



## **Privacy Policy of LP<sup>3</sup> AG concerning the website [www.octocracy.swiss](http://www.octocracy.swiss)**

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The following privacy policy applies to the use of our website <https://www.octocracy.swiss/> hereinafter referred to as "website".

We take data protection very seriously. Depending on the type of personal data processing, in addition to the applicable Swiss law (Federal Act on Data Protection (FADP) of 19 June 1992, SR 235.1), European data protection law (Regulation (EU) 2016/679 (GDPR)) and other national laws of the European states may also or exclusively apply; namely, in particular within the scope of this data protection declaration concerning the observation of the behaviour of data subjects residing in the EU (Art. 3 para. 2 let. b GDPR).

This privacy policy does not apply to linked websites of other providers or websites from which links are made to our website, nor to the processing of personal data of our employees and customers.

#### Legend:

-  Machining operation
-  Processed personal data
-  Purpose
-  Legal basis of the data processing
-  Necessary for functionality of the web pages
-  Storage period
-  Contractual agreements

## 1 Contact details

### Responsible

LP<sup>3</sup> AG  
General-Dufour-Strasse 18  
2502 Biel/Bienne, Switzerland  
[david.fiorucci@lp3leadership.com](mailto:david.fiorucci@lp3leadership.com)  
0041 (0)78 818 40 18  
<https://www.lp3leadership.com>

### Data protection officer

LP<sup>3</sup> AG  
Data Protection Officer  
General-Dufour-Strasse 18  
2502 Biel/Bienne, Switzerland  
[datenschutz@lp3Leadership.com](mailto:datenschutz@lp3Leadership.com)  
0041 (0)78 818 40 18  
<https://www.lp3leadership.com>

### Supervisory authority

Federal Commissioner for Public Information and Data Protection, FDPIC  
Feldeggweg 1  
3003 Bern, Switzerland  
<https://www.edoeb.admin.ch/edoeb/de/home.html>

### Representative in the European Union

Martin Weinbrenner  
Ob den Gärten 18  
76133 Karlsruhe, Germany  
[martin.weinbrenner@heartbeat-business.de](mailto:martin.weinbrenner@heartbeat-business.de)  
0049 (0) 175 1679718  
<https://martinweinbrenner.com/>

### LP3 AG

Eidochsweg 23  
2504 Biel/Bienne, Switzerland  
+41 78 818 40 18, [www.lp3leadership.com](http://www.lp3leadership.com)

## 2 Which data we use and why

### 2.1 Data from visitors of our website



We collect information about visitors of our website (hereinafter "visitors"). Information about the usage behaviour and interactions of visitors with our website is automatically recorded.

We reserve the right to subsequently check the log data if there is a justified suspicion of illegal use based on concrete evidence. We store IP addresses for 6 months in the log files if this is necessary for security purposes or if it is necessary for the provision of a service or the invoicing of a service, e.g. if you use one of our offers.



We collect, store and use personal data of visitors of our website (so-called server log files), namely

- IP address and service provider
- Date and time of the visit
- Computer and browser information of the visitor
- Visit information (e.g. referrer URL, web pages visited, etc.)



We use this log data without allocation to a person or other profiling for statistical evaluations for the purpose of operating, securing and optimising our website, but also for anonymous recording of the number of visitors of our website (traffic) and the extent and type of use of our website and services. Based on this information, we can analyse the data traffic, find and correct errors and improve our services.



The processing is based on our legitimate interests to optimise the website in accordance with Art. 13 para. 1 FADP and Art. 6 para. 1 let. f GDPR.



The mentioned data are not necessary in the context of the website functionality.



The log data of the visitors are automatically anonymised after 6 months.



The website is hosted by a third-party provider in Switzerland. We have concluded appropriate agreements with the third party providers which have access to this personal data.

## 2.2 Contact / Order



If you contact us (e.g. via contact form or e-mail) or place an order, we process the information provided to process the enquiry and in the event that follow-up questions arise.



We process the following data for contact or ordering purposes:

- Name
- E-mail address
- Message/Inquiry
- Address and order details (when ordering)



The data will be used for the purpose of answering your request or to fulfill your order.



When the data processing is carried out to implement pre-contractual measures which are carried out at your request or, if you are a customer, to implement the contract, the data processing is based on Art. 13 para. 2 let. a FADP and Art. 6 para. 1 let. b GDPR)..

We only process other personal data if you give your consent (Art. 13 para. 1 FADP or Art. 6 para. 1 let. a GDPR) or if we have a legitimate interest in processing your data (Art. 13 para. 1 FADP or Art. 6 para. 1 let. f GDPR). A legitimate interest lies, for example, in replying to your e-mail.



The processing of this personal data is necessary to contact you or to fulfill your order.



We will keep your contact details and order information for a period of 10 years after completion of the business transaction.



The contact requests are sent to us by e-mail.

## 2.3 Cookies

### 2.3.1 Fundamentals about cookies



We use cookies on our website. These are small text files that are automatically created by the browser and stored on the end device (laptop, tablet, smartphone etc.) when our site is visited. A cookie does not always mean that we can identify the visitor.

We distinguish between technically necessary and technically not necessary cookies. Technically necessary cookies serve the functionality of our website and are necessary for the use of our offers. The legal basis is therefore based on our legitimate interest (Art. 13 para. 1 FADP or Art. 6 para. 1 let. f GDPR). Cookies that are not technically necessary are often used for tracking or when

using external plug-ins. These cookies are only used with the visitor's express consent (Art. 13 para. 1 FADP or Art. 6 para. 1 let. a GDPR).

In the default setting of most Internet browsers, cookies are automatically accepted. When the visitor does not wish to have cookies from our website stored on his device, he can configure his web browser settings so that a warning appears before certain cookies are stored. The web browser settings can be configured in such a way that the web browser blocks cookies that are not technically necessary and only allows certain cookies or blocks all cookies. You can also withdraw your consent to certain cookies by deleting the cookies already stored.

Further information regarding cookies can be found on the websites of the relevant browser platforms:

- Internet Explorer
- Microsoft Edge
- Mozilla Firefox
- Google Chrome
- Safari
- Opera

Please note that partial or complete deactivation of cookies may mean that you will not be able to use all functions of our website.

## 2.3.2 Own technically necessary cookies

### 2.3.2.1 Cookies for the use of the login function



We use so-called session cookies in order to assign the visitor to his session during the entire visit on our website. This cookie contains a so-called session ID, with which various browser requests can be assigned to the common session. This enables us to recognise a visitor's computer when he or she returns to our website. They are used, for example, to use the login function over several pages.



The following information is stored in the aforementioned session cookie:

- Identification number of the cookie



The session cookies are processed for the purpose of using a login function and to optimise our website.



The processing is based on our legitimate interest (Art. 13 para. 1 FADP and Art. 6 para. 1 let. f GDPR) so that the functionality of our services can be guaranteed.



The session cookies are necessary for the functionality of the website.



These cookies are deleted after you close your browser.

### 2.3.2.2 Language cookie



We use cookies on our website so that the selected language of the visitor is stored. The visitor only has to select the language once and the website retrieves this information from the cookie.



The following information is stored in the mentioned cookie:

- Identification number of the cookie
- Language



The cookies are used for the purpose of remembering the visitor's preferred language.



The processing is based on our legitimate interest (Art. 13 para. 1 FADP and Art. 6 para. 1 let. f GDPR) so that the functionality of our services can be guaranteed.



The cookies are necessary for the functionality of the website.



These cookies are deleted after one year.

### 2.3.2.3 Cookies to record your consent



We use a logging cookie to store your personal user settings regarding cookies on our website.



The following information is stored in these cookies:

- Identification number of the cookie
- Acceptance of cookies (Yes, No)



The processing is done to re-identify your personal cookie settings on our website.



The processing is based on our legitimate interest (Art. 13 para. 1 FADP and Art. 6 para. 1 let. f GDPR) so that the functionality of our services can be guaranteed.



The use of this cookie is necessary for the operation of our website.



The cookie is automatically deleted from your system after one year.

## 2.3.3 Technically necessary cookies from third parties

### 2.3.3.1 YouTube



On the website, functions of the YouTube service are integrated. These functions are offered by YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA.

We have integrated YouTube videos into our online offering, which are stored at <https://www.YouTube.com> and can be played directly from our website. These are all embedded in "enhanced privacy mode", which means that no data about your user behavior is transferred to YouTube when you play the videos.



If you choose to play a YouTube video, YouTube receives information about your IP address and that you have visited our site.

For more information, please see the YouTube privacy policy at <https://www.google.de/intl/de/policies/privacy>.



We use the YouTube feature to make our website more interactive and improve the user experience.



The data processing is based on our legitimate interest (Art. 13 para. 1 FADP and Art. 6 para. 1 let. f GDPR) so that the functionality of our services can be guaranteed.



Necessary for functionality of the website.



For more information about the storage period, please see the YouTube privacy policy at <https://www.google.de/intl/de/policies/privacy>.

## 2.3.4 Technically not necessary cookies from third party providers

### 2.3.4.1 Analytics Cookies



To improve our online services, we occasionally evaluate with Matomo (formerly Piwik) how the site is used. The application stores cookies on your computer to identify different users. Your IP addresses are shortened so that a direct personal reference can be excluded. The IP addresses transmitted by your browser via Matomo are not merged with other data collected by us.



The following data are processed:

- URL of the page being viewed
- URL of the page that was viewed prior to the current page (Referrer URL)
- Screen resolution being used
- User Agent of the browser being used



This evaluation is based on our legitimate interest in improving the online offering (Art. 13 para. 1 FADP and Art. 6 para. 1 let. f GDPR).



Not necessary for the functionality of the website, but necessary for our analyses and for the optimisation of our website.





We delete the pseudonymised data about you after the statistics have been compiled.

## 2.4 Social Media Plug-Ins



We use the social media plug-ins below on our website to make our company better known.

For data protection compliant integration, the Social Media Plug-Ins are only activated when the visitor actively clicks on a Social Media button. In this way we can ensure that data will only be forwarded to the third party providers on the basis of consent, in accordance with the data protection declarations set out below.

If the visitor uses the services of these social networks independently or in connection with our website, the social networks will evaluate your use of the plug-in. In this case, information about the plug-in is forwarded to the social networks.

The following social media plug-ins are used with the corresponding privacy policy:

### 2.4.1 Facebook



Via our website, functions of the social network Facebook, provider Facebook Inc, 1 Hacker Way, Menlo Park, California 94025, USA, are integrated.

When a visitor of our website clicks on the Facebook button, a direct connection between the browser and the Facebook server is established via the plug-in. Facebook thereby receives information that the visitor has visited our site with his IP address.



After using the Facebook button, Facebook receives the visitor's IP address and the information that our website has been visited by the visitor.

For more information, please refer to the Facebook privacy policy at <http://de-de.facebook.com/policy.php>.



We use the Facebook function for advertising purposes to make our company better known on Facebook and to get in contact with our customers.



The data processing is carried out with your express consent by agreeing to the use of social media plug-ins in accordance with Art. 13 para. 1 FADP and Art. 6 para. 1 let. a GDPR.



The mentioned data are not necessary in the context of the website functionality.



For information about storage periods, please see the Facebook Privacy Policy at <http://de-de.facebook.com/policy.php>.

## 2.4.2 Twitter



Functions of the Twitter service are integrated on the website. These functions are offered by Twitter Inc, 1355 Market Street, Suite 900, San Francisco, CA 94103, USA.

By using the Twitter button, the websites visited by the visitor are linked to his Twitter account and made known to other users. Data is also transferred to Twitter in the process.



After using the Twitter button, Twitter receives information about the visitor's IP address and the visit to our website.

For more information, please refer to the Twitter privacy policy at <http://twitter.com/privacy>.



We use the Twitter function for advertising purposes to make our company better known on Twitter and to get in contact with our customers.



The data processing is carried out with your express consent by agreeing to the use of social media plug-ins in accordance with Art. 13 para. 1 FADP and Art. 6 para. 1 let. a GDPR.



The mentioned data are not necessary in the context of the website functionality.



For more information about the storage period, please see the Twitter privacy policy at <http://twitter.com/privacy>.

You can change your privacy settings on Twitter in the account settings at: <http://twitter.com/account/settings>

## 2.4.3 XING



Functions of the XING service are integrated on the website. These functions are offered by XING AG, Dammtorstrasse 29-32, 20354 Hamburg, Germany.

By using the XING button, the websites visited by the visitor are linked to your XING account and announced to other users. Data is also transferred to XING in the process.



After the XING button is used, XING receives information about the visitor's IP address and that the visitor has visited our website.

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Further information on this can be found in the XING privacy policy at <https://privacy.xing.com/de/datenschutzerklaerung>.



We use the XING function for advertising purposes to make our company better known on XING and to get in touch with our customers.



The data processing is carried out with your express consent by agreeing to the use of social media plug-ins in accordance with Art. 13 para. 1 FADP and Art. 6 para. 1 let. a GDPR.



The mentioned data are not necessary in the context of the website functionality.



Further information about the storage period can be found in the XING privacy policy at <https://privacy.xing.com/de/datenschutzerklaerung>.

#### 2.4.4 LinkedIn



On the website functions of the LinkedIn service are integrated. These functions are offered by LinkedIn Inc, 2029 Stierlin Court, Mountain View, CA 94043, USA.

Please note that when using the LinkedIn button, a connection is established between your browser and the LinkedIn server. LinkedIn is thus informed that our website was visited with your IP address.



LinkedIn receives information about the visitor's IP address and that the visitor has visited our website after using the LinkedIn button.

For more information, please refer to the LinkedIn privacy policy at <https://www.linkedin.com/legal/privacy-policy>.



We use the LinkedIn function for advertising purposes to make our company better known on LinkedIn and to get in contact with our customers.



The data processing is carried out with your express consent by agreeing to the use of social media plug-ins in accordance with Art. 13 para. 1 FADP and Art. 6 para. 1 let. a GDPR



The mentioned data are not necessary in the context of the website functionality.



For more information about storage periods, please refer to the LinkedIn Privacy Policy at <https://www.linkedin.com/legal/privacy-policy>.



## **2.5 Consent to technically not necessary cookies and social media plugins**

You can withdraw your consent at any time using the cookie settings at the bottom of the website.

### 3 Your rights



As the person concerned, you may assert various rights against us as a data subject and in accordance with the applicable national and international law.

In order to meet these requirements, we may process your personal data again.



Depending on the applicable law, data subjects may exercise the following rights:

- To request **information** about your personal data processed by us. In particular, information pursuant to Art. 15 GDPR or Art. 8 FADP may contain information:
  - on the processing purposes
  - the category of personal data
  - the categories of recipients to whom your data has been or will be disclosed
  - the planned storage period
  - the existence of a right of rectification, erasure, restriction of processing or opposition
  - the existence of a right of appeal
  - the origin of your data, as far as they were not collected by us
  - and on the existence of automated decision-making, including profiling and, where appropriate, meaningful information on its details

#### → Request information

- to demand the immediate **correction of** incorrect or incomplete personal data stored by us (Art. 16 GDPR, Art. 5 para. 2 FADP)

#### → Demand corrections

- to demand the **restriction of** the processing of your personal data, if the accuracy of the data is disputed by you, the processing is unlawful, you refuse to have the data deleted it, we no longer require the data and you require it for the assertion, exercise or defence of legal claims or you have lodged an objection to the processing in accordance with Art. 21 GDPR (Art. 18 GDPR, Art. 15 FADP)

#### → Request restriction.

- to receive your personal **data** that you have provided us with in a structured, common and machine-readable format or to **request** that it be **transferred** to another data controller (Art. 20 GDPR)

→ Port data

- to demand the **deletion of** your personal data stored by us, unless the processing is necessary for us to exercise the right to freedom of expression and information, to fulfil a legal obligation, for reasons of public interest or to assert, exercise or defend legal claims (Art. 17 GDPR, Art. 15 FADP)

→ Demand deletion

- **to revoke** your **consent to** us at any time. As a result, we may no longer continue to process data based on this consent in the future (Art. 7 para. 3 GDPR).

→ Revoke consent

- **object** to the processing, provided that your personal data are processed on the basis of legitimate interests in accordance with Art. 6 para. 1 let. f GDPR (Art. 21 GDPR) and the grounds of objection relates to your particular situation or the objection is directed against direct advertising. In the latter case, you have a general right of objection, which we will implement without specifying a special situation.

→ File an objection.

- complain to a **supervisory authority** (see above) (Art. 77 GDPR)

## 4 Data security

We make every effort to ensure the security of your data within the framework of the applicable data protection laws and technical possibilities.

Your personal data will be transmitted encrypted. This applies to the use of our contact form as well as the use of our evaluations. We use the SSL (Secure Socket Layer) coding system, but we would like to point out that data transmission on the Internet (e.g. when communicating by e-mail) can have security gaps. A complete protection of data against access by third parties is not possible.

To protect your data, we maintain technical and organisational security measures in accordance with Art. 32 GDPR, which we continually adapt to ensure a state of the art security framework.

Furthermore, we do not guarantee that our service will be available at certain times; disturbances, interruptions or failures cannot be excluded. The servers used by us are regularly and carefully backed up.

## 5 Transfer of data to third parties, no data transfer to third countries

As a matter of principle, we only use your personal data within our company.

If and to the extent that we involve third parties (such as IT service providers) in the performance of contracts, they will only receive personal data to the extent that the transmission is necessary for the corresponding service.

In the event that we outsource certain parts of the data processing ("subprocessing"), we contractually oblige the data processor to use personal data only in accordance with the requirements of the data protection laws and to ensure the protection of the rights of the data subject.

Data will not be transferred to bodies or persons in third countries without an adequate level of data protection or without a sufficient contractual obligation to maintain an adequate level of data protection, unless such data protection has been disclosed in this data protection declaration.

## 6 Topicality and amendment of this privacy policy

We reserve the right to change this privacy policy at any time or to adapt it to new processing methods. The current data protection declaration can be accessed at any time at <https://www.octocracy.swiss/en/privacy-policy>.

Status July 2020. Older versions of the privacy policy are available at <https://www.octocracy.swiss/en/data-policy/history>

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