

# Privacy policy

In this **privacy policy**, we provide information on which personal data we process in connection with our **activities and operations**, including our **[https://www.mertoldemirelli.com/-Website](https://www.mertoldemirelli.com/)**. In particular, we provide information on how, where and for what purpose we process which personal data. We also provide information about the rights of persons whose data we process.

Further data protection declarations and other legal documents such as general terms and conditions, terms of use or conditions of participation may apply to individual or additional activities and operations.

We are subject to Swiss data protection law as well as any applicable foreign data protection law, in particular that of the European Union (EU) with the General Data Protection Regulation (GDPR). The European Commission [recognizes](#) that Swiss data protection law ensures adequate data protection.

## 1. Contact addresses

Responsibility for the processing of personal data:

**Mertol Demirelli**  
c/o Bénédikt Battig  
Quai des Arénières 4  
1205 Genève

[mertoldemirelli@gmail.com](mailto:mertoldemirelli@gmail.com)

In individual cases, there may be other controllers for the processing of personal data or joint controllership with at least one other controller.

## Data protection representation in the European Economic Area (EEA)

We have the following data protection representation in accordance with [Art. 27 GDPR](#):

**TBNA**  
TBNA

[mertoldemirelli@gmail.com](mailto:mertoldemirelli@gmail.com)

The Data Protection Representation serves data subjects and authorities in the European Union (EU) and the rest of the European Economic Area (EEA) as *an additional* point of contact for inquiries in connection with the GDPR.

## 2. Terms and legal bases

### 2.1 Terms

**Personal data** is *any* information relating to an identified or identifiable natural person. A **data subject** is a person about whom we process personal data.

**Processing** includes *any* handling of personal data, *regardless* of the means and procedures used, such as querying, comparing, adapting, archiving, preserving, reading, disclosing, procuring, recording, collecting, deleting, disclosing, arranging, organizing, storing, modifying, disseminating, linking, destroying and using personal data.

The **European Economic Area (EEA)** comprises the [member states of the European Union](#) (EU) as well as the Principality of Liechtenstein, Iceland and Norway. The General Data Protection Regulation (GDPR) refers to the processing of personal data as the processing of personal data.

### 2.2 Legal basis

We process personal data in accordance with Swiss data protection law, in particular the [Federal Act on Data Protection](#) (Data Protection Act, DPA) and the [Ordinance on Data Protection](#) (Data Protection Ordinance, DPO).

We process - if and insofar as the General Data Protection Regulation (GDPR) is applicable - personal data in accordance with *at least* one of the following legal bases:

- [Art. 6 para. 1 lit. b GDPR](#) for the necessary processing of personal data for the performance of a contract with the data subject and for the implementation of pre-contractual measures.
- Art. 6 para. 1 lit. f GDPR for the necessary processing of personal data in order to protect the legitimate interests of us or third parties, unless the fundamental freedoms and rights and interests of the data subject prevail. Legitimate interests

The main objectives are our interest in being able to carry out our activities and operations in a permanent, user-friendly, secure and reliable manner and to communicate about them, to ensure information security, to protect against misuse, to enforce our own legal claims and to comply with Swiss law.

- Art. 6 para. 1 lit. c GDPR for the necessary processing of personal data to fulfill a legal obligation to which we are subject under any applicable law of member states in the European Economic Area (EEA).
- Art. 6 para. 1 lit. e GDPR for the necessary processing of personal data for the performance of a task carried out in the public interest.
- Art. 6 para. 1 lit. a GDPR for the processing of personal data with the consent of the data subject.
- Art. 6 para. 1 lit. d GDPR for the necessary processing of personal data in order to protect the vital interests of the data subject or another natural person.

### **3. Type, scope and purpose**

We process the personal data that is *required* to carry out our activities and operations in a permanent, user-friendly, secure and reliable manner. Such personal data may fall into the categories of inventory and contact data, browser and device data, content data, meta or marginal data and usage data, location data, sales data as well as contract and payment data.

We process personal data for the *duration* required for the respective purpose(s) or by law. Personal data that no longer needs to be processed is anonymized or deleted.

We may have personal data processed *by third parties*. We may process personal data jointly with third parties or transfer it to third parties. Such third parties are in particular specialized providers whose services we use. We also guarantee data protection for such third parties.

*As a matter of principle*, we only process personal data with the consent of the data subject. If and to the extent that processing is permitted for other legal reasons, we may refrain from obtaining consent. For example, we may process personal data without consent in order to fulfill a contract, to comply with legal obligations or to protect overriding interests.

We also process personal data that we receive from third parties, obtain from publicly accessible sources or collect in the course of our activities and operations, if and to the extent that such processing is permitted by law.

## **4. Communication**

We process personal data in order to be able to communicate with third parties. In this context, we process in particular data that a data subject transmits when making contact, for example by post or e-mail. We may store such data in an address book or with comparable tools.

Third parties who transmit data about other persons are obliged to guarantee data protection for such data subjects. Among other things, the accuracy of the personal data transmitted must be ensured.

## **5. Data security**

We take suitable technical and organizational measures to ensure data security appropriate to the respective risk. With our measures, we ensure in particular the confidentiality, availability, traceability and integrity of the personal data processed, without being able to guarantee absolute data security.

Access to our website and our other online presence takes place using transport encryption (SSL / TLS, in particular with the Hypertext Transfer Protocol Secure, abbreviated to HTTPS). Most browsers indicate transport encryption with a small padlock in the address bar.

Our digital communication - like all digital communication *in general - is subject* to mass surveillance without cause or suspicion by security authorities in Switzerland, the rest of Europe, the United States of America (USA) and other countries. We cannot directly influence the corresponding processing of personal data by secret services, police forces and other security authorities. We also cannot rule out the possibility that individual data subjects may be subject to targeted surveillance.

## 6. Personal data abroad

We *generally* process personal data in Switzerland and the European Economic Area (EEA). However, we may also export or transfer personal data to other countries, in particular in order to process it or have it processed there.

We may export personal data to all [countries and territories on earth](#) and elsewhere in the [universe](#), provided that the law there guarantees adequate data protection in accordance with the [decision of the Swiss Federal Council](#) and - if and insofar as the General Data Protection Regulation (GDPR) is applicable - in accordance with the [decision of the European Commission](#).

We may transfer personal data to countries whose laws do not guarantee adequate data protection, provided that data protection is guaranteed for other reasons, in particular on the basis of standard data protection clauses or with other suitable guarantees. Exceptionally, we may export personal data to countries without adequate or appropriate data protection if the special requirements under data protection law are met, for example the express consent of the data subjects or a direct connection with the conclusion or execution of a contract. On request, we will be happy to provide data subjects with information about any guarantees or provide a copy of any guarantees.

## 7. Rights of data subjects

### 7.1 Data protection claims

We grant data subjects all rights in accordance with the applicable data protection law. Data subjects have the following rights in particular:

- **Information:** Data subjects can request information as to whether we process personal data about them and, if so, what personal data is involved. Data subjects also receive the information required to assert their data protection claims and ensure transparency. This includes the processed personal data as such, but also information on the purpose of processing, the duration of storage, any disclosure or export of data to other countries and the origin of the personal data.

- **Correction and restriction:** Data subjects can have incorrect personal data corrected, incomplete data completed and the processing of their data restricted.
- **Deletion and objection:** Data subjects can have their personal data deleted ("right to be forgotten") and object to the processing of their data with effect for the future.
- **Data disclosure and data transfer:** Data subjects may request the disclosure of personal data or the transfer of their data to another controller.

We may defer, restrict or refuse the exercise of the rights of data subjects to the extent permitted by law. We may inform data subjects of any requirements that must be met in order to exercise their rights under data protection law. For example, we may refuse to provide information in whole or in part with reference to business secrets or the protection of other persons. For example, we may also refuse to delete personal data in whole or in part with reference to statutory retention obligations.

In *exceptional cases*, we may charge costs for the exercise of rights. We will inform affected persons of any costs in advance.

We are obliged to take appropriate measures to identify data subjects who request information or assert other rights. Data subjects are obliged to cooperate.

## 7.2 Legal protection

Data subjects have the right to enforce their data protection claims by legal means or to lodge a complaint with a competent data protection supervisory authority.

[The Federal Data Protection and Information Commissioner \(FDPIC\)](#) is the data protection supervisory authority for complaints by data subjects against private controllers and federal bodies in Switzerland.

European data protection supervisory authorities for complaints from data subjects - insofar and to the extent that the General Data Protection Regulation (GDPR) is applicable - are organized as [members of the European Data Protection Board \(EDPB\)](#). In some member states in the

European Economic Area (EEA), the data protection supervisory authorities are federally structured, [particularly in Germany](#).

## **8. Use of the website**

### **8.1 Cookies**

We may use cookies. Cookies - our own cookies (first-party cookies) as well as cookies from third parties whose services we use (third-party cookies) - are data that are stored in the browser. Such stored data need not be limited to traditional cookies in text form.

Cookies can be stored in the browser temporarily as "session cookies" or for a certain period of time as so-called permanent cookies. "Session cookies" are automatically deleted when the browser is closed. Permanent cookies have a specific storage period. In particular, cookies make it possible to recognize a browser the next time it visits our website and thus, for example, to measure the reach of our website. However, permanent cookies can also be used for online marketing, for example.

Cookies can be completely or partially deactivated and deleted at any time in the browser settings. Without cookies, our website may no longer be fully available. We actively request - at least if and insofar as necessary - express consent to the use of cookies.

For cookies that are used to measure success and reach or for advertising, a general objection ("opt-out") is possible for numerous services via [AdChoices](#) (Digital Advertising Alliance of Canada), the [Network Advertising Initiative](#) (NAI), [YourAd- Choices](#) (Digital Advertising Alliance) or [Your Online Choices](#) (European Interactive Digital Advertising Alliance, EDAA).

### **8.2 Logging**

We may log at least the following information for each access to our website and our other online presence, insofar as this information is transmitted to our digital infrastructure during such access: Date and time including time zone, [IP address](#), access status (HTTP status code), operating system including user interface and version, browser including language and version, individual sub-pages of our website accessed, and the name of the user.

site including the amount of data transferred, last website accessed in the same browser window (referrer).

We record such information, which may also constitute personal data, in log files. The information is required in order to provide our online presence in a permanent, user-friendly and reliable manner. The information is also required to ensure data security - also by third parties or with the help of third parties.

### **8.3 Tracking pixel**

We can integrate tracking pixels into our online presence. Tracking pixels are also known as web beacons. Tracking pixels - including those from third parties whose services we use - are usually small, invisible images or scripts written in JavaScript that are automatically retrieved when our online presence is accessed. Tracking pixels can be used to collect at least the same information as log files.

## **9. Social Media**

We are present on social media platforms and other online platforms in order to communicate with interested persons and to provide information about our activities and operations. In connection with such platforms, personal data may also be processed outside Switzerland and the European Economic Area (EEA).

The general terms and conditions (GTC) and terms of use as well as data protection declarations and other provisions of the individual operators of such platforms also apply. In particular, these provisions provide information about the rights of data subjects directly vis-à-vis the respective platform, including, for example, the right to information.

We are jointly responsible with Meta Platforms Ireland Limited (Ireland) for our **social media presence on Facebook**, including the so-called Page Insights, insofar as and to the extent that the General Data Protection Regulation (GDPR) is applicable. Meta Platforms Ireland Limited is part of the [Meta companies](#) (including in the USA). The Page Insights provide information about how visitors interact with our Facebook presence. We use Page Insights to provide our social media presence on Facebook in an effective and user-friendly way.

Further information on the type, scope and purpose of data processing, information on the rights of data subjects and the contact details of Facebook as well as the data protection officer are available on Facebook.

Facebook's data protection officer can be found in [Facebook's privacy policy](#). We have concluded the so-called "[Controller Addendum](#)" with Facebook and thus agreed in particular that Facebook is responsible for guaranteeing the rights of data subjects. For the so-called Page Insights, the corresponding information can be found on the page "[Information on Page Insights](#)" including "[Information on Page Insights data](#)".

## 10. Third party services

We use the services of specialized third parties in order to be able to carry out our activities and operations in a permanent, user-friendly, secure and reliable manner. Among other things, we can use such services to embed functions and content in our website. In the case of such embedding, the services used collect the [IP addresses](#) of users at least temporarily for technically compelling reasons.

For necessary security, statistical and technical purposes, third parties whose services we use may process data in connection with our activities and operations in aggregated, anonymized or pseudonymized form. This is, for example, performance or usage data in order to be able to offer the respective service.

We use in particular:

- **[Google services](#)**: Provider: Google LLC (USA) / Google Ireland Limited (Ireland) for users in the European Economic Area (EEA) and Switzerland; General information on data protection: "[Privacy and Security Principles](#)", [Privacy Policy](#), "[Google is committed to complying with applicable data protection laws](#)", "[Privacy Guide for Google Products](#)", "[How we use data from websites or apps on or in which our services are used \(information provided by Google\)](#)", "[Types of cookies used by Google and other technologies](#)", "[Personalized advertising \(activation / deactivation / settings\) \(information from Google\)](#)", "[Types of cookies and other technologies used by Google](#)", "[Personalized advertising \(activation / deactivation / settings\)](#)".

### 10.1 Digital infrastructure

We use the services of specialized third parties in order to make use of the necessary digital infrastructure in connection with our activities and operations. These include, for example, hosting and storage services from selected providers.

We use in particular:

- **Jimdo**: Website builder; Service provider: Jimdo GmbH (Germany); Privacy Policy: [Privacy Policy](#), [Cookie Policy](#).

## **10.2 Social media functions and social media content**

We use third-party services and plugins to embed functions and content from social media platforms and to enable the sharing of content on social media platforms and in other ways.

We use in particular:

- **Facebook (social plugins)**: Embedding Facebook functions and Facebook content, for example "Like" or "Share"; Provider: Meta Platforms Ireland Limited (Ireland) and [other Meta companies](#) (including in the USA); Data protection information: [Privacy policy](#).
- **Instagram platform**: Embedding Instagram content; Service provider: Meta Platforms Ireland Limited (Ireland) and [other Meta companies](#) (including in the USA); Data protection information: [Privacy Policy \(Instagram\)](#), [Privacy Policy \(Facebook\)](#).

## **10.3 Digital audio and video content**

We use services from specialized third parties to enable the direct playback of digital audio and video content such as music or podcasts.

We use in particular:

- **YouTube**: Video platform; Service provider: Google; YouTube-specific information: ["Privacy and Security Center"](#), ["My data on YouTube"](#).

## **11. Extensions for the website**

We use extensions for our website in order to be able to use additional functions. We may use selected services from suitable providers or use such extensions on our own server infrastructure.

We use in particular:

- **Google reCAPTCHA**: Spam protection (differentiation between desired content from humans and unwanted content from bots and spam); Service provider: Google; Google reCAPTCHA-specific information: "[What is reCAPTCHA?](#)". ("[What is reCAPTCHA?](#)").

## 12. Success and reach measurement

We try to determine how our online offering is used. In this context, we can, for example, measure the success and reach of our activities and operations as well as the effect of third-party links to our website. We can also, for example, test and compare how different parts or versions of our online offering are used ("A/B test" method). Based on the results of the success and reach measurement, we can in particular correct errors, strengthen popular content or make improvements to our online offering.

In most cases, the [IP addresses](#) of individual users are stored to measure success and reach. In this case, IP addresses are *generally* shortened ("IP masking") in order to comply with the principle of data minimization through the corresponding pseudonymization.

Cookies may be used to measure success and reach and user profiles may be created. Any user profiles created include, for example, the individual pages visited or content viewed on our website, information on the size of the screen or browser window and the - at least approximate - location. *In principle*, any user profiles are only created in pseudonymized form and are not used to identify individual users. Individual third-party services with which users are registered may be able to assign the use of our online offering to the user account or user profile with the respective service.

We use in particular:

- **Google Analytics**: Performance and reach measurement; Service provider: Google; Google Analytics-specific information: Measurement also across different browsers and devices (**cross-device tracking**) and with pseudonymized IP addresses, which are only transmitted in full to Google in the USA *in exceptional cases*, "[Data protection](#)", "[Browser add-on to deactivate Google Analytics](#)".

## **13. Final provisions**

We have created this privacy policy with the [privacy policy generator](#) of [Datenschutzpartner](#).

We may amend and supplement this privacy policy at any time. We will inform you of such amendments and additions in an appropriate form, in particular by publishing the current data protection declaration on our website.