

# RAIpin AG– Privacy Policy

## 1. General Information

Based on Article 13 of the Swiss Federal Constitution (BV) and the federal data protection provisions (Data Protection Act [DSG], Data Protection Ordinance [DSV]), every individual has the right to privacy and protection against the misuse of their personal data. We treat your personal data confidentially and in accordance with the statutory data protection regulations and this privacy policy.

This privacy policy applies to the processing of personal data by RAIpin AG within the scope of the Swiss Data Protection Act as well as the General Data Protection Regulation of the European Union (GDPR). In this privacy policy, we explain how we – RAIpin AG (RAIpin SA) (RAIpin Ltd.) – collect and process personal data (data that directly or indirectly identifies you).

In cooperation with our hosting providers, we strive to protect our databases as effectively as possible against unauthorized access, loss, misuse, or falsification. Please note that data transmission over the internet (e.g., email communication) may have security vulnerabilities. A complete protection of data against third-party access is not possible.

You can also download this privacy policy as a PDF file.

## 2. Scope

This privacy policy applies to customers who use the services and offers of RAIpin AG and to the use of the website [www.ralpin.com](http://www.ralpin.com).

The data protection notices and policies of other providers apply to websites of third parties that are referenced on the [www.ralpin.com](http://www.ralpin.com) website.

## 3. Controller

Controller for the processing of personal data described in this privacy policy is:

RAIpin AG  
Ludwig Näf  
Römerstrasse 3  
4600 Olten

UID: CHE-102.198.882

[data@ralpin.com](mailto:data@ralpin.com)

Phone: +41 (0)58 822 88 88

## **4. Personal Data**

We process personal data that we require for the purchase of services and products, which we receive from you, involved third parties, or collect ourselves.

The personal data processed by RAlpin AG includes, in particular:

- General personal details about you, such as your name, date of birth, nationality, and contact information.
- Details about the cargo you are transporting.
- Information about the company you work for, your role or title, and/or your relationship with other individuals.
- Customer numbers and truck license plates.
- Identification and background information provided by you or collected about you.
- Financial data, such as payment information.
- Product details (e.g., location, date, and time of purchase, type of purchased product, travel/transport date, scope of service).
- Consent to the terms and conditions.
- Personal data about you obtained from correspondence with third parties (e.g., authorities) as part of a contractual relationship or collected independently from public registers or websites.
- Information shared during meetings.
- Any additional personal information you provide us with.

## **5. Processing for Service Provision Purposes**

### **5.1 General Data Processing**

We primarily collect and process your personal data to provide our services and offers professionally and in accordance with our contractual and legal obligations, as well as to document and invoice these services.

Additionally, we process your personal data for the following purposes:

- Responding to your inquiries and communicating with you.
- Managing and optimizing the website (see Section 5.2).
- Processing job applications.
- Fulfilling legal obligations.
- Informing you about news, new services, offers, developments, and events at RAlpin (you can inform us at any time if you no longer wish to receive such information).

We have a legitimate interest in processing your personal data for the purposes mentioned above. Some processing activities are also necessary to fulfil our contractual obligations to you or comply with our legal obligations (e.g., record-keeping requirements).

## 5.2 Use of the Website in Particular

The data processed during your use of our website or the booking system available there will be deleted or blocked as soon as the purpose of their storage ceases to apply, provided there are no legal retention obligations preventing their deletion and unless otherwise specified for individual processing procedures.

### ➤ Cookies

To make your visit to our website more user-friendly, effective, and secure, and to enable the use of specific functions, cookies are employed when you visit our website at [www.ralpin.com](http://www.ralpin.com). Cookies are small text files stored on your computer. Most of the cookies used are deleted from your hard drive after the browser session ends (so-called session cookies). Other cookies are stored by your browser and enable us to recognise your browser during your next visit (so-called persistent cookies).

You can prevent the storage of cookies in your browser by restricting or disabling the saving and reading of cookies. Please note, however, that certain functions of the website [www.ralpin.com](http://www.ralpin.com) may not be usable without cookies.

### ➤ Server Log Files

For technical reasons, particularly to ensure a secure and stable online presence, data is transmitted to us or to our web space provider by your web browser when you access [www.ralpin.com](http://www.ralpin.com). These so-called server log files include, among other things, the type and version of your web browser, the operating system, the website from which you accessed our site (referrer URL), the pages of our website you visit, the date and time of access, and the IP address of the internet connection used to access our website.

This data cannot be attributed to specific individuals. It is not merged with other data sources. The data collected in this way is temporarily stored.

The server log files we use to monitor reservation enquiries are deleted 30 minutes after the session ends.

When you visit our booking platform (<https://cubo.ralpin.com> / <https://reservations.ralpin.com>), your web browser tells the platform which device type you are using (desktop or mobile) so we can monitor and track bookings. In terms of storage, this data is processed in accordance with the section "Use of the Website in Particular".

### ➤ Google Analytics

RALpin AG does not use the "Google Analytics" service and has deactivated it on its website.

## 6. Data Disclosure to Third Parties

To achieve the purposes described in section 5.1 of this privacy policy, it may be necessary to disclose your personal data to the following categories of recipients:

- Authorities,
- Business partners with whom we may need to coordinate service delivery,
- External service providers.

## **7. Location of Data Processing**

We generally process personal data within our area of responsibility in Switzerland. However, we may transfer this data to recipients (e.g., business partners) who process it in other countries, including those that do not offer a level of data protection comparable to Swiss law. In such cases, we will rely on consent, standard contractual clauses, or the necessity of fulfilling a contract or asserting legal claims to ensure compliance.

## **8. Data Retention**

We retain personal data only as long as necessary to fulfil the respective purpose (e.g., processing mutual contractual services), as required by legal retention or documentation obligations, or where we have a prevailing private or public interest in retaining the data.

## **9. Job Applications**

We occasionally publish job advertisements (e.g., on our website or relevant portals). You have the option to send us your application either by post or electronically, such as via our website. In the case of these (digital) applications or unsolicited applications, your applicant and application data will be electronically stored and processed by us for the purpose of handling the application process.

If an employment contract is concluded following the application process, the data transmitted as part of the application will be stored in your personnel file for the usual organisational and administrative processes, in compliance with additional legal obligations.

If an application is rejected, the data you submitted will be deleted within six months after the recruitment process is completed. Exceptions apply only if legal requirements necessitate longer retention of the data.

If you expressly consent to a longer retention period for your data, e.g., to be included in our applicant database, the data will be further processed based on your consent. You can withdraw this consent at any time with effect for the future by notifying the contact point specified in section 2. However, processing carried out until the point of withdrawal will not be affected.

## **10. Data Security**

### **10.1 General Data Processing**

To protect your personal data from loss, unauthorized alteration, or third-party access, we take appropriate and reasonable precautions.

If you provide us with personal data via a third party (e.g., your employees or other contact persons), it is your responsibility to inform them, in general terms, about the processing by service providers (such as us) or other external service providers (e.g., in a data privacy notice for employees). Please ensure that these individuals are aware of this Privacy Policy and only share their personal data with us if you are authorized to do so and the data is accurate.

We would like to point out that we may use external IT service providers and cloud providers with servers located in Switzerland for processing contractual relationships. We also use certain IT services and communication tools that may carry data security risks (e.g., email, video conferencing). It is your responsibility to inform us if you require special security measures.

## 10.2 Website Usage

Traffic on our website is generally encrypted. You can recognize whether a specific page is transmitted in an encrypted manner by the closed key or padlock symbol displayed in the address bar of your browser.

## 11. Your Rights

With regard to your personal data, you have the following rights:

- The right to receive information about the personal data we store about you, how it is processed, and for what purpose.
- The right to request a copy of your personal data in a standard format or have it transferred.
- The right to correct, restrict, or delete your personal data (if we are legally required to retain your data for a certain period, it will be blocked until deletion is permissible).
- The right to delete your customer account or request its deletion.
- The right to object to the processing of your personal data.
- The right to seek legal recourse with the relevant supervisory authority.

These rights are available to you free of charge unless the request entails disproportionate effort.

Please note that these rights are subject to certain conditions and exceptions. Where legally permissible and necessary, we may decline requests to exercise these rights. For instance, we may be required to retain or process personal data for legal reasons, even if you request its deletion or restriction.

We may be obligated to disclose some of this data to law enforcement or other authorities. For example:

- When connecting to the Wi-Fi at RALpin AG's head office in Olten or at the Wheelset Workshop in Wangen near Olten, we must retain and disclose connection and identification data in accordance with the Federal Act on the Surveillance of Postal and Telecommunications Traffic (BÜPF) and its associated ordinance (VÜPF) if required.

The Federal Act on Combating Money Laundering and Terrorist Financing (Money Laundering Act, GwG) obliges us to retain customer and transaction data for a specified period. The collection of data necessary to provide the website and the storage of data in log files are essential for the operation of our website. Therefore, users of our website do not have the right to object in this regard.

When using the Wi-Fi at the Freiburg terminal (D), no data is stored in accordance with the GDPR and the German Telecommunications Surveillance Regulation (TKÜV). Furthermore, RALpin AG is not responsible for the manner in which this service is used, as per the German Telemedia Act (TMG).

## 12. Website Operation

The web servers for operating the website [www.ralpin.com](http://www.ralpin.com) are technically managed by Contria GmbH, Langenthal.

### **13. Contact**

If you have any questions or if you, your employees, or other contact persons wish to exercise your or their data protection rights, please contact us at:

[data@ralpin.com](mailto:data@ralpin.com)

or write to:

RAIpin AG  
Ludwig Näf  
Römerstrasse 3  
4600 Olten

### **14. Can this Privacy Policy be amended?**

This Privacy Policy does not form part of a contract with you; therefore, your consent is not required. We reserve the right to amend the content of this Privacy Policy at any time and without prior notice.

The version published on the website is the most current version.

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