



Privacy policy
Klapp GmbH

Valid from 1 May 2021



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Author	Klapp GmbH - Data Protection Officer - info@klapp.pro
Addressees	Users of the Klapp solution (teachers, school leaders, students, parents, club members, etc.)
Purpose	To inform users what personal data we need, how it is used and what opportunities we have
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1. Introduction

Klapp GmbH, operator of [klapp.pro](#), [klapp.mobi](#), and the mobile app([iOS](#) | [Android](#)) furthermore referred to as "Klapp", based in Switzerland, takes the protection of your personal data very seriously.

It is important to us to inform you as a user about what personal data we store from you when you use Klapp, and how we use this data and to whom we may share this data. In addition, you will receive information on your rights against us about the use of your data.

Anyone with an account on the Klapp solution will be made aware of the privacy policy at the first login and must accept it to use Klapp.

We comply with the applicable data protection regulations. This data protection declaration is aligned with the EU General Data Protection Regulation (GDPR). Although the GDPR is a regulation of the European Union, it is important to us. Since the current valid version of the Federal Act on Data Protection (DSG) is no longer up-to-date due to the rapid technological development, Klapp is oriented towards the GDPR.

This is not a final description; if necessary, general terms and conditions, a contract for the processing of data on behalf, terms and conditions of participation and similar documents regulate specific facts.

2. Principles

Like any internet platform and app, we need a few personal data for the access-protected areas of the solution Klapp when setting up a user account. This data is only be collected and processed for the intended use and under no circumstances misappropriated. In doing so, we strictly adhere to the following principles:

We do not want to make money with your data. Under no circumstances will your user data be sold to third parties or used for advertising.

We use user data sparingly (Privacy by Design). We take care that no unnecessary data is collected in order to protect the privacy of every user as best as possible.

We store your data in Switzerland. User data is stored and processed in Switzerland and our partners comply with the Swiss and European Data Protection Regulations.

Klapp allows informational self-determination. Users decide for themselves which contact details they want to share or hide from other users.

No recording of the surfing behavior of registered users. In order to protect the privacy of users, Klapp dispenses with recording the browsing behavior of registered users.

3. Contact

If you have any questions about data protection, would like to request information or would like to request the deletion of your data, please contact our Data Protection Officer by sending an e-mail to info@klapp.pro or by calling us on +41 32 510 08 38.

The contact details of our Data Protection Officer are as follows:

Klapp GmbH | Data Protection Officer (DPO) | Postfach | CH-5442 Fislisbach



4. Scope and purpose of the processing of personal data

To provide the services described in the General Terms and Conditions (GTC) by Klapp, it is necessary to collect, process and use personal data.

a. when using Klapp as a registered user

Registered users differ in terms of eligibility and the personal data required. Certain information is required from the user, without which the registration and validation of the e-mail address cannot be completed. The following personal data will be recorded:

Date element	Who?	Purpose	Comments
First and last name	All users	Identification for other users ("to whom am I sending the message?")	
Date of birth	Students	Unambiguous identification of students at a school	For unambiguous identification of the student and for the authentication of the parents
E-mail address	All users	1. Username for identification 2. Sending Klapp messages in addition to the app (if desired)	Can be hidden from other parents and students, but is always visible to teachers and school administrators
Telephone number	All users optional for students	Emergency contact for teachers	Can be hidden from other parents and students, but is always visible to teachers and school administrators
Password	All users	Unambiguous authentication	

The user is prohibited from sharing particularly protected personal data via Klapp:

1. Data on religious, ideological, political or trade union views or activities
2. Data relating to health, privacy or racial or ethnic origin
3. Genetic data
4. Biometric data that uniquely identifies a natural person
5. Data on administrative or criminal prosecutions and sanctions
6. Data on social assistance measures

If you, as a registered user, access our portal www.klapp.mobi or our app, the web server technology we use does NOT log any technical visit information and waives the use of cookies. To protect the privacy of users, Klapp refrains from recording the browsing behavior of registered users.

b. when concluding a contract with Klapp

If you conclude a contract with Klapp, it is mandatory that you provide data such as your first and last name, address (complete postal address, postcode, town) and any other data, as we need these to process the contract with you. We store information about your current and previous purchases and contract conclusions.

c. while visiting www.klapp.pro

When visiting our marketing website www.klapp.pro, the web server technology we use automatically logs general technical visit information. This includes, among other things, details of the device used from which the visit is made, information on the browser type, the internet service provider and the operating system used, reference/exit pages, the time and duration of the visit. Cookies and analysis tools (e.g., Google Analytics) are used for this purpose.

The collection and processing of this information is carried out for the purpose of collecting general demographic information (not personal) and enabling the optimization of our website, as well as information on how our respective website is used. An identification of the users does not take place. Likewise, no connection is established between this automatically collected information and personal data stored by us (no



information about you personally), hence the consistent separation between <https://www.klapp.pro> (marketing page without user data) and <https://www.klapp.mobi> (Klapp portal with user data).

5. Law on informational self-determination

Personal data of users, children and parents are only visible within the entity school or association. These are typically the school administration, the teachers, the parents, and students, as well as members of the association, who are authorised by membership of a class or group.

Klapp users decide themselves which contact details they share with other parents and students within a group. Private contact details such as e-mail address or phone number can be made visible or hidden from other users. However, contact details are always visible to teachers directly related to the students' classes, as well as to school administrators.

In addition, Klapp users can decide for themselves whether they want to receive information via e-mail or not.

6. Data sharing and data transfer of data to third parties

We do not pass on personal data to third parties and do not achieve any commercial benefit from it. We do not sell, rent or trade the personal data you provide to us.

We commission the certified Swiss company [Infomaniak](#) to store our data. This company is obliged to store the data in Switzerland and to process it exclusively for order processing.

Klapp uses Mailgun to send e-mails. Mailgun adheres to the General Data Protection Regulation (GDPR). The servers through which e-mails are processed are located in the territory of the European Union. Further information about Mailgun can be found here: www.mailgun.com/gdpr.

We use the service of OneSignal to send you push messages, if you have consented to receive them by granting the appropriate permission. OneSignal's privacy policy can be found here: onesignal.com/privacy

The software solution Klapp is partly developed in cooperation with an external company. In order to eliminate sources of error, this company may be granted access to parts of the database. Strict confidentiality about all data is contractually guaranteed with the company.

In addition to employees in a direct employment relationship with Klapp GmbH, Klapp may engage external employees for the purpose of customer support. Klapp may grant these employees access to certain data for the purpose of fulfilling their mandate. Here too, strict confidentiality about all data is contractually guaranteed.

In the event of a sale, merger, or other reorganization of some or all our company's assets, personal data may be transferred as part of that transaction or reorganization. If this is the case and it is foreseeable that the privacy policy could be relaxed, Klapp will inform its users in good time.

Apart from the disclosures described above, we will only pass on your personal data if you have expressly consented to this, there is a legal obligation to do so or if this is necessary for the enforcement of our rights, in particular the enforcement of claims arising from the contractual relationship.

7. Duration of the retention of personal data

We process and store your personal data as long as it is necessary for the fulfilment of our contractual and legal obligations or otherwise the purposes pursued with the processing, i.e. for example for the duration of the entire business relationship (from initiation, processing to termination of a contract) as well as in accordance with the statutory retention and documentation obligations beyond that.

8. Data security

We use appropriate technical and organizational security measures to protect personal data against unintentional, illegal or unauthorized manipulation, deletion, modification, access, disclosure or use and



against partial or complete loss. Our security measures are continuously adapted and improved in line with technological developments.

If you register with us as a user, access to your user account is only possible after entering your personal password. You should always keep the access information confidential and log out of Klapp when you have finished using it, especially if you share your computer or smartphone with others.

9. Rights and obligations of users

Within the framework of the data protection law applicable to you and to the extent provided for therein (such as in the case of the GDPR), you have the right to access, rectify, delete, the right to restrict data processing and otherwise object to our data processing and to the surrender of certain personal data for the purpose of transfer to another location (so-called data portability). Please note, however, that we reserve the right to enforce the restrictions provided for by law, for example if we are obliged to retain or process certain data, have an overriding interest in in doing so (if we are entitled to rely on this) or require it for the assertion of claims. In principle, a request for information is free of charge. A fee may be charged in the case of a particularly large workload, excessive or notorious requests for information, unless there is an interest worthy of protection. If you incur any costs, we will inform you in advance.

Users have the right to withdraw their consent to the use of their data at any time. For the revocation, it is sufficient to send an e-mail to info@klapp.pro in which the user states the e-mail address used in the registration process.

Any data subject also has the right to enforce his claims in court or to lodge a complaint with the competent data protection authority. The competent data protection authority in Switzerland is the Federal Data Protection and Public Information Officer (www.edoeb.admin.ch).

10. Disclaimer

Klapp is aware of the sensitivity of this data and assumes the responsibility of data protection and the implementation of the Federal Act on Data Protection. Klapp's employees act in accordance with the principle of this data protection declaration and handle the data conscientiously and confidentially. However, Klapp has no influence on the content of the communications exchanged through its platform and assumes no liability, neither regarding transmitted content nor with respect to the users' compliance with data protection regulations. We accept no liability for the loss of data or their knowledge and use by third parties.

11. Up-to-date and changes of the data protection regulations

Please note that the privacy policy may be adjusted from time to time. In such a case, every Klapp user will be informed the next time they log in. The current version published on our website applies here.