Privacy Notice

1. What is this privacy notice about?

SynHedge GmbH, a consultancy firm based in canton Schwyz, Switzerland (referred to herein as "**SynHedge**," "**we**," or "**us**"), is committed to safeguarding your personal data. In the execution of our professional services, we collect and handle personal data (referred to as "data"), particularly concerning our clients, their associates, counterparties, judicial and regulatory bodies, correspondent law firms, professional and other associations, website visitors, event participants, job applicants, newsletter recipients, and other relevant entities or their respective contact persons and employees (collectively referred to as "**you**").

This privacy notice aims to inform you about how we process these personal data in accordance with the Swiss Federal Act on Data Protection (FADP) and the EU and UK General Data Protection Regulations (collectively "**GDPR**") if applicable. Beyond this notice, we may provide supplementary information regarding data processing practices (for example, in consent forms or contract terms), additional privacy notices (such as those found on other websites or applications we operate), and other relevant documents and communications. In this Privacy Notice, specific references to the GDPR are only relevant to the extent the GDPR applies.

If you provide us with data about other individuals (e.g., family members, representatives, counterparties, or associates), we assume that you have the authority to do so, that the information is accurate, and that you have informed those individuals about this disclosure where required by applicable information obligations (e.g., by presenting this Privacy Notice to them beforehand).

2. Who is the controller for processing your data?

For the processing activities delineated in this Privacy Notice, the entity responsible is:

SynHedge GmbH
Dorfstrasse 38
6340 Baar (ZG)
Schweiz

The responsibility for the specific processing activities resides with SynHedge. In instances where we represent clients, SynHedge typically acts as a data controller with respect to SynHedge's related data processing activities, potentially in conjunction with its respective clients.

Regarding the website where you accessed this Privacy Notice, as well as our pages on social networks (refer to Section 9), SynHedge is responsible for the collection and processing of personal data. Should another entity independently obtain personal data on such a website, we will disclose this information accordingly.

For any inquiries concerning the processing of your data, please contact us at "contact@ synhedge.com".

3. For what purposes do we process which of your data?

When you engage with our services or visit our websites www.synhedge.com or www.synhedge.ch (collectively referred to as the "**Website**"), or interact with us in any capacity, including involvement in a case we manage for a client, we collect and process various categories of your personal data. Specifically, we process the following personal data for the respective purposes outlined below:

- Sales and Marketing Activities: In our sales and marketing efforts, we process personal data. This includes data collected when exchanging business cards, using our contact form, or communicating through other channels such as LinkedIn and messaging apps. This data may be utilized for sales purposes to establish contact and may be stored in third-party Customer Relationship Management ("**CRM**") and sales software systems.

- Pre-Contractual and Contractual Arrangements: For contract formation, such as establishing a consultant-client relationship with you or your principal/employer, we process your name, contact details, powers of attorney, consent declarations, information about third parties (e.g., contact persons, family details, counterparties), contract details, date of conclusion, creditworthiness data, and other relevant data provided by you or obtained from public sources or third parties (e.g., commercial registers, credit agencies, sanction lists, media, legal protection insurers, or the Internet). This also includes conflict of interest checks at SynHedge.

- Communication: We process personal data to facilitate communication with you and third parties, such as involved parties, judicial bodies, or authorities, through email, telephone, messaging apps, letters, or other means (e.g., to respond to inquiries, provide legal advice, and execute pre-contractual or contractual measures). For this purpose, we process the content and metadata of communications and your contact details, including image and audio recordings from video or phone calls. Should a communication be recorded (e.g., during a video conference), you will be informed separately and may choose to opt-out of recording or terminate the communication. For identity verification, we may request additional information (e.g., an ID copy). We may also send information about events, legal updates, firm news, sales opportunities, or similar information to our clients, partners, and interested parties, such as through newsletters and regular communication (electronically, by mail, messaging apps, and/or phone). You can opt-out of marketing communications at any time (see Section 2 for contact details).

- Contract Administration and Execution: We process personal data to fulfill our contractual obligations to clients and partners (e.g., suppliers, service providers, CRM & payroll services, main scanning providers, correspondent law firms, project partners), including the provision and receipt of contractual services. This involves data management for mandates (e.g., legal advice, court representation, correspondence) and contract enforcement (debt collection, legal proceedings), accounting, and public communication (where permissible). We process data obtained or generated during contract initiation and execution, and data from public sources or third parties (e.g., courts, authorities, counterparties, information services, media, detective agencies, or the Internet). This includes conversation and consultation minutes, notes, internal and external correspondence, legal documents, judgments, background information, image and audio recordings, mandate-related information, and financial and payment data. Sensitive personal data may also be processed.

- Enhancing Our Offerings: To improve our website, services, and other electronic offerings (e.g., other websites, apps, online tools), we analyze your behavior and preferences, such as navigation patterns on our website and interactions with our social media profiles and tools. We process feedback from you regarding our website, social media presence, tools, and services, including direct or indirect feedback (e.g., comments, emails, public statements).

- Website Operation: To ensure secure and stable website operation, we collect technical data such as IP addresses, operating system information, device settings, region, and usage time. We also use cookies and similar technologies (see Section 8 for more information).

- Registration Requirements: Some services (e.g., newsletters) require registration. We process the data provided during registration and any additional data collected during the use of the service, such as behavior and preference data or communication data. Further information on data processing will be provided if necessary.

- Security and Access Control: We process personal data to maintain and enhance the security of our IT and other infrastructure (e.g., buildings), including monitoring and controlling electronic and physical access, analyzing IT systems, performing system checks, and creating backups. We also maintain access logs and visitor lists for documentation and security purposes, using surveillance systems (e.g., security cameras) at our premises.

- Risk Management and Corporate Governance: We process personal data for risk management (e.g., preventing criminal activities) and corporate governance, including operational organization (e.g., resource planning) and corporate development (e.g., mergers and acquisitions). We process master data, contract data, registration data, technical data, behavioral data, and communication data for these purposes.

- Compliance with Legal and Regulatory Requirements: We process personal data to comply with applicable laws (e.g., anti-money laundering, KYC/KYB requirements, tax obligations), self-regulations, certifications, industry standards, corporate

governance, and for internal and external investigations (e.g., by law enforcement or supervisory authorities). This involves processing master data, behavioral data, financial data, and other necessary data to fulfill compliance obligations.

- Job Applications: If you apply for a job with us, we process your data to review and assess your application, conduct the application process, and prepare and conclude an employment contract if successful. This includes contact data, information from communication, data in your application documents, criminal record extracts, and data obtained from job-related social networks, the Internet, media, and references (with your consent). Employment-related data processing is governed by a separate privacy notice.

- Other Purposes: Other purposes include training, educational, and administrative purposes (e.g., accounting). We may record phone or video conferences for training, evidence, and quality assurance purposes, informing you beforehand and allowing you to opt-out of recording or terminate the communication. We may process personal data for event organization, implementation, and follow-up (e.g., participant lists, presentation content, recordings). Other legitimate interests may also necessitate data processing, which cannot be exhaustively listed.

4. Where does the data come from?

- Data Provided by You: The majority of the data we process is provided directly by you. This occurs within the scope of our consultant-client relationship, other services we offer, your interactions with our website, and through your communications with us. While you are generally not obligated to disclose your data, there are certain exceptions (e.g., compliance with legal requirements). For instance, providing specific data is necessary to utilize our services or to enter into contractual agreements with us. Additionally, the operation of our website necessitates the processing of some data.

- Data Obtained from Third Parties: We may acquire data from publicly accessible sources (e.g., debt collection registers, sanction registers, land registries, commercial registers, media outlets, or the Internet, including social media). We also receive data from public authorities, your employer or principal (if they have a business relationship with us or engage with us in other capacities), and other third parties (e.g., clients, counterparties, legal protection insurers, credit agencies, address brokers, associations, contractual partners, Internet analytics services). This encompasses data processed during the initiation, conclusion, and execution of contracts, as well as data derived from correspondence and other communications with third parties. All other data categories specified in Section 3 are also included.

5. With whom do we share your data?

In line with the provisions detailed in Section 3, we share your personal data with the categories of recipients listed below. When necessary, we obtain your consent for these disclosures.

- Within SynHedge: SynHedge (as outlined in Section 2) exchange and process personal data for the purposes described in Section 3. Generally, we handle such data under our own responsibility.

- Service Providers: We collaborate with external service providers both in Switzerland and internationally who (i) process data on our behalf (e.g., IT providers like Microsoft, accounting tools, mail scanning and delivery solution, security tools, and communication tools), (ii) process data under joint responsibility with us, or (iii) process data under their own responsibility that they have received from us or collected on our behalf. These service providers include IT providers, forensic service providers, banks, insurance companies, debt collection agencies, credit agencies, list brokers, private investigators, legal directories, and other law firms or consulting companies. We typically enter into contracts with these processors regarding the handling and protection of personal data.

- Clients and Other Contractual Partners: This category includes our clients and other contractual partners for whom data transfer arises from the contract (e.g., because you work for a contractual partner or they provide services for you). It also includes entities with whom we cooperate, such as other law firms or consultancies in Switzerland and abroad, or legal protection insurance companies. These recipients process data under their own responsibility, either as sole controllers or as joint controllers with us.

- Authorities and Courts: We may disclose personal data to offices, courts, and other authorities in Switzerland and abroad if required to fulfill our contractual obligations, particularly to conduct our mandates, or if we are legally obliged or entitled to do so, or if necessary to protect our interests. These recipients are responsible for their own data processing.

- Counterparties and Involved Persons: To the extent necessary or useful for fulfilling our contractual obligations, particularly for managing mandates, we also disclose your personal data to counterparties and other involved persons (e.g., guarantors, financiers, affiliated companies, other law firms and consultancies, respondents, or experts).

- Other Persons: This includes other instances where involving third parties aligns with the purposes outlined in Section 3. Examples include delivery recipients or payment recipients specified by you, third parties in agency relationships (e.g., your lawyer, consultant, or bank), or individuals involved in official or legal proceedings. We may also disclose your data to authorities to release us from confidentiality obligations, if applicable. Your data may be shared with the media (including business directory publishers) for content transmission (e.g., photos, contact details) and in publications (e.g., citations and case reports). In business development, data (including data about you, such as a client or supplier or their representative) may be disclosed during

business sales or acquisitions, asset sales, company mergers, or partnerships. Data exchanges may also occur in communications with competitors, industry organizations, associations, market observers, and other entities.

All these recipient categories may involve third parties, making your data accessible to them. While we can restrict processing by certain third parties (e.g., IT providers), we cannot do so for others (e.g., authorities, banks).

Additionally, we allow certain third parties to collect personal data from you on our website and at our events, under their own responsibility (e.g., media photographers, providers of embedded website tools). These third parties are solely responsible for their data processing unless we are significantly involved in these data collections. For concerns or to assert your data protection rights, please contact these third parties directly (see Section 8).

6. Is your personal data also disclosed abroad?

We primarily process and store personal data in Switzerland and within the European Economic Area (EEA). However, personal data may also be processed globally, for example, through subcontractors of our service providers or during proceedings before foreign courts or authorities. In the course of our activities for clients, your personal data may be transferred to any country worldwide.

If a recipient is located in a country without adequate statutory data protection, we require them to commit to data protection standards. For this purpose, we use the revised standard contractual clauses of the European Commission, accessible at https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?, with necessary adaptations for Switzerland where applicable. Alternatively, the recipient may be subject to a recognized set of rules ensuring data protection.

In certain cases, we may disclose personal data to countries without adequate statutory data protection without a separate contract if an exception clause applies. Exceptions may include:

- Legal proceedings abroad.
- Situations involving overriding public interests.
- Necessity for the performance of a contract in your interest (e.g., sharing data with correspondent law firms or consultancies).
- Your explicit consent.
- Inability to obtain consent within a reasonable time when the disclosure is necessary to protect your or a third party's life or physical integrity.
- Data made publicly available by you, where you have not objected to its processing.
- Data from a legally provided register (e.g., commercial register) to which we have legitimate access.

7. What are your rights?

You have the right to request information about your data that we process, as well as additional rights concerning such data processing. Specifically, you have – or may have, depending on the circumstances – the right to:

- Information: To inquire whether we are processing your data and, if so, to receive further related information.
- Correction: To request the correction or completion of your data if it is incorrect or incomplete.
- Deletion: To request the deletion of your data, provided we are not under a legal obligation or do not have an overriding legitimate interest to retain such data.
- Objection: To object to the processing of your data based on our legitimate interest (Art. 6 para. 1 lit. f GDPR) by explaining your specific reasons and circumstances for the objection. For cookies that collect certain data, you can block them at any time by adjusting your browser settings. Note that deactivating cookies may limit your user experience and restrict access to some functionalities of our website or services.
- Restriction of Processing: To request a temporary restriction on our processing of your data.
- Data Portability: To request that we provide you or another controller with your data in electronic form, to the extent technically feasible.
- Withdrawal of Consent: To withdraw your consent if you have previously given consent for a specific purpose of data processing. This withdrawal will not affect the lawfulness of any processing conducted prior to the withdrawal or any processing based on a legal basis other than your consent. Note that withdrawing consent may mean we will no longer be able to provide our services to you.

To exercise any of these rights, please contact us using the details provided in Section 2. For security purposes and to prevent misuse, we may need to verify your identity (e.g., by requesting a copy of your ID).

Please be aware that these rights are subject to conditions, exceptions, and limitations (e.g., to protect the rights of third parties, trade secrets, or due to our professional confidentiality obligations). We reserve the right to redact copies or provide only excerpts to safeguard data protection and confidentiality.

8. How are cookies, similar technologies and social media plug-ins used on our website?

Cookies, small files transmitted between your system and the server, facilitate the recognition of a specific device or browser. Cookies created in a web environment or app are small text files that are stored on your device. This enables the website or app to remember specific entries and settings (for example, your login, language,

usage, preferences and statistics) over a certain period of time. That way, you don’t have to re-enter them when browsing around the site during the same visit.

During your visit to our website (including newsletters), data is generated and stored in logs, particularly technical data. Additionally, we may utilize cookies and similar technologies

(e.g., pixel tags or fingerprints) to identify website visitors, analyze their behavior, and recognize preferences.

You have the option to configure your browser settings to automatically reject, accept, or delete cookies. It's also possible to manage cookies on a case-by-case basis. Instructions on how to manage cookies in your browser can typically be found in the help menu.

While the technical data and cookies generally do not contain personal data, any personal data stored by us or third-party providers commissioned by us (e.g., if you have a user account) may be linked to the technical data or cookie information, potentially identifying you.

Furthermore, we employ social media plug-ins, small software components establishing a connection between your website visit and a third-party provider. These plug-ins inform the third-party provider of your visit to our website and may transmit cookies previously placed by the provider on your web browser. For details on how these third-party providers utilize your personal data collected via their social media plug-ins, please refer to their respective privacy notices.

We also integrate our own tools and third-party services (which may use cookies) on our website, primarily to enhance functionality or content (e.g., video or map integration, communication scheduling tools), compile statistics, and serve advertisements.

Presently, we utilize services from the following providers and advertising partners on our website and digital platforms, with their contact details and additional information on data processing available in their respective privacy notices:

Services	**Provider**	**Privacy notice**
Google Analytics	Google Ireland Ltd., Ireland	https://policies.google.com/privacy
Google Maps	Google LLC, USA	https://policies.google.com/privacy
LinkedIn	LinkedIn Ireland Unlimited Company, Ireland	https://www.linkedin.com/legal/privacy-policy
Telegram	Telegram Messenger Inc., Dubai	https://telegram.org/privacy
reCAPTCHA	Google Ireland Ltd., Ireland	https://policies.google.com/privacy

Under data protection law, these third-party providers may act as either data processors (e.g., Google Analytics) or independent data controllers. Additional details can be found in the respective privacy notices of the service providers.

Please note that some of these third-party providers may be located outside Switzerland. Information on cross-border data transfers can be found in Section 6.

9. How do we process personal data on our social media pages?

We maintain pages and other online presences on social networks and other platforms operated by third parties, through which we may process data about you. In this context, we may receive data from you (e.g., through communications or comments on our content) and from the platforms themselves (e.g., statistical information). Platform providers may analyze your usage and combine this data with other information they hold about you. They also process this data for their own purposes, such as marketing, market research, and platform management, acting as independent data controllers for these purposes. For further details on processing by platform operators, please refer to the privacy notices of the respective platforms.

Presently, we maintain a presence on the following platforms, with the identity and contact details of the platform operators available in their respective privacy notices:

- LinkedIn: LinkedIn Privacy Notice Provider: LinkedIn Ireland Unlimited Company, Ireland

We reserve the right, though not obligated, to review content before or after it is published on our online presences, to remove content without notice, and, if necessary, to report it to the relevant platform provider.

Please note that some platform operators may be located outside of Switzerland. Information on cross-border data transfers can be found in Section 6. If you access their offerings directly (e.g., by visiting our online presence on social media), you will be transmitting your personal data abroad directly, rather than through us.

10. What else needs to be considered?

While we do not automatically assume that GDPR applies to our data processing activities, in exceptional cases where it does apply, this Section 10 exclusively governs such processing for GDPR purposes.

In such cases, the processing of your personal data is based on the following principles:

- Necessity for Contractual Performance: Personal data processing is necessary for the initiation, conclusion, and execution of contracts, as well as their administration and enforcement (Article 6 para. 1 lit. b GDPR), as outlined in Section 3.

- Legitimate Interests: Processing is necessary to protect our legitimate interests or those of third parties, including communication, website operation, enhancing electronic offerings, security, compliance, risk management, corporate governance, training, education, administration, evidence, quality assurance, event organization, and protection of other legitimate interests (Article 6 para. 1 lit. f GDPR), as detailed in Section 3.
- Legal or Mandated Requirements: Processing is required or permitted by law due to our mandate or legal position under EEA or member state law (Article 6 para. 1 lit. c GDPR), or to protect vital interests or those of other natural persons (Article 6 para. 1 lit. d GDPR).
- Consent: Processing is based on your separate consent, such as through a corresponding declaration on our website (Article 6 para. 1 lit. a and Article 9 para. 2 lit. a GDPR).

We retain your data for as long as necessary for our processing purposes, legal retention periods, and legitimate interests, including documentation, evidence, or technical requirements. If no legal or contractual obligations or technical reasons prevent it, we generally delete or anonymize your data after the storage or processing period expires, following our retention policy.

Failure to provide certain personal data may impact our ability to provide services or conclude contracts. We specify which personal data are mandatory in our requests.

The right to object to data processing, outlined in Section 7, particularly applies to processing for direct marketing purposes.

If you disagree with our data handling or exercise of your rights, please inform us (see contact details in Section 2). If you are in the EEA, you also have the right to lodge a complaint with the data protection supervisory authority in your country. A list of authorities in the EEA can be found https://edpb.europa.eu/about-edpb/about-edpb/members_en.

11. To which authority can I address a complaint in case of a violation?

If you believe that our processing of your data contradicts the applicable data protection laws, you have the possibility to lodge a complaint with the appropriate data protection authority.

The data protection authority in Switzerland is the Federal Data Protection and Information Commissioner, Feldeggweg 1, 3003 Berne, Switzerland (https://www.edoeb.admin.ch). Based on your residence, you may have the possibility to lodge a complaint with the appropriate data protection authority of your place of residence.

12. Can this privacy notice be changed?

Yes, this Privacy Notice can be modified. It does not constitute part of any contractual agreement with you. We reserve the right to amend this Privacy Notice at any time. The version available on this website represents the current version.

Last update: 4 November 2026

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