



## VTX and Personal Data Protection

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VTX is committed to protecting the personal data of its customers and partners, and strives to comply with the new Swiss Data Protection Act (nLPD) and the General Data Protection Regulation (GDPR) applicable in the European Union.

This new regulation can be found [here](#).

### ➤ Context

The new Swiss Data Protection Act (nLPD) will come into effect on September 1, 2023, in Switzerland. This law is largely inspired by the European regulation, GDPR. The new rules aim to give individuals more control over their personal data, hold companies more accountable while reducing their reporting burdens, and strengthen the role of data protection authorities. This text has direct implications for many Swiss companies.

### ➤ What is personal data?

Data is considered "personal data" when it directly or indirectly relates to identified individuals. An individual is considered identified, for example, when their name appears in a file.

Data that may be considered anonymous can still qualify as personal data if it allows for the indirect identification or cross-referencing of information to a specific person. This can include information not associated with a person's name but that easily allows for their identification and knowledge of their habits or preferences (source: Commission nationale de l'informatique et des libertés (CNIL)).

### ➤ Does the VTX group use personal data?

Yes, but only indirectly:

- No targeting or processing based on personal data;
- No specific targeting of customers or prospects;
- VTX does not have access to the data of its customers who have servers or websites hosted in its data centers.

### ➤ What data does VTX generally collect?

We collect data provided by our customers during the initial contract establishment, as well as relevant data transmitted during their interactions with VTX's sales or technical services.

VTX does not collect personal data related to the consumption of its services by Swiss or EU customers beyond the telecommunications information necessary for billing purposes.

### ➤ Does VTX engage in targeting?

VTX does not engage in targeting based on personal data or the consumption behaviors of its services.

VTX does not exploit the personal data of its customers and is therefore not subject to Article 3 of the GDPR.

### ➤ What are VTX's commitments to its customers?

VTX is committed to ongoing monitoring of its employees who have access to the main databases containing customers' personal data. VTX ensures that all employees who come into contact with personal data have the necessary knowledge (nLPD Art. 7, GDPR Art. 24).

VTX is committed to implementing systematic encryption of client portal access systems from the creation of their profiles (nLPD Art. 7, GDPR Art. 25).

VTX is committed to managing the security and integrity of its customers' personal data. VTX will strive to respond to all requests and information inquiries from its customers within time frames in accordance with Swiss and European regulations. For all customer inquiries, the Data Protection Officer will be responsible for coordinating such requests and responses (nLPD Art. 14, GDPR Art. 27).

Although the law does not require VTX to maintain a register of data processing activities, our information system keeps track of access to personal data (nLPD Art. 12, GDPR Art. 30).



VTX is committed to implementing optimal security measures in its facilities and protecting the data and integrity of its customers through hardware and software upgrades as prescribed by our technical suppliers (nLPD Art. 8, GDPR Art. 32).

VTX is a training company that has been committed for many years to maintaining a professional framework and high values in terms of commitment and respect for its customers. Since the 2000s, VTX has issued a code of conduct in its regulations, and this code of conduct is systematically applied to all employees, apprentices, and interns (nLPD Art. 11, GDPR Art. 40 and 41).

For any further questions regarding the personal data we process, we invite you to contact us via email at [dataprotection@vtx-telecom.ch](mailto:dataprotection@vtx-telecom.ch).