



# Privacy Policy

Information on the processing of personal data under the revFADP (CH) and GDPR (EU)

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|------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Document</b>                          | Privacy Policy H.A.B.A.360                                                                                                                                                                          |
| <b>Date</b>                              | June 2026                                                                                                                                                                                           |
| <b>Author</b>                            | Christelle Schläpfer, edufamily® / H.A.B.A.360                                                                                                                                                      |
| <b>Scope</b>                             | Processing within the H.A.B.A.360 course programme (HABA Basis, HABA Level 1 — Facilitator and HABA Level 2 — Coach & Trainer); revFADP (CH), GDPR (EU) and national transposition laws (DE/FR/ES). |
| <b>Relationship to related documents</b> | Supplements the GTC H.A.B.A.360 (Article 12 — Data Protection) and the Confidentiality and Use Clause as amended from time to time.                                                                 |

## 1 Controller

The controller within the meaning of the General Data Protection Regulation (GDPR) and the revised Swiss Federal Act on Data Protection (revFADP), as well as of other national data protection laws of the Member States of the European Union and other data protection provisions, is:

**edufamily® · Christelle Schläpfer**

Eichweid 3

CH-8312 Winterberg

Email: [info@edufamily.ch](mailto:info@edufamily.ch)

UID: CHE-288.200.131

### 1.1 Data protection officer

As edufamily®, being a sole proprietorship, does not reach the statutory thresholds for the mandatory appointment of a data protection officer under either the revFADP or the GDPR, no formal data protection officer or data protection advisory body has been appointed. All data protection matters should be addressed directly to the email address stated above. As the organisation grows, the appointment of a data protection officer will be reviewed and carried out where appropriate.

### 1.2 EU representative

A representative in the EU within the meaning of Art. 27 GDPR has not currently been appointed, as the processing of data of persons in the EU within the meaning of Art. 27(2) GDPR does not reach the threshold for a mandatory appointment (in particular, no large-scale, regular processing of special categories of personal data). As the HABA programme scales, the need for an EU representative will be reassessed.

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## 2 Definitions

This Privacy Policy uses the terms of the GDPR (in particular Art. 4 GDPR) and of the revFADP. The most important terms in brief:

- **Personal data:** any information relating to an identified or identifiable natural person.
- **Processing:** any operation relating to personal data, e.g. collection, storage, alteration, retrieval, use, transmission, erasure.
- **Data subject:** the natural person whose personal data are processed — in the HABA context, in particular prospective participants, participants, licensees, website visitors and correspondents.
- **Processor:** a natural or legal person who processes personal data on behalf of the controller (e.g. course platform provider, payment service provider).
- **Consent:** a freely given, informed and unambiguous indication of the data subject's wishes.

## 3 Overview of Processing Activities

The following table provides an overview of the main processing activities. The detailed explanations are set out in the sections that follow.

| Processing activity                     | Purpose                                                                                                  | Legal basis                                                                                     |
|-----------------------------------------|----------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| Website visit                           | Provision of the website, security, statistical analysis                                                 | Art. 6(1)(f) GDPR (legitimate interest); Art. 31(1) revFADP                                     |
| Contact                                 | Handling of enquiries by email or contact form                                                           | Art. 6(1)(b) GDPR (pre-contractual measures); Art. 31(1)(a) revFADP                             |
| Admission check                         | Verification of the HABA access requirements under Article 4.1 GTC and the respective course description | Art. 6(1)(b) GDPR; Art. 31(1)(a) revFADP                                                        |
| Course booking and delivery             | Contract performance: booking, invoicing, platform access, teaching, assessment, certificate             | Art. 6(1)(b) GDPR; Art. 31(1)(a) revFADP                                                        |
| Case work in mentoring and intervention | Methodical case work under confidentiality                                                               | Art. 6(1)(b) GDPR; where applicable consent of the third-party data subject via the participant |
| Accounting and invoicing                | Compliance with statutory retention and tax obligations                                                  | Art. 6(1)(c) GDPR (legal obligation); Swiss Code of Obligations (CO), GeBüV                     |
| Newsletter and marketing                | Information about HABA topics, publications, events                                                      | Art. 6(1)(a) GDPR (consent); Art. 6(6) revFADP                                                  |
| HABA directory                          | Public directory of active licensees                                                                     | Art. 6(1)(a) GDPR (consent); legitimate interest                                                |
| Closed User Group (CUG)                 | Networking and exchange among licensees                                                                  | Art. 6(1)(b) GDPR (licence agreement)                                                           |

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## 4 Processing When Visiting the Website

### 4.1 Server log files

When our website is accessed, the hosting provider automatically stores data in what are known as server log files. These are technically necessary for providing the website, for security (protection against attacks) and for error analysis. In particular, the following are collected:

- IP address (shortened where technically possible)
- Date and time of access
- Page accessed and volume of data transferred
- Referrer URL (previously visited page)
- Browser type, browser version and operating system

Legal basis: Art. 6(1)(f) GDPR (legitimate interest in a stable and secure provision of the website); Art. 31(1) revFADP.

Retention period: Server log files are deleted or anonymised after a maximum of 14 days, unless a security-relevant incident requires their retention as evidence in an individual case.

### 4.2 Cookies and comparable technologies

Cookies and comparable technologies are used on our website. We distinguish between:

- **Strictly necessary cookies:** mandatory for the operation of the website (e.g. session cookie, cookie consent). Legal basis: Art. 6(1)(f) GDPR.
- **Statistics cookies:** help to analyse and improve usage behaviour (e.g. anonymised web analytics tool). They are set only with your consent. Legal basis: Art. 6(1)(a) GDPR.
- **Marketing cookies:** are set only with your express consent and may also involve third-party providers. Legal basis: Art. 6(1)(a) GDPR.

The specific cookies used, their purpose, their storage period and the respective providers are listed in detail in the cookie banner on your first visit. There you can give, refuse or selectively adjust your consent, and you can change or withdraw your settings at any time thereafter.

### 4.3 Contact form and contact by email

If you contact us via the contact form or by email, the data you provide (name, email address, content of the message and any further data you provide) are processed in order to handle your enquiry.

Legal basis: Art. 6(1)(b) GDPR for pre-contractual enquiries, otherwise Art. 6(1)(f) GDPR (legitimate interest in responding to enquiries).

Retention period: Enquiries are deleted as soon as they are no longer required, generally within 12 months of the enquiry being finally dealt with, unless statutory retention obligations or specific further processing purposes (e.g. an initiated contractual relationship) preclude this.

## 5 Admission Check for HABA Courses

For admission to a HABA course, we check whether the access requirements under Article 4.1 GTC and the respective course description are met. For this purpose we process the following data:

- First and last name, salutation, academic title
- Email address and telephone number
- Country of residence or professional domicile
- Details of education and studies (degree, university, year of study)

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- Details of professional activity and practical experience
- For practice professions for Level 1: proof of recognition of qualifications and practice examples
- For lateral entry to Level 2: proof of counselling training
- Uploaded copies of diplomas or certificates

Legal basis: Art. 6(1)(b) GDPR (pre-contractual measures at your request); Art. 31(1)(a) revFADP.

Retention period: In the event of admission and subsequent booking, the data become part of the contract file and are retained in accordance with the statutory retention periods (CO / GeBüV; see also Section 11). In the event of non-admission or non-booking, the documents are deleted 24 months after the final notification, unless later processing purposes preclude this.

Recipients: The admission check is currently carried out exclusively by the provider. With the activation of the teaching level HABA Level 3 — Mentor, the check may be delegated to qualified HABA Mentors with an active licence (details will be regulated in the GTC Level 3, which will be added when this level is activated). In that case, they are contractually bound as processors to safeguard data protection.

## 6 Course Booking and Delivery

### 6.1 Booking, invoicing and payment processing

When you book a course, we process the following data:

- Master data (name, address, email, telephone)
- Invoice address (if different)
- Booking data (course, run, payment method)
- Payment data (bank or payment service provider information, insofar as you enter it)
- Record of the consents given (GTC, withdrawal, data protection, and where applicable early commencement of the service) with timestamp, IP address and user agent for evidentiary purposes

Legal basis: Art. 6(1)(b) GDPR (contract performance); Art. 31(1)(a) revFADP. For retention obligations additionally Art. 6(1)(c) GDPR (legal obligation).

### 6.2 Platform access and teaching

During the course we process the following data:

- Login data (username, encrypted password)
- Platform usage data (login times, materials accessed, progress status)
- Attendance data in synchronous teaching formats (attendance, and where applicable audio/video connection during the event)
- Contributions in teaching and reflection formats, insofar as personal

Legal basis: Art. 6(1)(b) GDPR (contract performance); Art. 31(1)(a) revFADP.

Recordings: Live teaching days are, as a rule, not recorded. Insofar as individual didactic sequences are recorded, this is done only after prior information and on the basis of express consent under Art. 6(1)(a) GDPR. You may object to the recording at any time; in that case, alternative reflection and catch-up options will be provided for you.

### 6.3 Written work and assessment

The written work you submit as proof of achievement is processed for assessment. Responsibility for assessment lies with the HABA programme management; with the activation of Level 3, qualified HABA Mentors with an active licence may take over the assessment (details will be regulated in the GTC Level 3, which will be added when this level is activated).

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If you use case examples in your written work, you are obliged to anonymise them in advance or to obtain the written consent of the persons concerned. Responsibility for the data-protection-compliant inclusion of case material lies with you (cf. Article 4 of the Confidentiality and Use Clause in conjunction with Article 10 GTC).

### 6.4 Case mentoring and intervention

In the case mentoring and interventions you discuss your own cases from your professional practice. Here too, the following applies: you are obliged to introduce cases in anonymised form or, where necessary, to obtain the written consent of the persons concerned. The confidentiality obligation under Article 10 GTC in conjunction with the Confidentiality and Use Clause is unlimited in time.

The provider processes the content discussed in mentoring and intervention only insofar as this is necessary for the methodical support and — in the event of a later grant of a licence — for evidence of the records required for the active HABA licence (e.g. confirmation of participation in mentoring). The substantive contributions themselves are not stored centrally.

## 7 Processors and External Service Providers

To provide our services we use carefully selected processors. Data processing agreements under Art. 28 GDPR or Art. 9 revFADP are in place with all processors, ensuring an appropriate level of protection for your data.

### 7.1 Website hosting

Provider: ALL-INKL.COM — Neue Medien Münnich, owner René Münnich, Hauptstrasse 68, 02742 Friedersdorf, Germany · Data processed: technical connection data, website content data · Location: Germany (EU/EEA) · Protection basis: data processing agreement.

### 7.2 Booking and course platform

Booking / shop: WooCommerce on the self-hosted website (see 7.1); no booking data is outsourced to an external shop provider. Learning environment: Teachable, Inc., 470 Park Avenue South, New York, NY 10016, USA · Data processed: booking and consent data, platform usage data, learning content · Location: USA (third country) · Protection basis: data processing agreement; EU standard contractual clauses.

### 7.3 Payment service providers

Providers: Stripe, Inc., San Francisco, USA · PayPal (Europe) S.à r.l. et Cie, S.C.A., Luxembourg · bank transfer via the provider's own bank (Switzerland) · Data processed: name, invoice address, payment information · Location: USA (Stripe) · Luxembourg/EU (PayPal) · Switzerland (bank transfer) · Protection basis: data processing agreements; for Stripe (USA) additionally the EU-US Data Privacy Framework or EU standard contractual clauses.

### 7.4 Video conferencing platform for synchronous teaching days

Provider: Zoom Video Communications, Inc., San Jose, USA · Data processed: name, email address, connection data, and where applicable audio/video content during participation · Location: USA (third country) · Protection basis: data processing agreement; EU standard contractual clauses.

### 7.5 Email and newsletter distribution

Provider: Kit (kit.com) — Kit, Inc., USA · Data processed: name, email address, dispatch and open data · Location: USA (third country) · Protection basis: data processing agreement; EU standard contractual clauses.

### 7.6 Closed User Group (CUG) and networking platform

The Closed User Group and the associated networking platform will be activated together with the HABA licence programme from autumn 2026. The service providers used at that point will be added at that time and this Privacy Policy updated accordingly. Until then, no processing takes place in a CUG.

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**7.7 Accounting and taxes**

Provider: Kaiserbuchhaltung, Winterthur (Switzerland) · Data processed: invoicing data, payment data · Location: Switzerland · Protection basis: professional confidentiality under the CO; data processing agreement.

**7.8 Third-country transfers**

Insofar as processors have their seat or servers in a third country (outside the EU/EEA and outside Switzerland), the transfer takes place only in compliance with the statutory requirements:

- Adequacy decision of the EU Commission or recognised third country under the revFADP
- EU standard contractual clauses (SCC) with supplementary technical and organisational measures
- For US providers additionally: certification under the EU-US Data Privacy Framework, where applicable

**8 Newsletter and Marketing Communication**

If you subscribe to our newsletter, we process your email address and your name in order to send you regular information on HABA topics, events, publications and continuing professional development offers.

Legal basis: Art. 6(1)(a) GDPR (consent); Art. 6(6) revFADP. Registration takes place by means of a double opt-in procedure: after registering, you receive an email with a confirmation link which you must actively click for your email address to be added to the distribution list.

Withdrawal of consent: You may withdraw your consent at any time with effect for the future by clicking the unsubscribe link in each newsletter email or by sending a corresponding message to [info@edufamily.ch](mailto:info@edufamily.ch). The lawfulness of the processing carried out until withdrawal remains unaffected.

Dispatch statistics: When sending, technical information on delivery (open and click rates) is processed in order to improve the newsletters in terms of content and technology. Insofar as this is done in pseudonymised or personal form, it forms part of your consent.

**9 HABA Directory, Closed User Group, Annual Event****9.1 Public HABA directory**

Active HABA licensees may, on request, receive an entry in the public HABA directory accessible on the website. Published in the directory — only with your express consent and only to the extent you choose — are:

- First and last name, academic title
- Professional designation and HABA level
- Place of activity (city, country)
- Contact information of your choice (email, website, telephone)
- Optional details of areas of focus

Legal basis: Art. 6(1)(a) GDPR (consent); Art. 6(6) revFADP. You may withdraw your consent at any time with effect for the future and have an entry removed or changed.

**9.2 Closed User Group (CUG)**

Within the scope of an active HABA licence you receive access to the Closed User Group of your level and language. In the CUG we process the following data:

- Profile details (name, level, language region, and where applicable photo)
- Posts, comments and shared content
- Platform usage data

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Legal basis: Art. 6(1)(b) GDPR (licence agreement). Confidentiality within the CUG is secured by the licence agreement and the CUG house rules. Passing on content to persons outside the respective CUG is prohibited. The CUG is activated with the licence programme from autumn 2026.

### 9.3 HABA annual overall event

At the annual HABA overall event we process registration and attendance data of the licensees. Insofar as photos or video recordings are made at the event, this is done only after prior information and on the basis of your consent. You may object to the recording at any time.

## 10 Special Categories of Personal Data

HABA does not, in principle, process special categories of personal data within the meaning of Art. 9 GDPR or particularly sensitive personal data within the meaning of Art. 5(c) revFADP (e.g. health data, religious beliefs, sexual orientation, biometric data, data on criminal convictions). In the following constellations, however, an indirect contact with sensitive data may arise:

- **Case work in mentoring and intervention:** If you, as a participant, introduce cases from your practice, these may contain sensitive data about third parties. You are obliged to anonymise such cases in advance or to obtain the written consent of the persons concerned (cf. Article 4 of the Confidentiality and Use Clause in conjunction with Article 10 GTC). The data protection responsibility for lawful inclusion lies with you.
- **Written work:** The same applies to case examples in the written work.
- **Exchanges with particular personal relevance:** Should personal self-disclosures occur in the course context, these are treated confidentially and not systematically processed (cf. Article 10 GTC in conjunction with the Confidentiality and Use Clause).

The provider takes technical and organisational measures to ensure that sensitive data do not become accessible inadvertently or without authorisation.

## 11 Retention Period and Erasure

We store personal data only for as long as is necessary for the purposes specified in each case, or as required by statutory retention obligations. In overview:

| Data category                                                                     | Retention period                                                                                                                   |
|-----------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
| Website log files                                                                 | Maximum 14 days                                                                                                                    |
| Enquiries without conclusion of contract                                          | Generally 12 months after completion                                                                                               |
| Admission documents without subsequent booking                                    | 24 months after final notification                                                                                                 |
| Contract data (booking, course)                                                   | Duration of the contractual relationship plus 10 years (statutory retention obligations CO/GeBüV/HGB)                              |
| Consent records (GTC, withdrawal, data protection, early commencement of service) | At least 10 years for evidentiary purposes                                                                                         |
| Accounting and tax documents                                                      | 10 years under CO/GeBüV; national tax laws (DE/FR/ES up to 10 years)                                                               |
| Certificate and qualification records                                             | Unlimited in the internal register for verifiability; at the request of the data subject, erasure with a note on non-verifiability |
| Newsletter addresses                                                              | Until withdrawal of consent                                                                                                        |

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|                      |                                                                                                           |
|----------------------|-----------------------------------------------------------------------------------------------------------|
| HABA directory entry | During active licence; on licence end, erasure or transfer to an inactive register                        |
| CUG posts            | During active licence; on licence end, content is anonymised or deleted insofar as technically reasonable |

After the retention obligations have expired, the data are deleted or permanently anonymised.

## 12 Your Rights as a Data Subject

Under the GDPR and the revFADP you have comprehensive rights vis-à-vis the provider as controller. You may exercise these rights at any time — most easily by email to [info@edufamily.ch](mailto:info@edufamily.ch), stating your name and a brief description of your request.

### 12.1 Right of access

You have the right to request information as to whether and which personal data we process about you, as well as on the purposes of processing, the recipients, the intended retention period and your further rights (Art. 15 GDPR; Art. 25 revFADP).

### 12.2 Rectification

You have the right to have inaccurate data rectified and incomplete data completed (Art. 16 GDPR; Art. 32(1) revFADP).

### 12.3 Erasure ("right to be forgotten")

You have the right to request the erasure of your data, insofar as statutory retention obligations do not preclude this and the processing is not otherwise still permitted (Art. 17 GDPR; Art. 32(2)(c) revFADP).

### 12.4 Restriction of processing

Under certain conditions you have the right to request the restriction of the processing of your data (Art. 18 GDPR).

### 12.5 Data portability

You have the right to receive the data you have provided in a structured, commonly used and machine-readable format and to have it transmitted to another controller, insofar as the processing is based on your consent or on a contract and is carried out by automated means (Art. 20 GDPR; Art. 28 revFADP).

### 12.6 Objection

You have the right to object to the processing of your data, insofar as the processing is based on a legitimate interest and special grounds relating to your particular situation argue against the processing (Art. 21 GDPR). Against direct marketing (newsletter) you may object at any time without giving reasons.

### 12.7 Withdrawal of consent

Where processing is based on your consent (e.g. newsletter, directory entry, recordings), you may withdraw it at any time with effect for the future, without affecting the lawfulness of the processing carried out until then.

### 12.8 Right to lodge a complaint with the supervisory authority

You have the right to lodge a complaint with the competent data protection supervisory authority. The competent supervisory authorities are:

- Switzerland: Federal Data Protection and Information Commissioner (FDPIC), Feldeggweg 1, CH-3003 Bern, [www.edoeb.admin.ch](http://www.edoeb.admin.ch)

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- Germany: the respective state data protection authority of the federal state of your residence
- France: Commission Nationale de l'Informatique et des Libertés (CNIL), [www.cnil.fr](http://www.cnil.fr)
- Spain: Agencia Española de Protección de Datos (AEPD), [www.aepd.es](http://www.aepd.es)
- Other EU Member States: the respective national data protection authority

### 12.9 Identification

To safeguard the protection of your data, we may request a copy of an official identity document for identification purposes in the case of requests. Information other than that required for identification may be redacted.

## 13 Data Security

We take appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, alteration or disclosure (Art. 32 GDPR; Art. 8 revFADP). The measures include in particular:

- Encrypted transmission of the website via HTTPS/TLS
- Encrypted storage of passwords (hashing)
- Access controls and permission management on all platforms
- Regular backups of business data
- Device and network security (firewalls, up-to-date software)
- Awareness-raising among the persons entrusted with data processing
- Data processing agreements with all external service providers
- For digitally delivered HABA materials: personalised watermarks, login protection, revocation of access on licence end

The measures are reviewed regularly and adapted to the state of the art.

## 14 Automated Decision-Making and Profiling

Automated decision-making within the meaning of Art. 22 GDPR or Art. 21 revFADP that produces legal effects concerning you or similarly significantly affects you does not take place. In particular, the admission check is always carried out by a natural person (HABA programme management or, with the activation of Level 3, by qualified HABA Mentors).

## 15 Changes to this Privacy Policy

We reserve the right to adapt this Privacy Policy insofar as this becomes necessary due to new legal requirements, new technical solutions or changed processing activities. The respective current version is available on the course website and on the course platform.

In the case of material changes affecting you as a participant or licensee, we will additionally inform you in an appropriate form (e.g. by email or by notice at your next platform login).

Status of this Privacy Policy: As at June 2026.

### References

- GTC H.A.B.A.360 — Article 12 (Data Protection); Confidentiality and Use Clause H.A.B.A.360
- Right of Withdrawal for consumers from the EU/EEA
- Booking confirmation — text modules (consent record)
- Cookie banner / cookie settings — on the website

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— End of the Privacy Policy H.A.B.A.360™ · As at June 2026 —