



## Imprint

Responsible as service provider according to Art. 3 para. 1 lit. s of the Swiss Federal Act against Unfair Competition (UCA):

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In no event will Lookthrough be liable for any loss or damage of a material or immaterial nature arising from access to, use or non-use of published information, or from misuse of the connection or technical faults.

## Green Energy and Waste Reduction Policies

Our entire company mission is dedicated to transforming real estate sustainability by simplifying carbon data collection and analysis.

Our technology enables real estate owners and managers to measure, benchmark, and reduce emissions efficiently, supporting data-driven decision-making for a net-zero built environment.

At Lookthrough, we are committed to minimizing our own carbon footprint while enabling real estate decarbonization.

We actively support carbon removal initiatives, such as working with Oman-based 44.01, the first company outside of Iceland to produce Direct Air Capture Certificates.

Additionally, as a Swiss-based company, we operate on green energy for our office and servers and implement waste reduction practices, including rigorous recycling policies in our offices, aligning our operations with sustainability best practices.

## Privacy Policy

As the protection of your data is a major matter of concern for us, we want to take the time to inform you about what data we use during your visit and why we use it.

If you still have questions on the way we work with your personal data, you can refer to our data protection officer (contact details below).

Based on Article 13 of the Swiss Federal Constitution and the provisions of the revised Swiss Federal Act on Data Protection (FADP, effective since September 2023), as well as the EU General Data Protection Regulation (GDPR) where applicable, everyone has the right to the protection of their privacy, as well as to protection from misuse of their personal details. Lookthrough complies with these provisions. Personal data is treated as strictly confidential and is neither passed on nor sold to third parties.

### What is personal data?

The meaning of “personal data” is defined in the FADP and GDPR. According to these regulations, personal data includes all information that refers to an identified or identifiable natural person. This can include, for example, your rightful name, your address, your telephone number, or your date of birth. Even information on how you use this or other websites may contain personal data.

### Providing the website

An access log through our webserver has been fully anonymized. Normal, non-damaging website accesses are usually not logged. However, as soon as there is the suspicion that our system is subject to an attack, data relating to the visitor's computer system are automatically logged for forensic purposes and stored in firewall logs. The data stored includes the IP address, the date and time, the browser user agent, and the reason for the suspicious activity.

### Purpose of the processing

The capturing of logfiles serves to record averted or damaging website attacks, to secure forensic activities, and to secure and stabilize our website.

### Legal basis

The legal basis for this is Art. 6 para. 1 lit. f GDPR (legitimate interests) and the corresponding provisions under FADP.

### Legitimate interests

The purposes mentioned also include the legitimate interests in data processing within the meaning of Art. 6 para. 1 lit. f GDPR and FADP.

### Data storage – duration

Data is deleted when it is no longer necessary to achieve the purpose for which it was captured. As a rule, this is the case after one month at the latest.

### Objection

If data is captured in the extent described, this has become necessary to secure and to operate the website. There is, therefore, no opportunity to raise objection.

### Legal basis for collecting and processing personal data

As soon as we have your consent to process personal data, Art. 6 para. 1 lit. a GDPR/FADP serves as the legal basis for processing your personal data.

When processing your personal data to perform a contract between you and Lookthrough, Art. 6 para. 1 lit. b GDPR/FADP serves as the legal basis. This also applies to processes required to conduct pre-contractual activities.

When processing personal data to perform a legal obligation to which our company is subject, Art. 6 para. 1 lit. c GDPR/FADP serves as the legal basis.

Art. 6 para. 1 lit. f GDPR/FADP provides the legal basis for processing when the processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party and where such interests are not overridden by the interests or fundamental rights and freedoms of the data subject.

### Data storage – duration

Your personal data will be deleted or the processing will be restricted as soon as the data has met the purpose for which it was stored. Storage of the data beyond this may be possible if this is stipulated by Swiss, European, or national legislators in directives, laws, or other regulations to which the controller is subject. The data will be deleted or its processing will be restricted when a prescribed deadline expires, unless it is necessary to continue storing the data to conclude or perform a contract.

## Cookies

Cookies are small text files that are stored on your computer when you visit our website and allow us to reassign your browser. Cookies store information such as your language setting, the duration of your visit to our website, or the information you enter there.

There are different types of cookies. Session cookies are temporary cookies that are stored in the user's Internet browser until the browser window is closed and the session cookies are deleted. Permanent or persistent cookies are used for repeated visits and stored in the user's browser for a predefined time. First-party cookies are set by the website the user visits. Only this website may read information from cookies. Third-party cookies are set by organizations that are not operators of the website that the user visits. These cookies are used by marketing companies, for example.

The cookies used on this website are:

\_gat: Persistent third-party cookie for the purpose of reducing the request rate as used in tracking with Google Analytics. The storage period is 1 minute.

\_ga: Persistent third-party cookie for the purpose of differentiating users within the scope of tracking by Google Analytics. The storage period is 2 years.

\_gid: Persistent third-party cookie for the purpose of differentiating users within the scope of tracking by Google Analytics. The storage period is 24 hours.

\_gac: Persistent third-party cookie for the purpose of recognizing visits to websites. The storage period is 3 months.

PHPSESSID: First-party session cookie for the purpose of identifying the user's current session on our website. The storage time is identical to the current session.

## Legal basis

Art. 6 para. 1 lit. f GDPR/FADP provides the legal basis for deploying cookies.

## Legitimate interests

We use cookies to duly operate the website, to provide basic functionalities, and to tailor our website to preferred areas of interest. This is also the legitimate interest in data processing within the meaning of Art. 6 para. 1 lit. f GDPR/FADP.

## Objection

You can delete cookies already stored on your end device at any time. If you wish to avoid the deployment of cookies, you can refuse to accept cookies in your browser. Check your browser manual to see how this works in detail.

## Google Analytics

This website uses Google Analytics, a web analysis service of Google LLC ("Google"). The use includes the "Universal Analytics" operating mode. This makes it possible to assign data, sessions, and interactions across multiple devices to a pseudonymous user ID and thus analyze a user's activities across devices.

Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users interact with the site. The information generated by the cookie relating to your use of this website is usually transferred to a Google server in the USA and stored there. However, if IP anonymization is activated on this website, Google will reduce your IP address within Member States of the European Union or in other states party to the Agreement on the European Economic Area beforehand. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. We would like to point out that on this website Google Analytics has been extended to include IP anonymization in order to ensure anonymous collection of IP addresses (so-called IP masking).

The IP address transmitted by your browser in the context of Google Analytics is not merged with other Google data.

For more information on terms of use and data protection, please visit <https://www.google.com/analytics/terms/gb.html> or <https://policies.google.com/?hl=en>.

## Purposes of the processing

On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activity, and to provide the website operator with other services related to website and Internet use.

## Legitimate interests

The legitimate interest in the data processing lies in the optimization of our website, the analysis of the use of our website, and the adaptation of its contents. The interests of users are adequately protected by pseudonymization.

## Legal basis

The legal basis for the use of Google Analytics is Art. 6 para. 1 lit. f GDPR/FADP.

## Recipients or categories of recipients

The recipient of the collected data is Google.

## Transfer to third countries

Personal data will be transferred to the USA under the EU-US Data Privacy Framework (DPF) on the basis of the European Commission's adequacy decision.

## Data storage – duration

The data sent by us and linked to cookies, user-identifiers (e.g., User IDs), or advertising-identifiers are automatically deleted after 14 months. Data whose retention period has been reached is automatically deleted once a month.

## Objection

You can prevent the storage of cookies at any time by adjusting your browser software; accordingly, however, we would like to point out that in this case you may not be able to use all functions of this website to their full extent.

You can also prevent Google from collecting the data generated by the cookie and relating to your use of the website (including your IP address) and from processing this data by downloading and installing the browser add-on.

Opt-out cookies will prevent future collection of your data when you visit this website. To prevent Universal Analytics from collecting data across different devices, you need to opt-out of all systems used.

## Lead Forensics

Lead Forensics is software that reveals the identity of your anonymous website traffic and turns them into actionable leads within a business-to-business environment. This makes it possible to get in contact with you.

### Purposes of the processing

As an organization that processes business-related data, Lead Forensics has assessed all six grounds for lawful processing of personal data and has selected 'Legitimate Interests' as the most suitable lawful ground for the processing of data for the purposes of Lead Forensics marketing and sales.

Lead Forensics collects, processes, and stores data relating to businesses and decision makers. Lead Forensics believes that the individuals that we process the data of are likely to have an interest in the Lead Forensics product.

### Legal basis

The legal basis for the use of Lead Forensics is Art. 6 para. 1 lit. f GDPR/FADP.

### Recipients or categories of recipients

The recipient of the collected data is Lead Forensics. Please read the Lead Forensics Privacy Policy for more information.

### Transfer to third countries

Personal data will be transferred to the UK under the EU-UK Adequacy Decision on the basis of the European Commission's adequacy decision (renewed in 2025, valid until 2031).

### Data storage – duration

The data held within the Lead Forensics CRM system is processed and stored in the UK within a secure environment. Lead Forensics has a continual cycle of cleansing and refreshing data contained within our CRM system; all data is verified at least once in a 12-month cycle. Any invalid records are placed into a deletion queue, which is then securely purged four times in a 12-month period.



## Contact

We also collect your personal data when you yourself give your approval to do so – for example when you want us to contact you. Of course, personal data transferred in this manner is solely used for the purpose intended: establishing contact.

These details are provided voluntarily and, in these cases, are initiated by you yourself. Provided the details supplied are details of communication channels (such as email address, phone number), we will use these channels to contact you to deal with your concerns.

## Purpose of the processing

The purpose of processing your data in this sense is to deal with and answer your concern.

## Legitimate interests

The purpose described also represents the legitimate interest in processing your data.

## Legal basis

The legal basis for processing the data you entered to establish contact with us is Art. 6 para. 1 lit. f GDPR/FADP.

## Data storage – duration

We will delete the data we received from you in establishing contact either as soon as it is no longer required to fulfil the purpose for storing it, as soon as your concern has been dealt with in full and no further communication with you is necessary, or if you wish us to delete the data.

## Objection

You can refer to our data protection officer at any time with respect to deleting the data to your query (see below for contact details). However, this might also mean that we cannot fully deal with your concern.

## Children's Privacy

Our Services do not address anyone under the age of 13. We do not knowingly collect personal identifiable information from children under 13. In the case we discover that a child under 13 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to do necessary actions.

## Transferring Data to Third Parties

We generally do not transmit your data to third parties, unless we are legally obliged to do so. Should external service providers come into contact with your personal data, we shall have made use of legal, technical, and organizational measures and regular monitoring to ensure that such persons comply with the relevant data protection regulations (FADP/GDPR). Furthermore, these service providers may only use your data in accordance with our mandate.

## Your Rights

Gladly we will inform you whether and which of your personal data is processed by us and for what purposes (Art. 15 GDPR/FADP). Furthermore, given the respective legal conditions, you have the right to rectification (Art. 16 GDPR/FADP), the right to restrict processing (Art. 18 GDPR/FADP), the right to erasure (Art. 17 GDPR/FADP), the right to object (Art. 21 GDPR/FADP), and the right to data portability (Art. 20 GDPR/FADP).

Irrespective of these rights and the possibility of asserting another administrative or legal redress, you also have the possibility at any time of asserting your right to complain to a supervisory authority, in particular, in the member state of your place of domicile, of your place of work, or of the location of the alleged infringement if you are of the view that the processing of personal data affecting you infringes legal data protection regulations (Art. 77 GDPR; corresponding provisions under FADP).

## Controller

The controller within the meaning of the FADP and GDPR is:

Lookthrough Ltd.  
Bahnhofstrasse 12  
9100 Herisau  
Switzerland

## Data Protection Officer

For all these matters you can contact our data protection officer: dataprotection [at] lookthrough.com

## Links to websites of other providers

Our websites may contain links to websites of other providers. This privacy statement does not cover such external websites. If the use of internet websites of other providers is associated with the collecting, processing, and use of personal data, please refer to the data protection notes of the respective provider.

## Additional information

### How we protect your data

In close cooperation with our hosting provider, we make every effort to protect the databases as well as possible from outside access, data loss, misuse, or falsification.

### What data breach procedures we have in place

We monitor every possible attack with our security system and log all assaults. When a data breach is recognized, we will immediately start investigating it. Within the first 24h of the detection we will inform all affected subjects. Within 72h we inform the relevant data protection authority (e.g., FDPIC in Switzerland or EU supervisory authorities).

### What third parties we receive data from

We receive all data directly from your client.

## Amendments to this privacy statement

We reserve the right to amend this privacy statement at any time, taking account of applicable data protection regulations. Thus, we advise you to review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page. These changes are effective immediately after they are posted on this page.

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Lookthrough Advisory AG

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