

Privacy policy for users of social media pages



Data controller	Equity Real Estate SA privacy officer
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Equity Real Estate SA



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Privacy policy for users of social media pages

Pursuant to Art. 19 of the FADP (hereinafter also referred to as "FADP") and Art. 13 of the Data Protection Ordinance (hereinafter also referred to as "OPDa"), Equity Real Estate SA, as better identified below, in its capacity as "Data Controller," provides you with the following information regarding the processing of personal data (i.e., any information relating to an identified or identifiable natural person) that you provide. In accordance with the regulations indicated, such processing will be based on principles of correctness, lawfulness, transparency, and protection of your privacy and your rights.

In particular, the company has its own social media page on the following social media platforms:

- ✓ Instagram
- ✓ Facebook
- ✓ LinkedIn

Personal data controller.

The controller of personal data is:

Equity Real Estate SA

Via Serafino Balestra 33

6900 Lugano

represented by persons with signing authority in accordance with the entries in the Cantonal Commercial Register (CHE-463.314.127), hereinafter also referred to as "Equity Real Estate" or the "Company" or "Data Controller."

The list of data processors and any authorized persons is kept at the Data Controller's headquarters and made available upon request by the data subject.

For the processing activities identified below, the Company and the providers of the Social Platforms listed above each operate as independent Data Controllers.

In this regard, the Company informs Data Subjects that the use of and interaction with Equity Real Estate's Social Pages may involve further processing of the Data Subject's personal data by the respective Social Platform provider, not necessarily limited to their interaction with Equity Real Estate's Social Pages and for the purposes specified in this Policy.

Therefore, with regard to the processing carried out by the providers of Social Platforms (e.g., the management of users and shared information, the technical possibility of using Equity Real Estate's Social Pages), each Social Platform provider is solely responsible as an independent Data Controller.

As far as possible, Equity Real Estate endeavors to ensure that Social Platform providers process User data in accordance with the Privacy Policy. However, in many cases, the Company has no influence over the processing of data by Social Platform providers. Each Social Platform provider manages the entire IT infrastructure of the service, establishes its own provisions regarding the protection of personal data, and maintains an independent relationship with the User (provided that they are registered with the social media service). The provider is also solely responsible for all matters relating to the User's profile data, to which Equity Real Estate has no access.

For more information on the processing carried out by Social Platform providers as independent Data Controllers, the User is invited to consult the respective privacy policies of each provider on the Social Platform used (and listed below for the User's convenience):



- ✓ **Instagram** (Meta Platforms Ireland Ltd., 4 Gran Canal Square, Grand Canal Harbour Dublin 2, Ireland): <https://privacycenter.instagram.com/policy>;
- ✓ **Facebook**: (Meta Platforms Ireland Ltd., 4 Gran Canal Square, Grand Canal Harbour Dublin 2, Ireland): <https://www.facebook.com/privacy/policy/>
- ✓ **LinkedIn**: (LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland: https://www.linkedin.com/legal/privacy-policy?trk=content_footer-privacy-policy

Equity Real Estate does not guarantee that the links above are up to date with the privacy policies published from time to time by the providers of the Social Platforms on their respective Social Platforms. Therefore, the data subject is invited to consult the provider's privacy policy each time they browse the respective Social Platform.

Types of data processed through Equity Real Estate's social media pages

The Data Controller and the Joint Data Controller, depending on the different purposes referred to in this Policy, will process the following types of personal data of data subjects who use and interact with Equity Real Estate's Social Media Pages, in particular:

(i) **Data collected implicitly during the use of Equity Real Estate Social Media Pages**

Information relating to the interaction between the User and the Equity Real Estate Social Media Page provided by the data subject by virtue of using the Social Media Page.

This is mostly information that is not collected to be associated with identified data subjects, but which by its very nature could, through processing and association with data held by third parties, allow the data subjects to be identified. This category of data includes, for example, information sent to the Social Platform provider when the data subject clicks on the "like" button; information relating to the devices used and other technical information.

(ii) **Personal data provided directly by the data subject**

This is data provided directly by the data subject (such as, by way of example and not limited to: name, last name, email address, profile picture, place of birth, age, country, professional qualification, current or previous job positions, additional information made available by the data subject on the relevant Social Platform, comments and likes posted on the Equity Real Estate Social Page, personal data that may be contained in communications sent to the Company's contacts listed on the Equity Real Estate Social Page).

Definitions.

Pursuant to Art. 5 of the Federal Act on Data Protection (FADP), we provide the following definitions:

personal data: all information concerning an identified or identifiable natural person;

data subject: the natural person whose personal data is being processed;

processing: any operation relating to personal data, regardless of the means and procedures used, in particular the collection, recording, storage, use, modification, communication, archiving, erasure, or destruction of data;

disclosure: the transmission of personal data or making it accessible;

Data Controller: the private individual or federal body which, alone or jointly with others, determines the purposes and means of the processing;



Data Processor: the private individual or federal body that processes personal data on behalf of the Data Controller.

4. Purposes of processing

To the extent permitted by applicable law, the Company may process your personal data for the following specific purposes:

- to comply with regulatory (legal, tax, or regulatory) obligations to which Equity Real Estate is subject;
- to allow data subjects to browse Equity Real Estate's social media pages, to learn about the content published by Equity Real Estate, to process and respond to requests received from data subjects;
- to assert rights in court, out of court, or administratively, and to exercise the right of defense in legal disputes.

5. Legal basis and legitimate reason.

In accordance with Art. 6 of the FADP, the Data Controller processes your personal data within the applicable legal framework. Where required, and depending on the purpose of the processing activity, the processing of your personal data may be based on one of the following legal bases/grounds:

- to comply with regulatory obligations to which the Company is subject: the need to comply with a legal or regulatory obligation (Article 31 of the FADP, paragraph 1);
- to allow data subjects to browse the Company's pages, to assert rights in court, out of court or administratively, and to exercise the right of defense in legal disputes: overriding interest of the Data Controller/legitimate interest of the Data Controller (Art. 31 FADP c.).

If the legal basis for the processing is the legitimate interest of the Data Controller, the latter guarantees that it has carried out a prior assessment ("balancing test") to ensure the proportionality of the processing so that the rights and freedoms of the Data Subjects are not prejudiced, taking into account their reasonable expectations in relation to the specific processing activity carried out.

If the Company intends to use your personal data for any other purpose incompatible with the purposes for which it was originally collected or authorized, the Company will inform you in advance and, where required, request your consent for such processing.

The provision of data implicitly provided by the data subject occurs automatically when browsing the Company's Social Pages. Therefore, if the data subject does not wish to provide any personal browsing data, they are requested not to visit the relevant Social Pages of Equity Real Estate, , not to use them in any other way, or not to give their consent when this option is offered to them in accordance with the Privacy Policy.

The provision of data directly supplied by the User in communications with the Company is optional. However, in certain cases, failure to provide such data may make it impossible, where applicable, to receive replies to communications sent by the Data Subject to the Company.

6. Methods of processing personal data.

Personal data will be processed using manual, computerized, and telematic tools.



Data may be collected, recorded, stored, used, modified, communicated, archived, deleted, or destroyed using tools and procedures that guarantee the security and confidentiality of the data. Personal data will not be processed using fully automated tools, including profiling.

7. Storage period

Your Personal Data will be retained in accordance with the provisions of current privacy legislation based on the principle of necessity of processing. In particular:

- The personal data of the data subject processed to fulfill legal, accounting, and tax obligations and to allow data subjects to browse the Company's social media pages will be stored and processed for the entire duration of the browsing and, after its termination, for whatever reason, for a period not exceeding 24 months;
- Personal data processed to enable the company to exercise its rights in court and to punish unlawful conduct will be stored only for the time strictly necessary to achieve the purposes for which it was collected and, in any case, for no longer than 10 years from the date of collection.
- At the end of the retention periods, personal data will be deleted, unless there are further legitimate interests of the Company and/or legal obligations that make it necessary, subject to minimization, to retain them.

Subsequently, once the aforementioned reasons for processing no longer apply, the Data will be deleted, destroyed, or simply stored in anonymous form, unless there are further legitimate interests of the Data Controller and/or legal obligations that make it necessary, after minimization, to retain them.

8. Security measures

All Company personnel who have access to personal data are required to comply with internal rules and procedures relating to the processing of personal data in order to protect it and ensure its confidentiality. The Data Controller has also implemented appropriate technical and organizational measures to protect personal data from destruction, loss, alteration, misuse, disclosure, or unauthorized, accidental, or unlawful access, as well as from all other unlawful forms of processing.

9. Recipients.

Your personal data may be disclosed, where necessary, to:

- ✓ data processors;
- ✓ natural persons acting under the authority of the Data Controller and the Data Processor for the purposes set out above;
- ✓ firms or companies providing assistance and consulting services (e.g., legal, auditing);
- ✓ subjects who have the right to access your data by law, secondary legislation, or EU regulations;
- ✓ competent authorities for the fulfillment of legal obligations and/or provisions of public bodies upon request, including judicial authorities;

Where the Data Controller transfers your data to third-party service providers, it ensures that they meet the same security standards.

Third-party service providers are therefore required to comply with a series of technical and organizational security measures, regardless of their location, including measures relating to: (i)



information security management; (ii) information security risk assessment; and (iii) information security measures (e.g., physical access controls, logical access controls; protection against malware and hacking; data encryption measures; backup and recovery management measures). The third parties described above must process the personal data shared under this provision in accordance with the purpose for which such data was originally collected and at least to the same level of protection as that in force in Switzerland.

The list of Data Processors is constantly updated and available at the Data Controller's headquarters.

10. Communication of data outside the Confederation.

Your personal data, processed for the purposes referred to in Article 4, will be kept in Switzerland and will not be transferred to third countries that do not have the same data protection laws as the country in which the information was initially provided.

For the sake of completeness, it should be noted that, pursuant to Articles 16 and 17 of the FADP, the transfer of personal data may only be communicated abroad if the Federal Council has determined that the legislation of the recipient state or international organization guarantees adequate data protection, or if: the data subject has given his or her consent; the communication is directly related to the conclusion or execution of the contract; the communication is necessary to protect an overriding public interest or to ascertain, exercise, or enforce a right before a court or competent foreign authority; the communication is necessary to protect the life or physical integrity of the data subject or a third party; the data subject has made the personal data accessible to anyone; the data comes from a register provided for by law that is accessible to the public or to persons with a legitimate interest.

Your personal data will not be disclosed to third parties or subject to any fully automated decision-making process.

11. Third-party social media pages

This Policy applies solely and exclusively to Equity Real Estate's Social Media Pages and not to other websites owned by third parties that the data subject may access through links contained in Equity Real Estate's Social Media Pages. If the data subject accesses another social media page, they are advised to read the information regarding the processing of personal data applicable to that page.

Please note that the data subject has no control over the content of such websites and/or social media pages, nor does it have access to the personal data of users visiting them. Furthermore, the Company has no access to the personal data of visitors/users of the websites or to the social media accounts of its Users, but only to aggregated and anonymous data that it may use to evaluate the performance and effectiveness of its services.

The owners of the aforementioned websites and/or social media pages will therefore remain the sole and exclusive owners and Data Processors of their users' personal data, with the Company remaining uninvolved in this activity and free from any liability, prejudice, or cost that may arise from its failure or incorrect performance.



12. Rights of the data subject

In accordance with the provisions of the FADP, the Data Controller recognizes the following rights in particular (non-exhaustive list):

- to be subject to transparent processing (Articles 19-21 of the FADP);
- obtain confirmation as to whether or not personal data is being processed and, if so, obtain access to the personal data - including a copy thereof - and communication, among other things, of the following information: the purposes of the processing, the categories of personal data processed, the recipients to whom the data has been or will be disclosed, the period for which the data will be stored (right of access - Article 25 of the FADP);
- obtain, without undue delay, the rectification of inaccurate personal data and/or the integration of incomplete personal data (right to rectification - Article 32(1), (3), and (4) of the FADP);
- obtain, without undue delay, the erasure of personal data (right to erasure - Article 32(2)(c) of the FADP);
- receive personal data in a structured, commonly used, and machine-readable format, if the processing is based on consent and is carried out by automated means (right to data portability - Article 28 of the FADP);
- object to the processing at any time, for reasons related to your situation (right to object - Article 30(2)(b)). If you exercise this right, the Company will refrain from further processing your personal data, unless there are compelling legitimate grounds for proceeding with the processing;
- obtain restriction of processing (right to restriction of processing) if the accuracy of the personal data is contested (for the period necessary for the Data Controller to verify the accuracy of the personal data) or if the data subject has objected to processing (pending verification of whether the legitimate grounds of the Data Controller override those of the data subject);
- assert their point of view with regard to automated decisions and, in particular, demand a review of the decision by a human being (right not to be subject to an automated individual decision – Art. 21 FADP);
- lodge a complaint with the competent supervisory authority (in Switzerland, the Federal Data Protection and Information Commissioner - FDPIC);
- if neither the correctness nor the inaccuracy of the personal data can be proven, request the addition of a note to indicate the dispute;
- request that the correction, destruction, blocking, and, above all, communication to third parties, in addition to the note on the dispute or judgment, be communicated to third parties or published;
- have the processing of personal data declared unlawful.

The data subject may exercise their rights in the following ways:

- by email: by sending a request to the Company at the following email address: privacy@equityrealestate.ch
- by regular mail to the Company's headquarters: Equity Real Estate SA, Via Serafino Balestra 33, 6900 Lugano.



When contacting the Data Controller, the user must ensure that they include their name, email address, postal address, and/or telephone number(s) to ensure that the Data Controller can correctly handle their request.

The Company will comply with such requests, revocations, or objections as required by applicable data protection regulations within one month of receiving the request at the latest. This period may be extended depending on the complexity or number of requests, and the Company will explain the reason for the extension.

13. Privacy contact

The Company has appointed a privacy contact person, who can be contacted at the address of the Data Controller indicated above or by sending an email to privacy@equityrealestate.ch.

14. Updating of this policy

The Data Controller reserves the right to modify, update, add, or remove parts of this privacy policy at its discretion and at any time.

Effective date: July 1, 2025