



Privacy policy

With this **privacy policy**, we inform you which personal data we process in connection with our **creable.io website** and our other services (including applications, content, products, media kits, etc.). In particular, we provide information about what personal data we process, for what purpose, how and where. With this privacy policy, we also inform you about the rights of persons whose data we process.

For individual or additional offers and services, further data protection declarations as well as other legal documents such as general terms and conditions (GTC), terms of use or conditions of participation may apply.

Our offer is subject to Swiss data protection law as well as any applicable foreign data protection law, such as 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:

creable AG

c/o Daniel Koss
Staldenbachstrasse 9b
8808 Pfäffikon
Switzerland

daniel@creable.io

We point out if there are other persons responsible for the processing of personal data in individual cases.

2. Processing of personal data

2.1. Terms

Personal data is any information that relates to an identified or identifiable person. A **data subject** is a person about whom personal data is processed. **Processing** includes any handling of personal data, regardless of the means and procedures used, in particular the storage, disclosure, procurement, collection, deletion, storage, modification, destruction and use of personal data.

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

2.2. Legal basis

We process personal data in accordance with Swiss data protection law such as, in particular, the [Federal Data Protection Act \(FADP\)](#) and the [Ordinance to the Federal Data Protection Act \(DPO\)](#).

We process - if and to the extent that 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 fulfillment of a contract with the data subject as well as for the implementation of pre-contractual measures.
- Art. 6 para. 1 lit. f GDPR for the necessary processing of personal data to protect the legitimate interests of us or of third parties, unless the fundamental freedoms and rights and interests of the data subject prevail. Legitimate interests are, in particular, our interest in being able to provide our offer permanently, in a user-friendly, secure and reliable manner and to be able to advertise for it as required, information security as well as protection against misuse and unauthorized use, the enforcement of our own legal claims and compliance with Swiss law.
- Art. 6 para. 1 lit. c GDPR for the necessary processing of personal data to comply with 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 that is 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 to protect vital interests of the data subject or another natural person.

2.3. Nature, scope and purpose

We process those personal data that are **necessary** to provide our offer permanently, user-friendly, secure and reliable. Such personal data can 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, contract and payment data.

We process personal data for the **duration** required for the respective purpose(s) or as required by law. Personal data whose processing is no longer required will be anonymized or deleted. Persons whose data we process generally have a right to deletion.

As a matter of principle, we process personal data only with the consent of the data subject, unless the processing is permitted for other legal reasons, for example, for the performance of a contract with the data subject and for corresponding pre-contractual measures, to protect our overriding legitimate interests, because the processing is evident from the circumstances or after prior information.

In this context, we process in particular information that a data subject voluntarily and personally provides to us when contacting us - for example, by letter, e-mail, contact form, social media or telephone - or when registering for a user account. We may store such information, for example, in an address book, in a customer relationship management system (CRM system) or with comparable tools. If you transmit data about other persons to us, you are obligated to ensure data protection with respect to such persons as well as to ensure the accuracy of such personal data.

We also process personal data that we receive from third parties, obtain from publicly available sources or collect in the course of providing our services, if and to the extent that such processing is permitted for legal reasons.

Personal data from **applications** are only processed insofar as they are required for the assessment of suitability for an employment relationship or for the subsequent execution of an employment contract. The personal data required for the implementation of an application procedure is derived from the information requested or provided, for example, in the context of a job advertisement. Applicants have the option of voluntarily providing further information for their respective applications.

2.4. Processing of personal data by third parties, including abroad

We may have personal data processed by commissioned third parties or process it jointly with third parties or with the help of third parties or transmit it to third parties. Such third parties are in particular providers whose services we use. We also ensure appropriate data protection for such third parties.

Such third parties are generally located in Switzerland as well as in the European Economic Area (EEA). Such third parties may also be located in [other states and territories on earth](#) as well as elsewhere in the universe, provided that their data protection law ensures adequate data protection in the opinion of the [Swiss Federal Data Protection and Information Commissioner](#) (FDPIC) and - if and to the extent that the General Data Protection Regulation (GDPR) is applicable - in the [opinion of the European Commission](#), or if adequate data protection is ensured for other reasons, such as through a corresponding contractual agreement, in particular on the basis of standard contractual clauses, or through a corresponding certification. Exceptionally, such a third party may be located in a country without adequate data protection, provided that the data protection requirements for this, such as the express consent of the data subject, are met.

3. Rights of data subjects

Data subjects whose personal data we process have the rights under Swiss data protection law. These include the right to information as well as the right to correction, deletion or blocking of the processed personal data.

Data subjects whose personal data we process may - if and to the extent that the General Data Protection Regulation (GDPR) is applicable - request confirmation free of charge as to whether we are processing their personal data and, if so, request information about the processing of their personal data, have the processing of their personal data restricted, exercise their right to data portability, and have their personal data corrected, deleted ("right to be forgotten"), blocked or completed.

Data subjects whose personal data we process may - if and insofar as the GDPR applies - revoke any consent they have given at any time with effect for the future and object to the processing of their personal data at any time.

Data subjects whose personal data we process have a right of appeal to a competent supervisory authority. The supervisory authority for data protection in Switzerland is the [Federal Data Protection and Information Commissioner](#) (FDPIC).

4. Data security

We take appropriate and suitable technical and organizational measures to ensure data protection and, in particular, data security. However, despite such measures, the processing of personal data on the Internet can always have security gaps. We can therefore not guarantee absolute data security.

Access to our online offer takes place via transport encryption (SSL / TLS, in particular with the Hypertext Transfer Protocol Secure, abbreviated HTTPS). Most browsers mark transport encryption with a padlock in the address bar.

Access to our online offering is subject – like in general all Internet use - to mass surveillance without cause or suspicion, as well as other surveillance by security authorities in Switzerland, the European Union (EU), the United States of America (USA) and other countries. We cannot directly influence the corresponding processing of personal data by secret services, police agencies and other security authorities.

5. Website use

5.1. Cookies

We may use cookies for our website. Cookies - both our own cookies (first-party cookies) and cookies from third parties whose services we use (third-party cookies) - are data that are stored in your browser. Such stored data need not be limited to traditional cookies in text form. Cookies cannot run programs or transmit malware such as Trojans and viruses.

Cookies can be stored in your browser temporarily as "session cookies" or for a certain period of time as so-called permanent cookies when you visit our website. "Session cookies" are automatically deleted when you close your browser. Permanent cookies have a specific storage period. In particular, they allow us to recognize your browser the next time you visit 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.

You can disable cookies in your browser settings at any time in whole or in part, as well as delete them. Without cookies, our website may no longer be fully available. We ask you - if and to the extent necessary - actively for your express consent for the use of cookies.

For cookies used for performance and reach measurement or for advertising, a general objection ("opt-out") is possible for numerous services via [AdChoices](#) (Digital Advertising Alliance Of Canada), [Network Advertising Initiative](#) (NAI), [YourAdChoices](#) (Digital Advertising Alliance) or [Your Online Choices](#) (European Interactive Digital Advertising Alliance, EDAA).

5.2. Server log files

We may collect the following information for each access to our website, provided that this information is transmitted by your browser to our server infrastructure or can be determined by our web server: Date and time including time zone, Internet Protocol (IP) address, access status (HTTP status code), operating system including user interface and version, browser including language and version, individual sub-page of our website accessed including data volume transferred, website last accessed in the same browser window (referrer).

We store such information, which may also constitute personal data, in server log files. The information is necessary to provide our online offer permanently, user-friendly and reliably and to ensure data security and thus in particular the protection of personal data - also by third parties or with the help of third parties.

5.3. Tracking pixel

We may use tracking pixels on our website. Tracking pixels are also known as web beacons. Tracking pixels - also from third parties whose services we use - are small, usually invisible images that are automatically retrieved when you visit our website. Counting pixels can be used to collect the same information as server log files.

6. Notifications and messages

We send notifications and communications such as newsletters by email and through other communication channels such as instant messaging.

6.1. Success and reach measurement

Notifications and messages may contain web links or tracking pixels that record whether an individual message was opened and which web links were clicked. Such web links and tracking pixels may also track usage of notifications and communications on a personal basis. We need this statistical recording of usage for performance and reach measurement in order to be able to offer notifications and communications effectively and in a user-friendly manner based on the needs and reading habits of the recipients, as well as permanently, securely and reliably.

6.2. Consent and objection

In principle, you must expressly consent to the use of your e-mail address and other contact addresses, unless such use is permitted for other legal reasons. For any consent to receive e-mails, we use the "double opt-in" procedure where possible, i.e. you will receive an e-mail with a web link that you must click to confirm, so that no misuse by unauthorized third parties can take place. We may log such consents including Internet Protocol (IP) address, date and time for evidence and security reasons.

In principle, you can unsubscribe from notifications and communications such as newsletters at any time. By unsubscribing, you can in particular object to the statistical recording of usage for performance and reach measurement. Notifications and communications that are absolutely necessary for our offer remain reserved.

6.3. Service provider for notifications and messages

We send notifications and messages via third-party services or with the help of service providers. Cookies may also be used in the process.

We use in particular:

- [SendGrid](#): Platform for transactional e-mail ("e-mailing made easy"); provider: Twilio Inc. (USA) / Twilio Ireland Limited (Ireland); data protection information: [privacy statement \("Twilio Privacy Statement"\)](#).
- [Twilio](#): communication platform; provider: Twilio Inc. (USA) / Twilio Ireland Limited (Ireland); Data protection information: [Privacy policy](#).

7. Social media

We are present on social media platforms and other online platforms in order to communicate with interested persons and to inform them about our offer. In doing so, personal data may also be processed outside of 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 online platforms also apply in each case. These provisions inform in particular about the rights of data subjects, which include in particular the right to information.

For our social media presence on Facebook, including the so-called Page Insights, we are jointly responsible with Meta Platforms Ireland Limited (Ireland), if and to the extent that the GDPR is applicable. Meta Platforms Ireland Limited is part of the [Meta companies](#) (including in the USA). 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 manner.

Further information about the nature, scope and purpose of data processing, information about the rights of data subjects and the contact details of Facebook as well as Facebook's data protection officer can be found in [Facebook's privacy policy](#). We have concluded the so-called "[Responsible Party Addendum](#)" with Facebook and thus agreed in particular that Facebook is responsible for ensuring the rights of data subjects. For the so-called Page Insights, the corresponding information can be found on the page "[Page Insights Information](#)" including "[Page Insights Data Information](#)".

Users of social media platforms have the option of logging in or registering for our online offering with their corresponding user account ("**social login**"). The respective terms and conditions of the social media platforms concerned apply, such as the General Terms and Conditions (GTC) and Terms of Use or data protection declarations.

8. Third party services

We use third-party services to provide our offer permanently, user-friendly, secure and reliable. Such services may also be used to embed content on our website. Such services - for example, hosting and storage services, video services and payment services - require your Internet Protocol (IP) address, as such services cannot otherwise transmit the corresponding content.

For their own security, statistical and technical purposes, third parties whose services we use may also process data related to our offer as well as from other sources - including cookies, log files and counting pixels - in aggregated, anonymized or pseudonymized form.

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 Policy Guide in Google Products](#)", "[How we use data from websites or apps on or in which our services are used](#)" (information from Google), "[How Google uses cookies](#)", "[Personalized advertising](#)" (activation / deactivation / settings).

8.1. Digital infrastructure

We use third-party services in order to be able to make use of the digital infrastructure required for our offering. These include, for example, hosting and storage services from specialized providers.

We use in particular:

- [Google Cloud including Google Cloud Platform \(GCP\)](#): storage space and other infrastructure; Google Cloud-specific providers: Google LLC (USA) for users in the USA, among others / Google Ireland Limited or Google Commerce Limited (both

Ireland) for users in the European Economic Area (EEA) and Switzerland, among others (see "[Google Contracting Entity](#)" for providers in other countries); Google Cloud-specific privacy disclosures: "[Privacy Center](#)", "[Data Protection](#)", "[Center for Compliance Resources](#)", "[Trust and Security](#)".

- [Vercel](#): Cloud deployment platform, in particular for static websites; Provider: Vercel Inc. (USA); Privacy policy: [Privacy policy](#), "[Additional Information for Users in the EEA and the UK](#)".

8.2. Contact options

We use third-party services to better communicate with you and others, such as customers.

We use in particular:

- [Pipedrive](#): customer relationship management (CRM); provider: Pipedrive OÜ (Estonia); data protection information: [privacy policy](#), "[Data Controller and Data Processor](#)".

8.3. Audio and video conferencing

We use audio and video conferencing services to communicate online. We can use them, for example, to conduct virtual meetings or online lessons and webinars. In addition to this privacy policy, any terms and conditions of the services used, such as terms of use or privacy statements, also apply.

Depending on the life situation in which you are participating in an audio or video conference, we recommend that you mute the microphone by default and blur the background or fade in a virtual background.

We use in particular:

- [Discord](#): Video conferencing; Provider: Discord Inc. (USA); Data protection information: [Privacy policy](#).
- [Google Meet](#): video conferencing; Google Meet-specific privacy disclosures: "[Google Meet - Security and Privacy for Users](#)".
- [Zoom](#): Video conferencing; Provider: Zoom Video Communications Inc. (USA); privacy information: [privacy policy](#), "[Privacy at Zoom](#)", "[Legal Compliance Center](#)".

8.4. Social media functions and social media content

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

We use in particular:

- [Facebook \(social plugins\)](#): Embedding of 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 of Instagram content; Provider: Meta Platforms Ireland Limited (Ireland) and [other Meta companies](#) (including in the USA); data protection information: [privacy policy \(Instagram\)](#), [privacy policy \(Facebook\)](#).
- [LinkedIn Consumer Solutions Platform](#): Embedding of functions and content from LinkedIn, for example with [plugins](#) such as the "[Share Plugin](#)"; Provider: LinkedIn Ireland Unlimited Company (Ireland) for users in the European Economic Area (EEA) as well as in Switzerland / LinkedIn Corporation USA) for users in the rest of the world; Data protection information: "[Datenschutz](#)" ("[Privacy](#)"), [Privacy Policy](#), [Cookie Policy](#), [Cookie Management / Objection to email and SMS communication from LinkedIn](#), [Objection to interest-based advertising](#).
- [TikTok \(social plugins\)](#): Embedding of functions and content from TikTok, for example "Share to TikTok"; providers: TikTok Information Technologies UK Limited (UK) and TikTok Technology Limited (Ireland) for users in the European Economic Area (EEA), the UK and Switzerland / TikTok Inc. (USA) for users in the USA / TikTok Pte. Ltd. (Singapore) in the rest of the world; data protection information: [privacy policy](#), "[Privacy Policy for Younger Users](#)", [cookie policy](#).
- [Twitter for websites](#): Embedding functions and content from Twitter, for example for displaying tweets; provider: Twitter International Company (Ireland) for users in the European Economic Area (EEA) and the United Kingdom / Twitter Inc. (USA) for users in the rest of the world; Privacy information: [Privacy policy](#), "[Twitter for websites - information about ads and privacy](#)", "[How we use cookies and similar technologies](#)", "[Personalization based on derived identity](#)", "[Privacy settings for personalized ads](#)".

8.5. Audiovisual media

We use third-party services to enable the direct playback of audiovisual media such as music or videos on our website.

We use in particular:

- [YouTube](#): Videos; Provider: Google (among others in the USA); YouTube-specific information on data protection: "[Privacy and Security Center](#)", "[My data on YouTube](#)".

8.6. Fonts

We use third party services to embed selected fonts as well as icons, logos and symbols into our website.

8.7. Payments

We use payment service providers to process payments from our customers securely and reliably. The terms and conditions of the respective payment service providers, such as general terms and conditions (GTC) or data protection declarations, apply to the processing in each case.

We use in particular:

- [Apple Pay](#): payment processing; providers: Apple Inc. (USA) / Apple Distribution International Limited (Ireland) for persons in the EEA, the UK and Switzerland; data protection information: "[Apple Privacy Policy for Customer Data](#)", "[Apple Privacy Policy](#)", [Transparency Report](#).
- [PayPal](#) (including [Braintree](#)): processing of payments; providers: PayPal (Europe) S.à.r.l. et Cie, S.C.A (Luxembourg) / PayPal Pte. Ltd. (Singapore); information on data protection: [privacy policy](#), "[Statement on cookies and tracking technologies](#)".
- [Stripe](#): payment processing; provider: Stripe Inc. (USA) / Stripe Payments Europe Limited (Ireland) for persons in Europe; data protection information: "[Stripe Privacy Center](#)", privacy policy ("[Global Privacy Policy](#)"), cookie policy ("[Cookie Policy](#)").

8.8. Advertising

We use the option of displaying targeted **advertising for our offer** on third parties such as social media platforms and search engines.

With such advertising, we would like to reach in particular people who are interested in our offer or already use our offer (**remarketing** and **targeting**). For this purpose, we may transmit corresponding - possibly also personal - information to third parties that enable such advertising. We can also determine whether our advertising is successful, i.e. in particular whether it leads to visits to our website (**conversion tracking**).

Third parties with whom we advertise and where you are registered as a user may be able to assign the use of our offer to your profile there.

We use in particular:

- [Facebook advertising \(Facebook Ads\)](#): Social media advertising; Provider: Meta Platforms Ireland Limited (Ireland) and [other Meta companies](#) (including in the USA); data protection information: remarketing and targeting in particular with the **Facebook-Pixel** as well as **Custom Audiences** including **Lookalike Audiences**, [data protection declaration](#), "[advertising preferences](#)" (user registration required).
- [Google Ads](#): search engine advertising; Google Ads-specific privacy disclosures: advertising based on search queries, among other things, using different domain names - in particular doubleclick.net, googleadservices.com, and googlesyndication.com - for Google Ads, "[Advertising](#)" (Google), "[Why am I seeing a particular ad?](#)".
- [Instagram Ads](#): Social media advertising; Provider: Meta Platforms Ireland Limited (Ireland) and [other Meta companies](#) (including in the USA); data protection information: remarketing and targeting in particular with **Facebook-Pixel** as well as **Custom Audiences** including **Lookalike Audiences**, [data protection declaration \(Instagram\)](#), [data protection declaration \(Facebook\)](#), "[advertising preferences](#)" (Instagram) (user registration required), "[advertising preferences](#)" (Facebook) (user registration required).
- [LinkedIn Ads](#): Social media advertising; Provider: LinkedIn Corporation (USA) / LinkedIn Ireland Unlimited Company (Ireland); Data protection information: Remarketing and targeting in particular with the **LinkedIn Insight Tag**, "[Data protection](#)", [Privacy policy](#), [Cookie policy](#), [Objection to personalized advertising](#).

9. Extensions for the website

We use extensions for our website in order to be able to use additional functions.

We use in particular:

- [Google reCAPTCHA](#): Spam protection (distinguishing between wanted comments coming from humans and unwanted comments coming from bots and spam); Google reCAPTCHA-specific privacy information: "[What is reCAPTCHA?](#)".

10. Success and reach measurement

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

When using services and programs for performance and reach measurement, the Internet Protocol (IP) addresses of individual users must be stored. IP addresses are generally shortened in order to follow the principle of data economy through the corresponding pseudonymization and to improve the data protection of visitors to our website ("IP masking").

When using services and programs for performance and reach measurement, cookies may be used and user profiles may be created. User profiles include, for example, the pages visited or content viewed on our website, information on the size of the screen or browser window and the - at least approximate - location. As a matter of principle, user profiles are created exclusively on a pseudonymous basis. We do not use user profiles to identify individual visitors to our website. Individual services with which you are registered as a user may be able to assign the use of our online services to your profile with the respective service, whereby you usually had to give your consent to this assignment in advance.

We use in particular:

- [Google Analytics](#): Success and reach measurement; Google Analytics-specific data protection information: Measurement also across different browsers and devices (cross-device tracking) as well as with pseudonymized Internet Protocol (IP)

addresses, which are only transmitted in full to Google in the USA as an exception, "[Data protection](#)", "[Browser add-on to deactivate Google Analytics](#)".

- [Google Tag Manager](#): Integration and management of services for performance and reach measurement as well as other services from Google and third parties; further information on data protection can be found in the individual integrated and managed services.

11. Final provisions

We can adapt and supplement this data protection declaration at any time. We will inform about such adjustments and additions in an appropriate form, in particular by publishing the respective current privacy policy on our website.