



ADIVERA
GROUP

PRIVACY POLICY

Privacy Policy

Adivera AG

VERSION

1 October 2026

CONTROLLER

Adivera AG, Zurich

CONTACT

Roberto Hellmich

LAW

FADP · DPO · GDPR where applicable

Access, quietly.

Privacy Policy

This policy explains how Adivera AG processes personal data when you visit our websites adivera.com, adivera.ventures and adivera.software, contact us, use our services or apply for a position with us.

LANGUAGE / GOVERNING VERSION

This English text is a translation provided for convenience. The German version of this document is the legally binding one. In the event of any discrepancy or dispute regarding interpretation, the German version prevails.

1 Controller

The controller responsible for the data processing described in this Privacy Policy is:

Adivera AG	Dufourstrasse 49, 8008 Zurich, Switzerland
Company identification number	CHE-489.745.227
Monaco Office	Shangri-La, 11 Boulevard Albert 1 ^{er} , 98000 Monaco (office of Adivera AG, not a separate legal entity)
Telephone	+41 44 748 44 44
E-mail	info@adivera.com
Websites	adivera.com · adivera.ventures · adivera.software
Contact person for data protection matters (data protection advisor within the meaning of Art. 10 FADP)	Roberto Hellmich, reachable via the above contact details or the contact form on the website

Adivera AG, with its registered office in Zurich, is the controller in all cases. The Monaco Office is an office rented by Adivera AG and not a separate legal entity; it does not process personal data under its own responsibility.

2 Scope of Application and Applicable Law

This Privacy Policy applies to the websites adivera.com, adivera.ventures and adivera.software, including all subdomains (hereinafter jointly the "Website"). It informs you how we process personal data when you visit these websites, contact us, use our services or apply for a position with us.

We process personal data in accordance with Swiss data protection law, in particular the Swiss Federal Act on Data Protection (FADP) and the Data Protection Ordinance (DPO). Insofar and provided that the EU General Data Protection Regulation (GDPR) is applicable in an individual case, we additionally process personal data in accordance with its requirements.

3 Definitions

Personal data means all information relating to an identified or identifiable natural person. Processing comprises any handling of personal data, irrespective of the means and procedures applied, in particular the collection, storage, retention, use, modification, disclosure, archiving, deletion or destruction of personal data. A data subject is a natural person about whom personal data is processed.

4 Principles and Legal Bases

We process personal data in accordance with the principles of Art. 6 FADP, namely lawfully, in good faith, proportionately and for a specified purpose.

Insofar as the GDPR is applicable, we base the processing on the following legal bases: the consent of the data subject (Art. 6 para. 1 lit. a GDPR), the performance of a contract or the taking of pre-contractual steps (Art. 6 para. 1 lit. b GDPR), compliance with legal obligations (Art. 6 para. 1 lit. c GDPR), the protection of vital interests (Art. 6 para. 1 lit. d GDPR) or the safeguarding of legitimate interests (Art. 6 para. 1 lit. f GDPR), such as in the secure and economical operation of our online offering, in the maintenance of customer relationships and in communication with business partners.

5 Categories of Data Processed and Purposes

5.1 Visiting the Website (Server Log Files)

When you visit our website, the web server automatically collects technical data, namely the IP address, the date and time of access, the pages and files accessed, the browser type and version, the operating system used, the referrer URL and the host name of the accessing device. This data is processed in order to provide the website, to ensure system security and stability and for internal statistical purposes, and is not combined with other data sources. We reserve the right to evaluate the log data subsequently if there are specific indications of unlawful use. The log data is deleted after six months, unless longer retention is required to preserve evidence.

5.2 Contact Form and E-mail Contact

If you contact us via the contact form or by e-mail, we process the information you provide (in particular name, contact details and the content of the enquiry) in order to handle the enquiry and for any follow-up questions. We point out that the transmission of data by unencrypted e-mail may have security vulnerabilities.

5.3 Customer and Supplier Data

In the course of our business activities we process personal data of contact persons at customers, prospective customers, suppliers and partners (in particular name, position, business contact details, correspondence and contract data) for the initiation, conclusion and performance of contracts, for invoicing, for the maintenance of the business relationship and for compliance with statutory obligations.

5.4 Job Applications

In the case of job applications, we process the application documents transmitted to us exclusively for the purpose of conducting the application procedure. Insofar as application documents contain sensitive personal data (e.g. health data), we process such data only to the extent necessary for the application procedure or for compliance with obligations under employment and social insurance law. Upon completion of the procedure we delete the documents within six months, unless you have consented to longer retention (talent pool) or an employment relationship is entered into.

6 Cookies and Consent Management

Our website uses cookies and comparable technologies. Cookies are small text files that are stored on your end device. We distinguish between technically necessary cookies, which are required for the operation of the website, and optional cookies for statistical and analytical purposes.

We use technically necessary cookies on the basis of our legitimate interest in providing a functional website. We use optional cookies only if you have given your consent via the cookie consent banner displayed when the website is accessed. You may adjust or withdraw your consent at any time with effect for the future via the cookie settings on our website. The declaration of consent is stored in order to be able to provide evidence of it and to avoid having to repeat the request; the storage period is up to two

years. In addition, you can deactivate or delete cookies via your browser settings; this may restrict the functionality of the website.

7 Disclosure of Personal Data

We disclose personal data to third parties insofar as this is necessary for the performance of our contractual or statutory obligations, we are legally entitled or obliged to do so, or you have given your consent. Recipients may include, in particular, IT and hosting service providers, payment and financial service providers, authorities and advisors.

Insofar as we engage service providers as processors, we conclude contracts with them which meet the requirements of Art. 9 FADP (or Art. 28 GDPR) and ensure the protection of your data.

8 Cross-Border Disclosure

We process and store personal data in principle in Switzerland and in the European Economic Area (EEA). Individual service providers may also process personal data in other countries, in particular in the USA.

A cross-border disclosure takes place only if the recipient country has an adequate level of data protection pursuant to Annex 1 of the Data Protection Ordinance (DPO) (this applies, among others, to the states of the EEA and the Principality of Monaco). For the USA, this applies to companies certified under the Swiss-U.S. Data Privacy Framework (DPF); the certified companies can be viewed in the public DPF list (www.dataprivacyframework.gov). In other cases we base the disclosure on appropriate safeguards, in particular the standard data protection clauses approved or recognised by the competent supervisory authority, or on a statutory exception (e.g. your express consent or the necessity for the performance of the contract).

9 Third-Party Services Used

The fonts used on our website are hosted locally on our own servers; no data transmission to third-party providers takes place in this connection.

9.1 Google Analytics 4

We use Google Analytics 4, a web analytics service of Google Ireland Limited. Google Analytics uses cookies and similar technologies which enable an analysis of the use of our website. By default, the IP addresses of visitors are not stored by Google Analytics 4, but are used only for a rough determination of location and are truncated or discarded prior to storage. The information generated in the course of use may be transmitted to Google servers, including in the USA. Google LLC is certified under the Swiss-U.S. Data Privacy Framework. Use takes place exclusively with your consent given via our cookie banner; you may withdraw your consent at any time with effect for the future via the cookie settings. Further information: <https://policies.google.com/privacy>

10 Data Security

We take appropriate technical and organisational measures in accordance with Art. 8 FADP and Art. 1 et seq. DPO in order to protect your personal data against unauthorised access, loss, misuse or falsification. These include, in particular, the control of physical and electronic access, encryption, logging and ensuring the confidentiality, integrity and availability of the systems. Our website uses SSL/TLS encryption, recognisable by the "https://" and the padlock symbol in the address bar of your browser. However, complete protection of data against access by third parties is not possible in the case of transmission over the internet.

11 Retention Period

We process and store personal data for as long as this is necessary for the respective purpose, statutory retention obligations exist (in particular the ten-year retention obligation for business records under Art. 958f CO) or retention is necessary for the safeguarding of legal claims. Once the purpose ceases to apply or the periods have expired, the data is deleted or anonymised.

12 Rights of Data Subjects

Within the framework of the applicable data protection law you have, in particular, the following rights:

Right of access (Art. 25 FADP)

You may request information as to whether and which personal data we process about you.

Rectification (Art. 32 FADP)

You may request the rectification of incorrect personal data.

Deletion

You may request the deletion of your personal data, unless overriding interests or statutory obligations preclude deletion.

Data portability and transfer (Art. 28 FADP)

Under the statutory conditions you may request the release of your personal data in a commonly used electronic format or its transfer to another controller.

Objection

You may object to a processing of your personal data.

Withdrawal of consent

You may withdraw consent given at any time with effect for the future; the lawfulness of the processing carried out up to the withdrawal remains unaffected thereby.

Insofar as the GDPR is applicable, you are additionally entitled to the rights under Art. 15 to 21 GDPR (access, rectification, erasure, restriction of processing, data portability, objection).

In order to exercise your rights you may contact the contact person named in Section 1 at any time. We may request proof of identity. As a rule, we provide information within 30 days.

You furthermore have the right to lodge a complaint with the competent supervisory authority. In Switzerland this is the Federal Data Protection and Information Commissioner (FDPIC), Feldeggweg 1, 3003 Bern (www.edoeb.admin.ch).

13 Amendments to this Privacy Policy

We may amend this Privacy Policy at any time. The version published on our website as amended from time to time applies. We communicate material amendments in an appropriate manner.

14 Questions on Data Protection

If you have any questions on data protection, please contact the contact person named in Section 1 or write to us at info@adivera.com.

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Adivera AG