



IncaMail Privacy Policy

Effective date: 07 December 2024

Swiss Post and its affiliates provide a wide range of services and process a variety of personal data in connection with this. Below, you will find information about how we process data in connection with IncaMail. This Privacy Policy describes our commitment to protect the privacy of individuals in accordance with Swiss data protection laws and the EU GDPR.

Our Data Privacy Commitment

Our mission is to make privacy and security available to people and businesses. That's why we use encryption to protect the content of the mails you send via IncaMail.

We encrypt all and every transmission containing personal data using Secure Socket Layer technology (SSL).

We never store your passwords in an unencrypted or invertible form.

When using the service, creating and using your user account, you submit some data, which may include personal data as well.

Who will process your personal data?

IncaMail is provided by Post CH Kommunikation AG, having its registered seat at Wankdorfallee 4, 3030 Bern, Switzerland ("Swiss Post"), a company registered under the laws of Switzerland. If you have a subscription with IncaMail as an individual user, Swiss Post will be the controller of your personal data.

If your account is part of a Business Subscription – in accordance with section 6 of our Terms of Service – or you receive an email from a user who is part of a Business Subscription, in certain cases, the ultimate decisions regarding your personal data will be made by the owner of the Business Subscription. In such case, the owner of the Business Subscription will be considered as a controller and Swiss Post will act as a processor, acting upon the instructions of such organisation.

In any case, certain activities of Swiss Post are purchased from or outsourced to third parties (processors) they may also use your personal data when acting on behalf of Swiss Post. You can find more details about our sub-contractors at [Legal Information – IncaMail](#).

What kind of personal data do we process?

A) Data that you provide to us

Registration information. When you register for our services, you submit some identification and contact data (such as your email address, name, address, phone number). The data that we request at the time of registration is necessary for the provision of our services.

Billing information. At the time of registration, you also need to provide certain billing information. You might also provide payment information, such as payment card details, which we collect via secure payment processing services. This data is necessary to provide you with our services.

Account information. When you use our services, you also give us access to certain information that is necessary for the provision and maintenance of your user account. To send and deliver emails upon your instructions, Swiss Post stores and accesses certain personal data (such as the email address, name of the sender and the receiver, content of the email, date of sending, logs about email openings).

Other information. You may decide to share further information, including personal data, with us or our partners when you contact our Support or Sales Teams, submit forms on our website or otherwise communicate with us. It is solely your decision to share any detailed, non-aggregated logs, your screen or any other data with us during such communications, so our processing of such data will be based on your consent.

Information that we collect about you on our websites. When you visit our websites (incamail.ch and support.incamail.ch), we and our partners may use cookies and other information gathering technologies for a variety of purposes. These technologies may provide us with personal data, information about devices and networks you utilize to access our websites, and other information regarding your interactions with our websites. For detailed information about the use of cookies on the websites, please read and review our Cookie Policy at www.incamail.com.



Website statistics. You can visit the IncaMail websites, which is separate from the IncaMail app and service, without providing any direct information about yourself.

We store access data without direct personal references, namely the visitor's browser types, the name of your internet service provider, the websites from which you have visited us, the software version, and internet protocol addresses (IP addresses).

Unless you choose to identify yourself, either by responding to a promotional offer, opening an account or filling out a web form, this data does not allow us to draw any conclusions regarding your identity. By storing and analyzing such information, we can create in-depth analysis about our service, which is essential for improvement, security and debugging purposes.

Logs. As most websites and services provided through the Internet, we gather certain information and store it in log files when you interact with our website or service.

This information includes IP addresses as well as browser type, operating system, identification numbers associated with your devices, time of access, and error logs. We log website visits and application usage statistics to improve our services.

Analytics. When you use our services, we automatically collect information such as the type of device you use, operating system version, your software version and the IP addresses associated with you.

B) Information that we collect from third parties

Other users of our services. Other users of IncaMail services may provide information about you while using our service. Similarly, your Administrator may provide your contact information when they designate you as a user under your company's policy.

Our resellers and distributors. From time to time, we engage trusted business partners who help us generate leads, and market, promote and resell our product. We receive information from these partners, such as billing information, contact information, company name and registered address.

Other partners. We receive information about you and your activities on our websites from third-party partners, such as advertising partners. Upon your consent, such partners provide us with information about your engagement with our websites, social media pages and online advertisements. If you want to learn more, please see our Cookie Policy on our website.

We may also use publicly available information about you that we collect through services like LinkedIn, or we may also receive certain information from our trusted partners such as company and business professional information.

What is the (legal) basis for processing? (for users from the European Economic Area and Switzerland)

If you are an individual in the European Economic Area (EEA) or Switzerland, we collect and process information about you only where we have bases for doing so under applicable laws. This means we collect and use your information only where:

- It is necessary in order to provide you our services, including to set up and maintain an account for you, to provide customer support and to protect the safety and security of our services;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote our services and to protect our legal rights and interests;
- You give us consent to do so for a specific purpose; or
- It is needed to comply with a legal obligation.

How do we use your data?

We may process your personal data for several purposes. How we use your personal data depends on your subscription, on how you use IncaMail, and your preferences you have communicated to us.



Services

- We will use your personal data, such as Registration and Account Information, for the provision and maintenance of your user account, for authentication purposes, and for providing IncaMail to you and to other registered IncaMail users as designated by you.

Billing

- We will process your Registration and Billing Information for billing purposes, i.e. to complete transactions, and send you related information, including purchase confirmations and invoices.

Communications

- We will send you technical notices, updates, security alerts, support and administrative messages. Please be aware that you cannot opt out of receiving certain service messages from us, including necessary security alerts and legal notices.
- We also send messages about how to use the services. You may change your communication preferences at any time.
- Our service also enables communications between you and others. In particular, sending and delivering emails.

Developing Services

- We are always looking for ways to make IncaMail better, faster, and more secure. We use aggregated web statistics and logs about how people use our services and feedback provided directly to us to troubleshoot and to identify trends, usage, activity patterns and improvement of our services.
- We also test and analyze certain new features with some users before rolling the feature out to all users.

Marketing

- If you are an existing customer of Swiss Post, we may use your email address and phone number provided to us to send you marketing communications, such as providing you with information about similar Swiss Post products and services, unless you have opted-out.
- We may also use information about you, including web statistics and logs, to personalize the content and experience you receive on our websites or in our marketing communications, as well as by displaying Swiss Post ads on other companies' websites and applications, such as on platforms like Facebook and Google. Where legally required, we also seek your consent for sending marketing communications.
- For the purposes of improving our understanding of your needs and preferences relating to our services, if applicable law allow us, we may combine information that we receive from different sources in certain circumstances. For example, we may combine your information with details about your organization, such as its industry and size.

Security

- We use information about you to secure your profile, verify accounts and activity, to monitor suspicious or fraudulent activity and to identify violations of our Terms of Service or Acceptable Use Policy.

Protecting our legitimate business interests and legal rights

- Where required by law or where we believe it is necessary to protect our rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.

Other purposes

- We may also process your data for any other purposes for which we obtain your consent where necessary or otherwise in accordance with applicable law and this policy.



Do we share your personal data with third parties?

We will share your personal data with third parties only in accordance with this policy. We will never sell your personal data from IncaMail to third parties. However, we may need to share some information, including personal data, we obtain from your use of our service in the following circumstances.

1) Complying with legal requirements

We may transmit personal data if the applicable legal provisions so require, or when such action is necessary to comply with any laws, including to meet national security or law enforcement requirements. We may also need to share personal data for the protection of our rights and interests, to protect your safety or the safety of others or to investigate fraud, in accordance with the applicable laws.

2) Using third-party service providers

In certain cases, we need to share information, including personal data with our third-party service providers. We use third-party service providers for a number of services, including purchasing the system/service, application development, backup, storage, payment processing, analytic, messaging services and other services. We require our third-party service providers to use the personal data that we share with them solely in connection with the services they provide to us. The current list of our service providers who assist in providing the IncaMail service and the website is available at [Legal Information – IncaMail](#).

3) Administrators

If your account is part of a Business Subscription – in accordance with Section 6 of our IncaMail Terms of Service - the relevant Administrator may be able to view certain information about your interactions with the relevant Business Subscription. Such information may include your email and activity. If you have any questions about this, please refer to the policies of your organisation.

4) Business transactions

We may assign or transfer this policy, as well as your account and related information and data, including any personal information, to any person or entity that acquires all or substantially all of our business, stock or assets, or with whom we merge.

5) Testimonials

We may post testimonials on our website that may contain personal data. We obtain your consent to post your name along with your testimonial. If you wish to update or delete your testimonial, you can contact us at support@incamail.ch.

Where do we transfer your data?

Swiss Post is a company organized and existing under the laws of Switzerland.

We primarily store personal data within the EEA or Switzerland. Your personal data stored with us may also be transferred to countries outside of the EU or Switzerland. All such transfers of personal data are and will be made in accordance with applicable laws. You can reach the list of our current sub-processors at [Legal Information – IncaMail](#).

How do we protect your data?

We take appropriate technical and organizational measures to protect your personal data against loss or other forms of unlawful processing. [[Legal Information – IncaMail](#)]

How long will we retain your information?

A) Your Personal Data

We will retain your personal data as long as it is needed to fulfill the purposes specified above, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). When we have no ongoing legitimate business need to process your personal data, we will either delete or anonymize it as soon as it is technically possible.



If your personal data is held by us on behalf of your company or another company that acts as the controller of your personal data, we will retain such personal data in accordance with the terms and conditions of our data processing agreement with them, subject to applicable law.

Your data protection rights

- You have the right to receive information about what data we process about you.
- You have the right to have your data deleted. For example, if it is no longer necessary in relation to the purposes for which it was originally collected. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations.
- You may have the right to request us to stop processing your personal data.
- You may have the right to request that we restrict processing of your personal data in certain circumstances (for example, where you believe that the personal data we hold about you is inaccurate or unlawfully held). You also have the right to have incorrect data corrected. If the accuracy of the data cannot be definitively established, the data may be marked with a note of dispute/denial notice.
- In certain circumstances, you may have the right to be provided with your personal data in a structured, machine readable and commonly used format and to request that we transfer the personal data to another data controller without hindrance.

If you would like to exercise such rights, please contact us at support@incamail.ch. We will consider your request in accordance with applicable laws. To protect your privacy and security, we may ask you to verify your identity before complying with the request.

Please note that if your account is part of a Business Subscription, we will not independently respond to your request without your organizations' prior written consent, except where required by applicable law.

You also have the right to complain to a data protection authority or claim damages before the court. For more information, please contact your local data protection authority. In Switzerland, the competent supervisory authority for data protection is the Federal Data Protection and Information Commissioner. A list of contact details for the EU data protection authorities is available at https://www.edpb.europa.eu/about-edpb/about-edpb/members_en.

Withdrawal of consent

In cases where the processing of your personal data is based on your consent, you can withdraw your consent any time by editing settings at device level. In addition, you can also contact us at support@incamail.ch. If you withdraw your consent, we will no longer process your personal data for the relevant purpose. However, please note that such withdrawal of your consent does not affect the lawfulness of our processing activities based on consent before its withdrawal.

Changes to this policy

As every high-quality service, our service is constantly improved in effort to keep users satisfied, but these improvements necessarily mean changes. Due to changes in the law and the changing nature of technology, data practices are changing from time to time. Thus, we reserve the right to alter or modify this policy when it is necessary.

If there are any material changes to this policy, you will be notified. We encourage you to periodically review this page for the latest information on our privacy practices. Your continued use of our website or our services constitutes your acknowledgement of such changes to this policy.

Third party controllers

Our webpage or services may contain links to and from the websites or services of third parties. This policy does not extend to these external sites or companies, so please refer directly to their privacy policies.



Any further question?

If you have any questions, please contact us at support@incamail.ch.
Our data protection officer can be contacted at support@incamail.ch.

As Swiss Post is also located outside of the EU, we appointed our EU affiliate to represent us in relation to GDPR-related issues in connection with IncaMail. If you wish, you can also contact them directly:

Tresorit Kft.
Köztelek utca 6.
1092 Budapest, Hungary
support@incamail.ch