

Privacy Policy

At the Waltham Watch Company SA and our licensee GFF Suisse SA t/a Watch Angels (“Us” or “Our” or “We”) We take your privacy seriously. If you have any questions about this policy, We can be reached by email at mydataprotection@waltham.ch

Alternatively, you can contact us at:

Waltham Watch Company SA
Via Penate 16
6850 Mendrisio
Switzerland

This privacy policy sets out the basis on which any personal data that We have collected about you, or that you provide to us, will be processed by us. Please read the following carefully to understand Our views and practices regarding your personal data and how We will treat it.

We review this privacy policy regularly. Occasionally We may need to make changes or additions to this privacy policy that may affect how We handle your data. We will post new versions of this privacy policy on Our Website www.waltham.ch and www.watchangels.ch (the “Sites”). We may also notify you of changes to this privacy policy by email. This privacy policy was last reviewed and updated in May 2018.

While information is the cornerstone of Our ability to provide superior service, Our most important asset is Our customers' trust. Keeping customer information secure and using it only as Our customers would want us to, is a top priority for Us. Here then, is Our promise to you:

1. INFORMATION WE HAVE COLLECTED AND MAY COLLECT AND HOW

When you register on Our Site, either directly or through third party providers, We will collect some personal information from you, such as your name, email address, country of origin, location, occupation, photos, social media accounts and other data you upload or enter. This personal data is entered by you or shared by you through another social media service, in order to become Our customer or to receive information from us. While your credit card number is validated on the Sites, your credit card number and payment details are stored exclusively by Our third-party payment providers and not by us.

We may also collect data about your navigation of the Sites on an aggregate basis, such as your Internet Protocol Address (“IP Address”), which is identified and logged automatically in Our server log files whenever you navigate the Sites, your Internet Service Provider (“ISP”), your login frequency, the pages you visited within the Sites, and the Internet browser or device you are using.

When you participate in the Sites, complete forms for optional promotions, RSVP for the Sites events, or participate in contests, surveys, or beta testing, We may require that you submit certain personal information to the Sites, Our mobile application or via email. You

may also voluntarily provide personal information when you send us an enquiry or support request via email. When you contact us, We keep a record of your communication, and may use third party service providers (e-mail system provider, CRM systems), to help solve any issues you might be facing in the future. When you contact Us, you may share your location data for us to optimise your experience and inform you about special offers and events nearby or optimize Our newsletter that is part of Our service for users.

Surveys are periodically conducted to collect information to help us improve the Sites. All information collected through surveys will remain confidential, even if We use a third party to help us conduct the survey, unless otherwise indicated.

Any information you disclose in public areas of the Sites may become public information. Please exercise caution when disclosing personal information in these areas. We are not responsible for any use by third parties of personal information disclosed by you in public areas of the Sites.

In order to facilitate the fulfilment of your watch product, product personalisation or other related services, you authorise Us to provide private data to Our partners and suppliers that carry out such services. Any such exchange only happens for the fulfilment of your request.

2.COOKIES

We use cookies on the Sites and other technologies to recognise you and uniquely identify your browser. This helps us to provide you with a good user experience when you use the Sites and also allows us to improve the Sites. By continuing to use the Sites, you are agreeing to Our use of cookies.

A cookie is a small file of letters and numbers that We store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

Strictly necessary cookies. These are cookies that are required for the operation of the Sites. They include, for example, cookies that enable you to log into secure areas of the Sites. Analytical/performance/statistical cookies. They allow us to recognise and count the number of visitors and to see how visitors move around the Sites when they are using it. This helps us to improve the way the Sites works, for example, by ensuring that users are finding what they are looking for easily.

Functionality cookies. These are used to recognise you when you return to the Sites. This enables us to personalise Our content for you, greet you by name and remember your preferences (for example, your choice city).

Targeting cookies. These cookies may record your visit to the Sites and the pages you have visited on Our Site. We will use this information to make the Sites more relevant to your interests.

Please note that third parties (including, for example, providers of external services like Web traffic analysis services) may also use cookies, over which We have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or indicate when a cookie is being sent. You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of the Sites and your user experience may be inferior when navigating Our Sites.

3.WHY WE COLLECT INFORMATION

Information collected may be used to provide and improve Our products and service of the Sites; for billing, identification and authentication purposes; to analyse the Sites usage for statistical purposes; to manage and improve Our products and the Sites; to deliver administrative and informative notices and communications relevant to your use of Our products and the Sites; for internal market research; for troubleshooting problems; for detecting, protecting against and preventing fraudulent or other criminal activity; for distribution to third party contractors who provide services to us (such as Our email server) who are bound by Our privacy restrictions or restrictions at least as restrictive as those set forth in this policy; to enforce Our Terms of Service.

4.WITH WHOM WE SHARE

We may disclose your personal information to any member of Our group, which means Our subsidiaries, Our ultimate holding company and its subsidiaries for outsourcing purposes (i.e. where such member of Our group provides services for and on Our behalf).

When you submit information to Us, it is collected, processed and maintained solely by us or by Our third-party contractors, those third-party contractors being bound by Our privacy policy or by restrictions at least as restrictive as those set forth in this policy.

Partners may sponsor special member offers, promotions, privileges or contests that require you to disclose personal information to benefit from them. We will never disclose private member data, including email addresses, to partners without your prior express consent. Certain partners may require members to opt-in or agree to terms on the partners' landing pages authorising us to provide member information to the partner in question. We advise you always to check Our partners' privacy policies before submitting information about yourself.

We may disclose your personal information:

in the event that We sell or buy any business or assets, in which case We may disclose your personal information to the prospective seller or buyer of such business or assets;
to identify, contact or bring legal action against you if you are violating Our Terms of Service or other rules or if We believe you are causing injury or interference with the rights of members, the general public or to Us.

if We or substantially all of Our assets are acquired by a third party, in which case personal information held by us will be some of the transferred assets; and

if We are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply Our Terms of Service and other agreements or to protect Our rights, property, or safety of Our customers, or others. In the event that you raise a payment dispute and your bank or credit card provider requests data supporting your transaction and use of Our Services.

5.OPTING IN OR OUT OF COMMUNICATIONS

By using the Sites you are consenting to the terms of this privacy policy and you agree that We (if you have provided the respective partner your email address or have consented to us giving your email address to the respective partner) may send you communications regarding goods, services, events and other information that may be of interest to you. You understand that Our newsletter is an integral part of Our Service that you sign up to as a user of the Sites. You may opt out of receiving communications from us and/or Our partners, and from participating in member surveys at any time by either following the simple unsubscribe process set out in each email. You may opt in to receiving communications from us and/or our partners by filling in your email address in the appropriate section of the Sites.

Please be aware that on certain, rare occasions, We will send emails to communicate important corporate or member messages, like changes in Our privacy policy or a receipt of your payments. These emails will not have an unsubscribe feature, as they are one-time only communications.

If you supply us with your postal address, you may receive mailings from us with information on new products and services. If you do not wish to receive such mailings, let us know by emailing us at mydataprotection@waltham.ch

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To ensure removal from any lists, please provide us with your exact name, email and address when communicating with us.

6.WHERE WE STORE/TRANSFER YOUR PERSONAL DATA

Our main servers for registered users and members are based on third party services. The data that We collect from you may be transferred to, and stored at, a destination outside Switzerland and the European Economic Area ("EEA") by us. It may also be processed on Our behalf by staff operating outside Switzerland and the EEA who work for us or one of Our suppliers, including but not limited to countries such as the United Kingdom and the United States of America. By consenting to the collection and processing of your personal data, you agree to such transfer, storing or processing. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this privacy policy.

The transfer, storage or processing of personal information outside Switzerland and the EEA does not diminish your rights and We will take all reasonable steps necessary to ensure that any information that is transferred, stored or processed outside Switzerland and the EEA

will be treated securely, in accordance with this privacy policy and with the same level of protection required by the Swiss Federal Act on Data Protection (“Swiss-Act”).

7. DATA RETENTION POLICY

If you de-register from all Our Services, We may retain information submitted by you or collected from you, for such time as is reasonably necessary for backup, archival and/or audit purposes, to prevent fraud or other criminal activity, or prevent violation of Our Terms of Service and for such time as may be required by applicable laws.

We will remove personal information by deleting it from Our database if required to do so by law. We will also delete personal information upon your request in line with the right to erasure (‘right to be forgotten’) according to Art. 17 GDPR and similar local and national regulations elsewhere (depending on your residency). According to Art. 16 GDPR (and similar local and national regulations elsewhere), following the right to rectification, We will also rectify inaccurate personal data concerning you.

We regularly review the way We collect, store and process information, including physical security measures, in order to protect Our systems from any unauthorised access.

Access to any personal information is limited to Our employees, contractors, suppliers and agents, to the extent relevant to their job duties (such as processing certain information). Anyone with access to private data is bound by strict confidentiality obligations.

8. ACCESS TO INFORMATION

The Swiss-Act, GDPR and other local and national regulations give you the right to access personal data held about you. Your right of access can be exercised in accordance with these Acts, subject to any fees that We may be permitted to charge you under such Acts (send e-mail request to mydataprotection@waltham.ch).

9. NOTIFICATION OF NEW USES

On occasion, We may use personal information for new, unanticipated uses not previously disclosed in this privacy policy. In such cases, We will notify you of the content and purposes of the change by email. If you do not oppose such change in writing (by email to mydataprotection@waltham.ch) within ten (10) days of the date of the email, the changes will be deemed accepted by you. Any data collection changes will be effective from then on. We will not retroactively collect data for new collection procedures.

This policy became effective on 01 October 2020.