



Privacy Policy

Privacy Policy



Important Legal Notice

Bulk Trading is committed to protecting and respecting your privacy. This Privacy Policy sets out the basis on which any Personal data which Bulk Trading Sa (“Bulk Trading”, “we”, “us”) collects about you, or that you provide to Bulk Trading, will be processed by us.

For the purposes of applicable data protection and privacy laws, the data controller is Bulk Trading SA (company number CHE-107.614.327) register office in Piazza Molino Nuovo 17 - 6900 Lugano. This Policy explains what Personal data we collect, how we may use and manage it and the rights you have in relation to your Personal data. Before you provide us with any Personal data or browse our Websites, you should read through this Policy in full and make sure that you are comfortable with our privacy practices.

1. Whose Personal data do we collect?

Bulk Trading collects Personal data from a range of individuals in the context of its business activities, including:

- representatives of our suppliers, customers and other business contacts;
- contractors;
- users of our Websites;
- individuals who contact us by any means

2. How we collect your Personal data

We obtain Personal data which you knowingly and voluntarily disclose to us, both online and offline, notably when you:

- visit our Websites and / or complete one of our web forms;
- visit our premises;
- communicate with us via any means, including but not limited to telephone, email and through the use of social networking websites, third party apps or similar technologies.

We may also collect information from third party sources, e.g. relating to your use of other websites which we operate and from related third parties e.g. sub-contractors.

3. Information Bulk Trading may collect from you

Bulk Trading may collect a range of Personal data from you in a business context, including but not limited to your name, gender, job title, photographic identification, email address, home address and other contact details, details of your business and other interests, communications with you (including notes from meetings) and financial and payment information.

When you use our sites <https://www.bulktrading.ch> (“Website(s)”), we collect certain standard information that is sent by your browser to the Websites, e.g. your IP address, browser type, operating system, language, time zone setting, access times and any referring website addresses.

We may collect and process information that you provide by filling in forms on the Websites, including without limitation information provided as part of a job application or other employment related enquiry.

If you contact us, we may keep a record of that correspondence.

Privacy Policy



Bulk Trading may also ask you to complete surveys that we use for research purposes, although you are under no obligation to respond to them.

We may also record details of your visits to the Websites, including any resources that you access.

Bulk Trading may record and retain certain telephone conversations where we are required to do so to comply with our regulatory obligations.

4. Where We Store Your Personal data

The data that we collect from you may be transferred to, and stored in, a country other than your own and that such country may provide a lower level of data protection requirements than your own country. By submitting your Personal data, you agree to this potential transfer to a country other than your own.

Whenever we transfer Personal data across borders, we will take legally required steps to ensure that adequate safeguards are in place to protect your personal data and to make sure that it is treated in accordance with this Privacy Policy.

If you are located in the EEA, Switzerland or the UK, you can request a copy of the safeguards which we have put in place to protect your Personal data and privacy rights in these circumstances, using the contact form available on our Website (<https://www.bulktrading.ch/contacts/>).

You acknowledge and understand that the transmission of information via the internet is not completely secure. Although we will take reasonable and appropriate steps to protect your personal data once we have received it, we cannot guarantee the security of your data transmitted to the Websites; any transmission is at your own risk. Once we have received your information, we will use appropriate procedures and security features to try to prevent unauthorized access.

5. Uses made of the information

We use Personal data held about you in the following ways:

- To ensure that content from the Websites is presented in the most effective manner for you and for your computer, including carrying out analytics in relation to the use of the Websites.
- To provide you with information that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To carry out our obligations arising from any contracts entered into between you and us.
- To communicate with you and third party contacts.
- To comply with our legal and regulatory obligations, which may include the disclosure of certain information and/or recordings of telephone conversations to regulatory authorities.
- For other business-related purposes, including negotiating contracts, managing accounts and records, supporting corporate social responsibility activities, legal, regulatory and internal investigations and debt administration.

6. The legal basis for Bulk Trading processing your Personal data

In accordance with the purposes for which we collect and use your Personal data, as set out above, the legal basis for Bulk Trading processing your Personal data will typically be one of the following:

- your consent;
- the performance of a contract that we have in place with you or other individuals;
- Bulk Trading or our third parties' legitimate business interests; or



Privacy Policy

- compliance with our legal obligations.

7. Disclosure of your Information

Bulk Trading may share your Personal data with people within the organisation who have a “need to know” that data for business or legal reasons, e.g. in order to carry out an administrative function such as processing an invoice, or to direct a query that you have submitted to the relevant department within Bulk Trading.

Because Bulk Trading operates globally, we may disclose your Personal data to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006. These entities are required to maintain the confidentiality of your data and are restricted from using it for any purpose other than the purposes set out in this Privacy Policy.

We may disclose your Personal data to third parties including the authorities, Bulk Trading's advisors, suppliers of IT services and third parties engaged by Bulk Trading for the purpose of providing services requested by you; to protect any intellectual property rights in any materials displayed on or otherwise available from Bulk Trading's Websites; for the purposes of seeking legal or other professional advice; to respond to a legal request or comply with a legal obligation; and to enforce Bulk Trading's Website Terms of Use.

We may also disclose your Personal data to third parties:

- In the event that we sell, merge or buy any business or assets, in which case we may disclose your Personal data to the prospective seller or buyer of such business or assets.
- If Bulk Trading or substantially all of its assets are acquired by a third party, in which case Personal data held by it about its customers will be transferred.
- In the event that we are required to do so to comply with our regulatory obligations, to regulatory authorities.

We may decide to allow our Website users to share comments, postings, testimonials, or other information. If you choose to submit such information to us, the information that you submit may be available generally to the public. Information that you provide in these areas may be read, collected, and used by others who access them.

Finally, we may share non-personal data with other third parties that are not described above. When we do so we may aggregate or de-identify the information so that a third party would not be likely to link data to you, your computer, or your device. Aggregation means that we combine the non-personal data of numerous people together so that the data does not relate to any one person. De-identify means that we attempt to remove or change certain pieces of information that might be used to link data to a particular person.

8. Records retention

Your Personal data is not kept for longer than is necessary for the purposes for which it is collected. This means that data and records are destroyed or erased from our systems when no longer required. The amount of time that records are kept for varies depending upon the type of Personal data they contain.

Privacy Policy



9. Your Rights – Marketing and Third Party Websites

You have the right to ask us not to process your Personal data for marketing purposes. Where required by law, we will inform you (before or at the time of collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by ticking certain boxes on the forms we use to collect your data. You can also exercise your right to ‘opt-out’ from receiving marketing communications at any time by contacting us at info@BulkTrading.ch

The Websites may, from time to time, contain links to and from the websites of our partner networks and affiliates, or of other third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any Personal data to these websites.

10. Your Rights - Access, Rectification and Deletion

Applicable data privacy laws give rights to individuals in respect of Personal data that organizations hold about them. If you wish to:

- request a copy of the Personal data that we hold about you; or
- request that we rectify, delete, or limit the processing of your personal data,

Please submit your request [here](#) and select “Personal data and privacy rights”.

11. Cookies and other tools

We may use information about your visits to the Websites by using a “cookie” or similar technologies for storing information, e.g. local shared objects and web beacons (“cookies”). A cookie is a small text file which is transferred to and stored on your computer, portable device or mobile. Cookies can be unique to your web browser and contain text and information e.g. unique identifier, site name, digits and numbers.

Cookies are used to differentiate one user from another, to pass information from page to page during their visit to the Websites and to collect data about a given browser, along with the information requested and sent by the browser's operator. They enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and so allow us to customise the Websites according to your individual interests.
- To recognise you when you return to the Websites.

By using the Websites, you are consenting to our use of cookies.

12. What cookies do we use?

This website uses cookies. We use cookies to personalise content and ads, to provide social media features and to analyse our traffic. We also share information about your use of our site with our social media, advertising and analytics partners who may combine it with other information that you’ve provided to them or that they’ve collected from your use of their services.

Cookies are small text files that can be used by websites to make a user's experience more efficient. The law states that we can store cookies on your device if they are strictly necessary for the operation of this site.



Privacy Policy

For all other types of cookies we need your permission. This site uses different types of cookies. Some cookies are placed by third party services that appear on our pages. You can at any time change or withdraw your consent from the Cookie Declaration on our website.

Learn more about who we are, how you can contact us and how we process personal data in our Privacy Policy. Please state your consent ID and date when you contact us regarding your consent.

Your consent applies to the following domains: [www.Bulk Trading.com](http://www.BulkTrading.com)

Your current state: Use necessary cookies only.

13. Changes to Our Privacy Policy

We reserve the right to modify or amend this Privacy Policy at any time. Any changes we may make to this Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. It is your responsibility to review this Privacy Policy every time you submit information to us.

14. Contact

Questions, comments and requests regarding this Privacy Policy and Bulk Trading's handling of your Personal data are welcomed and should be addressed to info@BulkTrading.ch, as well as complaints and concerns in the first instance.

If you are not satisfied with the handling of your concern or complaint by Bulk Trading, you can escalate this to your national Data Protection Authority.

Last Updated: 04.05.2021