

# Privacy Policy

## SICO - Swiss International College of Osteopathy

### 1 Introduction

In this data protection declaration we would like to inform you about how the SICO Swiss International College of Osteopathy (hereinafter “we”) processes personal data. This is not an exhaustive description; if necessary, other documents regulate specific issues.

When it comes to data protection, we value openness and transparency. Personal data is processed when visitors use the website or otherwise contact us. Personal data includes any information relating to an identified or identifiable person. The processing of personal data includes any handling, regardless of the methods used, e.g. acquisition, storage, use, disclosure or destruction.

### 2 Responsible

The person responsible within the meaning of data protection law is:

SICO Swiss International College of Osteopathy  
Zinnenstrasse 7  
6353 Hertenstein  
Email: [welcome@sico.ch](mailto:welcome@sico.ch)

Do you have specific questions about how we handle your personal data? We will be happy to help you.

### 3 Types of personal data

We process different types of personal data, in particular:

- Inventory data (e.g.: first name, last name, title, date of birth, occupation, biological sex, gender identity, occupation, copy of passport/ID)
- Contact details (e.g. postal address, email address, telephone number)
- Contract data (e.g. services used, courses completed,
- Subject of the contract, contractual communication)
- Payment data (e.g. bank details, invoice, payment history)
- Meta/communication data (e.g. IP addresses, device information)
- Usage data (e.g. websites visited, access times, click behavior)

- Content data (e.g. images, proof of achievements, qualification data such as in professional diplomas, entries in online forms)
- Registration data (e.g. login area for our courses and training, newsletter delivery)

#### 4 Types of communication

We use different communication channels and means

Communication category	Purpose	Persons	Platforms
Information	Information	External Internal Interested persons	Website Advertising Social media
Means of communication	1:1 communication information	External Internal	Email program Phone Messenger services Odoo chat
Classe 365	Learning content Organization Exams	Students Course participants Administration Lecturers	Classe 365

#### 5 Processing activities

Category people	Proceedings	Purpose	Personal data category	Recipient data (external)
Visitor website	website	Information, Student/client Acquisition	Meta/communication data	Google Tag Manager, Google Analytics Google Maps Odoo Data protection consent Cookies
Study - Interested people	Study registration /information	Information, Registration	Inventory data contact details	Odoo Means of communication
Clients	Treatments Clinic	Registration clinic	Inventory data Contact details Contract data	Odoo Means of communication Written Patient record
Students	Studies	Communication Learning materials exams	Inventory data Contact details Content data Registration Data Contract data	Odoo Means of communication Class 365



## 6 Purposes of processing

### 6.1 Courses

You have the opportunity to register for one of our training programs and provide us with the necessary information. This data is necessary to enable the planning, implementation and billing of our training offers. After completing your training/further training, you will either receive a course confirmation indicating the duration of the courses or a certificate that additionally qualifies the services you have provided. As part of our training offer, we communicate with participants via various channels such as telephone, email or messenger.

### 6.2 marketing

We process your information for marketing purposes and to maintain customer relationships, for example to provide you with tailored advertising about our own products and services and those of third parties. This is done through various channels such as newsletters, regular contacts or as part of special marketing campaigns such as events or competitions. You always have the option to decline such contacts or to refuse or withdraw your consent to be contacted for marketing purposes. With your consent, we can tailor our online advertising on the Internet more specifically to your needs. We also use your data for market research, to improve our services and operations, and to develop new products.

### 6.3 Operation of the website

We collect personal data from you to display and optimize our website content and to ensure data security. This also applies to the analysis of website usage. If you use certain functions, we also process personal data for:

- contacting you, for example to answer your questions,
- regular information about our offers, for example via newsletter,
- other specified uses.

Our website is hosted by Odoo SA and its sub-processors . All interactions lead to our central Odoo platform.

#### 6.3.1 Contact forms

If you use our contact forms, your inventory and address data as well as your message can usually be sent to us, depending on the respective service. Content data is also transmitted on the registration form

#### 6.3.2 Cookies

When you visit our website, a small file called a “cookie” is automatically stored on the user’s computer. Cookies have the purpose of making the overall use of our website more user-friendly and effective in order to make your visit as pleasant as possible. They also enable the analysis of your use of our website. The information collected through cookies is used internally or by affiliated companies solely to optimize the website and user experience.

Most of the cookies we use are so-called session cookies, which are automatically deleted after your visit. Other cookies remain on your device until you delete them.

Most internet browsers accept cookies by default. However, you can specify in your browser settings that you would like to be informed about the setting of cookies. You also have the option to allow the acceptance of cookies in certain cases or to reject them generally. Automatic deletion of cookies when closing the browser can also be activated. You can delete cookies that have been set at any time via your browser or other software programs.

The exact procedure for controlling and deleting cookies depends on the browser you use. You can find information about this in the help menu of your browser. Please note that if you disable the use of cookies, certain features of our website may not function properly.

### 6.3.3 Google services

#### 6.3.3.1 Generally

On our website we use various services from Google LLC, based in the USA or, if your habitual residence is in the European Economic Area (EEA) or Switzerland, from Google Ireland Ltd. based in Ireland ("Google"). Google LLC is always responsible for the processing of personal data when using "Google Maps". We use the following Google services on our website:

- Google Tag Manager
- Google Analytics
- Google Maps

Further details about each service can be found below. Google uses technologies such as cookies, browser web storage and web beacons to enable analysis of your use of our website. The information generated about your use of the website can be transferred to a Google server in the USA or other countries and stored there. Information about the locations of Google data centers can be found here.

We use Google tools, which Google says may process personal data in countries where Google or its subcontractors maintain facilities. In its "Data Processing Addendum for Products where Google is a Data Processor", Google guarantees an adequate level of data protection by relying on the EU standard contractual clauses.

Further information on data processing by Google and data protection settings can be found in Google's data protection declaration and data protection settings.

#### 6.3.3.2 Google Tag Manager

Our website uses Google Tag Manager, which is used to efficiently manage website tags. Website tags are placeholders in the source code of a website that are used, for example, to integrate frequently used elements such as code for web analysis services. Google Tag Manager triggers other tags that may collect data. Google Tag Manager itself does not access this data. If a deactivation occurs at the domain or cookie level, this deactivation remains in effect for all tracking tags implemented via Google Tag Manager. For more information, see the Google Tag Manager Terms of Service.

### 6.3.3.3 Google Analytics

We use the web analysis service Google Analytics 4 to analyze our website, visitor statistics and for marketing and advertising purposes.

Google Analytics uses cookies that are stored on your device (laptop, tablet, smartphone, etc.) and enable your website usage to be analyzed. This allows us to evaluate usage behavior on our website and make our offering more interesting based on the statistics/reports obtained.

In Google Analytics 4, the anonymization of IP addresses is activated by default, whereby your IP address is shortened by Google within Switzerland or the EU/EEA before transmission. Only in exceptional cases will the full IP address be transmitted to a Google server and shortened there.

Google uses this information to evaluate your use of the website, to create reports on website activity and to provide other services related to website activity and internet usage. According to Google, the IP address transmitted by your browser as part of Google Analytics is not merged with other Google data. When you visit our website, your user behavior is recorded in the form of events (e.g. page views, interactions), other data such as your approximate location, technical information about your browser and the devices used, as well as the referrer URL.

You can prevent the collection and transmission of the data generated by the cookie and related to your website usage (including your IP address) to Google and the processing of this data by Google by downloading the browser add-on to deactivate Google Analytics and install. If you would like to object to interest-based advertising by Google, you can use the settings and opt-out options provided by Google.

For an overview of data usage in Google Analytics and the data protection measures taken by Google, see the Google Analytics Help Center.

Further information about the terms of use of Google Analytics and data protection at Google can be found in the relevant documents.

### 6.3.3.4 Google Maps

For all map services on our website, we use the Google Maps map service from Google LLC (USA). When you use Google Maps, information about your use of the website is transmitted to a Google server and stored there. If you are logged in to Google, your data is assigned directly to your account. If you do not wish this, you must log out beforehand. Further information can be found in Google's privacy policy at <https://policies.google.com/privacy>.

### 6.3.4 Meta pixels

On our website we have the Meta Pixel, a code snippet from Meta Platforms Inc. based in the USA or, if you have your habitual residence in the European Economic Area (EEA) or Switzerland, Meta Platforms Ireland Ltd. based in Ireland, embedded ("Meta").

The Meta Pixel enables Meta to determine the visitors to our websites as a target group for the display of advertisements, such as so-called "Facebook" or "Instagram Ads". We use the Meta pixel to show our Facebook and Instagram ads only to users of these platforms who have shown interest in our online offerings or who have certain characteristics that we transmit to Meta (so-called "Custom Audiences"). The aim is to ensure that our ads match the potential interest of users and are not annoying.

The Meta Pixel also allows us to track the effectiveness of Facebook and Instagram advertisements for statistical and market research purposes by allowing us to see whether users are redirected to our website after clicking on an ad (so-called " conversions ").

By using cookies, Meta can recognize you in the member area of Facebook or Instagram and optimize the efficiency of advertising, for example by offering targeted ads. This requires that you are logged in to the member area of Facebook or Instagram. If you are not a member of Facebook or Instagram, you are not affected by this data processing.

General information on Meta 's use of data , your rights and the protection of your privacy can be found in Meta 's data protection policy on the Facebook or Instagram website. Specific information and details about the Meta Pixel and how it works can be found in the Meta Help section . If you would like to generally object to the collection by the Meta Pixel and the use of your data to display Facebook or Instagram ads, you can do this in Facebook's advertising settings or Instagram's data protection settings. To do this, you must be logged in to Facebook or Instagram.

If you do not have a Facebook or Instagram account, you can object to the use of cookies for reach measurement and advertising purposes via the Network Advertising Initiative deactivation page and on the US website YourAdChoices or the European website Your Online Choices .

## 7 Legal basis

Your personal data is usually processed on the following legal basis:

- Consent from you or an authorized person, which you can revoke at any time free of charge (by email or by post to the (email) address specified in section 1)
- Conclusion or performance of a contract with you or your request to do so in advance
- Balancing of interests, which you can object to under certain circumstances (by e-mail or by post to the (e-mail) address specified in section 1)
- Legal obligation that can also be taken into account when weighing up interests

## 8 Recipients of personal data

If external processors or persons responsible are commissioned to process personal data, we ensure that the legal requirements are adhered to. In principle, it will only be passed on to third parties if:

- this is necessary for the execution of the contract with you,
- the transfer is permissible on the basis of a balance of interests,
- we are legally obliged to pass it on, or
- You have given your consent in this regard.

Regular recipients of personal data may fall into the following categories:

- Service providers from us (internal and external, including order processors)
- Further training partners
- Payment service providers and banks
- IT service providers (e.g. web hosting providers, email delivery service providers, online tools)

## 9 Announcement abroad

Data recipients can be located both domestically and abroad (worldwide). Particularly when using online tools, please note that your data may be transferred to countries in Europe and the USA where the service providers we use maintain their infrastructure (such as Google LLC or Meta Platforms Inc. based in the USA). Depending on the nature of the product or service, personal data may need to be disclosed to recipients located in countries that do not have an adequate level of data protection. When transferring data to such a country, we require that the recipient takes appropriate measures to protect personal data (e.g. by agreeing on so-called EU standard clauses, which are available here: [https://eur-lex.europa.eu/eli/dec\\_impl/2021/914/oj?](https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?) or through other precautions such as contractual necessity or consent in individual cases).

## 10 Social media

The data you enter on our social media profiles will be published by the social media platform and will not be used or processed by us for any other purposes at any time. However, we reserve the right to delete content if necessary. We may communicate with you via the social media platform.

Please note that the operator of the social media platform uses web tracking methods. Web tracking, over which we have no influence, can occur regardless of whether you are logged in or registered with the social media platform.

Further information on data processing as well as information on your rights, setting options to protect your privacy and your right to object to the creation of user profiles by the provider of the social media platform can be found in the data protection declaration of the respective provider:

- Facebook, Meta Platforms Inc. (USA)/Meta Platforms Ireland Ltd. (Ireland): Privacy Policy
- Instagram, Meta Platforms Inc. (USA)/ Meta Platforms Ireland Ltd. (Ireland): Privacy Policy
- LinkedIn, LinkedIn Corporation (USA)/LinkedIn Ireland Unlimited Company (Ireland): Privacy Policy
- YouTube, Google Ireland Limited (Ireland): Privacy Policy

## 11 Duration of data processing

We store personal data for as long as is necessary to fulfill our contractual obligations or otherwise for the purposes pursued by the data processing. This covers the entire business relationship from the initiation through processing to the termination of a contract. The storage also takes place in accordance with the legal retention and documentation obligations. It is possible that personal data will be retained for the period during which claims can be asserted against us and to the extent required by law or legitimate interests so require (e.g. for evidentiary and documentation purposes). As soon as the personal data is no longer required for the stated purposes, it is usually deleted or anonymized.

## 12 Your rights

We reserve the right to enforce the restrictions provided for by law, in particular if we are obliged to store or process certain data, have an overriding interest in doing so (to the extent that we are entitled to rely on this) or need the data to assert claims. Please note that exercising these rights may conflict with contractual agreements and this may have consequences such as early termination of the contract or cost consequences. In this case, we will inform you in advance unless this is already contractually stipulated.



Swiss International College of Osteopathy

If you believe that the processing of your personal data violates data protection law or your data protection rights have been violated in any other way, you can also complain to the responsible supervisory authority. In Switzerland, this is the Federal Data Protection and Information Commissioner (FDPIC; <https://www.edoeb.admin.ch/>).

Exercising your data protection rights usually requires clear proof of identity (e.g. a copy of your ID if your identity is not clear or cannot be verified). To assert your rights, please contact us by email using the contact option specified in Section 1.

SICO reserves the right to adapt this data protection declaration at any time without prior notice or notification. The current version published on the website applies.