

Privacy Notice — ALCOLM Cloud Services

ALCOLM AG, Zürcherstrasse 133, 8952 Schlieren, Switzerland — Version 3.0, 28.10.2026

1. Who we are and what this notice covers

ALCOLM AG ("ALCOLM", "we") provides cloud-based business management software (the "Services"). This Privacy Notice explains how we process personal data in connection with the Services and our website. It is addressed to our customers, the users acting for them, and other persons who interact with us (e.g. prospective customers and support contacts).

We process personal data in accordance with the Swiss Federal Act on Data Protection (FADP) and, where applicable, the EU General Data Protection Regulation (GDPR).

This notice is available in German, English, French and Italian; in the event of discrepancies, the German version prevails.

2. Our two roles: controller and processor

We process personal data in two distinct roles:

- As a controller, we process personal data that we need for our own purposes: managing customer accounts, providing logins, invoicing, support, securing and improving the Services, and communicating with you. This notice describes this processing.
- As a processor, we host and process the data that our customers and their users enter into the Services ("Customer Data"). Customer Data may contain personal data of our customers' employees, clients and business partners. For this data, our customer is the controller and decides on purposes and means; we process it only on the customer's documented instructions, as set out in the Data Processing Agreement (Part 2 of our GTC, available at <https://alcolm.com/agb>). If you have questions about personal data contained in Customer Data, please contact the organisation that provided you access to the Services.

3. Personal data we process as a controller

Category	Examples	Purpose / legal basis*
Account data	Name, business email address, telephone number, role, employer, username, hashed password	Providing and administering the Services (contract performance)
Contract and billing data	Company details, subscription, invoices, payment status	Invoicing, accounting, enforcement of claims (contract performance; legal obligations)
Support data	Support requests by email or telephone, correspondence, diagnostic information you provide	Providing support, improving the Services (contract performance; legitimate interest)
Technical and usage data	IP addresses, browser and device information, login timestamps, log files, feature usage events	IT security, error analysis, capacity planning, service improvement (legitimate interest)
Marketing and website data	Contact details of prospects, cookies and similar technologies (see section 8)	Marketing our Services (legitimate interest; consent where required)

*Legal bases are indicated for processing subject to the GDPR. Under the Swiss FADP, we rely on the processing principles of the FADP and, where required, on justification grounds pursuant to Art. 31 FADP.

4. Where your data is processed and who receives it

We use the following service providers (processors) to provide the Services:

- iWay AG, Zurich, Switzerland — application and database hosting for the products Alcolm Business Solution (ABS) and Alcolm Logistik Lösungen 1, and operation of our SMTP infrastructure; data centre: Rechenzentrum Ostschweiz, Gais AR, Switzerland
- Infomaniak Network SA, Geneva, Switzerland — application and database hosting for the products Alcolm Business Solution für Sport Business and Alcolm Logistik Lösungen 2, and hosting of all test environments; data centres in Switzerland (ISO 27001:2022 certified)
- Amazon Web Services EMEA SARL, Luxembourg — object storage (Amazon S3) for documents uploaded to or generated in the applications (e.g. PDFs), stored in the AWS Europe (Zurich) Region, eu-central-2, Switzerland
- Microsoft Ireland Operations Ltd., Dublin, Ireland — email dispatch from the applications via Microsoft 365 (tenant region EU), where neither the customer's own email server nor our SMTP infrastructure at iWay is used. Emails are generally dispatched via the customer's own email server (the customer stores its credentials in the system for this purpose); in that case no ALCOLM service provider is involved.
- Zendesk, Inc., San Francisco, USA — support ticketing (in addition to our own ticketing system); support requests may contain personal data; EU data residency configured
- Vonage B.V., Amsterdam, Netherlands — SMS dispatch from the applications (telephone numbers and message content)

The current list of sub-processors used for the processing of Customer Data is maintained in Appendix C of the Data Processing Agreement (Part 2 of the GTC, available at <https://alcolm.com/agb>), and customers are informed of intended changes in accordance with the DPA.

We disclose personal data to other third parties only where necessary for the performance of the contract, where you have consented, or where we are legally obliged to do so (e.g. to courts or authorities).

The applications, databases and document storage are located in data centres in Switzerland. Certain ancillary services (support ticketing, email dispatch via Microsoft 365, SMS dispatch) process data in the EU/EEA, where an adequate level of data protection exists. Where data is nevertheless disclosed to a country without an adequate level of data protection — in particular, incidental remote access by support or operations personnel of providers with a U.S. parent company cannot be excluded — we ensure appropriate safeguards, in particular the EU Standard Contractual Clauses supplemented as required under Swiss law and/or the recipient's certification under the Swiss–U.S. / EU–U.S. Data Privacy Framework.

5. Retention

We retain personal data only as long as necessary for the purposes described above or as required by law:

- Account data: for the duration of the contract and up to 12 months thereafter
- Contract and billing data: 10 years (statutory retention obligation under Swiss commercial law)
- Support correspondence: 24 months after closure of the request
- Log files and technical data: 12 months, unless needed longer for security investigations
- Customer Data (processor role): for the duration of the contract plus the post-termination export period, then deletion in accordance with the GTC and DPA

6. Your rights

Subject to the conditions of applicable law, you have the right to request information about the personal data we process about you, to have inaccurate data corrected, to request deletion or restriction of processing, to object to processing based on legitimate interests, to withdraw consent at any time with effect for the future, and to receive certain data in a portable format.

To exercise your rights, contact us at info@alcolm.com. We may ask you to verify your identity. If your request concerns personal data contained in Customer Data, we will refer you to the responsible customer (controller) and support that customer in responding, as required by the DPA.

You may also lodge a complaint with a supervisory authority, in Switzerland the Federal Data Protection and Information Commissioner (FDPIC), or, if the GDPR applies to you, with your competent EU data protection authority.

7. Data security

We take appropriate technical and organisational measures to protect personal data against unauthorised access, loss and misuse, including encryption in transit (TLS 1.2+), access controls and role-based permissions, multi-factor authentication for administrative access, logging, daily backups, firewalls and annual security reviews (penetration tests or vulnerability scans). Details of the measures applicable to Customer Data are set out in the DPA. No system is completely secure; we notify affected customers and, where legally required, the competent authorities of data security breaches in accordance with applicable law.

8. Cookies and website analytics

Our website uses strictly necessary cookies as well as Google Analytics, a web analytics service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Google Analytics uses cookies that enable an analysis of the use of the website. We use Google Analytics with IP anonymisation enabled. The information generated by the cookie may be transmitted to Google servers, including in the USA; Google LLC is certified under the Swiss–U.S. / EU–U.S. Data Privacy Framework. Where legally required, we set analytics cookies only with your consent (cookie banner); you may withdraw your consent at any time with effect for the future or prevent the storage of cookies in your browser settings. You may also prevent collection by Google Analytics using the opt-out browser add-on (<https://tools.google.com/dlpage/gaoptout>).

9. Changes to this notice

We may update this Privacy Notice from time to time. The version published at <https://alcolm.com/agb> applies; material changes affecting registered users will additionally be communicated by email or in-product notice. The date of the last update is shown at the top of this notice.

10. Contact

ALCOLM AG, Zürcherstrasse 133, 8952 Schlieren, Switzerland

info@alcolm.com — +41 58 0958 20 00