

KITTHub Privacy Notice

Website and Platform

1. Controller and Contact Details

The controller is SwissGlobal Language Services AG, Wettingerstrasse 17, 5400 Baden, Switzerland, UID CHE-134.705.151, email: info@swissglobal.ch ('SwissGlobal', 'we').

This notice describes our own data processing activities in connection with the KITTHub website, the initiation and performance of contracts, and the administration and security of KITTHub accounts. Where customer content contains personal data, the controller is generally the relevant customer or the third party on whose behalf the customer acts; SwissGlobal processes such data in accordance with the instructions issued along the processing chain.

Where the EU General Data Protection Regulation (GDPR) applies directly, our own processing is based, depending on the purpose in question, on pre-contractual steps or the performance of a contract, on legal obligations, on our legitimate interests in operation, security, communication and the enforcement of rights, or on consent where this has been obtained.

2. Website, Contact and Newsletter

2.1 When you visit our website, technically necessary connection and log data may be generated, in particular your IP address, the time of access, the resource accessed and details of your browser and device. We process such data only to the extent necessary for content delivery, stability, error analysis, security and the prevention of misuse.

2.2 When you contact us, we process your contact details, the content of your enquiry and any subsequent correspondence in order to respond to your enquiry, to initiate or provide services, and to document or enforce claims.

2.3 For our newsletter, we use Mailchimp, a service provided by The Rocket Science Group LLC d/b/a Mailchimp, USA. We process the contact details provided on subscription to send and administer the newsletter. Open and click tracking is enabled and records deliveries, opens and the links clicked so that we can evaluate reach and content. Where applicable law so requires, the newsletter is sent and tracked only with your consent. You can unsubscribe from the newsletter at any time via the unsubscribe link or by notifying us.

3. KITTHub Accounts and Platform Operation

3.1 For account and contract administration, we process in particular the first name, surname and business email address of authorised users. We receive these details from the data subject, the customer or an authorised customer administrator. Where technically necessary for login, operation and security, role, authentication, usage and security logs may also be generated, together with support, contract and billing information.

3.2 We use such data for account provisioning and administration, authentication, permissions, support, security, contract performance, billing, and the establishment, exercise or defence of legal claims.

3.3 We generally process customer content such as texts, files, terminology resources, translation memories, prompts and outputs as a processor acting on the instructions of the relevant customer. Any requests concerning such content should therefore be addressed to the customer in the first instance.

3.4 Third-party AI, LLM, MT, PDF and other services may form part of the agreed standard configuration or may be activated additionally on the customer's instructions. When these services are used, only the content required for the selected operation is transmitted to the designated provider. Before the standard configuration is ordered or additional integrations are activated, we display or otherwise make information accessible about the provider, the function, the data concerned, the countries of processing and the safeguards applied, together with key information on retention and on any use of the data by the provider for training or for other purposes of its own.

4. Categories of Recipients

Personal data may be disclosed, to the extent necessary, to the following categories of recipients:

- IT, hosting, development, maintenance, security and support service providers;
- communication, email and newsletter service providers;
- providers of AI, LLM, MT and other integrations used as part of the standard configuration, additional activations or the customer's own connections;
- banks, payment, accounting and advisory service providers, in so far as necessary for the contract and for business operations;
- authorities, courts and other third parties, where required by a legal obligation, an official order or the protection of legal claims.

Our processors may process personal data only for the agreed purposes and in accordance with our instructions, unless, in exceptional cases, they act as controllers in their own right.

5. Countries of Processing and Safeguards

5.1 During normal operation, customer content and the platform database are stored on an ongoing basis in Microsoft Azure in the Zurich region, Switzerland. Administrative access to customer content takes place only where necessary for authorised support, maintenance or security purposes.

5.2 The current list of sub-processors for KITTHub, or the provider information linked directly from that list, identifies the countries in which cloud subcontractors carry out further processing for operational or support purposes, together with the safeguards used in each case. For customer-activated integrations, these details are displayed or made directly accessible before activation.

5.3 For recipients in countries whose level of data protection is not recognised as adequate, we use a permitted mechanism, in particular recognised standard data protection clauses with the necessary Swiss adaptations or, for US companies with valid certification, the Swiss-U.S. Data Privacy Framework. Where necessary, we review these safeguards and supplement them with measures appropriate to the risk.

5.4 Mailchimp processes newsletter data in the USA and, according to its current statements, is certified under the Swiss-U.S. Data Privacy Framework. Should this basis be unavailable, we base the transfer on recognised standard data protection clauses or another permitted mechanism.

6. Retention

6.1 We retain personal data only for as long as is necessary for the relevant purpose, for statutory retention requirements, for security or for the pursuit or defence of legal claims. The data is then erased or anonymised.

6.2 We process newsletter data until you unsubscribe and thereafter only to the extent necessary to evidence the unsubscription or to comply with legal obligations. The retention of customer content is governed by the customer contract and the Data Processing Agreement. Backup copies are retained with access blocked until they are overwritten as part of the regular backup cycle.

7. Cookies and Similar Technologies

7.1 The website and platform may use technically necessary cookies or similar storage technologies to enable pages, login, security and selected settings to function.

7.2 Before any optional analytics or marketing technologies are used, information about the technologies actually in use, their providers, purposes and lifetimes is provided in an on-screen settings panel or in this notice. Where consent is required, such technologies are used only once it has been given in that panel; consent may be withdrawn there or by using the contact details specified.

8. Data Security

We take technical and organisational measures appropriate to the risk to protect against unauthorised access, loss, alteration or unlawful disclosure. These include, in particular, role-based permissions, appropriate authentication, secure transmission, logging and incident-response procedures. We continue to develop these measures in line with the risk situation and the state of the art.

9. Rights

9.1 Under applicable data protection law, you may, in particular, request access to your personal data, or its rectification, erasure or release to you, object to processing, or withdraw your consent with effect for the future. These rights may be subject to statutory conditions and restrictions.

9.2 Please send enquiries about our own processing to info@swissglobal.ch. Enquiries concerning personal data in customer content should be addressed in the first instance to the relevant customer, whom we support in dealing with them. You may also contact the Federal Data Protection and Information Commissioner (FDPIC).

9.3 Where the GDPR applies directly, you additionally have the rights provided for under the GDPR and, where applicable, the right to lodge a complaint with the competent EU/EEA supervisory authority.

10. Changes

We may update this notice if our data processing activities or the applicable law change. The version published on the website and in the platform at any given time applies. We provide additional notice of material changes where required by the circumstances or applicable law. This notice does not form part of the contract.