

Privacy Policy

(Version dated February 2026)

Absolut Distribution AG, headquartered in CH-6214 Schenkon and with a branch office in CH-1203 Geneva, and Absolut Services GmbH, headquartered in CH-8048 Zurich, are companies of the Absolut Group (hereinafter referred to as "Absolut"). This privacy policy governs the processing of personal data by Absolut. Absolut is a distributor and reseller of IT products and services. Absolut offers its customers the opportunity to purchase products and services offered by Absolut and various third-party providers directly from Absolut or through resellers and distributors. Each offer may be subject to offer-specific data protection principles, which may replace or supplement the provisions of this privacy policy.

Data protection is a matter of trust, and your trust is important to us. Absolut respects your personality and privacy. Absolut also ensures the protection and lawful processing of your personal data.

1. Responsible controller

The controller responsible for the processing of personal data within the meaning of the Swiss Data Protection Act (DSG) and, where applicable, the General Data Protection Regulation (GDPR; Art. 4) is:

Absolut Distribution AG
Parkstrasse 1b
CH-6214 Schenkon
info@absolut-distribution.ch
Tel. +41 43 534 72 00

The respective group companies are responsible for data processing within the scope of their own customer relationships, in particular Absolut Distribution Germany (DE-80539 Munich and DE-10117 Berlin) and Absolut Distribution Austria (A-1010 Vienna). Insofar as group companies process personal data on behalf of Absolut Distribution AG (e.g., within the framework of joint IT systems), this is done as order processing in accordance with the applicable data protection regulations.

2. Scope and legal basis

This privacy policy applies to all processing activities in connection with personal data by Absolut, such as when using the Absolut websites, online offers, customer portals, online shops, participation in courses, seminars, and training, business relationships, the purchase of goods or services, and communication via email, telephone, and other channels.

The offerings in our online shop are intended exclusively for customers with a delivery address in Switzerland or the Principality of Liechtenstein.

Depending on the data processing, European data protection law may also or exclusively apply in addition to the applicable Swiss law, the Federal Act on Data Protection (FADP) of September 25, 2020, SR 235.1. This applies in particular to the use of our website. Linked websites of other providers or websites from which our website is linked are not covered by this privacy policy.

Absolut may amend this privacy policy as necessary, e.g., in the event of legal or technical changes. The current version at www.absolut-distribution.ch applies.

3. Terms

"Personal data" is information relating to an identified or identifiable natural person. "Processing" means any handling of personal data (e.g., collection, storage, use, utilization, management, transmission, disclosure, deletion, etc.).

Depending on the use and business relationship, the following categories of personal data in particular are processed:

- Master and contact data: name, company, position, address, email, telephone number, customer number.
- Contract and transaction data: Offers, orders, delivery notes, invoices, returns, payment status, terms and conditions, serial numbers/device allocation.
- Delivery and logistics data: Delivery address, delivery instructions, tracking information, customs/export information (if necessary).
- Online shop data processing: order data, delivery information, address and contact details, payment information
- Support and communication data: inquiries, tickets, correspondence, logs, diagnostic data (e.g., log files) in the context of support services, if applicable.
- Usage and peripheral data: IP address, time, browser/device information, referrer, log data when using the website/portal.
- Marketing data (if used): Newsletter registration data, consents, opt-outs, interactions with campaigns.
- Compliance and risk data: Fraud prevention checks, sanctions/embargo and export control clarifications (where necessary).

We process personal data in particular when:

- You access information, make inquiries, or place orders via the website, shop, or portal
- You communicate with us as the contact person for a corporate customer/reseller (email, telephone, ticket)
- You use support services or RMA/warranty processes are handled
- Deliveries, payment processing, dunning, or legally required checks are carried out
- You subscribe to marketing communications or participate in events/webinars

We generally receive personal data from you or your employer/reseller, as well as from manufacturers and logistics and payment service providers, if applicable, in the course of processing.

4. Purposes and legal basis of processing

Absolut processes personal data in connection with the sale of IT products and services and the provision of support and other services.

Switzerland/Liechtenstein (DSG): We process personal data in accordance with the principles of the DSG (in particular, lawfulness, proportionality, purpose limitation, transparency, data security). Insofar as processing may constitute an invasion of privacy, we rely on a justification, in particular consent, overriding private or public interests, or a legal basis.

GDPR (where applicable): We process personal data in particular on the basis of Art. 6 (1) (b) (contract/preparation of a contract), (c) (legal obligation), (f) (legitimate interests) and, where necessary, (a) (consent, e.g., newsletter, cookies/tracking).

Processing is carried out in particular for the following purposes and on the following legal bases:

- **Fulfillment of contracts and preliminary contracts** (quotations, orders, delivery/shipping, tracking, billing and payment processing, dunning, processing of returns, warranty and guarantee processes (including RMA), administration of customer accounts, reseller programs, master data maintenance)

This processing is carried out regularly because it is necessary for the execution of the contract

and/or is based on a legal basis (e.g., retention obligations) or is justified by overriding private interests (e.g., efficient processing, verification, and documentation). If personal data is necessary for the conclusion or fulfillment of the contract, we may not be able to fulfill the contract without this data, or only to a limited extent.

- **Customer service, technical support, and services:** Processing for handling inquiries and providing support and services (ticketing, communication, error analysis and documentation, support escalations, and cooperation with manufacturers/vendors as necessary, quality assurance, and improvement of support processes)

This processing is carried out for the purpose of providing services, ensuring quality, and based on overriding private interests (in particular, efficient support and traceability).

- **Operation, security, and availability of systems and services:** Processing to ensure secure operation and to improve our websites, portals, IT systems, and infrastructure (IT security, prevention of misuse and fraud, access controls, logging (log data), troubleshooting, performance and capacity management, system maintenance, ensuring the availability and integrity of data and systems)

This processing is based on overriding private interests in the security, availability, and integrity of our systems and, where relevant, on legal grounds.

- **Compliance, risk management, and legal claims:** Processing to fulfill legal and regulatory obligations and to safeguard and enforce legal positions (commercial and tax law retention and documentation obligations, export control, embargo, and sanctions checks where necessary, assertion, exercise, or defense of legal claims; preservation of evidence)

This processing is carried out on the basis of legal principles and/or based on overriding private interests (in particular, law enforcement, risk management, fraud and abuse prevention).

- **Marketing and customer information:** Processing for the purpose of providing information about products, services, updates, and events (sending newsletters and marketing communications, maintaining consents and objections (opt-in/opt-out), evaluating the success and measuring the reach of marketing measures)

This processing is carried out, where necessary, on the basis of your consent and, in other cases, based on overriding private interests within the legally permissible framework. Consent to direct marketing can be revoked at any time.

We do not make any exclusively automated individual decisions with legal or similarly significant effects. Where we use profiling (e.g., fraud prevention or marketing control), this is done within the legally permissible framework and, where necessary, with consent.

5. Recipients/disclosure to third parties

We only pass on personal data to the extent necessary for the above-mentioned purposes, in particular to:

- Logistics and transport service providers (shipping, delivery, tracking)
- Payment service providers/banks (payment processing, risk and fraud prevention)
- IT and cloud service providers (hosting, email, ticket system, ERP/CRM, backup, monitoring)
- Manufacturers/vendors (e.g., for processing warranties, RMA, support escalations)
- Consultants and assistants (legal advice, auditing, trustees, insurers)
- Authorities/courts, insofar as we are obliged to do so or this is necessary for law enforcement

6. Data transfer abroad

As we operate internationally and sometimes use international service providers, personal data may be transferred to countries outside Switzerland and the EEA. Where data is transferred outside Switzerland or the EEA, this will only take place if an adequate level of data protection is guaranteed, in particular through:

- Transfer to countries with recognized adequate data protection (if applicable), or
- Appropriate safeguards such as standard contractual clauses (SCC, EU standard contractual clauses) and/or other technical and organizational measures (e.g., encryption, access restrictions), or
- a legally provided exception, if permissible in individual cases (e.g., contract processing).

The Swiss-U.S. Data Privacy Framework and the EU-U.S. Data Privacy Framework enable the secure transfer of personal data from Switzerland to certified U.S. companies. You can find out which companies are certified at www.dataprivacyframework.gov. In addition, you will find further information on the processing of personal data in the specific privacy policies of the data processor. The DPF only applies to certified recipients.

7. Cookies, tracking, and similar technologies

Our websites use cookies and similar technologies to provide the website, enable functions, ensure security and, with your consent, measure reach, compile statistics and conduct marketing. Cookies are small text files that are stored or read on your device when you visit a website. Similar technologies perform comparable functions (e.g., storing settings, recognizing browsers, measuring usage).

We use cookies/technologies in the following categories:

- **Necessary cookies:** These cookies are necessary for the operation of the website and essential functions (e.g., page navigation, language settings, security functions, shopping cart, login, consent storage).
- **Preference/convenience cookies (optional):** These cookies store your settings (e.g., preferred language, display options).
- **Statistics/analysis cookies (optional):** These cookies help us understand how the website is used (e.g., page views, interactions) in order to improve the website.
- **Marketing cookies (optional):** These cookies are used to personalize content and advertising, measure campaigns, and, if necessary, recognize users across different websites.

The specific cookies/technologies used, providers, and purposes are listed in the cookie list in our consent tool. We use **necessary cookies/technologies** to enable the operation and security of the website and essential functions (e.g., shopping cart, login). We only use **optional cookies/technologies** (e.g., statistics/analysis, marketing) after obtaining your consent, where legally required. You can revoke or adjust your consent at any time with future effect via the cookie settings, using the cookie/consent tool on our website.

You can disable or delete cookies in whole or in part in your browser settings. Please note that this may restrict the functions of the website (in particular the online shop, login, shopping cart).

If you decide not to accept our cookies or the cookies of our partner companies, you will not see certain information on our website and will not be able to use some features that are designed to improve your visit.

If third-party technologies are used, data may be disclosed abroad (e.g., EU/EEA or other countries). Where necessary, we ensure appropriate safeguards (e.g., standard contractual clauses) and take appropriate protective measures in accordance with our privacy policy.

Cookies can only be stored for the duration of the session (session cookies) or for a longer period (persistent cookies). The specific storage period is specified in the cookie list in the cookie settings.

7.1. Log files

Each time you access our website, your internet browser transmits certain usage data to us for technical reasons and stores it in log files. This includes the following usage data: date and time of access to our website; name of the website accessed; IP address of your computer or mobile device; address of the website from which you accessed our website; amount of data transferred; and name and version of your browser.

The evaluation of the log files helps us to further improve our Internet offerings and make them more user-friendly, to find and fix errors more quickly, and to control server capacities. Using the log files, we can determine, for example, at what times the use of our Internet offerings is particularly popular and provide the appropriate data volume to ensure you the best possible use.

7.2. Google Analytics

We use Google Analytics, in particular for web analysis and marketing purposes. This may involve the processing of information about usage behavior. Where legally required, Google Analytics and the associated marketing cookies will only be used with your consent. You can revoke or adjust your consent at any time with future effect via the cookie settings.

The provider is Google (usually Google Ireland Limited, depending on the processing also Google LLC and other group companies). The respective Google contract documents and product settings are decisive.

The processing or transfer of personal data outside Switzerland or the EU/EEA (in particular to the USA) cannot be ruled out. Where necessary, we base such transfers on appropriate safeguards, in particular on applicable certification under the Swiss-US/EU-US Data Privacy Framework (DPF) and/or on standard contractual clauses and additional protective measures.

7.3. Social plugins

Our websites use social plugins. The plugins are marked with the provider's logo and can be, for example, "Like" or "Share" buttons. If we integrate content from social networks (e.g., "Like" button, "Share" button, embedded feeds/videos), technical data may be transmitted to the respective provider when the corresponding page is accessed; the provider may process this data for its own purposes. Please refer to the providers' privacy policies for the purpose and scope of data collection and further processing of your data by the provider, as well as your rights and settings options for protecting your privacy.

Where legally required, such integrations will only be activated after you have given your consent. Without activation, no corresponding content will be loaded. You can revoke or adjust your consent at any time with future effect via the cookie settings.

The recipients are the respective providers. Transfer to other countries (including the USA) cannot be ruled out. Where necessary, we base transfers on appropriate safeguards (e.g., DPF certification, standard contractual clauses). Providers include, in particular:

- Facebook (Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland)
- Whatsapp (Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland)
- Google/YouTube (Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland)
- X (Twitter) (X Corp., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA)
- LinkedIn (LinkedIn Ireland Unlimited Company Wilton Place, Dublin 2, Ireland)
- XING (New Work SE, Am Strandkai 1, 20457 Hamburg, Germany)

8. Newsletter and direct marketing

If you subscribe to our newsletter or receive marketing information, we process your contact details and your opt-in/opt-out. You can revoke your consent or object to receiving such information at any time, e.g. via the unsubscribe link in the newsletter or by sending an email to info@absolut-distribution.ch. We may inform existing customers about similar products/services within the limits permitted by law. You can object to this at any time.

9. Customer account/portal

When you register and use a customer account, we process login data, roles/authorizations, transactions, and usage data in particular. For security reasons, we log accesses and security-related events.

10. Data security

We have technical and organizational security procedures in place to protect the security of your personal data and to protect your session data and personal data against unauthorized or unlawful processing and/or against accidental loss, alteration, disclosure, or access. However, you should always be aware that the transmission of information via the Internet and other electronic means involves certain security risks and that we cannot guarantee the security of information transmitted in this way.

11. Storage period

We retain your personal data for as long as we deem necessary or appropriate to comply with applicable laws, or for as long as it is necessary for the purposes for which it was collected. The relevant criteria are, in particular:

- Contract duration and follow-up work (e.g., warranties, evidence, support)
- Legal retention obligations (e.g., commercial and tax law deadlines)
- Limitation periods and preservation of evidence

After the expiry of these periods, data will be deleted or anonymized, provided that no further lawful processing is required.

12. Rights relating to personal data

Data subjects have the legal rights under the DSG and, where applicable, under the GDPR. In particular, you may request information about whether and which personal data about you is being processed (Art. 25 DSG) and, depending on the circumstances, request the correction, deletion, or restriction of processing

and object to processing; you may revoke any consent you have given at any time with effect for the future.

Please send any requests to info@absolut-distribution.ch.

Where applicable, data subjects also have the right to lodge a complaint with the competent supervisory authority. In Switzerland, this is the Federal Data Protection and Information Commissioner (FDPIC).

13. Updates and changes to this privacy policy

We reserve the right to change this privacy policy at any time or to adapt it to new processing methods. The current privacy policy can be accessed at any time on our website.