

# Privacy Policy

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## 1. General

The Threema Work Management Cockpit (hereinafter “**Threema Work Cockpit**”) is a web-based software as a service application for “**Business Customer**” for the use of “**Threema Work**”, the business software of Threema GmbH (hereinafter “**Threema**”).

Aside from the Threema Work Cockpit, Threema Work includes additional applications, namely the “**Threema Work App**” for mobile phones of “**Work Users**” as well as the services “**Threema Broadcast**” and “**Threema Gateway**”.

The management of Threema Work takes place via the Threema Work Cockpit through “**Administrators**” appointed by the Business Customer.

In contrast to the Threema Work App, which is used for one-to-one communication between Work Users, the Threema Work Cockpit is a web-based software as a service application that is used for managing access authorizations for Work Users as well as customizations of the Threema Work-App by Administrators.

Threema’s focus lies on data protection and privacy, which is why we provide Business Customers and other interested persons with the information for transparent processing of their personal data in this Privacy Policy.

## A. Scope of Application

This Privacy Policy applies to all data processing activities, which take place while using the Threema Work Cockpit in its latest version, that are related to personal data, namely:

- A. [Calling up the Threema Work Cockpit;](#)
- B. [Setup of the Customer Account;](#)

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- C. [Management of Administrators](#);
- D. [Management of Additional Recipients](#);
- E. [Product Updates \(Newsletter\)](#);
- F. [Requesting Trial Licenses](#);
- G. [Generating and Accepting Quotations for License Packages](#);
- H. [Invoicing License Packages](#);
- I. [Support Requests](#);
- J. [Access Management for the Threema Work App](#);
- K. [Configuration of the Threema Work App \(App Configuration\)](#);
- L. [Synchronization of the Threema-ID from the Threema Work App \(User List\)](#);
- M. [Directory for the Threema Work App](#);
- N. [Threema Broadcast](#);
- O. [Misuse Protection \(hCpatcha\)](#).

In principle, this Privacy Policy does not apply to the Threema Work App for mobile phones as well as Threema Broadcast and Threema Gateway; the three aforementioned applications have their separate privacy policies regarding the processing of personal data. This Privacy Policy for the Threema Work Cockpit is exclusively referring to the three aforementioned applications if particular uses of the Threema Work Cockpit have an effect on personal data in these applications.

Threema as the data controller is a limited liability company under Swiss law with its registered office in Pfäffikon SZ (municipality of Freienbach), Switzerland, and company identification number (hereinafter "**UID**") CHE-221.440.104.

Personal data from the use of the Threema Work Cockpit, unless stated otherwise in this Privacy Policy, is processed and, if necessary, stored exclusively on Threema's own servers in two ISO 27001-certified data centers located in Zurich, Switzerland (hereinafter "**Threema Servers**").

As a company with its registered office in Switzerland, Threema and the data processing it carries out are subject to Swiss data protection law (Federal Act on Data Protection of September 25, 2020, SR 235.1; hereinafter "**FADP**"). For data subjects residing in the territory of the EU or the EEA (marked with "**for EU/EEA**"), European data protection law (Regulation (EU) 2016/679 of April 27, 2016, General Data Protection Regulation; hereinafter "**GDPR**") may additionally apply.

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Personal data pursuant to Art. 5 lit. a FADP [for EU/EEA: Art. 4 No. 1 GDPR] is information that relates to an identified or identifiable natural person.

### **B. Controller**

Threema GmbH  
Churerstrasse 82  
8808 Pfäffikon SZ  
Switzerland

UID: CHE-221.440.104

### **C. Data Protection Officer**

Threema GmbH  
Data Protection Officer  
Churerstrasse 82  
8808 Pfäffikon SZ  
Switzerland

Email: [privacy@threema.ch](mailto:privacy@threema.ch)

### **D. Representative in the EU (Art. 27 GDPR)**

ACC Datenschutz UG  
Messestrasse 6  
94036 Passau  
Germany

**Threema.**

## **E. Swiss Supervisory Authority**

Federal Data Protection and Information Commissioner (FDPIC)

Feldweg 1

3003 Bern

Switzerland

Telephone: +41 58 462 43 95

Contact form of the FDPIC: [Link](#)

## **2. Processing Activities**

Depending on the usage of the Threema Work Cockpit, Threema processes different categories of personal data for different purposes, based on different legal bases and with different storage periods, if any personal data is stored at all.

### **A. Calling Up the Threema Work Cockpit**

#### **Processing**

When the Threema Work Cockpit as web-based software is called up, information, including personal data, is automatically sent to the Threema Servers by the browser on the end device of the data subject and stored in a log file.

#### **Categories of Processed Personal Data**

The following personal data is processed on the Threema Servers when the Threema Work Cockpit is called up and stored in log files:

- IP address.

#### **Purpose**

The aforementioned personal data is processed by Threema for the following purposes:

- Delivery of the Threema Work Cockpit in the browser of the data subject.

#### **Legal Basis**

The processing and storage of IP addresses is technically necessary and based on the overriding private interest (delivery of the Threema Work Cockpit in the browser;

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contractual performance) of Threema; Art. 31 Sec. 2 lit. a FADP [for EU/EEA: Art. 6 Sec. 1 lit. b GDPR].

### Necessity

The processing of the IP address is technically necessary to deliver the Threema Work Cockpit in the browser of the data subject and to enable the Business Customer or its Administrators to use it as contractually agreed.

### Storage Period

The log file with the data subject's IP address created when the Threema Work Cockpit is called up is stored on the Threema Servers for **10 days**, counting from the creation date of the log file, and then automatically deleted.

## B. Setup of the Customer Account

### Processing

In order to access and use the Threema Work Cockpit as a Business Customer, the Business Customer must set up a "**Customer Account**".

The e-mail address of a Business Customer used to create the Customer Account must be verified in order to activate the Customer Account and thus access to the Threema Work Cockpit.

In addition, a Business Customer is assigned a randomly generated "**Customer Number**" when creating their Customer Account. This consists of the letters "WK" and a ten-digit sequence of numbers and letters.

### Categories of Processed Personal Data

The following personal data is processed and stored on the Threema Servers to create the Customer Account:

- Customer Number;
- E-mail address of the Business Customer.

To protect the Threema Work Cockpit from misuse, Threema uses a captcha from the hCaptcha service (see Section 2.O.).

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## Purpose

The aforementioned personal data is processed by Threema for the following purposes:

- Use of the Threema Work Cockpit by the Business Customer (contractual performance).

## Legal Basis

The processing of personal data for the creation of the Customer Account is based on the overriding private interest (use of the Threema Work Cockpit by the Business Customer; contractual performance) of Threema; Art. 31 Sec. 2 lit. a FADP [for EU/EEA: Art. 6 Sec. 1 lit. b GDPR].

## Necessity

The processing of the Business Customer's personal data is necessary to enable the Business Customer to use the Threema Work Cockpit as contractually agreed.

## Storage Period

The personal data stored to set up the Customer Account will be stored on the Threema Servers **until revocation**, i.e. the deletion of the Customer Account by the Business Customer in the Threema Work Cockpit, and then deleted **after 14 days**.

If a Business Customer does not have any active license packages or any open license orders and has not logged into the Customer Account of the Threema Work Cockpit **within 1 year**, the Customer Account and all linked personal data will be deleted.

**Note:** Threema is subject to a statutory retention obligation of 10 years in connection with accounting records and accounting vouchers, including any personal data. In addition, Threema reserves itself the right to retain all data and documents required for the reconstruction of the contractual relationship with a Business Customer, including any personal data, for the duration of the ordinary statute of limitations of 10 years.

## C. Management of Administrators

### Processing

The use of the Threema Work Cockpit by a Business Customer requires the registration of at least one Administrator per Customer Account, who does not necessarily have to be the Business Customer himself.

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Subsequently, additional Administrators may be registered and managed in the Threema Work Cockpit.

The e-mail address of an Administrator used for registration must be verified by the Administrator concerned in order to activate it in the Threema Work Cockpit.

### Categories of Processed Personal Data

The following personal data is processed and stored on the Threema Servers for the registration and management of Administrators:

- E-mail address of the Administrator.

To protect the Threema Work Cockpit from misuse, Threema uses a captcha from the hCaptcha service (see Section 2.O.).

### Purpose

The aforementioned personal data is processed by Threema for the following purposes:

- Use of the contractually agreed functions of the Threema Work Cockpit by the Business Customer (contractual performance).

### Legal Basis

The processing of personal data for the registration and management of Administrators is based on the overriding private interest (use of the Threema Work Cockpit by the Business Customer; contractual performance) of Threema; Art. 31 Sec. 2 lit. a FADP [for EU/EEA: Art. 6 Sec. 1 lit. b GDPR].

### Necessity

The processing of the Administrator's personal data is necessary to enable the Business Customer to use the Threema Work Cockpit as contractually agreed.

### Storage Period

The personal data stored for the management of Administrators will be stored on the Threema Servers **until revocation**, i.e. the personal data of an Administrator is changed or deleted in the Threema Work Cockpit, and then deleted **after 14 days**.

If the license package of a Business Customer within which an Administrator has been registered becomes inactive (see Section 2.B.), the personal data of the Administrator

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concerned will not be deleted, but initially only **deactivated**. **After 1 year** of inactivity of the corresponding license package, the personal data of an Administrator will be automatically deleted. If the Business Customer reactivates the corresponding license package by purchasing new licenses, deactivated e-mail addresses of Administrators will be reactivated automatically.

In case of deletion of the Customer Account by the Business Customer (see section 2.B.), the personal data stored for the management of Administrators will be deleted **after 14 days** or, if the Business Customer has never purchased a license package, **immediately**.

## D. Management of Additional Recipients

### Processing

Besides Administrators, “**Additional Recipients**” without administrator rights may be registered and managed in the Threema Work Cockpit within an active license package to receive system e-mails from Threema (e.g. invoices).

These e-mail addresses of Additional Recipients must be verified by the affected recipient in order to activate them in the Threema Work Cockpit.

### Categories of Processed Personal Data

The following personal data is processed and stored on Threema Servers for the registration and management of Additional Recipients:

- E-mail address of the Additional Recipient.

To protect the Threema Work Cockpit from misuse, Threema uses a captcha from the hCaptcha service (see Section 2.O.).

### Purpose

The aforementioned personal data is processed by Threema for the following purposes:

- Registration and management of additional recipients for the receipt of system emails (contract processing).

### Legal Basis

The processing of personal data for the registration and management of Additional



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Recipients is based on the overriding private interest (use of the Threema Work Cockpit by the Business Customer; contractual performance) of Threema; Art. 31 Sec. 2 lit. a FADP [for EU/EEA: Art. 6 Sec. 1 lit. b GDPR].

### Storage Period

The personal data stored for the management of Additional Recipients will be stored on the Threema Servers **until revocation**, i.e. the personal data of an Additional Recipient is changed or deleted in the Threema Work Cockpit, and then deleted **immediately**.

If the license package of a Business Customer within which an Additional Recipient has been registered becomes inactive (see Section 2.B.), the personal data of the Additional Recipient concerned will not be deleted, but initially only **deactivated**. **After 1 year** of inactivity of the corresponding license package, the personal data of an Additional Recipient will be automatically deleted. If the Business Customer reactivates the corresponding license package by purchasing new licenses, deactivated e-mail addresses of Additional Recipients will be reactivated automatically.

In case of deletion of the Customer Account by the Business Customer (see section 2.B.), the personal data stored for the management of Additional Recipients will be deleted **immediately**.

## E. Product Updates (Newsletter)

### Processing

Threema informs Administrators of the Threema Work Cockpit about new features of the Threema Work Cockpit as well as the other Threema Work applications via email within the scope of a newsletter, the so-called "**Product Updates**".

An Administrator is automatically signed up to receive Product Updates after successfully registering in the Threema Work Cockpit.

Administrators may unsubscribe from Product Updates at any time via the Threema Work Cockpit under "Your admin account > Notifications".

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## Categories of Processed Personal Data

The following personal data is processed on the Threema Servers for sending Product Updates:

- E-mail address of the Administrator.

## Purpose

The aforementioned personal data is processed by Threema for the following purposes:

- Assistance in the optimal use of Threema Work (support);
- Existing customer marketing.

## Legal Basis

The processing of an Administrator's email address for sending Product Updates is initially based on the overriding private interest (support in the optimal use of Threema Work; marketing towards existing customers) of Threema; Art. 31 Sec. 2 lit. a FADP [for EU/EEA: Art. 6 Sec. 1 lit. b GDPR].

If an Administrator who has unsubscribed from Product Updates in the Threema Work Cockpit later subscribes to them again, the processing of his email address for sending Product Updates is based on his voluntary consent to the processing of this personal data; Art. 31 Sec. 1 FADP [for EU/EEA: Art. 6 Sec. 1 lit. a GDPR].

## Necessity

The processing of an Administrator's e-mail address for sending Product Updates is necessary to support the Business Customer or its Administrator in the optimal use of Threema Work, to promote new features and Threema Work applications, as well as to inform about changes to the terms of use.

Threema invokes the existing customer privilege when sending Product Updates without prior consent of an Administrator.

## Storage Period

The e-mail address for sending Product Updates is processed **until revocation**, i.e. the cancellation of the subscription in the Threema Work Cockpit by the Administrator concerned, and is then **immediately** terminated.

If the license package of a Business Customer within which an Additional Recipient has

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subscribed to the Product Updates becomes inactive (see Section 2.B.), the subscription will not be cancelled, but only **deactivated**. (the data subject will no longer receive Product Updates). If the Business Customer reactivates the corresponding license package by purchasing new licenses, deactivated subscriptions for Product Updates and thus the processing of the e-mail address will be reactivated automatically.

The storage period of e-mail addresses of Administrators is set out under Section 2.C. hereinabove, irrespective of the subscription to Product Updates.

## F. Requesting Trial Licenses

### Processing

Business Customers may request trial licenses within the Threema Work Cockpit for temporary use of the Threema Work Cockpit.

Each request is reviewed individually by Threema before the requested trial licenses are approved.

### Categories of Processed Personal Data

The following personal data is processed and stored on the Threema Servers when trial licenses are requested:

- Company;
- Address;
- E-mail address of the Business Customer, its Administrators and its Additional Recipients.

To protect the Threema Work Cockpit from misuse, Threema uses a captcha from the hCaptcha service (see Section 2.O.).

### Purpose

The aforementioned personal data is processed for the following purposes:

- Processing of requests for test licenses (contractual performance).

### Legal Basis

The processing and storage of personal data when requesting trial licenses is based on the overriding private interest (contractual performance) of Threema; Art. 31 Sec. 2 lit.

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a FADP [for EU/EEA: Art. 6 Sec. 1 lit. b GDPR].

### Necessity

This data processing is necessary to perform contracts with Business Customers on trial licenses for the use of Threema Work.

### Storage Period

The company and address of a Business Customer concerned are stored until the deletion of his Customer Account and then **immediately** deleted, subject to retention rights and obligations (see Section 2.B.).

## G. Generating and Accepting Quotations for License Packages

### Processing

A Business Customer may use the Threema Work Cockpit to create quotations for license packages at any time, which consist of the number of licenses and the subscription package of the desired license package.

The Threema Work Cockpit automatically creates a quotation based on the information provided by the Business Customer, the price of which is fixed for 30 days, calculated from the time of creation.

If such a quotation is accepted by the Business Customer within the deadline, the Threema Work Cockpit automatically creates an invoice and sends it to the Administrators registered by the Business Customer (see section 2.H.).

### Categories of Processed Personal Data

The following personal data is processed and stored on the Threema Servers for the purpose of creating and accepting offers:

- Company;
- Address;
- E-mail addresses of Administrators.

To protect the Threema Work Cockpit from misuse, Threema uses a captcha from the

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hCaptcha service (see Section 2.O.).

### Purpose

The aforementioned personal data is processed for the following purposes:

- Creation of quotations as well as their processing in case of acceptance (contractual performance).

### Legal Basis

The processing and storage of personal data when creating and accepting quotations by Business Customers is based on the overriding private interest (contractual performance) of Threema; Art. 31 Sec. 2 lit. a FADP [for EU/EEA: Art. 6 Sec. 1 lit. b GDPR].

### Necessity

This data processing is necessary to perform contracts with Business Customers on license packages for the use of Threema Work.

### Storage Period

The company and address of a Business Customer concerned will be stored until the deletion of his Customer Account and then **immediately** deleted, subject to retention rights and obligations (see Section 2.B.).

If a Business Customer does not accept a quotation within the period of 30 days, calculated from the date of creation, the processing of his personal data within the scope of this quotation is automatically **terminated**. The Administrators of the Business Customer will be automatically informed about the deletion of the quotation.

The storage period of the e-mail addresses of Administrators is set out under Sections 2.C. hereinabove.

## H. Invoicing License Packages

### Processing

As soon as a Business Customer has accepted a quotation (see Section 2.G.), the data stored for his Customer Account, including personal data, are processed on the Threema Servers for billing.

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In addition to the acceptance of quotations (purchase of licenses, upgrade of the license package subscription model), the renewal of existing licenses also triggers the billing of a license package to the Business Customer.

## Categories of Processed Personal Data

The following personal data is processed on the Threema Servers for invoicing of license packages:

- Customer Number;
- Company (optional);
- Address (optional);
- E-mail addresses of Administrators and Additional Recipients.

## Purpose

The aforementioned personal data is processed for the following purposes:

- Invoicing for license packages (contractual performance).

## Legal Basis

The processing of personal data for invoicing is based on the overriding private interest (contractual performance) of Threema; Art. 31 Sec. 2 lit. a FADP [for EU/EEA: Art. 6 Sec. 1 lit. b GDPR].

## Necessity

This data processing is necessary to perform contracts with Business Customers on license packages for the use of Threema Work.

## Storage Period

The company and address of a Business Customer concerned will be stored until the deletion of his Customer Account and then **immediately** deleted, subject to retention rights and obligations (see Section 2.B.).

If a Business Customer does not pay an invoice based on a quotation within the applicable payment period, the processing of his personal data within the scope of this invoice is automatically **terminated**. The Administrators and Additional Recipients of the Business Customer will be automatically informed about the deletion of the invoice.

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If the invoice is issued as part of the renewal of existing license packages, the personal data of the Business Customer will be further processed by Threema for the purpose of reminders and enforcement of the claim. If a license package is terminated by a Business Customer prior to its (in principle automatic) renewal, no more personal data will be processed for the creation of new invoices within the scope of the terminated license package.

The storage period of the e-mail addresses of Administrators and Additional Recipients is set out under Sections 2.C. and 2.D. hereinabove.

## I. Support Requests

### Processing

Administrators may submit support requests to the Threema staff via a corresponding form of the Threema Work Cockpit.

### Categories of Processed Personal Data

When submitting a support form, the following personal data is processed on the Threema Servers:

- Customer Number;
- Username of the Administrator;
- E-mail adress of the Administrator.

To protect the Threema Work Cockpit from misuse, Threema uses a captcha from the hCaptcha service (see Section 2.O.).

### Purpose

The aforementioned personal data is processed by Threema for the following purposes:

- Recording, processing, and answering of support requests.

### Legal Basis

The processing of personal data for support requests is based on the overriding private interest (use of the Threema Work Cockpit by the Business Customer; contractual performance) of Threema; Art. 31 Sec. 2 lit. a FADP [for EU/EEA: Art. 6 Sec. 1 lit. b GDPR].

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## Storage Period

The support request is stored on the Threema Servers for **6 months** and then automatically deleted. If the Administrator submits another support request before the deletion period expires, the 6-month deletion period is reset and starts anew.

The storage period of the personal data of Business Customers and Administrators is set out under Sections 2.B. and 2.C. hereinabove.

## J. Access management for the Threema Work-App

### Processing

In order for a Work User to use the Threema Work App, an access authorization must be created for them by an Administrator. Each access authorization to the Threema Work App requires an available license as part of an active license package and consists of a username and a password.

The username may be freely chosen by the Administrator, but must be unique on the Threema Servers. The same username must not have already been used by the Administrator of another Business Customer.

With the access data registered by the Administrator, a Work User may activate and use their Threema Work App.

### Categories of Processed Personal Data

The following personal data is processed and stored on the Threema Server for registration and administration of Work Users:

- Username.

### Purpose

The aforementioned personal data is processed for the following purposes:

- Use of the contractually agreed functions of the Threema Work App by Work Users (contractual performance).

### Legal Basis

The processing of personal data for the registration and administration of Work Users is based on the overriding private interest (contractual performance) of Threema; Art.



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31 Sec. 2 lit. a FADP [for EU/EEA: Art. 6 Sec. 1 lit. b GDPR].

### Necessity

The processing of personal data is necessary to enable Business Customers to use Threema Work as contractually agreed.

### Storage Period

The usernames stored for the registration and administration of Work Users are stored on the Threema Servers **until revocation**, i.e. the change or deletion of a Work User's username in the Threema Work Cockpit, and then **immediately** deleted.

If the license package of a Business Customer, within which a Work User has been registered, becomes inactive, the username of the Work User is not deleted, but only **deactivated** (the data subject may no longer use the Threema Work App). If the Business Customer reactivates the corresponding license package by purchasing new licenses, deactivated Work User access authorizations may be reactivated by Administrators.

In case of deletion of the Customer Account by the Business Customer, the personal data stored for registration and administration of Work Users will be **immediately** deleted.

## K. Configuration of the Threema Work App (App Configuration)

### Processing

Administrators have the option in the Threema Work Cockpit to configure the Threema Work App by setting “**App Configurations**” globally (per license package) or per access authorization of a Work User (per license). These are used to configure the Threema Work App of all or only individual Work Users within a license package, in order to control functions of the Threema Work App or to identify Work Users more easily within the Business Customer's organization.

In order to synchronize the App Configuration with the data in the Threema Work App on Work Users' mobile phones, App Configurations set by Administrators are

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automatically downloaded by the Threema Work App to the mobile phone of the Work User and synchronized every 24 hours.

**Note:** The use of the App Configuration is completely optional; the Business Customer or their Administrators decide what data is processed and stored in the context of using the App Configuration.

### Categories of Processed Personal Data

The following personal data is processed and stored on the Threema Servers when using the App Configuration:

- First name (optional);
- Last name (optional);
- Nickname (optional);
- Category (e.g. job title or department; optional);
- Customer Specific Identifier ("CSI", e.g. employee number; optional).

### Purpose

The aforementioned personal data is processed for the following purposes:

- Use of the contractually agreed functions of the Threema Work Cockpit (contractual performance).

### Legal Basis

The processing of personal data of Work Users in the context of the use of the App Configuration by Administrators is based on the overriding private interest (contractual performance) of Threema; Art. 31 Sec. 2 lit. a FADP [for EU/EEA: Art. 6 Sec. 1 lit. b GDPR].

### Necessity

The processing of personal data is necessary to enable Business Customers to use Threema Work as contractually agreed.

### Storage Period

App Configurations of a Work User set by Administrators are stored on the Threema Servers **until revocation**, i.e. the change or deletion of individual or all App Configurations of a Work User in the Threema Work Cockpit, and then **immediately** deleted.

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If the license package of a Business Customer, within which App Configurations of a Work User have been stored, becomes inactive, the App Configurations of the Work User will not be deleted, but only **deactivated** (the data subject will no longer be able to use the Threema Work App). **After 1 year** of inactivity of the corresponding license package, the App Configurations to Work Users will be automatically deleted. If the Business Customer reactivates the corresponding license package by purchasing new licenses, deactivated accesses/authorizations of Work Users including the stored App Configurations may be reactivated by Administrators.

## L. Synchronization of the Threema-ID from the Threema Work-App (User List)

### Processing

Each Work User's access authorization within a license package includes an eight-digit, alphanumeric Threema ID, which is randomly generated (along with the public and private keys) when the Threema Work App is set up.

When the Work User uses the Threema Work App, their Threema ID as well as the optional App Configurations (see Section 2.K.) are uploaded to the Threema Servers every 24 hours, linked to the concerned Work User's access authorization in the Threema Work Cockpit, and stored. This allows Administrators to create a **"User List"** of Work Users within the Business Customer's organization in the Threema Work Cockpit.

### Categories of Processed Personal Data

The following personal data is processed and stored on the Threema Servers when the Threema ID of Work Users is synchronized:

- Threema ID of the Work User;
- First name (optional);
- Last name (optional);
- Nickname (optional);
- Category (optional);
- CSI (optional).

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## Purpose

The aforementioned personal data is processed for the following purposes:

- Use of the contractually agreed functions of the Threema Work Cockpit (contractual performance).

## Legal Basis

The processing of the Threema ID and App Configurations of Work Users is based on the overriding private interest (contractual performance) of Threema; Art. 31 Sec. 2 lit. a FADP [for EU/EEA: Art. 6 Sec. 1 lit. b GDPR].

## Necessity

The processing of personal data is necessary to enable Business Customers to use Threema Work as contractually agreed.

## Storage Period

Threema IDs of Work Users are stored on the Threema Servers **until revocation**, i.e. the deletion of a Work User's access authorization in the Threema Work Cockpit by an Administrator, and then **immediately** deleted.

If the license package of a Business Customer, within which Threema IDs of Work Users have been stored, becomes inactive, the Threema ID of a Work User will not be deleted, but only **deactivated** (the data subject will no longer be able to use the Threema Work App). **After 1 year** of inactivity of the corresponding license package, all personal data linked to the Threema ID of a Work User will be automatically deleted. If the Business Customer reactivates the corresponding license package by purchasing new licenses, deactivated access authorizations of Work Users may be reactivated together with the stored Threema IDs.

Work Users may, provided they have previously set a "**Revocation Password**" in the Threema Work App, delete their Threema ID at any time. Deletion by Revocation Password also leads to **immediate deletion** of the Threema ID of the concerned Work User in the Threema Work Cockpit.

If a Work User changes his mobile phone without having backed up their Threema ID first, they have to generate a new random Threema ID when setting up the Threema Work App on their new mobile phone. When synchronizing their new Threema ID with

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the Threema Work Cockpit, his old Threema ID is not deleted, but only **deactivated** and remains stored on the Threema Servers until deleted by an Administrator.

The storage period of the optional App Configurations is set out under Sections 2.K. hereinabove. If a Work User deletes their Threema ID with the Revocation Password, all App Configurations linked with this Threema ID are **immediately** deleted as well.

## M. Directory for the Threema Work-App

### Processing

Administrators have the option in the Threema Work Cockpit to create a “**Directory**” with the Work Users from the Business Customer's organization.

An entry in the Directory consists of a Threema ID and the corresponding App Configurations (see Section 2.K.). Threema IDs may be added to the Directory by Administrators either manually or automatically from the User List (see Section 2.L.).

Work Users, provided they have an Internet connection to the Threema Servers, may access this Directory and save individual contacts from it locally in the Threema Work App.

**Note:** Creating a Directory in the Threema Work Cockpit is completely optional; the Business Customer or their Administrators decide what data is processed in the context of using Directories.

### Categories of Processed Personal Data

The following personal data is processed on the Threema Servers in the context of using the Directory:

- Threema ID;
- First name (optional);
- Last name (optional);
- Nickname (optional);
- Category (optional);
- CSI (optional).

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## Purpose

The aforementioned personal data is processed for the following purposes:

- Use of the contractually agreed functions of the Threema Work Cockpit (contractual performance).

## Legal Basis

The processing of personal data of Work Users in the context of creating a Directory by Administrators as well as their use is based on the overriding private interest (contractual performance) of Threema; Art. 31 Sec. 2 lit. a FADP [for EU/EEA: Art. 6 Sec. 1 lit. b GDPR].

## Necessity

The processing of personal data is necessary to enable Business Customers to use Threema Work as contractually agreed.

## Storage Period

The processing of personal data in the context of the creation and use of the Directory is carried out **until revocation**, i.e. the change or deletion of personal data in the Directory by an Administrator in the Threema Work Cockpit. The storage periods for Threema IDs and App Configurations are set out under Sections 2.K. and 2.L. hereinabove.

If a Business Customer's license package within which a Directory was created becomes inactive, the Directory will not be deleted, but only **deactivated**. If the Business Customer reactivates the corresponding license package by purchasing new licenses, deactivated Directories will be automatically reactivated.

# N. Threema Broadcast

## Processing

A Business Customer may request and use one "**Broadcast ID**" per license package (if included in the license package subscription model).

Once this Broadcast ID has been requested and set up in the Threema Work Cockpit, the Threema IDs stored in the User List (together with the linked App Configurations) are synchronized with Threema Broadcast in the Threema Work Cockpit on an hourly

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basis.

This allows Administrators to use Threema Broadcast to set up groups and distribution lists for messages, for example for all Work Users who belong to the same department based on the App Configurations.

**Note:** The use of Threema Broadcast in the Threema Work Cockpit is completely optional; the Business Customer or their Administrators decide what data is processed and stored in the context of the use of Threema Broadcast.

## Categories of Processed Personal Data

The following personal data is processed and stored on the Threema Servers as part of the use of Threema Broadcast:

- Threema ID;
- First name (optional);
- Last name (optional).

## Purpose

The aforementioned personal data is processed for the following purposes:

- Use of the contractually agreed functions of the Threema Work Cockpit (contractual performance).

## Legal Basis

The processing of personal data of Work Users in the context of the use of Threema Broadcast is based on the overriding private interest (contractual performance) of Threema; Art. 31 Sec. 2 lit. a FADP [for EU/EEA: Art. 6 Sec. 1 lit. b GDPR].

## Necessity

The processing of personal data is necessary to enable Business Customers to use Threema Work as contractually agreed.

## Storage Period

The processing of personal data in the context of the use of Threema Broadcast is carried out **until revocation**, i.e. as long as Threema Broadcast is activated in the Threema Work Cockpit. The storage periods for Threema IDs and App Configurations are set out under Sections 2.K. and 2.L. hereinabove.

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If the license package of a Business Customer within which Threema Broadcast has been set up becomes inactive, the personal data processed within Threema Broadcast (e.g. Threema IDs within a distribution list) will not be deleted, but only **deactivated**. If the Business Customer reactivates the corresponding license package by purchasing new licenses, Threema Broadcast will be automatically reactivated.

## O. Misuse Protection (hCaptcha)

### Processing

In order to prevent misuse through forms submitted by machines, Threema uses the captcha of the “**hCaptcha**” service for all forms and login screens used in the Threema Work Cockpit.

hCaptcha is a service of Intuition Machines, Inc., 350 Alabama St, San Francisco, CA 94110, USA (hereinafter “**Intuition Machines**”). hCaptcha is “ISO 27001”-certified. Visitors can find more information on data protection at Intuition Machines under this [external link](#).

The USA as the registered office of Intuition Machines and the probable place of data processing of the hCaptcha service is not on the list of states of the under Annex 1 to the Ordinance on Data Protection of August 31, 2022 (“**DPO**”; SR 235.11); therefore, its legislation does not ensure adequate data protection; Art. 16 Sec. 1 FADP in connection with Art. 8 Sec. 1 DPO.

For this reason, personal data disclosed to Intuition Machines is converted to a one-way encrypted hash value on the Threema Servers before it is disclosed.

**Note:** No personal data is disclosed to Intuition Machines; identification of Administrators is thereby not possible.

### Categories of Processed Personal Data

When solving a captcha, the following personal data is processed on the Threema Servers and disclosed to Intuition Machines in pseudonymized form:

- IP address (one-way encrypted).



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## Purpose

The aforementioned personal data is processed by Threema and disclosed to Intuition Machines in pseudonymized form for the following purposes:

- Information security.

## Legal Basis

The processing of IP addresses on the Threema Servers and their disclosure to Intuition Machines in pseudonymized form is based on the overriding private interest (misuse protection) of Threema; Art. 13 Sec. 2 lit. a FADP [for EU/EEA: Art. 6 Sec. 1 lit. b GDPR].

## Necessity

This data processing is necessary to prevent misuse through forms in the Threema Work Cockpit submitted by machines.

## Storage Period

After their pseudonymization and their disclosure to Intuition Machines in pseudonymized form, the IP addresses of Business Customers or their Administrators are **immediately** deleted on the Threema Servers.

## 3. Disclosure of Data to Third Parties

Principally, Threema does not disclose to third parties any personal data that is transmitted by the User when using the Threema Work Cockpit and then processed and stored on the Threema Servers.

Threema reserves the right to disclose personal data to third parties (e.g. lawyers) if it is necessary for the assertion, exercise or defence of legal claims by Threema.

## 4. Collection of Data from Thrid Parties

Principally, Threema does not collect from third parties any personal data that is transmitted by the User when using the Threema Work Cockpit and then processed and stored on the Threema Servers.

## 5. Data Security

In addition to using the latest encryption methods, Threema takes all necessary technical and organisational measures to prevent unauthorised access and misuse of data in the Threema Work Cockpit. The security measures are continuously improved in line with technological developments.

## 6. Control Options

In addition to the legal claims of data protection law (see Section 7), Threema grants data subjects (Business Customers, Administrators and Work Users) the following control options over their personal data:

### **Deletion of all stored Personal Data of a Customer Account (for business customers)**

Business Customers may delete all personal data processed and stored within the scope of the Customer Account at any time, unless there is an active license package, by deleting their Customer Account.

This is subject to Threema's retention rights and obligations (see Section 2.B.).

### **Rectification, Completion and Deletion of Personal Data as well as Termination of Processing (for Administrators)**

Administrators may rectify or complete personal data in the Threema Work Cockpit at any time, terminate their processing or delete them if they are stored, namely:

- Company and address data;
- Personal data of Administrators;
- Personal data of Additional Recipients;
- Access data of Work Users;
- Old, inactive Threema IDs of Work Users;
- App Configurations of Work Users;
- Entries of Work Users in the User List;
- Entries of Work Users in the Directory;
- Personal data in Threema Broadcast.

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## Information about Inventory Data (for Work Users)

Work Users may access the inventory data, including personal data, stored by Threema and linked to the Work User's Threema-ID at any time by sending the message "info" to the Threema-ID "\*MY3DATA". Work Users can find out more under the following link: [https://threema.ch/en/faq/get\\_my\\_data](https://threema.ch/en/faq/get_my_data)

## Deletion of all Inventory Data by Revocation (for Work Users).

The Work User may immediately delete his Threema-ID and all information linked with it, including personal data, at any time. To do so, the Work User must revoke their Threema-ID via the link <https://myid.threema.ch/revoke> on the Threema website.

The revocation of the Threema-ID is irreversible and a Revocation Password must be set in advance in the Threema Work App.

## 7. Rights of Data Subjects

Data subjects whose personal data is processed within the scope of using the Threema Work Cockpit can assert various claims under data protection law against Threema.

If Threema processes personal data on behalf of a Business Customer, i.e., as a processor, claims of data subjects under data protection law must be primarily asserted against the Business Customer as the controller of the data processing. Threema will support the Business Customer in the fulfilment of claims under data protection law by data subjects.

In order to fulfil these claims, Threema may have to process personal data of data subjects. In particular, Threema must be able to identify the data subject in order to ensure that the data subject rights are not exercised by anyone other than the data subject and that no personal data is unlawfully disclosed to third parties.

Regarding the processing of personal data through the use of the Threema Work App, secure identification of the data subject is only possible via algorithmic proof of possession of the private key associated with the Threema-ID via a so-called key derivation. This is ensured in the case of automated inventory data access for Work Users of the Threema Work App via the Threema-ID "\*MY3DATA".

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Depending on the applicable law, data subjects may exercise the following rights in relation to personal data against Threema:

## Right to Information

Art. 25 and 26 FADP [for EU/EEA: Art. 15 GDPR]

A data subject has the right to request information about their personal data processed by Threema.

## Right to Correction or Completion

Art. 32 Sec. 2 FADP [for EU/EEA: Art. 16 GDPR]

A data subject has the right to request that Threema corrects inaccurate or completes incomplete personal data without undue delay.

## Right to Deletion

Art. 32 Sec. 2 FADP [for EU/EEA: Art. 17 GDPR]

A data subject has the right to request that Threema deletes their personal data without undue delay.

## Right to Withdrawal of Consent

only for data processing based on **consent**; Art. 30 Sec. 2 FADP [for EU/EEA: Art. 7 Sec. 3 GDPR]

A data subject has the right to withdraw their consent to the processing of their personal data by Threema. This has the consequence that Threema may no longer continue the data processing based on this consent. The processing of the User's personal data by Threema up to this point in time on the basis of the User's consent remains lawful.

## Right to Objection

only for data processing based on **legitimate interests**; Art. 30 Sec. 2 FADP [for EU/EEA: Art. 21 GDPR]

A data subject has the right to object to the processing of their personal data by

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Threema where such personal data is processed based on Threema's overriding private interests; Art. 31 DSG [for EU/EEA: Art. 6 Sec. 1 lit. f GDPR].

### Right to Blocking

Art. 32 FADP [for EU/EEA: Art. 18 GDPR]

For the protection of their personality, a data subject has the right to request that Threema blocks the processing of their personal data.

### Right to Data Transfer

Art. 28 and 29 FADP [for EU/EEA: Art. 20 GDPR]

[only for data processing based on **consent** or **a contract** and with the aid of **automated procedures**]

A data subject has the right to receive the personal data they have provided to Threema in a structured, commonly used, and machine-readable format, provided that:

- the processing is based on consent or on a contract; and
- the processing is carried out with the aid of automated procedures.

## 8. Timeliness and Amendment of this Privacy Policy

Threema reserves the right to amend this Privacy Policy from time to time in order to comply with changed legal requirements or to implement new features in the Privacy Policy. The current Privacy Policy is always linked in the Threema Work Cockpit.