

Privacy Policy

Last modified: March 2022

This privacy policy informs about the purpose, scope, and other personal data processing terms, as well as the rights of the data subject (“User, you”) arising from the use of our website www.globalpass.ch (“Website”).

By accessing and using the Website, you hereby consent to this Privacy Policy and agree to its terms.

1. Data Controller and contact information

The controller of personal data is GlobalPass AG, a Switzerland based company registered with the Swiss Companies Register under the company number CHE-497.420.514 (“we, us” and “GlobalPass”).

If you have any questions regarding this Privacy Policy, please contact our Data Protection Officer: dpo@globalpass.ch

Or send your inquiries by post:

GlobalPass
Attention DPO
Baarerstrasse 25
6300 Zug
Switzerland

2. What is GlobalPass and what legislation do we adhere to?

GlobalPass is a global identity verification company. We deliver a worldwide platform to verify customers online, anywhere, in seconds.

Because of our international reach, we adhere to the highest legislative standards, including the [Swiss Federal Act on Data Protection](#) and EU General Data Protection Regulation (Regulation). Regulation has been in force since May 2018 and regulates the data protection practices of any companies which deal with all personal data of private individuals in the EU, irrespective of whether these companies are based in the EU or not.

3. What information does GlobalPass collect through the Website?

We collect and process the User's personal data which the User provides to us for the following purposes:

- provision of information and answers to your questions and requests;
- registering for a free demo version of our services;
- provision of technical, service and other support;
- notification about changes and updates;
- newsletter and commercial communication subscription;
- anonymous statistics on the use of the Website;
- maintenance and improvement of the Website;
- compliance with our legal obligations and dispute resolution.

We collect only the data that we need to respond to your inquiries or to provide you with the services you request from us. Specifically:

- If you choose to subscribe to our newsletter and commercial communications, we will collect your name and your email information. Newsletters and commercial communications may be sent periodically with highlights and news about our industry and company.

You can unsubscribe from the newsletters and commercial communications at any time using the unsubscribe option provided at the bottom of each email from us or by sending an email to support(at)globalpass.ch with the subject line "UNSUBSCRIBE" from the email address you wish to unsubscribe.

- If you choose to contact us directly, we will process your e-mail information and any personal data you choose to include to the e-mail.
- If you choose to book a demo version of our services, we will collect and process your name, email, and any data you provide us via free text field.

4. Lawfulness of processing

We will process your personal data only on the following legal basis:

- 1) User has given consent to the processing of his personal data for one or more specific purposes;
- 2) processing is necessary for the performance of a contract to which the User is party or in order to take steps at the request of the User prior to entering into a contract;
- 3) processing is necessary for compliance with a legal obligation to which GlobalPass is subject;
- 4) processing is necessary in order to protect the vital interests of User or of another natural person;
- 5) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the GlobalPass;

- 6) processing is necessary for the purposes of the legitimate interests pursued by GlobalPass or by a third party.

5. Recipients of personal data

Users' personal data are processed by our employees and contractors who are authorized to work with personal data and are properly trained. Such persons process the User's data only for the purposes indicated above.

We do not disclose User's personal data to third parties, except:

- according to the clear and undeniable consent of User;
- to persons provided for by regulatory enactments in the manner and amount established therein;
- in cases provided for by regulatory enactments for the protection of legitimate interests.

Service providers, which provide us with services that include the processing of Users' personal data, belong to the following categories: website analytics services, website hosting and maintenance, IT development and management, cybersecurity services.

We guarantee and ensure that such third parties process the User's data in accordance with the agreement concluded between us and such third party and requirements contained therein, as well as that we always cooperate only with reliable partners who ensure strong compliance with data protection laws and regulations.

6. Your information may be transferred internationally

Personal information that you share through the Website may be transferred internationally, including to or through areas where the standards for data privacy differ from those in force in European Union and Switzerland.

Some of our service providers may be located in countries outside the European Union and Switzerland which the European Commission and Swiss Federal Data Protection and Information Commissioner has recognized as a country or territory, or one or more specific sectors as providing adequate protection. Such transfer does not require any special permission.

However, some of our service providers may be located in countries that are not recognized as providing adequate level of personal data protection. When transferring data to such service providers, we guarantee that we will take measures to ensure the protection of the personal data and rights of the Users, using legal tools approved in the relevant data protection legislation.

You can obtain information on such service providers and make your decision regarding transfer of your personal data to such service providers in our Cookies management tool available on the Website.

7. How long will your information be stored for?

We store Users' personal data for a limited period of time, which varies depending on the purpose of the data processing. After this period, the personal data of the Users will be permanently deleted or anonymized.

We store the received personal data until:

- Data is necessary for the purpose for which it was obtained (for example, to carry out User's request);
- The User or GlobalPass can exercise their legitimate interests in the manner prescribed by regulatory enactments (for example, to file objections or to initiate legal proceedings);
- There is a legal obligation to store personal data;
- User's consent to the corresponding processing of personal data is valid unless there is another legal basis for the processing.

Users' personal data is stored in accordance with the following rules and criteria:

- data collected for the registration for free demo services: will be stored till the end of demo period and for the purposes of commercial communication based on GlobalPass legitimate interests until the User unsubscribes from the communications;
- data collected in connection with the newsletter and commercial communications subscription: will be stored until the User unsubscribes from the newsletters;
- data related to User requests to our customer service: will be stored until the User request is fulfilled.

8. Will your information be disclosed to the third parties?

GlobalPass does not sell, trade, or otherwise transfer your personal data to third parties without your express consent.

GlobalPass may disclose your personal data in cases where such disclosure is necessary to comply with the law, enforce our site policies, or protect our or others' rights, property, or safety.

9. Security of data

When we process Users' personal data, we assess the risks of confidentiality and use our organizational, financial, and technical resources, which are necessary to ensure the security of processing personal data in accordance with the principles set forth in the respective data protection laws.

10. Third-party offers on the Website

Occasionally, at our discretion, we may refer to third-party products or services on our Website. These third parties have separate and independent privacy policies. GlobalPass has no responsibility or liability for, nor direct control over, the content and activities of these third parties.

11. Your rights regarding your information processed by GlobalPass

The User have the right to request from the GlobalPass access to and rectification or erasure of personal data or restriction of processing, to object to processing as well as the right to data portability. Where the processing is based on User's consent, User has the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

If you have a reason to believe that we violate your rights specified by law or these rules on data processing, you have the right to submit a complaint to the supervisory authority.

We will make commercially reasonable efforts to provide you with reasonable access to any of your personal data we maintain within 1 month as of receipt of your request.

Please note that all requests under the rights listed above must be made in writing either by letter or email to [dpo\(at\)globalpass.ch](mailto:dpo(at)globalpass.ch), and may require subsequent verification procedures to confirm the requestor's identity.

12. Changes to the Privacy Policy

We will, solely at our discretion, make changes or updates to this Privacy Policy from time to time. If we make changes, we will post those changes on this page, and update the Website Privacy Policy modification date at the top of this Privacy Policy.