

# Privacy Policy of Le Veneur Sàrl

*(Version 1.1 – Effective 9 April 2026)*

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## 1 Introduction

Le Veneur Sàrl (hereinafter «*Le Veneur*», «*we*», «*our*» or «*us*») respects your privacy and is committed to processing your personal data in a transparent, secure and lawful manner. This Privacy Policy explains how we collect, use, disclose and safeguard personal data when you visit [leveneur.ch](https://leveneur.ch) (the «*Website*») or engage with us through any other channel operated by Le Veneur in Switzerland.

By accessing or using our Website, you acknowledge that you have read and understood this Privacy Policy. If you do not agree with the terms herein, please refrain from using our services.

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## 2 Definitions

Unless otherwise defined in this Privacy Policy, the terms below have the meaning assigned to them in the Federal Act on Data Protection (FADP; RS 235.1) and, where applicable, in the EU General Data Protection Regulation (GDPR):

<b>Term</b>	<b>Meaning</b>
Personal Data	Any information relating to an identified or identifiable natural person.
Processing	Any operation performed on Personal Data, such as collection, storage, use, disclosure, modification, archiving or deletion.
Data Subject	The natural person whose Personal Data is processed.
Controller	The natural or legal person which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.
Processor	A natural or legal person that processes Personal Data on behalf of the Controller.
Recipient	A natural or legal person to whom Personal Data is disclosed.

### 3 Identity of the Controller

The Controller responsible for Processing your Personal Data in the sense of the FADP and, where applicable, the GDPR is:

Le Veneur Sàrl

Rue Rodolphe-Toepffer 8

CH-1206 Geneva

Switzerland

Company No.: CHE-412.877.443

E-mail: [privacy@leveneur.ch](mailto:privacy@leveneur.ch)

Telephone: +41 78 234 73 78

If you have any questions regarding this Privacy Policy or the Processing of your Personal Data, you may contact us at any time using the details above.

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### 4 Applicable Legal Framework

This Privacy Policy is based on:

1. The Swiss Federal Act on Data Protection (FADP) of 25 September 2020 and its Ordinance (OFADP), both in force since 1 September 2023; and
2. The EU General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679), to the extent that we offer goods or services to, or monitor the behaviour of, individuals in the EEA.

Where the FADP and GDPR impose different obligations, we apply the higher standard in order to ensure robust protection for all Data Subjects.

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## 5 Technologies and Service Providers

To deliver a modern, high-quality both online and offline experience, we rely on certain third-party technologies and platforms which—depending on how you interact with our Website—may process limited Personal Data on our behalf as Processors or as independent Controllers. These include:

- Google LLC – e.g., *Google Analytics, Google Fonts, YouTube, Google Workspace, Google Ads, Google Tag Manager*;
- Microsoft Corporation – e.g., hosting services on *Microsoft Azure*, and collaboration tools within *Microsoft 365*;
- Webflow Inc. – front-end web development and hosting platform;
- LinkedIn Unlimited Company Ireland - social network, social plug-ins, and advertising platform;
- X Internet Unlimited Company - social network, social plugins, and advertising platform;
- Meta Platforms Ireland Limited - provider of social networks and widgets (Facebook, Instagram), communication tools (WhatsApp, Messenger), and advertising network;
- CookieYes Limited - provider of cookies automation services and consent marketing automation powering our cookie banner;
- ActiveCampaign, LLC - marketing automation services, including newsletter delivery, text and WhatsApp messages;

- Radiops, Inc. (SalesMate) - customer-relationship-management (CRM) and marketing automation services
- Calendly, LLC - booking system;
- Sendinblue SAS (Brevo) - marketing automation services, including newsletter delivery, text and WhatsApp messages;
- Tally BV - interactive online questionnaires, booking system and feedback forms,
- Seznam.cz, a.s. - provider of advertising network and platform;
- HubSpot Ireland Limited – customer-relationship-management (CRM) and marketing automation services; and
- Typeform SL – interactive online questionnaires, booking system and feedback forms.

Details regarding the role of each provider, the categories of data processed, and applicable safeguards (such as EU Standard Contractual Clauses) are provided in later sections of this Privacy Policy.

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## **6 Scope of this Policy**

This Privacy Policy applies to all Processing of Personal Data:

1. Conducted via the Website and its sub-pages;
2. In the context of requests, enquiries or contracts initiated through Webflow, HubSpot or Typeform forms embedded on the Website;
3. Carried out when you communicate with us by e-mail, telephone, social media or other channels referencing this Policy; and

4. Performed in relation to recruitment, events or marketing campaigns managed by Le Veneur in Switzerland.

## 7 Categories of Personal Data We Collect

Depending on the nature of your interaction with us, we process one or more of the following categories of Personal Data:

### 7.1 Data You Provide Directly

- **Identification & Contact Details** – such as name, postal address, e-mail, telephone number, job title and company affiliation.
- **Communication Content** – any information you share when completing a *Typeform* survey, requesting a proposal, subscribing to our newsletter or otherwise corresponding with us.
- **Contractual & Transaction Data** – purchase orders, service agreements, invoices, payment confirmations and related records.
- **Recruitment Information** – CVs, cover letters, references and interview notes when you apply for a position at Le Veneur.

### 7.2 Data Collected Automatically

- **Technical Identifiers** – IP address, device ID, browser type/version, operating system and language settings.
- **Usage Metrics** – date/time of access, pages viewed, links clicked, referring/exit pages and interaction patterns captured via Google Analytics, ActiveCampaign, Google Ads, Google Workspace, HubSpot, Microsoft, Meta, YouTube, LinkedIn, X, Seznam.cz, Typeform, CookieYes, LinkedIn, and Webflow's native analytics.

- **Cookie Data & Similar Technologies** – unique cookie identifiers, pixel tags and local storage objects (see Section 9).

### 7.3 Data from Third-Party Sources

- **CRM Enrichments** – publicly available business information (e.g., company size, industry) supplied by *HubSpot* for lead qualification.
- **Social Media Information** – profile details when you interact with our content on LinkedIn or other platforms (subject to the respective privacy notices of those platforms).

This paragraph is included solely to prevent copying of this text from our website. It contains an anagram of our name: eLnVure. If you find this text on a website whose domain does not contain these letters, it has been stolen illegally.

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## 8 Purposes and Legal Bases of Processing

Under both the FADP and the GDPR, we may only process Personal Data where we have a valid legal basis. The table below summarises our primary purposes and corresponding bases:

#	Purpose of Processing	Categories of Data	Legal Basis (GDPR)	Legitimate Interest (Art. 6 para. 1 lit. f)
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1	Provide, operate & secure the Website	Identification & Contact, Technical Identifiers, Usage Metrics	Performance of a contract (lit. b) or Legitimate interest	Ensuring functionality, detecting fraud & misuse
2	Respond to enquiries & fulfil contracts	Identification & Contact, Communication Content, Contractual Data	Pre-contractual measures (lit. b)	Delivering requested information/services
3	Analytics & audience measurement	Technical Identifiers, Usage Metrics, Cookie Data	Consent (lit. a) via cookie banner	Optimising Website and services
4	Direct marketing (e-mail newsletters, event invitations)	Identification & Contact, Usage Metrics, Marketing Preferences	Consent (lit. a) or Legitimate interest	Promoting similar services to existing clients

5	CRM & lead management	Identification & Contact, CRM Enrichments	Legitimate interest	Efficient business development
6	Recruitment & talent management	Recruitment Information, Identification & Contact	Pre-contractual measures (lit. b)	Talent acquisition
7	Compliance with legal obligations	Any category, as required	Legal obligation (lit. c)	N/A

**Direct marketing on the basis of an existing business relationship.** If you (i) write to us by e-mail, (ii) complete a web or paper form, (iii) hand us your business card at an event, or (iv) otherwise show interest in our services, we may use the contact details you provide to send you information about similar services, insights and events (newsletter).

- Legal basis: our legitimate interest in promoting our consultancy services to existing or prospective B2B clients (Art. 31 para. 1 FADP / Art. 6 (1)(f) GDPR).

- Your rights: you may object at any time or use the unsubscribe link in every newsletter. We will then cease such communications unless another legal basis applies.

**FADP Note:** Where consent is required under the GDPR, we also rely on *your consent* under Art. 31-1 FADP. Where we cite *legitimate interests* under the GDPR, we likewise rely on our overriding interests under Art. 31-1 FADP, after carefully balancing your fundamental rights and freedoms.

You have the right to withdraw consent or object to Processing based on legitimate interests at any time (see Section 12).

## 9 Cookies & Similar Technologies

### 9.1 What Are Cookies?

Cookies are small text files that a website stores on your device when you visit. Similar technologies include pixel tags, local storage objects and server-side logs. They help us recognise your browser, remember your preferences and understand how you use our Website.

### 9.2 Categories of Cookies We Use

Category	Purpose	Example Lifespan	Consent Required
<b>Strictly Necessary</b>	Enable core functionality such as page navigation, load balancing and security (e.g., Webflow session cookie).	End of session	No (Art. 45a TCA)

<b>Functional</b>	Remember choices (e.g., language, display settings) to enhance user experience.	Up to 6 months	Yes
<b>Performance / Analytics</b>	Collect aggregated statistics on Website usage via Google Analytics, HubSpot, CookieYes to improve content and UX.	1-24 months	Yes
<b>Marketing</b>	Deliver or measure personalised content and campaigns via HubSpot, ActiveCampaign, Meta/Facebook-Pixel, LinkedIn Insight Tag, X Pixel, Seznam Sklik and Typeform embeds.	13 months	Yes

### 9.3 Consent Management

At your first visit we display a cookie banner powered by **Webflow or CookieYes**, our consent-management platform, that allows you to accept all cookies, reject non-essential cookies or customise your preferences. Your choices are stored for 12 months unless you delete your browser cookies sooner.

## 9.4 Managing Cookies

Most browsers allow you to block or delete cookies via their settings. Doing so may affect certain features of the Website. For analytics opt-out you can also install the Google Analytics Opt-out Browser Add-on.

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# 10 Recipients & International Transfers

## 10.1 Internal Recipients

Within Le Veneur, access to Personal Data is limited to personnel who need it to perform their duties (e.g., sales, consulting, finance, HR). All staff are bound by confidentiality obligations.

**Intra-group data flows.** Le Veneur Sàrl is part of the Le Veneur holding group, which comprises several legally independent subsidiaries in Switzerland and the European Economic Area (EEA). For centralised administration, accounting, IT hosting, compliance, and consolidated reporting, we may transfer Personal Data to— and jointly process it with—these sister or parent entities. Such transfers are made on the basis of our overriding legitimate interest in efficient group management (Art. 31 para. 1 FADP / Art. 6 (1)(f) GDPR) and are governed by an intra-group data-transfer agreement that incorporates the EU Standard Contractual Clauses together with the Swiss Addendum where required.

### 10.2 External Service Providers

Service Provider	Country of Processing	Guarantee for International Transfer
Google LLC ( <i>Google Analytics, Google Fonts</i> )	USA	EU Standard Contractual Clauses (SCC) 2021 + Swiss Addendum
Microsoft Corp. ( <i>Azure, Microsoft 365</i> )	EU / EEA	Adequacy decision (EEA), SCC where data may transit via USA
Webflow Inc.	USA	SCC 2021 + Swiss Addendum
HubSpot Ireland Ltd.	EU / USA	SCC 2021
Typeform SL	EU (Spain)	Adequacy (EEA)
Meta Platforms Ireland Ltd. ( <i>Instagram/Facebook Pixel, WhatsApp Business</i> )	EU (Ireland) / USA	SCC 2021 + Swiss Addendum

LinkedIn Ireland Unlimited Co	EU (Ireland) / USA	SCC 2021
X Corp. / Twitter International Co.	EU (Ireland) / USA	SCC 2021
Seznam.cz, a.s. ( <i>Sklik</i> )	EU (Czechia)	Adequacy (EEA)
ActiveCampaign LLC	USA	SCC 2021 + Swiss Addendum
CookieYes Ltd.	United Kingdom	UK Adequacy decision for CH/EU
Radiops, Inc.	United States	SCC 2021
Sendinblue SAS	European Union (primarily Germany and France)	SCC 2021 and the EU-US Data Privacy Framework (DPF) (for necessary sub-processor transfers to the US).

Calendly, LLC	United States	SCC 2021 and certified under the EU-US Data Privacy Framework (DPF).
Tally BV	European Union (Belgium/European servers)	Data is primarily hosted and kept within the EU. For any third-party sub-processors located outside the EEA, they rely on Standard Contractual Clauses (SCCs).

### 10.3 Other Disclosures

We may disclose Personal Data to courts, law-enforcement or regulatory authorities where required by Swiss or EU/EEA law, or to professional advisers (lawyers, auditors) under confidentiality.

For our presence on Facebook, Instagram and LinkedIn, we act as joint controllers with the respective platform provider for aggregated “Page Insights” statistics, pursuant to Art. 26 GDPR. The core of the joint-controller arrangement is available here:

- [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum) (Meta)
- <https://legal.linkedin.com/pages-joint-controller-addendum> (LinkedIn).

This is a randomly inserted paragraph intended to prevent copying of this text from our website. It contains an anagram of our name: LurVee.

### 10.4 Cross-Border Transfers

Where Personal Data is transferred to a country without an adequate level of protection, we implement appropriate safeguards such as SCCs, Data Processing Agreements, data-minimisation and encryption. Copies of the SCCs can be requested via [privacy@levenueur.ch](mailto:privacy@levenueur.ch).

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## 11 Data Retention

We retain Personal Data only as long as necessary for the purposes outlined in Section 8, plus any statutory retention periods:

Data Category	Typical Retention Period	Legal Basis
Web server logs & security data	12 months	Legitimate interest (security)
Google Analytics aggregated data	26 months	Consent

CRM & marketing data (HubSpot, ActiveCampaign, SalesMate)	24 months after last interaction, or more, if legal	Legitimate interest / consent
Contractual & financial records	10 years	Art. 958f Swiss Code of Obligations
Recruitment files (successful)	Employment + 5 years	Legal obligation
Recruitment files (unsuccessful)	6 months	Legitimate interest (defence of claims)

When retention periods expire, data is anonymised or securely deleted.

## 12 Security Measures

We apply appropriate technical and organisational measures («TOMs») in line with Art. 8 FADP and Art. 32 GDPR, including but not limited to:

- **Encryption** – TLS 1.3 for data in transit; AES-256 at rest on Microsoft Azure and Webflow servers.

- **Access Controls** – role-based access, strong authentication and least-privilege principles.
  - **Monitoring & Logging** – continuous security monitoring, intrusion detection and audit logs.
  - **Back-ups & Business Continuity** – encrypted back-ups stored in geographically separate data centres.
  - **Vendor Due Diligence** – contractual TOMs and regular audits of Processors.
  - **Employee Training** – mandatory data-protection and security awareness sessions.
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## 13 Your Rights as a Data Subject

Under the FADP and, where applicable, the GDPR, you have the right to:

1. **Access** – obtain confirmation whether we process your Personal Data and receive a copy.
2. **Rectification** – request correction of inaccurate or incomplete data.
3. **Erasure («Right to be Forgotten»)** – obtain deletion where legally permissible.
4. **Restriction of Processing** – have Processing limited under certain conditions.
5. **Data Portability** – receive data you provided in a structured, commonly used format.
6. **Object** – object at any time to Processing for direct marketing or based on our legitimate interests.

7. **Withdraw Consent** – withdraw consent at any time; this will not affect the lawfulness of Processing prior to withdrawal.
8. **Lodge a Complaint** – with the Swiss Federal Data Protection and Information Commissioner (FDPIC) or, where GDPR applies, with your local supervisory authority.

To exercise these rights, please contact us via the details in Section 3. We may require proof of identity to protect your data.

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## 14 Automated Decision-Making

We do **not** engage in automated decision-making, including profiling, that produces legal effects concerning you or similarly significantly affects you.

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## 15 Changes to This Privacy Policy

We may amend this Privacy Policy from time to time to reflect technological developments, legal requirements or our business practices. We will post the updated version on the Website and indicate the «Effective date» at the top. Substantial changes will be announced via e-mail where feasible.

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## 16 Contact

For any questions, concerns or requests regarding this Privacy Policy or our data-protection practices, please contact:

Data Protection Officer (DPO) – Le Veneur Sàrl

Rue Rodolphe-Toepffer 8, CH-1206 Geneva, Switzerland

E-mail: [privacy@leveneur.ch](mailto:privacy@leveneur.ch)

Telephone: +41 78 234 73 78

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*(End of Policy)*