

RUAG International General Privacy Notice

Data protection is a matter of trust, and your trust is a core value of RUAG International Holding AG (hereinafter referred to as “**RUAG**” and “**RUAG International**”). This privacy notice („**Privacy Notice**”) is based on the EU General Data Protection Regulation („**GDPR**”) requirements – even where GDPR does not apply – to ensure a high level of protection for all individuals whose personal data is processed by all legal entities of RUAG.

This Privacy Notice describes the processing of personal data by all legal entities of RUAG, unless specified otherwise, such as in a contract or in additional privacy notices (for example for visitors of our website, applicants, trade fairs and similar events). These privacy notices are available on our website at <https://www.ruag.com/en/privacy>.

1. Who we are?

RUAG International Group, including legal entities (e.g., Beyond Gravity companies) controlled by RUAG is responsible for the processing of personal data according to this Privacy Notice (also referred hereinafter to as “**we**” and/or “**us**”). Each RUAG company that processes personal data for its own business purposes acts as a data controller. For example, if you interact with a company about a matter concerning that company, it will be the controller of the personal data processed in parity with your request. A detailed list of the different RUAG companies and their contact details is available at <https://www.ruag.com/en/imprint>.

If you have any questions or requests in relation to the processing of your personal data, you can contact our Data Protection Team at data.protection@beyondgravity.com.

2. Which personal data do we process and for what purposes?

“**Personal data**” is the information relating to yourself (or from which you may be identified). We may process personal data in the following situations and for the following purposes:

- **Communication:** We may process personal data when you have contact with RUAG, such as when you contact our customer services department or when you write to or call us. In this case, we may typically process name(s) and contact data as well as the content and time of the relevant messages. We may use this data in order to provide you with information, process your request, and communicate with you. We may also forward your messages within RUAG if your request concerns another RUAG company or an employee.
- **Visiting websites; using cookies and other tracking technologies:** Please refer to our separate Website and Cookies Privacy Notice (available at <https://www.ruag.com/en/privacy>) for information on how we may process personal and other data when you use our website, including our newsletter registration form.
- **Use of e-mail:** We may use your name and e-mail address to send you alerts, updates, event invitations and other information by e-mail. However, we will ask for consent first unless we have other legal grounds, such as where we have obtained your contact details from you in the context of our services. If you receive marketing communications from us and no longer wish to do so, you may unsubscribe at any time by following the link included in these e-mails. We may use a third-party provider to be made aware if you open our e-mails or if you click on links included in them. You may prevent this by using the appropriate settings in your e-mail client.

- **Visiting our premises:** When you enter our premises, we may make video recordings (CCTV¹) in appropriately marked areas for security and evidence purposes. For more information on how your data is being processed for CCTV purposes, please refer to our separate Privacy Notice for video recording (available at <https://www.ruag.com/en/privacy>). In addition, when entering/signing in to our buildings, you may have to provide us personal data such as your name, address, employer, title, identification details, copies of documents, government-issued documents, mobile phone and telephone number(s), date and place of birth, all citizenship details (including previous citizenships), nationality details (including previous nationalities), residence permit(s), and place of residence. We collect this personal data for security reasons and for compliance with regulatory requirements (e.g., trade compliance) as well as background checks and any other checks we may conduct to verify information provided including third party reference information (as permitted under applicable law). We may also collect information from third parties such as information from official registers, e.g., to comply with sanctions and embargo regimes. Furthermore, you may be able to use our Wi-Fi service. In this case, we collect device-specific data when you sign in and ask you to provide your name and your e-mail address for security and access control purposes.
- **Customer events:** When we hold customer events (such as advertising events, sponsoring events, cultural and sporting events), we may also process personal data. Such data may include the name and address of the participants or interested parties and, other data, depending on the event, possibly your date of birth.

We process this information for the purpose of carrying out customer events, and for marketing and relationship management purposes. Further details can be found in the respective conditions of participation. Please read our Privacy Notice for Trade Fairs and Similar Events (available at <https://www.ruag.com/en/privacy>) for further information about how we process your personal data.

- **Business partners:** RUAG is working together with various companies and business partners, such as suppliers, commercial customers of our goods and services and with external service providers (for example, IT service providers). We may process personal data about the contact persons in these companies, for instance: their name, job, citizenship details (including previous citizenships), nationality details (including previous nationalities), residence permit(s), place of residence, place & date of birth and title. We process this personal data to conclude, administer, and perform contractual relationships, for communication and compliance purposes as well as for security reasons and for compliance with regulatory requirements (e.g., trade compliance).

Depending on the field of activity, we are also required to scrutinize the relevant company and/or its employees.

We may also process personal data about you to improve our customer orientation, customer satisfaction and customer loyalty (Customer Relationship Management).

- **Administration:** We may process personal data from contracts and communications and for our internal administration. For example, we may process personal data in the context of IT or real estate management. We may also process personal data for accounting, archiving and statistic purposes and in general, to review and improve internal processes.
- **Corporate transactions:** We may also process personal data from contracts and communications in order to prepare and process company transactions.
- **Job applications:** We may also process personal data when you apply for employment at RUAG. As a general rule, we require the usual information and documents as well as the ones mentioned in a job advertisement. Please read our Privacy Notice for job applicants (available at <https://www.ruag.com/en/privacy>) for information about how we process your personal data collected in the course of a job application.

¹ „Closed Circuit Television“, broadly known as video monitoring

- **Employment:** We process the personal data of our employees in the course of their employment in accordance with our RUAG Employee Privacy Notice.
- **Compliance with legal requirements:** We may process personal data to comply with legal requirements. This includes the operation of a whistleblowing program to report suspected wrongdoings, internal investigations, or the disclosure of documents to an authority if we have good reason or are legally obliged to do so. In this context we may process names, documentation, or narratives referring to you or to a third party in accordance with our Whistleblowing Privacy Notice, available at <https://www.ruag.com/en/privacy>.
- **Protection of rights:** We may process personal data in various constellations to protect our rights, for example to assert claims in and out of court and before local and foreign authorities or to defend ourselves against claims. In addition, we may have to process prospects clarified or submit documents to an authority. Authorities may also require us to disclose documents containing personal data.

3. On what legal bases do we process your personal data?

We process personal data according to the applicable law on the following legal bases:

- for the performance of a contract (article 6 para.1 let. b GDPR),
- for legitimate interests (article 6 para. 1 let. f GDPR), which includes: the interest in customer care and communication with customers outside of a contract; in marketing activities; in relationship management; in improving products and services and developing new ones; in combating fraud, and the prevention and investigation of offences; in the protection of customers, employees and other persons and data, secrets and assets of RUAG; in IT security, especially in connection with the use of websites and other IT infrastructure; in the organisation of business operations, including the operation and further development of websites and other systems; in company management and development; in the sale or purchase of companies, parts of companies and other assets; and in the enforcement or defence of legal claims,
- based on a consent, where such consent was obtained separately (article 6 para.1 let. a GDPR), and
- for compliance with legal and regulatory obligations (article 6 para. 1 let. c GDPR).

If you provide us with **special categories of personal data** (e.g., sensitive personal data), we will process these on the basis of your consent (article 9 para. 2 let. a GDPR). In addition, we are also use your personal data in anonymous form for statistical purposes.

We do not intend to use your personal data for purposes other than those listed above. Otherwise, your prior consent will be obtained.

You are generally under no obligation to disclose personal data to us. However, we must collect and process certain data to be able to conclude and perform a contract, and for compliance and security purposes.

4. Who may have access to your personal data?

We restrict access to personal data to our employees who need that information to process it for the relevant purpose. They act in accordance with our instructions and are bound to confidentiality and secrecy when handling your personal data and are aware of the data protection and data security implications.

We may transfer your personal data to other legal entities within RUAG Group for the purpose of internal administration and for the processing purposes described in this Privacy Notice. This means that your personal data can also be processed and combined with personal data originating from another RUAG company for the respective purposes.

We may also disclose your personal data to third party service providers, in particular for the following services:

- IT services, such as for data storage, cloud services, data analytics etc.,
- consulting services: tax consultants, lawyers, management consultants, recruiters, etc.,
- logistics to deliver goods,
- administrative services, such as real estate management,
- business information and debt collection.

Generally, these service providers process personal data on our behalf as processors. Our processors are obliged to process personal data exclusively in accordance with our instructions, taking appropriate security measures. Certain service providers are joint controllers with us or independent controllers (e.g., debt collection agencies). We ensure an appropriate level of data protection when engaging service providers by way of contractual agreements.

There are cases where we may disclose your personal data to other third parties who may use personal data also for their own purposes, for instance:

- We may disclose your personal data to third parties if this is required by law (e.g., the authorities). We also reserve the right to process your personal data to comply with a court order or to assert or defend legal claims or if we consider it necessary for other legal reasons.
- We may disclose your personal data to third parties if this is necessary for a corporate transaction (for example an acquirer).

Recipients of your personal data mentioned in the section above, may be located abroad worldwide, including in countries outside of Switzerland, the EU or the EEA that may not have laws in place that protect your personal data to the same extent as the laws as mentioned. If we disclose your personal data to a recipient in such a country, we typically enter into the European Commission's standard contractual clauses (available [here](#)) in order to ensure the data protection level and safeguards required by the applicable law. For more details on this topic, please contact directly the RUAG Data Protection Team at data.protection@beyondgravity.com.

5. How long do we retain your personal data?

We retain your personal data:

- as long as it is necessary for the purposes for which the data was collected. In case of contracts, we generally retain your personal data for the duration of the contractual relationship and the statutory period of limitation,
- as long as we have a legitimate interest in retaining the data. This may be the case if we need personal data to enforce or defend claims, for backup and archiving purposes, and to ensure IT security,
- to comply with statutory duties of retention.

If you have given us consent, we will store your data until you withdraw your consent, unless there are statutory retention periods preventing the deletion. After the expiration of the retention period, your personal data will be either deleted or retained in a form that does not allow your personal identification (e.g., through anonymization).

6. How do we protect your personal data?

We take appropriate technical and organisational security measures to maintain the required security of your personal data and to protect it against unauthorised or unlawful processing and to prevent the risk of loss, unintentional alteration, unintentional disclosure or unauthorised access.

7. What are your rights with respect to your personal data?

You have certain rights under applicable data protection laws, in particular the following rights, in each case as set forth and within the limits of applicable law:

- **Right of access:** You are entitled to a copy of the personal information we hold about yourself and certain details on how we use it. Your personal data will usually be provided to yourself in writing, unless otherwise requested, or where you have made the request by electronic means, in which case the information will be provided to you by electronic means where possible. If you make a subject access request and there is any question about who you are, we may require you to provide information from which we can satisfy ourselves as to your identity.
- **Right to rectification:** We take reasonable steps to ensure that the information we hold about yourself is accurate and complete. However, if you do not believe this is the case, you can ask RUAG to update or amend it.
- **Right to erasure:** In certain circumstances, you have the right to ask RUAG to erase your personal information, for example where the personal information we collected is no longer necessary for the original purpose or where you withdraw your consent. However, this will need to be balanced against other factors (e.g., we may have legal and regulatory obligations, which means we cannot comply with your request).
- **Right to restriction of processing:** In certain circumstances, you are entitled to ask us to stop using your personal information, for example where you think that the personal information, we hold about yourself, may be inaccurate or where you think that we no longer need to use your personal information.
- **Right to data portability:** In certain circumstances, you have the right to ask that we transfer personal information that you have provided to us to another third party of your choice.
- **Right to object:** You have the right to object to processing, which is based on our legitimate interests, which is the case here. Unless we do have a compelling legitimate ground for the processing, we will no longer process the personal data on that basis when you file an objection. Note however, that we may not be able to provide certain services if we are unable to process the necessary personal data for that purpose.
- **Rights relating to automated decision-making:** You have the right not to be subjected to automated decision-making, including profiling, which produces legal effect for yourself or has a similar significant effect. We generally do not use automated decision-making or profiling in the employment context, but if you have been subject to an automated decision and do not agree with the outcome, you can contact directly the RUAG Data Protection Team and ask us to review the decision.
- **Right to withdraw consent:** In most cases, we do not base the processing of your personal data on your consent. However, it may happen that we ask for your consent in specific cases. In case we do this, you have the right to withdraw your consent to further use of your personal information. To withdraw your consent, please contact the RUAG Data Protection Team. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. In addition, if you withdraw consent, it will not affect the lawfulness of what we have done before such withdrawal.
- **Right to lodge a complaint:** You have the right to lodge a complaint with a supervisory authority. The supervisory authority of your country of residence will generally be competent for a complaint and will also provide advice or direct you to another supervisory authority.

To exercise these rights, please contact our RUAG Data Protection Team at data.protection@beyondgravity.com. Please note that these rights are subject to certain conditions and may be subject to exceptions.

8. Contact details

If you have any questions or would like to exercise your rights in relation to the processing of your personal data, please contact the RUAG Data Protection Team at data.protection@beyondgravity.com.

Physical requests may be sent to:

RUAG International Holding AG

Global Data Protection Officer
Bahnhofplatz 10b
3011 Bern
Switzerland

or to each respective RUAG company in its role as Data Controller. A detailed list of the different RUAG companies and their contact details is available at <https://www.ruag.com/en/imprint>.

9. Changes to this Privacy Notice

This privacy notice may be changed by us unilaterally from time to time, in particular, if we change our data processing or in case of new legislation. Please refer often to this page for the latest information and the effective date of any changes. The version published on this website is the current version. Changes to the Notice shall not apply retroactively.