All General Privacy Policy of Grass & Partner AG

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1. What is the purpose of this Privacy Policy?

Grass & Partner AG (hereinafter also referred to as "Grass & Partner," "we," or "us") processes personal data relating to you or other individuals in various ways and for different purposes.

"Personal data" refers to all information that can be associated with a specific individual, and "processing" refers to any handling of such data (e.g., collection, use, disclosure).

This Privacy Policy explains how we process such data (hereinafter referred to as personal data or data) in the following situations:

- When you visit our website www.grassgroup.ch,
- When you use our services,
- When you are otherwise connected to us under a contract,
- When you contact us via email, letter, social media, SMS, contact form, etc.,
- When you register for our newsletter,
- Whenever you interact with us in other data processing scenarios related to our offerings.

To enhance readability, this Privacy Policy does not explicitly utilize multiple gender forms. However, all references are intended to apply equally to individuals of all genders.

Please take time to read this Privacy Policy to learn how and why Grass & Partner processes your personal data, how Grass & Partner protects your personal data, and what rights you have in this context. If you have any questions or would like further information about our data processing, we are happy to assist (see Section 2).

We have aligned this Privacy Policy with both the Swiss Federal Act on Data Protection (FADP) and the European General Data Protection Regulation (GDPR). When this Privacy Policy references "personal data," it also includes "personal data" within the meaning of the GDPR. Whether and to what extent the GDPR applies depends on the specific case.

2. Who is responsible for processing your data?

For data processing at all our locations (Zurich, Basel, Bern, Zug, Lucerne, St. Gallen, Lausanne, and Geneva) according to this Privacy Policy, the following entity is the "controller," i.e., the entity primarily responsible under data protection law, unless otherwise communicated in individual cases:

Grass & Partner AG
Head Office
Bahnhofstrasse 16
6300 Zug
Switzerland

If you have any questions about data protection, please contact us at:
Email address: datenschutz@grassgroup.ch

This email address also applies for the EU/UK representative under Art. 27 EU-/UK-GDPR and the Data Protection Officer under Art. 37 ff. EU-/UK-GDPR

3. What personal data do we process?

Depending on the context and purpose, we process various categories of personal data. The main categories appear below (this list is not exhaustive).

Many of the data mentioned in this section are provided by you directly (e.g., via completed forms, in communication with us, under a contract, or by using the website). Generally, you are not obliged to provide data. However, if you wish to conclude contracts with us or utilize our services, you must provide us with data—particularly master (basic) data and contractual data—within your contractual obligations.

If you provide us with data about other individuals (e.g., information about colleagues or superiors), we assume that you are authorized to do so and that this information is accurate. By transmitting data relating to third parties, you confirm that these

conditions are met. Please also ensure that these third parties are informed about this Privacy Policy (e.g., by referring them to it).

3.1. Master Data

Master data refers to basic information we require for managing business relationships or for marketing and advertising purposes, and which directly relates to you as a person, including your personal characteristics. For example, we process the following master data:

- Salutation, first and last name, gender, and date of birth
- Address and contact details
- Nationality
- Information about language preferences
- In the case of contact person for corporate clients, the individual's relationship to the company they work for
- Position in the company
- Consent statements

We usually receive this master data directly from you, but sometimes from others (e.g., family members or your employer).

3.2. Contractual Data

Contractual data is information arising in connection with contract formation or performance (e.g., details of contracts and the services to be provided or already provided), data from the pre-contractual stage, information about concluding the contract itself (e.g., the date and subject matter of the contract), and data required or used to fulfill the contract. Examples of contractual data we process:

- Date, application process, type, content and duration of the relevant contract, and data about how and when the contract ended
- Contact details
- Information about payments and payment methods, invoices, complaints, feedback, etc.
- For online services, login credentials and access details that we provide to clients/customers

We receive this data from you as well as from partners with whom we cooperate. This data may relate to your company (not personal data in that case) or to you personally if you use or provide services in a personal capacity.

3.3. Communication Data

Communication data is data arising from our contact with you, for instance when you reach out via our contact form or other communication channels. Communication data might include.

- Name and contact details, such as postal address, email address, and telephone numbers
- The content of correspondence (e.g., emails, letters, phone conversations)
- Information about the type, time, and potentially the place of communications as well as other contextual data

3.4. Technical Data

Technical data is collected in connection with your use of our website. For example:

- IP address of your device and device ID
- Information about your device and its operating system or language settings
- Information about your internet service provider
- Accessed content or logs that record the use of our systems
- Date and time of access to the website and your approximate location

3.5. Behavioral and Assessment Data

To provide our services effectively, we aim to get to know you. Thus, we analyze and use data regarding your behavior, your strengths and weaknesses, your talents, and your overall personality (e.g., via CliftonStrengths Assessment, Bambeck Master Profiling, or graphological assessments).

Data about your work preferences offers insight into your needs and desires and indicates the potential employers or job roles that may best fit you. Hence, we also process data about your interests and preferences to produce personality reports and to draw conclusions about traits, preferences, and likely behaviors.

Additionally, in the context of assessments, we process the following data:

- Information from your CV, especially details about your professional profile and employment (e.g., position, employer), education/training, career path, professional achievements, and the nature of your work
- Skills, qualifications, language skills, information about previous positions and employers
- Information about past applications and interviews
- Where relevant, details about salary history or desired compensation
- Information about political roles, hobbies, and interests

3.6. Other Data

We may collect data about you in other instances. Data may arise in connection with administrative or judicial proceedings (e.g., files, evidence) that can also involve you.We also record your participation in workshops and Grass events (e.g., Grass-Treffs).

4. For what purposes do we process your personal data?

We primarily use the personal data we collect to fulfil our services. Moreover, to the extent permitted and as we deem appropriate, we may also process your personal data for additional purposes in which we (and sometimes third parties) have a legitimate interest:

- **Communication purposes:** to contact you and maintain communication (including responding to inquiries and following up on matters, e.g., by email).
- **Customer care and marketing:** to inform you—based on your personal interests—about our offerings.
- **Improving our services and product development**: we analyze data to enhance our services and to develop new offerings.
- **IT security and prevention:** we process personal data to monitor how well our operations (particularly IT, our website, applications, and other platforms) are functioning; to ensure security; to avert theft, fraud, or abuse; and as evidence. This includes analyzing system logs related to the use of our systems, preventing, defending against, and investigating cyberattacks or malware, performing network and infrastructure tests, and conducting system and error checks.
- **Legal protection**: in certain cases, we process personal data to assert claims in court or out of court or before authorities in Switzerland or abroad, or to defend against claims. For these purposes, we may process your master and communication data.
- **Compliance with legal requirements:** such as handling complaints, complying with court or governmental directives, implementing measures to detect and investigate abuse, and generally meeting legal obligations, self-regulatory guidelines, or industry standards. This may require processing your master and communication data.
- **Administration and support**: to streamline internal processes, for example IT administration, accounting, and archiving data.
- **Other purposes**: such as corporate management including organizational planning and development, additional internal operations and administrative tasks (e.g., master data administration, accounting, archiving), training and education, preparing and carrying out the purchase or sale of business divisions, companies, or shares in companies (and any associated data transfers), as well as business management measures and other legitimate interests.

If we request your consent for certain data processing, we will inform you separately about those specific purposes. Consent may be withdrawn at any time by written notice to us.

5. What online tracking and online advertising technologies do we use?

On our website, we use various technologies through which we and third parties we engage may recognize you during your visit and, in some cases, track you across multiple visits. The use of these technologies is specifically regulated. Below, we explain how and why we use them.

5.1. How and why do we use cookies and similar technologies?

On our website, we use services from third parties to measure and improve user-friendliness and online advertising campaigns. These may involve embedding third-party components that themselves may use cookies. Whenever we engage in tracking or deploy similar technologies, the primary goal is to distinguish your access to our website (via your system) from those of other users, thus allowing us to ensure our site's functionality and to conduct statistical evaluations. We do not aim to identify you personally.

These technologies generally work so that whenever our website is accessed, our server (or third-party servers) assigns you or your browser a unique identifier (a "cookie").

Cookies are files that your browser automatically stores on your end device when you visit our website. Cookies contain a unique identifier (ID) that allows us to distinguish individual visitors from others without identifying them. Depending on their purpose, cookies may also store other information, such as which pages have been viewed and how long a page was visited. We use both session cookies (deleted after you close the browser) and persistent cookies (remain stored for a certain period even after the browser is closed, allowing us to recognize returning visitors).

We may use cookies, among other things, for the following purposes:

- Displaying advertisements on third-party websites and measuring their success (i.e., whether you respond to these ads) – so-called remarketing
- Determining whether and how we can improve our website
- Collecting statistical data on user numbers and their habits, as well as improving the website's speed and performance
- Possibly using your contact details to show you advertising on third-party platforms

5.2. How can cookies and similar technologies be disabled?

When you visit our website, you can decide whether to activate or deactivate certain categories of cookies. You can also configure your browser settings to block certain cookies or similar technologies, or to delete existing cookies and data stored in your browser. You can install browser add-ons ("plug-ins") that block tracking by certain

third parties. For details, see your browser's help pages (usually under "privacy" or "data protection"). Please be aware that disabling cookies and similar technologies may prevent our website from functioning fully.

5.3. Third-party and partner cookies on our website

We use services from third parties to measure and improve user-friendliness and online advertising campaigns on our website. These third parties may also be located outside Switzerland and the EU/EEA, as long as your data is sufficiently protected. For example, we employ analytics services to optimize our website. The third party may record and analyze how users interact with our site and then combine this data with information from other websites. This enables them to track user behavior across multiple sites and devices and provide us with statistical analysis. These providers may also use the data for their own purposes (e.g., personalized advertising on their own or other websites).

Two of our third-party providers are Google and AddThis. More details are provided below. Other third-party providers generally process personal data or other data in similar ways.

- **Google Analytics**, A web analytics service offered by Google LLC (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) and Google Ireland Ltd. (Google Building Gordon House, Barrow St, Dublin 4, Ireland). Both are referred to as "Google," with Google Ireland Ltd. serving as the controller for any personal data processing. Google uses cookies and similar technologies to collect information about how individual users interact with our website, including the device used (computer, tablet, smartphone, etc.). Google provides us with reports based on this information and may also process certain data for its own purposes. We have configured Google Analytics to anonymize IP addresses of visitors before data is transmitted to the United States. For more information, see Google's privacy policy. You can disable Google Analytics by installing an appropriate browser add-on Browser-Add-On

  AddThis Plugins, an analytics service from the bookmarking service AddThis, operated by AddThis LLC, 1595 Spring Hill Rd, Suite 300, Vienna, VA 22182, USA ("AddThis"). A list of AddThis plugins and what they look like can be found at AddThis.com. When you visit any page of our website containing such a plugin, your browser automatically establishes a direct connection with a server operated by AddThis in the United States. It transmits the information—your IP address and the fact that you visited that page—to AddThis, which then stores this information. Cookies may be used for this purpose. AddThis uses data to create anonymized user profiles that form the basis for personalized and

  interest-based advertising for visitors to websites that use AddThis plugins. You can find more information in the AddThis privacy policy .

6. How do we process data in connection with social media?

We offer you the option of using "social media plugins" from LinkedIn and Xing on our website, enabling those providers' features to be integrated into our website. These plugins are deactivated by default. Once you activate them (e.g., by clicking a button), the respective provider can identify that you are on our website. If you have an account with LinkedIn or Xing, the provider can link this data to your account and thereby track your use of online services.

Together with these providers, we may be jointly responsible for the exchange of data that these plugins or similar features collect, though not for any further processing by the respective provider. To the extent possible, we have concluded an additional agreement with the provider. You can submit requests for information and other data subject inquiries regarding joint data processing directly to the respective provider.

If you communicate with us via social media or through our profiles (LinkedIn, Xing)—for instance, by posting or sharing content—we record this data and use it primarily for communication with you, for marketing, and for statistical analysis. Please note that the social media provider itself also collects data (e.g., about user behavior) when you visit our social media pages and may link it with other data (e.g., for advertising or for personalizing the platform's content). For more information on how social media providers handle data, see the privacy policies of LinkedIn and Xing.

7. To whom do we disclose your personal data?

During our processing activities, we may disclose your personal data to other recipients.

We also share personal data with service providers to the extent needed for them to perform their services. This primarily involves IT service providers but may also include consulting firms, analytics providers, marketing providers, etc. If any such service provider processes personal data on our behalf, it is obligated to process that data solely in accordance with our instructions and to implement data security measures.

We may also disclose data to other recipients, such as courts and authorities in the context of legal or regulatory obligations, or to potential buyers in business transactions. In some cases, we may share personal data with other third parties for their own purposes - for example, if you have given us your explicit consent or if the law permits or requires us to do so.

8. Do we disclose personal data abroad?

Data recipients may not only be located in Switzerland. This is especially true of certain IT service providers and Gallup (the service provider for strengths and talent analysis. These service providers may be located outside the European Economic Area (EEA) and

Switzerland (particularly in the United States) or in other countries worldwide. We may also disclose data to authorities or other individuals abroad if we are legally obligated to do so, for instance, in connection with a company sale or a court proceeding. Not all countries guarantee a level of data protection equivalent to Swiss or EU standards. Where necessary, we ensure adequate protection through appropriate contractual arrangements—namely, by adopting the standard contractual clauses issued by the European Commission, which are recognized by the Swiss Federal Data Protection and Information Commissioner (FDPIC). Ou can find more detail on such clauses at the Swiss FDPIC website; copies are also available there: Welcome to the FDPIC

In certain circumstances, we may transmit data in compliance with data protection laws even without such arrangements—for example, if you have consented to the transfer, or if the transfer is required for contract performance, for establishing, exercising, or enforcing legal rights, or due to overriding public interests.

9. How long do we process personal data?

We store and process your personal data for as long as required by the purpose for which it was collected (for contractual data, generally the duration of the contractual relationship), for as long as we have a legitimate interest in storing it (e.g., to enforce or defend claims, for archiving, or to ensure IT security), or for as long as data is subject to a statutory retention requirement (certain data must be kept for ten years, for instance). If no legal or contractual obligations prevent it, we delete or anonymize your data after the retention or processing period ends in accordance with our standard processes.

10. On which legal bases do we process data?

Depending on the applicable law, certain data processing may only be legal if the law specifically permits it. This does not apply under Swiss data protection law but does under the GDPR where relevant. In such cases, our processing of your personal data rests on one or more of the following legal bases:

- Your consent (Art. 6(1)(a) and Art. 9(2)(a) GDPR)
- Necessity for the performance of a contract or to take pre-contractual steps (e.g., to review a contract application; Art. 6(1)(b) GDPR)
- Necessity for establishing, exercising, or defending legal claims (Art. 6(1)(f) and Art. 9(2)(f) GDPR)
- Necessity for compliance with legal obligations (Art. 6(1)(c), (f), Art. 9(2)(g) GDPR)
- Necessity for our legitimate interests, particularly those outlined in Section 4 (Art. 6(1)(f) GDPR)

11. How do we protect your data?

We implement appropriate security measures to ensure the confidentiality, integrity, and availability of your personal data and to protect it against unauthorized or unlawful processing, and against the dangers of loss, accidental alteration, unauthorized disclosure, or unauthorized access. Nevertheless, security risks in general cannot be entirely ruled out; some residual risk is unavoidable.

12. What rights do you have?

Under applicable data protection law, you have certain rights that allow you to be informed about and influence our processing of your personal data. These rights may include:

— **Right of access:** You may request details about how we process your data. You may also submit an official "access request" if you want further information or a copy of your data.

— **Right to object and right to erasure:** You can object to our data processing at any time and request that we erase your personal data unless we are required or entitled to continue processing it (e.g., to fulfil a contract) or it remains necessary to complete the contractual relationship.

— **Right to rectification:** You can request that incorrect or incomplete personal data be corrected or supplemented, or you can request that a note of dispute be added.

— **Right to data portability**: You may, where data processing is based on your consent or is necessary to perform a contract, request that personal data you provided to us be received in a structured, commonly used, and machine-readable format or that it be transferred directly to a third party.

— **Right to withdraw consent:** Wherever we process your data based on your consent, you can withdraw that consent at any time. Withdrawal only applies to future processing. We may continue processing the data after withdrawal if permitted by another legal basis.

Please note that these rights are subject to statutory requirements and limitations and thus may not be fully available in every instance. For instance, we might still be required or allowed to process and store your data to fulfil a contract with you, to protect our own legitimate interests (e.g., to assert, exercise, or defend legal claims), or to comply with legal obligations. Where legally permissible - particularly to protect the rights and freedoms of other individuals or our own business secrets - we may wholly or partially refuse to comply with your request (e.g., by redacting content pertaining to third parties or confidential information).

If you wish to exercise any of these rights, please send us a written request. Our contact details can be found in Section 2. We typically need to verify your identity (e.g., by a copy of your ID). You may also lodge a complaint with the supervisory responsible

regarding our processing of your data. In Switzerland, this is the Swiss Federal Data Protection and Information Commissioner (FDPIC).

The supervisory authority in Switzerland is the Federal Data Protection and Information Commissioner Welcome to the FDPIC

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