

Privacy Notice

Simulcation — Datacenter Simulation Platform

Version 1.0 · Last updated: 9 June 2026

This Privacy Notice explains how **Simulcation** ("Simulcation", "we", "us" or "our") collects, uses, discloses and protects personal data when you use the Simulcation website, web application and related services at simulcation.com (the "Service"). It forms part of, and should be read together with, our Terms of Use.

We process personal data in accordance with the revised Swiss Federal Act on Data Protection (FADP, in force since 1 September 2023) and, where applicable, the EU General Data Protection Regulation (GDPR).

1. Acknowledgement and Consent

By checking the box and completing registration, you confirm that you have read and understood this Privacy Notice and how we process your personal data as described here.

Acknowledging this Privacy Notice is not, by itself, consent to optional processing. Where we rely on your consent — for example to send you marketing emails or to set non-essential cookies — we ask for that consent separately and on an opt-in basis. You can withdraw consent at any time, without affecting the lawfulness of processing carried out before withdrawal.

Registration checkbox labels (suggested):

• **Required:** I have read and understood the Privacy Notice.

Optional: I would like to receive occasional product updates and marketing emails from Simulcation (you can unsubscribe at any time).

We keep a record of the version of this Privacy Notice you acknowledged and the date.

2. Who We Are (Controller)

Simulcation is the controller responsible for the personal data processed through the Service. You can contact us about privacy matters at:

Simulcation — Rigmattstrasse 18, 6045 Meggen, Switzerland Email: info@simulcation.com

For individuals in the EU/EEA, we have appointed an EU representative under Article 27 GDPR: **EURep** (eurep.ie). You can contact our EU representative on data protection matters using the details published at eurep.ie. This appointment will be in place before the Service is made publicly available.

3. Scope

This Notice applies to personal data we process in connection with the Service. It does not apply to third-party websites, products or services that may be linked from or integrated with the Service, which have their own privacy practices.

4. Personal Data We Collect

Depending on how you use the Service, we may process the following categories of personal data:

- **Account and profile data** — name, email address, username, hashed password, organisation and role.
- **Billing and transaction data** — billing name, address and country, VAT/tax identifiers, plan and subscription details, and transaction history. Full payment card details are handled by our payment provider; we do not store them ourselves.
- **Usage and simulation data** — the datacenter models, configurations, bills of materials and projects you create, together with feature usage and in-app actions.
- **Technical and device data** — IP address, browser and device information, log data, timestamps and identifiers from cookies or similar technologies.
- **Communications and support data** — messages, support requests and feedback you send us.
- **Marketing data** — your contact preferences and consent status.

5. How We Collect Personal Data

We collect personal data directly from you (for example when you register, subscribe or contact us), automatically when you use the Service (for example log and usage data), and from third parties that help us operate the Service (for example our authentication and payment providers).

6. Purposes and Legal Bases

We process personal data for the purposes set out below. Where the GDPR applies, the corresponding legal basis is indicated. Under the FADP, processing must in any case be lawful, proportionate, transparent and carried out in good faith.

Purpose	Legal basis (GDPR)
Provide, operate and maintain the Service and your Account	Performance of a contract
Process payments, subscriptions and renewals	Performance of a contract; legal obligation
Secure the Service, prevent fraud and abuse, ensure integrity	Legitimate interests
Improve and develop the Service, and perform analytics	Legitimate interests (or consent for non-essential cookies)
Send service and administrative communications	Performance of a contract; legitimate interests
Send marketing communications	Consent (opt-in; withdrawable)
Comply with legal, accounting and tax obligations	Legal obligation

7. Cookies and Similar Technologies

We use strictly necessary cookies to operate the Service (for example to keep you signed in and to secure sessions). With your consent, we may also use functional and analytics cookies to understand and improve how the Service is used. You can manage non-essential cookies through our cookie settings or your browser. Strictly necessary cookies cannot be switched off as they are required for the Service to function.

8. Disclosure of Personal Data and Sub-Processors

We do not sell your personal data. We share it with service providers (processors) that help us operate the Service, acting on our instructions and under appropriate contractual safeguards. Our principal providers are:

Provider	Purpose	Location
Stripe	Payment and subscription processing	EU / United States
Hetzner Online GmbH	Cloud hosting and infrastructure	Germany (EU)
Cloudflare	CDN, DNS and security	EU / United States (global)
Clerk	Sign-in and account security (authentication)	United States
Sentry	Error and performance monitoring	EU / United States
GoDaddy / Microsoft 365	Transactional and account email	EU / United States

We may also disclose personal data to public authorities or other parties where required by law or legal process, to protect our rights or the safety of others, or in connection with a merger, acquisition or transfer of assets (subject to this Notice).

9. International Transfers

Some of our providers are located in, or may process data in, countries outside Switzerland and the EU/EEA, including the United States. Where personal data is transferred to a country without an adequacy decision, we rely on appropriate safeguards — in particular the EU Standard Contractual Clauses together with the Swiss addendum recognised by the Federal Data Protection and Information Commissioner (FDPIC), or another lawful transfer mechanism. You can request more information about these safeguards using the contact details above.

10. Data Retention

We keep personal data only for as long as necessary for the purposes set out in this Notice, after which we delete or anonymise it. Our standard retention periods are:

Data category	Retention period
Account and profile data	For the life of your Account, then deleted or anonymised within 90 days of closure
Simulation and usage content (projects, configurations, BOMs)	For the life of your Account, then deleted within 90 days of closure unless you have exported it or we are required to retain it
Billing and transaction records	10 years from the end of the relevant financial year (Swiss bookkeeping law, Art. 958f CO)
Technical and log data	Up to 12 months, then deleted or aggregated
Support communications	Up to 24 months after the request is resolved
Marketing consent records	Until you withdraw consent or unsubscribe, plus up to 3 years as proof of compliance

Data held in routine backups is overwritten on a rolling basis and fully purged within 90 days. Where we are required to retain data by law, or need it to establish, exercise or defend legal claims, we keep it only for as long as necessary for that purpose and then delete it.

11. Data Security

We implement appropriate technical and organisational measures to protect personal data against loss, misuse and unauthorised access, including encryption of data in transit, access controls, managed secrets and hosting in secure datacenters. However, no method of transmission or storage is completely secure, and we cannot guarantee absolute security.

12. Your Rights

Subject to applicable law, you have the right to access the personal data we hold about you and to request its correction or deletion. Where the GDPR applies, you may also have rights to restrict or object to processing, to data portability, and to withdraw consent at any time. To exercise your rights, contact us at info@simulcation.com.

You also have the right to lodge a complaint with a supervisory authority — in Switzerland, the Federal Data Protection and Information Commissioner (FDPIC); in the EU/EEA, your local data protection authority.

13. Marketing Communications

We only send marketing communications where you have opted in or as otherwise permitted by law. Every marketing message includes an easy way to unsubscribe, and you can withdraw your consent at any time. Withdrawing consent does not affect service-related messages necessary to operate your Account.

14. Automated Decision-Making

We do not make decisions that produce legal or similarly significant effects about you based solely on automated processing. Any analytics or profiling we carry out is used to operate and improve the Service and does not, by itself, determine access to it.

15. Children

The Service is not intended for, or directed to, anyone under the age of 16, and we do not knowingly collect personal data from children under 16. If you believe a child has provided us with personal data, please contact us so we can delete it.

16. Changes to This Notice

We may update this Privacy Notice from time to time. The current version and its date are shown at the top. Where changes are material, we will notify you by a reasonable means before they take effect.

17. Contact

For any questions about this Notice or how we handle your personal data, contact us at: **Simulcation** Rigistrasse 18, 6045 Meggen, Switzerland Email: info@simulcation.com

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