Data protection

Swiss Post Ltd (hereinafter referred to as "Swiss Post") takes the protection of personal data very seriously. This data protection statement explains which personal data we collect from you when you use the EQS Integrity Line and how we use it. We ensure compliance with the applicable data protection requirements by means of appropriate technical and organizational measures. The PostCourage service, which is run by the EQS Integrity Line on behalf of Swiss Post, is aimed exclusively at employees of Swiss Post and its subsidiaries.

Responsible body

Responsibility for processing personal data lies with:

Swiss Post Ltd
Wankdorfallee 4
P.O. Box
3030 Berne
Switzerland

The technical implementation of the EQS Integrity Line is performed on our behalf by EQS Group AG, Hardturmstrasse 11, 8005 Zurich, Switzerland ("EQS").

Personal data

The EQS Integrity Line can be used without providing personal data insofar as it is legally permissible to do so. However, you may provide personal data voluntarily as part of the whistleblowing process, in particular information on your identity, your first name and last name, and your country of residence, telephone number or e-mail address.

As a general rule, we do not request or process any special categories of personal data, such as information on racial and/or ethnic origins, religion and/or ideology, union membership or sexual orientation. You may, however, provide such categories of personal data voluntarily in the free text fields on the reporting form.

In addition, the report you submit may contain personal data regarding third parties referred to in your report. Depending on the situation, the affected individuals will generally be given an opportunity to respond to the report. In such cases, we will inform the affected individuals of the report. Confidentiality will also be guaranteed in these cases, as the affected individual will not – insofar as is legally permissible – receive any information on your identity, and your report will be used in such a way that your anonymity is not endangered.

Purpose of and legal basis for data processing

The EQS Integrity Line enables you to contact us and report infringements of compliance regulations and the law. We process your personal data in order to check the report you have submitted via the EQS Integrity Line and investigate the alleged compliance and legal infringements. We may have to ask you some questions as part of this process. To do so, we will communicate exclusively via the EQS Integrity Line. The confidentiality of the information you provide is our utmost priority at all times.

Your personal data will be processed on the basis of the consent you give when you submit your report via the EQS Integrity Line in order to perform the contract and provide the service.

We also process your personal data to the extent required to comply with legal obligations. This includes, in particular, reporting facts and circumstances that are relevant from a criminal, competition or employment law perspective.

Finally, your personal data is also processed to the extent necessary to preserve the legitimate interests of Swiss Post or a third party. Among other things, we have a legitimate interest in processing personal data in order to prevent and detect infringements at Swiss Post, to verify the legality of internal processes and to safeguard our integrity.

If you provide us with special categories of personal data, we will process them on the basis of your consent.

Data is processed in Switzerland at Swiss Post, which is the responsible party, and at EQS Integrity Line, which is the order processor, and is subject to Swiss law. This is subject, in individual cases, to country-specific requirements placed on the person who enters the data, such as the General Data Protection Regulation (GDPR) or other special regulations.

If a basis for justifying the data processing is required, the sources it can be drawn from include but are not limited to the provisions of data protection law, the Federal Act on Data Protection (FADP, in particular Articles 4, 6, 10a and 13) and, depending on applicability, the GDPR (e.g. Article 6 or 9) or special regulations.

We also use your personal data in anonymized form for statistical purposes.

We do not intend to use your personal data for any purposes other than those listed above. Should this become necessary, we will obtain the appropriate consent from you in advance.

Technical implementation and security of your data

The EQS Integrity Line includes an option to communicate anonymously via an encrypted connection. Your IP address and your current location will not be saved at any point during the use of this service. After submitting your report, you will receive details for accessing the EQS Integrity Line inbox so that you can continue communicating with us by encrypted means. The EQS Integrity Line does not receive access to case content at any point.

We employ appropriate technical measures to guarantee data protection and confidentiality. The data you provide is saved in a specially secured database by EQS. All data saved in the database is encrypted by EQS using state-of-the-art technology.

Passing on personal data

Swiss Post operates internationally and has locations in different countries. Saved data can be viewed only by specially authorized persons within Swiss Post. To the extent necessary to fulfil the purpose named above, specially authorized persons from our subsidiaries may also be entitled to view your data. This is particularly likely to be the case if your report is investigated in the country concerned. All persons authorized to view your data are expressly obliged to maintain confidentiality.

To fulfil the purpose named above, it may also be necessary to pass on your personal data to external bodies such as law firms or criminal prosecution or competition authorities in the countries concerned.

If we pass on your personal data internally within the Group or externally, an equivalent level of data protection will be guaranteed by means of internal data protection regulations and/or appropriate contractual agreements. In all cases, responsibility for data processing will remain with Swiss Post.

Finally, we pass on your personal data to the extent described above to EQS for the purpose of technical implementation. EQS is subject to the same data protection law obligations as Swiss Post, may only process your data upon instruction by and on behalf of Swiss Post and is bound by contract.

Duration of retention

We retain personal data for only as long as is necessary to process your report or for as long as we have a legitimate interest in retaining your personal data. Personal data may also be retained if this is stipulated by law for the purpose of fulfilling legal obligations, such as retention requirements. All personal data is subsequently deleted, blocked or anonymized.

Your rights

If you have provided personal data, you have a right to obtain information about that data or have it amended or deleted. You may also restrict the processing or require that the data be passed on to another responsible body.

Furthermore, you have the right, for reasons resulting from your specific situation, to object to the processing of your personal data at any time.

You have the right to withdraw your declaration of consent at any time. Withdrawal of your consent does not affect the legality of any data processing that has occurred on the basis of your consent prior to its withdrawal.

If you have questions, suggestions or concerns in relation to the handling of your data or would like to assert your rights, you are welcome to contact us by post or e-mail as follows:

–   Postal address
    Swiss Post Ltd, Group Audit, Wankdorfallee 4, 3030 Berne, Switzerland

–   E-mail
    auditsupport@swisspost.ch

Should you wish to contact us by e-mail, please note that e-mails will be in an unencrypted form and will therefore be susceptible to the security risks typically associated with such methods of communication.