

Privacy policy of the Association SAMA

Applicable to «SAMA Swiss Aircraft Maintenance Association»
(German: «SVFB Schweizerischer Verband Flugtechnischer Betriebe»)
(French: «ASEA Association Suisse des Entreprises Aérotechniques»)
(Italian: «ASMA Associazione Svizzera Manutenzioni Aeronautiche»)

Status: 1 September 2023

Privacy policy

In this **privacy policy**, we provide information about which personal data we process in connection with our **activities and operations**, including our [svfb.ch website](https://www.svfb.ch). In particular, we provide information on why, how and where we process which personal data. We also provide information about the rights of persons whose data we process.

Further data protection declarations and other legal documents such as general terms and conditions (GTC), terms of use or conditions of participation may apply to individual or additional activities and operations.

We are subject to Swiss data protection law as well as any applicable foreign data protection law, in particular that of the European Union (EU) with the [General Data Protection Regulation](#) (GDPR). The [European Commission](#) recognises that Swiss data protection law guarantees adequate data protection.

1. Contact addresses

Responsibility for the processing of personal data:

SVFB Schweizerischer Verband Flugtechnischer Betriebe
c/o Swiss International Air Lines Ltd.
P. O. Box
4002 Basel
Switzerland
kontakt@svfb.ch

We would like to point out if there are other controllers for the processing of personal data in individual cases.

2. Terms and legal bases

2.1. Terms

Personal data is **any** information relating to an identified or identifiable natural person. A **data subject** is a person about whom we process personal data.

Processing includes **any** handling of personal data, **regardless** of the means and procedures used, for example the retrieval, comparison, adaptation, archiving, storage, reading, disclosure, procurement, collection, recording, deletion, disclosure, organisation, storage, modification, dissemination, linking, destruction and use of personal data.

The **European Economic Area (EEA)** comprises the [member states of the European Union](#) (EU) as well as the Principality of Liechtenstein, Iceland and Norway. The General Data Protection Regulation (GDPR) refers to the processing of personal data as the processing of personal data.

2.2. Legal basis

We process personal data in accordance with Swiss data protection law, in particular the [Federal Act on Data Protection](#) (Data Protection Act, DPA) and the [Ordinance on Data Protection](#) (Data Protection Ordinance, DPO).

If and insofar as the General Data Protection Regulation (GDPR) is applicable, we process personal data in accordance with at least one of the following legal bases:

- Art. 6 para. 1 lit. b GDPR for the necessary processing of personal data for the fulfilment of a contract with the data subject and for the implementation of pre-contractual measures.
- Art. 6 para. 1 lit. f GDPR for the necessary processing of personal data in order to protect the legitimate interests of us or third parties, unless the fundamental freedoms and rights and interests of the data subject prevail. Legitimate interests are, in particular, our interest in being able to carry out our activities and operations in a permanent, user-friendly, secure and reliable manner and to communicate about them, to ensure information security, to protect against misuse, to enforce our own legal claims and to comply with Swiss law.
- Art. 6 para. 1 lit. c GDPR for the necessary processing of personal data to fulfil a legal obligation to which we are subject in accordance with any applicable law of member states in the European Economic Area (EEA).
- Art. 6 para. 1 lit. e GDPR for the necessary processing of personal data for the performance of a task carried out in the public interest.
- Art. 6 para. 1 lit. a GDPR for the processing of personal data with the consent of the data subject.
- Art. 6 para. 1 lit. d GDPR for the necessary processing of personal data in order to protect the vital interests of the data subject or another natural person.

3. Type, scope and purpose

We process the personal data that is **required** to carry out our activities and operations in a permanent, user-friendly, secure and reliable manner. Such personal data may fall into the categories of inventory and contact data, browser and device data, content data, meta or marginal data and usage data, location data, sales data as well as contract and payment data.

We process personal data for as **long as** is necessary for the respective purpose(s) or required by law. Personal data whose processing is no longer required and whose retention does not serve to identify the operational business case will be anonymised or deleted.

We may have personal data processed **by third parties**. We may process personal data jointly with third parties or transfer it to third parties. Such third parties are, in particular, specialised providers whose services we use. We also guarantee data protection for such third parties.

We only process personal data with the consent of the data subject. If and to the extent that processing is permitted for other legal reasons, we may refrain from obtaining consent. For example, we may process personal data without consent in order to fulfil a contract, to comply with legal obligations or to protect overriding interests.

We also process personal data that we receive from third parties, obtain from publicly accessible sources or collect in the course of our activities and operations, if and to the extent that such processing is permitted by law.

4. Communication

We process data in order to be able to communicate with third parties. In this context, we process in particular data that a data subject transmits when making contact, for example by post or e-mail. We may store such data in an address book or with comparable tools.

Third parties who transmit data about other persons are obliged to guarantee data protection for such data subjects. To this end, the accuracy of the personal data transmitted must be ensured, among other things.

5. Applications

We process personal data about applicants to the extent necessary to assess their suitability for an employment relationship or for the subsequent performance of an employment contract. The required personal data results in particular from the information requested, for example in the context of a job advertisement.

We also process personal data that applicants **voluntarily** disclose or publish, in particular as part of cover letters, CVs and other application documents as well as online profiles.

We process - if and insofar as the General Data Protection Regulation (GDPR) is applicable - personal data about applicants, in particular in accordance with Art. 9 para. 2 lit. B GDPR.

6. Data security

We take suitable technical and organisational measures to ensure data security appropriate to the respective risk. With our measures, we guarantee in particular the confidentiality, availability, traceability and integrity of the processed personal data, without being able to guarantee absolute data security.

Access to our website and our other online presence takes place using transport encryption (SSL / TLS, in particular with the Hypertext Transfer Protocol Secure, abbreviated to HTTPS). Most browsers indicate transport encryption with a small padlock in the address bar.

Our digital communication - like all digital communication **in general - is subject** to mass surveillance without cause or suspicion by security authorities in Switzerland, the rest of Europe, the United States of America (USA) and other countries. We cannot directly influence the corresponding processing of personal data by secret services, police forces and other security authorities. We also cannot rule out the possibility that individual data subjects may be subject to targeted surveillance.

7. Personal data abroad

We **generally** process personal data in Switzerland and the European Economic Area (EEA). However, we may also export or transfer personal data to other countries, in particular in order to process it or have it processed there.

We may export personal data to all [countries and territories on earth](#) and elsewhere in the [universe](#), provided that the law there guarantees adequate data protection in accordance with the [decision of the Swiss Federal Council](#) and - if and insofar as the General Data Protection Regulation (GDPR) is applicable - in accordance with the [decision of the European Commission](#).

We may transfer personal data to countries whose laws do not guarantee adequate data protection, provided that data protection is guaranteed for other reasons, in particular on the basis of standard data protection clauses or with other suitable guarantees. Exceptionally, we may export personal data to countries without adequate or appropriate data protection if the special requirements under data protection law are met, for example the express consent of the data subjects or a direct connection with the conclusion or fulfilment of a contract. We will be happy to provide data subjects with information about any guarantees or provide a copy of any guarantees upon request.

8. Rights of data subjects

8.1. Data protection claims

We grant data subjects all rights in accordance with the applicable data protection law. Data subjects have the following rights in particular:

- **Information:** Data subjects can request information as to whether we process personal data about them and, if so, what personal data is involved. Data subjects also receive the information required to assert their data protection claims and ensure transparency. This includes the processed personal data as such, but also information on the purpose of processing, the duration of storage, any disclosure or export of data to other countries and the origin of the personal data.
- **Correction and restriction:** Data subjects can have incorrect personal data corrected, incomplete data completed and the processing of their data restricted.
- **Erasure and objection:** Data subjects can have their personal data erased ("right to be forgotten") and object to the processing of their data with effect for the future.
- **Data disclosure and data transfer:** Data subjects may request the disclosure of personal data or the transfer of their data to another controller.

We may postpone, restrict or refuse the exercise of the rights of data subjects to the extent permitted by law. We may inform data subjects of any requirements that must be met in order to exercise their rights under data protection law. For example, we may refuse to provide information in whole or in part with reference to business secrets or the protection of other persons. For example, we may also refuse to delete personal data in whole or in part with reference to statutory retention obligations.

In **exceptional cases**, we may charge costs for the exercise of rights. We will inform affected persons of any costs in advance.

We are obliged to take appropriate measures to identify data subjects who request information or assert other rights. Data subjects are obliged to cooperate.

8.2. Legal protection

Data subjects have the right to enforce their data protection claims by taking legal action or to lodge a complaint with a competent data protection supervisory authority.

The data protection supervisory authority for complaints by data subjects against private controllers and federal bodies in Switzerland is the [Federal Data Protection and Information Commissioner](#) (FDPIC).

Possible data protection supervisory authorities for complaints from data subjects - if and insofar as the General Data Protection Regulation (GDPR) is applicable - are organised as [members of the European Data Protection Board](#) (EDPB). In some Member States in the European Economic Area (EEA), the data protection supervisory authorities are organised on a federal basis, [particularly in Germany](#).

9. Use of the website

9.1. Cookies

We may use cookies. Cookies - our own cookies (first-party cookies) as well as cookies from third parties whose services we use (third-party cookies) - are data that are stored in the browser. Such stored data need not be limited to traditional cookies in text form.

Cookies can be stored in the browser temporarily, as "session cookies" or for a certain period of time as so-called permanent cookies. "Session cookies" are automatically deleted when the browser is closed. Permanent cookies have a specific storage period. In particular, cookies make it possible to recognise a browser the next time it visits our website and thus, for example, to measure the reach of our website. Permanent cookies can also be used for online marketing, for example.

Cookies can be completely or partially deactivated and deleted at any time in the browser settings. Without cookies, our website may no longer be fully available. We actively request your express consent to the use of cookies - at least if and to the extent necessary.

9.2. Logging

We may log at least the following information for each access to our website and our other online presence, provided that this information is transmitted to our digital infrastructure during such access: Date and time including time zone, [IP address](#), access status (HTTP status code), operating system including user interface and version, browser including language and version, individual sub-page of our website accessed including amount of data transferred, last website accessed in the same browser window (referrer).

We record such information, which may also constitute personal data, in log files. The information is required in order to provide our online presence in a permanent, user-friendly and reliable manner. The information is also required to ensure data security - also by third parties or with the help of third parties.

9.3. Tracking pixel

We can integrate tracking pixels into our online presence. Tracking pixels are also known as web beacons. Tracking pixels - including those from third parties whose services we use - are usually small, invisible images or scripts written in JavaScript that are automatically retrieved when our online presence is accessed. Tracking pixels can be used to collect at least the same information as log files.

10. Notifications and messages

We send notifications and messages by e-mail and via other communication channels such as instant messaging or SMS.

10.1. Success and reach measurement

Notifications and messages may contain web links or tracking pixels that record whether an individual message has been opened and which web links have been clicked on. Such web links and tracking pixels can also record the use of notifications and messages on a personalised basis. We require this statistical recording of usage for measuring success and reach in order to be able to send notifications and messages in an effective, user-friendly, permanent, secure and reliable manner based on the needs and reading habits of the recipients.

10.2. Consent and objection

You must **always** expressly consent to the use of your e-mail address and your other contact addresses, unless such use is permitted for other legal reasons. Wherever possible, we use the "double opt-in" procedure to obtain consent, i.e. you will receive an e-mail with a web link that you must click on to confirm, so that no misuse by unauthorised third parties can occur. We may log such consents, including the IP address, date and time, for reasons of proof and security.

You can object to receiving notifications and communications such as newsletters at any time. With such an objection, you can also object to the statistical recording of usage for measuring success and reach. Necessary notifications and communications in connection with our activities and operations remain reserved.

11. Social Media

We are present on social media platforms and other online platforms in order to communicate with interested parties and provide information about our activities and operations. In connection with such platforms, personal data may also be processed outside Switzerland and the European Economic Area (EEA).

The general terms and conditions (GTC) and terms of use also apply in each case, as well as data protection declarations and other provisions of the individual operators of such platforms. In particular, these provisions provide information about the rights of data subjects directly vis-à-vis the respective platform, including, for example, the right to information.

We are jointly responsible with Meta Platforms Ireland Limited (Ireland) for our **social media presence on Facebook**, including the so-called Page Insights - if and to the extent that the General Data Protection Regulation (GDPR) is applicable. Meta Platforms Ireland Limited is part of the [Meta companies](#) (including in the USA). Page Insights provide information about how visitors interact with our Facebook presence. We use Page Insights to optimise our social media presence on Facebook in an effective and user-friendly manner.

Further information on the type, scope and purpose of data processing, information on the rights of data subjects and the contact details of Facebook and Facebook's data protection officer can be found in [Facebook's privacy policy](#). We have concluded the so-called "[Controller Addendum](#)" with Facebook and thus agreed in particular that Facebook is responsible for guaranteeing the rights of data subjects. For the so-called Page Insights, the corresponding information can be found on the page "[Information on Page Insights](#)" including "[Information on Page Insights](#)". [ten Insights data](#)".

12. Third party services

We use services from specialised third parties in order to be able to carry out our activities and operations in a permanent, user-friendly, secure and reliable manner. Among other things, we can use such services to embed functions and content in our website. In the case of such embedding, the services used collect the [IP addresses](#) of users at least temporarily for technically compelling reasons.

For necessary security, statistical and technical purposes, third parties whose services we use may process data in connection with our activities and operations in aggregated, anonymised or pseudonymised form. This is, for example, performance or usage data in order to be able to offer the respective service.

We use in particular:

- **Google services:** Provider: Google LLC (USA) / Google Ireland Limited (Ireland) for users in the European Economic Area (EEA) and Switzerland; General information on data protection: "[Privacy and security principles](#)", [Privacy policy](#), "[Google is committed to complying with applicable data protection laws](#)", "[Privacy policy for Google products](#)", "[How we use data from websites or apps on or in which our services are used](#)" (information from Google), "[Types of cookies and other technologies used by Google](#)", "[Personalised advertising](#)" (activation / deactivation / settings).

- **[Services from Microsoft](#)**: Providers: Microsoft Corporation (USA) / Microsoft Ireland Operations Limited (Ireland) for users in the European Economic Area (EEA), the United Kingdom and Switzerland; General information on data protection: "[Data protection at Microsoft](#)", "[Data protection and privacy \(Trust Centre\)](#)", [Privacy Policy](#), [Privacy Dashboard](#) (data and privacy settings).

12.1. Digital infrastructure

We use the services of specialised third parties in order to be able to use the necessary digital infrastructure in connection with our activities and operations. These include, for example, hosting and storage services from selected providers.

We use in particular:

- **[hosttech](#)**: Hosting; Providers: hosttech GmbH (Germany) / hosttech GmbH (Austria) / hosttech GmbH (Switzerland); Data protection information: [Privacy policy \(Germany\)](#), [Privacy policy \(Austria\)](#), [Privacy policy \(Switzerland\)](#), "[Infrastructure](#)".
- **[Wix](#)**: Website builder and other infrastructure; Service provider: Wix.com Ltd (Israel) together with Wix.com Ltd (USA) / Wix.com Inc (USA) / Wix.com Luxembourg S.à r.l. (Luxembourg); Privacy Policy: [Privacy Policy](#), "[Privacy & Security](#)", "[Wix Help Centre 'Privacy'](#)" including [Cookie Policy](#).

12.2. Audio and video conferences

We use specialised audio and video conferencing services to communicate online. For example, we can use them to hold virtual meetings or conduct online lessons and webinars. For participation in audio and video conferences, the legal texts of the individual services, such as data protection declarations and terms of use, also apply.

Depending on your life situation, we recommend muting the microphone by default when taking part in audio or video conferences and blurring the background or displaying a virtual background.

We use in particular:

- **[Microsoft Teams](#)**: Platform for audio and video conferencing, among other things; provider: Microsoft; Teams-specific information: "[Data protection and Microsoft Teams](#)".

12.3. Card material

We use third-party services in order to be able to embed graphics in our website.

We use in particular:

- **[Google Maps](#)** including [Google Maps Platform](#): Map service; Provider: Google; Google Maps-specific information: "[How Google uses location information](#)".

12.4. Extensions for the website

We use extensions for our website in order to be able to utilise additional functions. We may use selected services from suitable providers or use such extensions on our own server infrastructure.

We use in particular:

- **Google reCAPTCHA:** Spam protection (differentiation between desired content from humans and unwanted content from bots and spam); Service provider: Google; Google reCAPTCHA-specific information: ["What is reCAPTCHA?". \("What is reCAPTCHA?"\)](#).

12.5. Links to other sites

Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

13. Video surveillance

We use video surveillance to prevent criminal offences and to preserve evidence in the event of criminal offences as well as to exercise our domiciliary rights. If and insofar as the General Data Protection Regulation (GDPR) is applicable, these are overriding legitimate interests pursuant to Art. 6 para. 1 lit. f GDPR.

We store recordings from our video surveillance for as long as they are required to preserve evidence. As a rule, the recordings are deleted or overwritten after 48 hours.

We may secure recordings on the basis of legal obligations, to enforce our own legal claims and in the event of suspected criminal offences, and transmit them to competent authorities, in particular judicial or law enforcement authorities.

14. Final provisions

We have created this privacy policy with the [data protection generator](#) of [Datenschutzpartner](#).

We may amend and supplement this privacy policy at any time. We will inform you of such amendments and additions in an appropriate form, in particular by publishing the current privacy policy on our website. current privacy policy on our website.

This privacy policy is an unofficial translation of the German-language original.