regarding data protection shall be submitted to Ascom’s data protection officer under the following contact: dpo@ascom.com.

13. Changes of the Privacy Policy

- 13.1. Ascom is entitled to amend this Privacy Policy at any time and without prior notice or announcement. The latest version according to the website shall be applicable.
- 13.2. Should the Privacy Policy form part of an agreement with Customers, Ascom may inform them of an up-date by email or in another appropriate manner. The update shall be deemed to have been accepted by the Customer unless an objection is raised within 30 days of notification.