



Privacy Policy of creable

1 Who is responsible for your personal data?

In this Privacy Policy, we describe how we process your personal data when you visit or use our platform, www.creable.io ("Platform") and our related websites, services, applications, products and content, in particular your Media Kit (collectively "Services"). Terms not defined in this Privacy Policy have the meaning ascribed to them in the Terms of Services.

Contact details

creable Ltd.
c/o Daniel Koss, Staldenbachstrasse 9b
8808 Pfäffikon, Switzerland

2 Which law is applicable?

We process your personal data in accordance with Swiss data protection laws and, if and to the extent applicable, the EU General Data Protection Regulation GDPR ("applicable data protection laws").

3 What data do we process, for what purpose and on what basis?

3.1 When you visit our Platform

When you visit our Platform, the server automatically logs general technical information. This data includes your IP address, operating system, browser type, information about the device you use to access the Platform, referring pages, etc.

We also use cookies and other tracking technologies to ensure the functionality of the Platform, to improve its user-friendliness, to evaluate the use of the Platform, to collect information aimed at improving our Services, and for marketing purposes (Google Analytics, Hotjar and Facebook Pixel).

Cookies are pieces of information your web browser automatically stores on your device when you visit our Platform. You can independently manage the security settings in your browser and block or delete the cookies we use. Please note that our Platform may no longer function to its full extent if you block cookies that are necessary for the functioning of the Platform.

We will ask for your consent for the use of tracking or similar cookies and of other tracking technologies collecting your personal data.

3.2 When you use our services or purchase our products

When you use our Services, we will process the personal data necessary for their functioning, this includes in particular:

- (a) Registration information, such as age, username and password, language, email and phone number;



- (b) Profile information, such as name, social media account information and profile image;
- (c) Information in correspondence you send to us, such as service-related emails regarding account management, notifications on technical issues or changes to the services;
- (d) Opt-in choices for newsletters,
- (e) Other personal data you store on the Media Kit.

We also collect personal data from other sources, like:

- (a) Social Media, such as Facebook, TikTok, Instagram or Google, when you choose to link or sign up using your social network;
- (b) Other sources, such as publicly available sources.

We process your personal data for the following purposes and based on the following grounds for processing:

- (a) to enter into, fulfill and enforce a contract with you;
- (b) on the basis of our legitimate interests to communicate with you (including for other reasons than for the preparation or conclusion of a contract), to optimize your user experience, to improve and expand our services or products, to analyze demand patterns or conduct other evaluations, to ensure IT security and data protection as well as to guarantee the business operations, management and development of our company and to enforce or defend legal claims;
- (c) to comply with legal obligations (e.g. obligation to keep business records).

Based on our interest in informing people who are interested in our Services about our offers and about any new developments, we can send you marketing information (e.g. via a newsletter). You can opt out of receiving such information at any time.

We also store and use an anonymized version of your data (where you are no longer recognizable as the data subject) for analysis and statistical purposes.

4 When and how do we transfer your personal data to third parties?

To fulfil our contract, to protect our interests or to comply with legal regulations, it may be necessary for us to transfer your personal data to third parties. This includes, for example, our IT service providers and third-party providers in the areas of authentication and payment transactions.

If we transfer your personal data to third parties outside Switzerland or the EU and EEA, we comply with the provisions of the applicable data protection laws on international data transfers, e.g. by concluding standard contractual clauses.



5 Data security

We protect your personal data through appropriate technical and organizational security measures against unintentional, illegal or unauthorized manipulation, deletion, modification, access, disclosure, use or loss.

6 How long do we keep your personal data?

We only store your personal data for as long and to the extent necessary for the purposes described above or for legal reasons.

7 What are your rights in connection with your personal data?

Subject to the conditions of the applicable data protection laws, you have the following rights in connection with your personal data:

- Right to access your personal data;
- Right to have inaccurate personal data rectified;
- Right to erasure (“right to be forgotten”);
- Right to restrict the processing of your personal data;
- Right to data portability;
- Right to object to the processing of your personal data.

Please note that exceptions apply to these rights. In particular, we may be obliged to further process your personal data in order to fulfil a contract, to protect our own legitimate interests, such as the assertion, exercise or defense of legal claims, or to comply with legal obligations. In these cases, we can or must reject certain requests or comply with them only to a limited extent.

8 Links to other Services

Our Services links to third-party Services that are not operated or controlled by us. We are not responsible for whether and how these third parties comply with data protection laws.

9 Complaints

If you are not satisfied with the way in which we process your personal data, you have the right to complain to the [Swiss Federal Data Protection and Information Commissioner FDPIC](#) or, if the GDPR is applicable, to your competent supervisory authority.

Please contact us first before submitting a complaint. This will enable us to try to resolve it directly. The easiest way is to contact us via the chat tool provided.

10 Modifications

We may modify this Privacy Policy at any time. New versions will come into effect for you as soon as we have notified you by publishing them on our Services.



[Pfäffikon], 13.02.2021