

General information

Based on Art. 13 of the Swiss Federal Constitution and the data protection regulations of the Swiss Confederation (Data Protection Act, DSG), every person has the right for protection of their privacy as well as for protection against misuse of their personal data. The operators of these pages take the protection of your personal data very seriously. We treat your personal data confidentially and in accordance with the legal data protection regulations as well as this privacy policy.

In cooperation with our hosting providers, we make every effort to protect the databases as well as possible against unauthorized access, loss, misuse or falsification.

We would like to point out that data transmission on the Internet (e.g. communication by e-mail) can have security gaps. A complete protection of data against access by third parties is not possible.

By using this website, you consent to the collection, processing and use of data in accordance with the following description. This website can generally be visited without registration. Data such as pages accessed or names of files accessed, date and time are stored on the server for statistical purposes without this data being directly related to your person. Personal data, in particular name, address or e-mail address are collected as far as possible on a voluntary basis. Without your consent, the data will not be passed on to third parties.

Who we are

The controller of your personal data is SEQUOIA Legal & Advisory LLC, Sonnhaldenstrasse 10, 8903 Birmensdorf, Switzerland. References in this privacy notice (the Notice) to «SEQUOIA», «SEQUOIA Legal & Advisory», “we” or “us” are references to SEQUOIA Legal & Advisory LLC.

Personal data we process

Personal data we process about you includes:

- your name and contact details (for example name, address, phone number or email address), information about the company you work for, your position or title and your relationship to a person, and other basic information;
- identification and background information provided by you or collected as part of our on-boarding process;
- financial information, for example payment-related information;
- information provided to us by or on behalf of our clients or generated by us in the course or providing services to clients;
- information provided to us for the purposes of attending meetings, seminars and events;

- information in relation to materials and communications we send to you electronically, for example your use of marketing e-mails;
- any other information relating to you which you may provide to us.

We collect this information when you interact with us, for example when you communicate with our staff, sign up to receive information by e-mail, or participate at meeting, seminar or other event. We also collect or generate personal data in the course of providing legal services, and we may collect personal data from other sources for example to keep your information up to date using publically available sources.

How we process your personal data

We process your personal data:

- to communicate with you;
- to carry out anti-money laundering, conflict and reputational checks;
- to provide and improve our services to you and our clients, including personal data of others provided to us or collected by us on behalf of our clients, for example processing identification and background information as part of our on-boarding, finance, administration and marketing processes;
- to administer our relationship with you and with our clients;
- to provide and improve our websites, including monitoring and evaluating its use (see sec. 4 below for additional information);
- to promote our services, including by sending publications, alerts, updates, event invitations etc.;
- to comply with our legal, regulatory and risk management obligations, including establishing, exercising or defending legal claims.

We process personal data for these purposes on the following basis: that it is necessary for us to perform a contract, such as engaging with an individual to provide legal or other services; for the establishment, exercise or defence of legal claims or proceedings; to comply with legal and regulatory obligations; for legitimate interests including the interests set out above; and/or based on consent.

We use various technical and organisational measures to help protect your personal data from unauthorised access, use, disclosure, alteration or destruction.

Use of our websites; communication

We automatically collect and store for a limited time log data and device information when you access and use our website. That information includes, among other things, details about how you use our website, IP address, access dates and times, hardware and software information, device information and similar information. We process that data on the basis that it is required for us to operate, maintain and improve our websites

Our websites use Google Analytics, a service provided by Google LLC, USA, which monitors and records the way our websites are used. Google Analytics does this by placing small text files called cookies on your computer or other devices. Cookies record information about the number of visitors to these websites, visits to individual pages, and the duration for which these websites are visited. This information is available in aggregate form and is not identifiable with regard to the individual. This integration of Google Analytics is basically done via anonymized IP addresses by truncating them within the EU/EEA. As of August 12, 2020, Google will be subject to the European Commission's standard contractual clauses for the transfer of data for online advertising as well as personal data originating from the European Economic Area, Switzerland and the United Kingdom (further information: <https://support.google.com/adspolicy/answer/10042247?hl=en>).

You may refuse the use of cookies by selecting the appropriate settings on your browser. Note however that this may affect your experience of our websites. To find out more about cookies, including how to manage, reject and delete cookies, visit www.allaboutcookies.org.

We may use your name and e-mail address(es) to send you publications, alerts, updates, event invitations and other information by e-mail, but will ask for consent first unless we have obtained your contact details from you in the context of our services and you have not opted out from receiving such marketing communications. 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. Note that we use personal data to understand if you read our e-mails or click on links included in them.

Who we share your personal data with

We may share your personal data with trusted third parties including:

- suppliers to whom we outsource certain support services such as translation and document review;
- IT service providers;
- third parties engaged in the course of the services we provide to clients, with their prior consent, for example other law firms and technology service providers such as data room services;
- our auditors;
- third parties involved in hosting or organising events or seminars.

For the purposes set out in this Policy and where necessary, we may share personal data with courts, tribunals, regulatory authorities, government agencies and law enforcement agencies. We may also be required to disclose your personal data to comply with legal or regulatory requirements.

Countries we transfer your personal data to

We may transfer your personal data to recipients abroad, including in countries that do not provide the same level of protection as Swiss law. We will usually do so on the basis that

such a transfer is necessary for the performance of an agreement with the data subject(s), for an agreement or performance of an agreement concluded in the interest of the data subject, or for the establishment, exercise or defence of legal claims.

If we transfer data to a country without adequate legal data protection, we ensure an appropriate level of protection as legally required by way of using appropriate contracts (in particular on the basis of the standard contract clauses of the European Commission) or binding corporate rules or we rely on the statutory exceptions of consent, performance of contracts, the establishment, exercise or enforcement of legal claims, overriding public interests, published personal data or because it is necessary to protect the integrity of the persons concerned. You can obtain a copy of the above-mentioned contractual guarantees at any time from us. However, we reserve the right to redact copies for data protection reasons, reasons of secrecy or to produce excerpts only.

How we retain your personal data

We retain your personal data for as long as it is necessary for the purposes for which the data is collected, and as long as we have a legitimate interest in keeping personal data, for example to enforce or defend claims or for archiving purposes and IT security. We also retain your personal data as long as it is subject to a legal retention obligation.

Your rights

You are entitled to ask for details of the personal data we hold about you and how we process it and to receive a copy of your personal data and to request that certain personal data be transferred to another entity (so-called data portability). You may also have your data rectified or deleted, restrict our processing of that information, and object to the processing of your personal data. You may also choose to withdraw your consent. Please note that even after you have chosen to withdraw your consent, we may be able to continue to process your personal data to the extent required or permitted by law. You may also lodge a complaint in relation to our processing of your personal data with a local supervisory authority, in Switzerland with the Federal Data Protection and Information Commissioner.

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