



TERMS AND CONDITIONS OF USING THE WEBSITE DATA PROTECTION AND PRIVACY STATEMENT

Association Information

Spindle is an association as defined by Art. 60 ff. of the Swiss Civil Law (ZGB), with its seat in CH-3963 - Crans Montana , Switzerland. Its activities are governed by its Bylaws. The association is independent in terms of politics and religion.

Copyright

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Disclaimer

The information contained in this website is for information purposes only. Whilst we make every effort to ensure that the information on this website is correct, Spindle can make no warranty as to its accuracy or freedom from error.

Spindle shall have no liability for any loss or damage resulting from the use of this website, the inability to use this website, any information contained within it or any defect in it. The information contained in this website is not intended nor implied to be a substitute for professional medical advice nor is it intended to be for medical diagnosis or treatment.

Material appearing on this website may include advertising and other material submitted by parties other than Spindle. This website may also provide weblinks to other websites operated by advertisers and third parties. In using one of these weblinks it is considered that you are leaving the Spindle website, therefore Spindle does not offer any guarantees, endorsements or accept any responsibility for any such websites.

Services provided to patients and professionals are governed by additional terms and conditions of using the services, stipulated in the respective service offers or membership statements.

Privacy Policy

Data protection and privacy compliance

The website www.spindle.rehab (hereafter „website“) is operated by Spindle, CH-3963 - Crans Montana (hereafter „Spindle“ or „we“). Spindle is responsible for the collection, processing and use of personal data, which are collected from or entered into by the visitors of the website (hereafter „user“ or „you“), and for data protection compliance with the applicable data protection and privacy regulations.

Spindle complies with the provisions of the Swiss Federal Data Protection Act (DSG), the Ordinance to the Federal Data Protection Act (VDSG) and the General Data Protection Regulation of the European Union (GDPR) and the rules on internal data transfer, such as the EU-US and Swiss-US Privacy Shield.

Spindle is committed to safeguarding your privacy online. This policy only covers this website. Weblinks from this website to other websites are not covered by this policy.

Data collected and reasons for data collection

The Spindle website is not encrypted and can be accessed and browsed, in principle, without disclosing any personal data.

Spindle collects the following information regarding visitors to the website: IP addresses, information regarding what pages are accessed and when. We use your IP address to help us to track usage behaviour and compile data that will allow content and navigation improvement of our website. This information is un-identified and non-identifiable and does not enable us to identify the Visitor or User from whom it was collected. It will not be linked or stored with personal data.

Further, Spindle uses email forms for visitors to request information on services. Contact information (i.e. name and email address) from the email form is collected and used to send information to our visitors as specifically requested by them. Personal details will not be passed to any third parties not involved with Spindle.

Spindle places great importance on the security of all personal information. We have security measures in place to protect against the loss, misuse and alteration of personal data under our control.

Transfer of data to third parties

Spindle only discloses personal data from users if the user either has consented explicitly, a legal obligation therefore exists or if it is required for the enforcement of rights and claims of Spindle.

In addition, Spindle will pass on personal data from users to third parties as far as it is necessary in the context of the use of the website as well as the answering of questions, processing of inquiries or for the possible provision of services required by the user. The use of the data submitted by the third parties is strictly limited to the stated purposes.

If the personal data represents information which falls under the scope of the patient secrecy according to art. 321 StGB, this information shall in no case be passed on to third parties without the consent of the user.

Transfer of personal data abroad

Spindle is entitled to forward personal data from users to third parties and service providers abroad, provided that this is necessary in the context of the use of the website, answering of questions, processing of inquiries or for the possible provision of services required by the user.

These third parties are bound to the same extent as Spindle to comply with the applicable data protection rules. Some of the service providers have their headquarters in the Israel and the US.

Spindle is hosted by Wix.com Ltd., based in Israel, which is considered by the European Commission to be offering an adequate level of protection for the Personal Information of EU Member State residents.

Spindle's web partners participate in, and have certified their compliance with, the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce's Privacy Shield List, [here](#).

Right to information, deletion, correction and data portability

Users have the right to receive information about their personal data stored by Spindle, upon request. In addition, users have the right to correct inaccurate data and to have their personal data deleted, insofar as this is not contrary to any statutory retention duty or any other legal basis that allows Spindle to process this data.

In addition, users have the right to demand the release of the data they have provided to Spindle (right of data portability). Upon request, Spindle will also forward the data to a third party of your choice. Users have the right to receive the data in a common file format.

For this, users need to contact: info@spindle.rehab.

In case of data protection breach suspicion, the users may contact the competent data protection authority.

Data retention

Spindle only stores personal data for as long as it is necessary to use the tracking services mentioned above and other processing in the context of our legitimate interest. Contract data is retained by Spindle for a longer period, as this is prescribed by legal retention obligations. Retention duties, which oblige Spindle to store data, result from regulations on accounting and tax law. According to these regulations, business communications, contracts concluded and accounting records must be stored for up to 10 years. Such data will only be used for the purposes stipulated.

Data security

Spindle uses appropriate technical and organizational security measures to protect personal data against manipulation, partial or total loss and against unauthorized access by third parties. These safety measures are continuously improved in line with the technological developments.

Cookies

Our website uses cookies technology to provide you with a better and more personalized web service. The data stored by cookies used on our website will never display personal details allowing to determine the identity of any individual.

Cookies are small text files stored and/ or read by your browser on the hard disk of the user's final device (for example: computer, laptop or smartphone) depending on the websites they are visiting. Likewise, cookies make the user's interactions with websites safer and faster, as they can remember preferences (for example language), by sending the contained information back to the initial website (first-party cookie) or to another website to which they belong (third-party cookie), upon a new visit to the same website, when using the same final device. Some of the installed cookies are automatically deleted after the end of the browser session (so-called session cookies). Other cookies remain on the user's device and allow us to recognize the browser on the next visit (persistent cookies).

Certain cookies may already be set as soon as users access the website. Users may, however, set up the browser in such a way that they are informed of the setting of cookies and they may decide individually about their acceptance. The non-acceptance or de-activation of cookies may restrict the functionality of the website.

Browsers allow the users to control the storage of cookies on their respective devices. The description for the respective browsers can be found in the settings of the browsers concerned:

Internet Explorer™: Settings > Tools > Internet Options > Advanced

Safari™: Data protection

Chrome™: Settings > Advanced > Site settings > Cookies

Firefox™: Settings > Data protection and safety

Opera™ : Settings > Advanced > Privacy and security > Site settings > Cookies

Information on deleting or controlling cookies is also available at <https://www.aboutcookies.org/>

Re-targeting technologies

Spindle also uses so-called re-targeting technologies and tracking tools on the website. In doing so, the user's behaviour is analysed on the website in order to be able to subsequently offer individual tailored advertising to the user on the partner websites. The behaviour of the user is recorded anonymously.

Spindle uses Google Analytics, a web analytics service of Google. The information about the use of the website is generally transferred to a Google server in the US and stored there. By activating the IP anonymisation on this website the IP address in the Member States of the European Union or in other States Parties to the Agreement on the European Economic Area as well in Switzerland is shortened prior to transmitting to the US. Only in exceptional cases

the full IP address is transferred to a Google server in the US and shortened there. The anonymized IP address transmitted by Google Analytics from the user's browser is not merged with any other data from Google.

The information is used to evaluate the use of the website in order to compile reports about the activities on the website and to provide other services associated with the use of the website for the purposes of market research and the appropriate design of the website.

Users can prevent the recording of data (including the IP address) generated by the cookie and related to the website from being accessed by Google, as well as the processing of this data by Google, by downloading and installing the browser plug-in that is available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>

Spindle uses a so-called Conversion-Tracking Code of Google, Google Ads. This code or tag allows to track the conversion of Spindle's Google Ads campaigns. As soon as a user lands on a Google Ads or any other advertisement of Spindle in the Google network, a temporary cookie is installed in the browser of the respective user. When this user continues to the website of Spindle, the code or tag on the website recognizes the cookie and is able to forward the information about this conversion to Google. Additional information about the conversion-tracking can be found here. Users may prevent this tracking by rejecting or deactivating cookies.

You may opt-out of receiving targeted ads from certain advertisers and ad networks by clicking here (or if you are located in the European Union click here (provided by YourChoicesOnline.eu). Please note this does not opt you out of receiving all advertising and that your opt-out will only be in relation to the specific advertising. You will continue to receive advertising for which you have not opted out.

Spindle and certain Third Party Services may employ a software technology called "clear gifs" (a.k.a. Web Beacons/Web Bugs), which enables them and us to improve our Services by measuring their effectiveness and performance. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, however are not stored on your device, but instead embedded within our Services.

Spindle and certain Third Party Services may also employ certain tracking technologies known as "Flash cookies" and "HTML5", mainly for advertising purposes. Various browsers may offer their own management tools for removing or blocking such technologies.

Social plug-ins

Spindle has social plugins installed. These social plugins consist on the one hand of "Like-Buttons" or similar functionalities that are typical for social media networks, on the other hand of "dynamic" links to the sites of Spindle on the respective social media networks.

Users recognize the respective plugins because they are displayed using the logo of the respective network.

If a user is logged in his/ her user account with the respective social media network when accessing the website of Spindle, the respective network may connect the website visit to his/ her user account. If a user interacts with the plugins, the respective information will directly be forwarded to the server of the respective provider and stored there. The information may be published on the respective social media network and in certain circumstances displayed to other users of the network (e.g. if the “like”-button is used).

The provider of the social media network uses the information for marketing purposes, market surveys and the user-focused design of its services. In this respect use, interest or relation profiles may be created, e.g. in order to analyse the use of the Spindle website by the respective user with respect to the advertising displayed to this user on the social media network, in order to inform other users of the social media network about the activities of the respective user on the Spindle website, and in order to provide other services connected to the use of the social media network.

Purpose and extent of the data collection, processing and use by the provider of the social media networks as well as the rights and user settings for the protection of the users' privacy may be found in the data privacy policies for the social media networks.

If users do not want that the provider of a social media network is able to connect the data collected on the website of Spindle directly with their user account, they need to log out from their user account prior to using the plugins or prior to visiting the website.

Applicable Law and Place of Jurisdiction

The legal relationship between the user of the services or their representative and Spindle shall (irrespective of the legal grounds) be governed and exclusively be subject to the substantive laws of Switzerland excluding the conflict of laws rules according to Swiss International Private Law and any international treaties.

For all (contractual or non-contractual) disputes between the user of the services or their representative and Spindle, irrespective of the legal grounds, the exclusive place of jurisdiction shall be at the seat of Spindle in 3963 - Crans Montana, Switzerland.

Consent

By continuing to use this website it is implied that you accept our Terms and Conditions and Privacy Policy.