

PWLAN Privacy Policy (Liechtenstein)

General information

The responsible and legally compliant handling of personal data is a major concern of Swisscom (Switzerland) Ltd, Alte Tiefenastrasse 6, Worblaufen, 3050 Bern ("Swisscom" or "we"). This privacy policy ("policy") describes the way in which we process your personal data when you use the Swisscom Public WLAN at selected locations (hereinafter referred to as "hotspots") in Liechtenstein.

As a rule, there is no legal or contractual obligation to disclose personal data. However, we will have to collect and process personal data that is necessary for the establishment and processing of a contractual relationship. Otherwise we will be unable to conclude or maintain the relevant contract.

We may change this Policy from time to time and at our sole discretion. The version published on our website (<https://www.swisscom.ch/en/residential/internet-television-fixednetwork/internet/benefits/pwlan.html>) applies. Please re-read this statement from time to time.

1. Categories of personal data

In connection with your use of the public WLAN service, we process various categories of personal data from you such as:

- contact and identification data like name; first name; title; address; e-mail address; telephone number; customer number; copy and number of the official ID.
- User account information like user name; password; user account number; login type.
- Contract data such as contract content, applicable terms and conditions of use; start of contract; contract term; invoice data when using services subject to a charge.
- Financial data when using services subject to a charge, such as account information; payment information; credit card information.
- Usage and traffic data such as date; time and duration of use; SSID; IP address; location data; visited websites and Internet services.
- Device information such as the type and manufacturer of your end device; the operating system; device identifiers like the MSISDN, IMSI and MAC address; browser type and browser settings.

Content data is processed by Swisscom exclusively for the purpose of telecommunication transmissions.

2. Purpose of processing

We process your personal data for the following purposes.

- Processing of the contractual relationship regarding use of the service: this includes in particular the maintenance of a customer and user database, the administration of customer and user relationships, issuing an invoice, checking of your data, customer and user communication, the provision and performance of our services and the operation of our technical infrastructure.
- Service quality: this includes in particular measures to guarantee service quality and security, the planning and management of servers and network capacities as well as technical troubleshooting and correction.
- Further development of our services: this includes in particular the evaluation, improvement and new development of our services and functions, quality control, analysis and evaluation of the utilisation of our web application and apps for mobile communication terminals to improve user-friendliness and statistical evaluations of customer behaviour on the basis of anonymised customer data.
- Compliance with legal requirements: this includes, in particular, compliance with applicable laws and regulations or answering inquiries from the competent courts and authorities and also asserting, exercising or defending legal claims.

3. Legal basis of processing

Swisscom processes your personal data on the basis of the following legal principles. The interests in processing (based on Art. 6[1][f] GDPR) are listed in the table.

Purpose of processing	Data categories	Legal basis of processing
Processing of the contractual relationship regarding use of the service	<ul style="list-style-type: none"> - Contact and identification data - User account information - Contract data - Financial data - Usage and traffic data - Device information 	Contract fulfilment
Service quality	<ul style="list-style-type: none"> - Contact and identification data - User account information - Contract data - Usage and traffic data - Device information 	Legitimate interest in customer satisfaction, competitiveness and compliance with Swiss law
Further development of our services	<ul style="list-style-type: none"> - Contact and identification data - Contract data - Usage and traffic data - Device information 	Legitimate interest in customer satisfaction and competitiveness
Compliance with legal requirements	<ul style="list-style-type: none"> - Contact and identification data - User account information - Contract data - Usage and traffic data - Device information - Financial data 	Legal obligation and legitimate interest in complying with Swiss law

4. Categories of data recipients and cross-border processing

4.1. Categories of data recipients

We may share your information with the following categories of data recipients in compliance with legal requirements:

- Service providers (inside and outside the Swisscom Group): Service providers that we use as part of our business activities to perform customer-related or IT-related tasks on a contractual basis, such as product manufacturers and suppliers, maintenance and support service providers and sales partners.
- Third parties in relation to the fulfilment of legal obligations: we may disclose your personal data to third parties where this appears necessary or appropriate to comply with or verify compliance with applicable laws and regulations and to respond to inquiries from competent authorities.
- Other group companies: We may pass on your personal data within the scope of our legitimate interests within the Swisscom Group for administrative purposes inside the Group.

4.2 Cross-border processing in countries outside the EEA (third countries)

The recipients of your personal data may also be located abroad - also outside the European Economic Area ("EEA"; including the member states of the EU and EFTA with the exception of Switzerland). The countries concerned may not have laws that protect your personal data to the same extent as in Switzerland, the EU or the EEA. If we transfer your data to such a country, we will ensure the protection of your personal data in an appropriate manner, for example by concluding data transfer contracts on the basis of contracts approved, issued or recognised by the European Commission, so-called standard contractual clauses (Art. 46 para. 2 GDPR). For an example of the contracts generally used, please see <https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries>. Please contact us if you would like a copy of our data transfer contracts.

5. Storage duration and deletion of data

We store and process your personal data for as long as necessary to achieve the purpose for which it was collected or as long as this is prescribed or permitted by law. Traffic data is stored for six months after the last login. Your personal data will then be deleted from our systems or made anonymous so that you can no longer be identified.

6. Rights of persons concerned

Within the scope of the GDPR, you have the following rights regarding your personal data.

6.1 Information: You have the right to obtain confirmation from us as to whether we are processing personal data from you and, if so, to request information on the processing of your personal data. This information includes, in particular, information on the purpose of processing, the categories of personal data and the recipients or categories of recipients to whom the personal data have been or will be made available.

6.2 Correction: You have the right to have your personal data, which we process, corrected and/or updated.

6.3 Deletion: You have the right to have your personal data deleted, unless we are obliged by applicable laws and regulations to retain your personal data if the personal data is no longer required for the purposes pursued, you have revoked your consent and there is no other legal basis for processing, you have effectively objected to the processing or the processing has taken place illegally.

6.4 Limitations of processing: You may ask us to limit processing in the following cases, if you contest the accuracy of the data, if you refuse deletion in the event of unlawful processing and instead wish to limit processing, or if you request that the data not be deleted, but instead retained for the purpose of asserting rights.

6.5 Right of objection: You have the right to object to the processing of your personal data by us at any time for reasons relating to your particular situation, and we may be asked to stop processing your personal data. If you have a right of objection and exercise this right, your personal data will no longer be processed by us for such purposes.

A right of objection does not exist in particular if we have compelling reasons for the processing that are worthy of protection, which outweigh your interests, rights and freedoms, or if the processing serves to assert, exercise or defend legal claims or if it is necessary for the conclusion and execution of a contract.

6.6 Right to withdraw consent: You have the right to withdraw your consent to the processing of your personal data for one or more specific purposes. The withdrawal of consent does not affect the legality of the processing that has taken place up to the time of revocation.

You also have the right to lodge a complaint with the competent supervisory authority, in particular in the Member State of your habitual residence or the place of suspected infringement, if you believe that the processing of your personal data is contrary to the GDPR.

7. Contact

If you have any questions or concerns or wish to assert your rights in connection with personal data, please contact us as follows:

- Contact form: <https://www.swisscom.ch/en/residential/help/contact.html>
- Telephone: 0800 800 800
- Post: Swisscom (Switzerland) Ltd, Contact Center, 3050 Berne

You can contact the Data Protection Officer of Swisscom Ltd and Swisscom (Switzerland) Ltd as follows:

- E-mail: datenschutz@swisscom.com
- Post: Swisscom (Switzerland) Ltd, Dr. Nicolas Passadelis, LL.M., Data Protection Officer of Swisscom Ltd and Swisscom (Switzerland) Ltd, PO Box, 3050 Bern

8. Cookies

We use our own cookies to simplify the registration process and the utilisation of the service.

Cookies are small files that are stored on your computer or mobile communication terminal when you visit or use one of our web pages. Cookies store certain browser and data settings, which deal with the exchange of information between the website and your browser.

You can configure your browser so that it does not accept cookies, or so that it asks you before accepting a cookie from a web page you have visited. You can also delete cookies on your computer or mobile communication terminal by using the appropriate function of your browser. However, this may result in restrictions regarding the normal usability of the service.