

1. Controller

The controller responsible for the data processing described here is Gian-Luca Wittwer. If you have any data protection concerns, you can send them to the following contact address: St. Gallen Law Review, Dufourstrasse 50, 9000 St. Gallen, info@sglr.ch.

2. Collection and Processing of Personal Data

We primarily process the personal data that we receive from our customers and other business partners, as well as from individuals involved, in the context of our business relationship, or that we collect from users when operating our websites, apps, and other applications.

Where permitted, we also obtain certain data from publicly accessible sources (e.g., debt collection registers, land registers, commercial registers, press, Internet) or receive such data from authorities and other third parties. In addition to the data that you provide directly to us, the categories of personal data that we receive from third parties about you particularly include information from public registers, information obtained in connection with administrative or court proceedings, information relating to your professional functions and activities (so that we can conduct business with your employer with your help), information about you in correspondence and discussions with third parties, credit information (where we conduct business with you personally), information about you provided by persons from your environment (family, advisors, legal representatives, etc.) to enable us to conclude or process contracts with you or with your involvement (e.g., references, your delivery address, powers of attorney, information for compliance with legal requirements such as anti-money laundering or export restrictions, information from banks, insurers, distribution and other contractual partners regarding the use or provision of services by you (e.g., payments made, purchases made)), media and Internet information about you (where appropriate in specific cases, e.g., in the context of job applications, press reviews, marketing/sales), your addresses and, if applicable, interests and other sociodemographic data (for marketing), and data related to the use of the website (e.g., IP address, MAC address of your smartphone or computer, information about your device and settings, cookies, date and time of visit, pages and content accessed, functions used, referring website, location information).

3. Purposes of Data Processing and Legal Bases

We primarily use the personal data we collect to conclude and process our contracts with customers and business partners, particularly in connection with publishing a legal journal. If you act on behalf of such a customer or business partner, your personal data may also be affected.

Furthermore, to the extent permitted and appropriate, we process personal data for the following purposes in which we (and sometimes third parties) have a legitimate interest:

- Provision and development of our offers, services, websites, apps, and other platforms;
- Communication with third parties and processing of their inquiries (e.g., applications, media requests);
- Review and optimization of procedures for needs analysis for the purpose of direct customer contact, as well as collecting personal data from publicly accessible sources for customer acquisition;
- Advertising and marketing (including events), provided you have not objected to the use of your data (if we send you advertising as an existing customer, you may object at any time and we will add you to a suppression list);
- Market and opinion research, media monitoring;
- Assertion of legal claims and defense in connection with legal disputes and proceedings;
- Prevention and investigation of criminal acts and other misconduct (e.g., internal investigations, data analysis for fraud prevention);
- Ensuring our operations, particularly IT, our websites, apps, and other platforms;
- Video surveillance for house-right protection and other IT, building, and facility security measures, as well as protection of our employees, other persons, and our entrusted or owned property (e.g., access controls, visitor lists, network and mail scanners, telephone recordings).

If you have given consent for the processing of your personal data for specific purposes (e.g., subscription to newsletters or conducting a background check), we process your data within the scope of this consent unless another legal basis applies. Consent may be withdrawn at any time, but does not affect data processed prior to the withdrawal.

4. Cookies / Tracking and Other Technologies Related to Website Use

We typically use cookies and similar technologies on our websites to identify your browser or device. A cookie is a small file sent to your computer or stored automatically when you visit our site. When you revisit the site, we can recognize you even if we do not know your identity. Session cookies are deleted after your visit, while permanent cookies can store user settings and other information for a set period (e.g., two years). You can adjust your browser settings to refuse cookies, store them only for a session, or delete them early. Most browsers accept cookies by default. We use permanent cookies to better understand how you use our services and content.

By using our websites and consenting to receive newsletters and marketing emails, you agree to the use of these technologies. If you do not wish this, you must adjust your browser or email program accordingly.

We also use social media plug-ins (e.g., Facebook, Twitter, YouTube, LinkedIn, Pinterest, Instagram). These are deactivated by default. When activated, social network operators can identify your presence on our site and use this information for their purposes. Their

processing of your data is governed by their privacy policies. We do not receive personal information from them.

5. Data Disclosure and International Transfers

In the course of our business activities and for the purposes described in Section 3, we disclose data to third parties, including:

- Our service providers (e.g., IT providers);
- Dealers, suppliers, subcontractors, and business partners;
- Customers;
- Authorities and courts in Switzerland and abroad;
- Media;
- The public, including website and social media visitors;
- Competitors, industry organizations, associations, and other bodies;
- Other parties in possible or actual legal proceedings.

These recipients may be located in Switzerland or anywhere in the world.

If a recipient is in a country without adequate data protection laws, we contractually require them to comply with applicable standards using the revised EU Standard Contractual Clauses (available here: https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj), unless they are already subject to an approved framework or an exception applies (e.g., consent, public interest, contractual necessity, or publicly accessible information that you have not objected to).

6. Data Retention

We store personal data as long as necessary to fulfill contractual and legal obligations or other processing purposes, including the entire duration of the business relationship and beyond in accordance with statutory retention and documentation duties. Data may also be retained for periods during which claims may be asserted against our organization or where we have legitimate business interests (e.g., evidence, documentation). When data is no longer needed, it is deleted or anonymized where possible. Operational data (e.g., system logs) typically have shorter retention periods of twelve months or less.

7. Data Security

We implement appropriate technical and organizational security measures to protect your personal data from unauthorized access and misuse.

8. Obligation to Provide Personal Data

You must provide the personal data necessary to initiate and conduct a business relationship and fulfill related contractual obligations. Without such data, we generally cannot enter or execute a contract with you (or the entity you represent). Certain website functions may also be inaccessible if required data (e.g., IP address) is not disclosed.

9. Rights of Data Subjects

Under applicable data protection law (e.g., GDPR), you have the right to access, rectify, delete, restrict processing, object to processing (especially for direct marketing), and request data portability. We may assert legal limitations, such as obligations to retain data or overriding interests. Costs will be communicated in advance if applicable.

You must usually verify your identity to exercise these rights (e.g., by providing an ID copy). To exercise your rights, contact us at the address listed in Section 1.

You may also pursue claims in court or lodge a complaint with a supervisory authority. The competent Swiss authority is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).

10. Changes

We may update this privacy policy at any time without notice. The version published on our website applies. If the policy is part of an agreement with you, we will inform you of changes via email or other suitable means.