

# Privacy Policy

PTGR AG · [pan-excursions.com](https://pan-excursions.com)

Effective date <b>26 May 2025</b>	Version <b>1.1</b>	Governing law <b>Swiss DSG / nDSG</b>	Last reviewed <b>26 May 2025</b>
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## About This Policy

PTGR AG ("PTGR", "we", "us") operates the excursion platform [pan-excursions.com](https://pan-excursions.com). This Privacy Policy explains what personal data we collect, why we collect it, how we process and store it, and what rights you have. By using our website or submitting an application, you confirm that you have read and understood this policy. Given the sensitive nature of the data collected – including identity documents, financial records, and compliance screening data – we treat data protection as a core operational obligation.

## 1. Who We Are (Data Controller)

Category	Details
Legal entity	PTGR AG
Address	Ibelweg 18a, 6300 Zug, Switzerland
General email	<a href="mailto:info@ptgr.ch">info@ptgr.ch</a>
Excursions email	<a href="mailto:excursions@ptgr.ch">excursions@ptgr.ch</a>
Website	<a href="https://pan-excursions.com">pan-excursions.com</a>
Role under DSG	Data Controller – PTGR AG determines the purposes and means of processing your personal data.
Data Protection contact	For all data protection matters: <a href="mailto:info@ptgr.ch">info@ptgr.ch</a> (subject: Data Protection)

*Note: PTGR AG does not currently appoint a formal Data Protection Officer (DPO) as this is not mandatory under Swiss DSG for organisations of our size. However, we have designated a data protection contact (above) who handles all data subject requests and compliance matters.*

## 2. Scope & Eligibility

This Privacy Policy applies to all visitors of pan-excursions.com and all individuals who submit or consider submitting an application to PTGR excursion programs.

### Minors – Important

Our platform and programs are exclusively for adults (18 years of age or older). We do not knowingly collect personal data from minors. If you are under 18, you may not use this platform or submit an application. If we discover that we have inadvertently collected data from a minor, we will delete it immediately. If you believe a minor has submitted data to us, please contact [info@ptgr.ch](mailto:info@ptgr.ch) immediately.

## 3. What Personal Data We Collect

*We collect the following categories of personal data. Data marked as sensitive receives additional protection under Swiss DSG Article 5.*

### 3.1 Identity & Travel Documents ⚠ Sensitive

- Passport data: full name, date of birth, nationality, passport number, issue and expiry dates
- Passport scan or high-resolution photograph
- Previous Schengen visa copies (voluntarily provided)

### 3.2 Professional & Employment Data

- Employment contracts, business licences, tax registration certificates
- Pension certificates or proof of retirement
- Curriculum Vitae: employment history, education, skills, certifications
- Public professional profiles (e.g. LinkedIn) reviewed for consistency with submitted documents

### 3.3 Financial Data ⚠ Sensitive

- Bank statements (minimum 3 months, stamped by issuing bank)
- Personal savings book records
- Property ownership documents, vehicle registration, lease agreements
- Marriage certificates and birth certificates of children (evidence of ties to home country)

### 3.4 Questionnaire & Application Data

- Written motivation answers and personal statements
- Referral codes
- Application status, internal scoring, and reviewer notes
- Online interview notes or recordings (where applicable)

### 3.5 Compliance & Verification Data ⚠ Sensitive

- Identity verification results and data processed by DiDIt (third-party provider)
- AML (anti-money laundering) screening results generated by DiDIt
- Compliance flags, risk scores, or reviewer notes generated during the process

### 3.6 Communication Data

- Email correspondence with the PTGR excursions team
- Timestamps and metadata of submitted applications and document uploads

### 3.7 Technical & Website Data

- IP address, browser type, operating system, device type
- Website session data and navigation behaviour
- Cookie data (see Section 9)

## 4. Legal Basis for Processing

We process your personal data on the following legal bases under the Swiss Federal Act on Data Protection (nDSG) and, where applicable, the EU General Data Protection Regulation (GDPR):

Category	Details
<b>Contractual necessity (Art. 6(1)(b) GDPR / DSG)</b>	Processing your application, assessing eligibility, preparing the Excursion Agreement, coordinating visa preparation, and delivering the excursion program. Without this data, we cannot process your application.
<b>Legal obligation (Art. 6(1)(c) GDPR / DSG)</b>	AML screening and identity verification are required by applicable Swiss law. Certain retention periods are legally mandated (e.g. AML records).
<b>Legitimate interest (Art. 6(1)(f) GDPR / DSG)</b>	Verifying consistency of submitted documents; reviewing public professional profiles to protect program integrity and prevent fraud. We have assessed that these interests are not overridden by your rights.
<b>Your consent (Art. 6(1)(a) GDPR / DSG)</b>	Processing of voluntarily submitted documents (e.g. Schengen visa copies); future analytics or non-essential cookies. Consent may be withdrawn at any time without affecting prior processing.
<b>Vital interests</b>	In exceptional cases only, where processing is necessary to protect the vital interests of you or another person.

## 5. How We Use Your Data

Your data is used exclusively for the following purposes and not for any other purpose without your prior consent:

- Reviewing, evaluating, and ranking excursion applications
- Conducting pre-selection, shortlisting, and candidate pool maintenance
- Preparing and supporting the Swiss Schengen visa application process
- Performing mandatory identity verification and AML screening via DiDIt
- Communicating with you about your application, status, and next steps
- Drafting, executing, and managing the Excursion Agreement
- Coordinating program logistics for selected participants

- Maintaining a long-term candidate pool for future excursion programs (with your awareness)
- Complying with Swiss legal, regulatory, and AML obligations
- Improving our platform and process (using aggregated, anonymised data only)

## 6. Automated Decision-Making & Profiling

### Your rights regarding automated processing

Under DSG Article 21 and GDPR Article 22, you have rights regarding decisions made solely by automated means that significantly affect you. This section explains how automated processing is used in our application process.

### 6.1 AML & Identity Screening (DiDiT)

The identity verification and AML screening conducted by our third-party provider DiDiT involves automated processing of your identity documents and personal data. This may include:

- Automated identity document verification (passport authenticity checks)
- Automated cross-referencing against AML and sanctions databases
- Risk scoring generated by DiDiT's automated systems

### Important safeguard

Automated DiDiT screening results are never used as the sole basis for rejecting an application. All flagged results are reviewed by an authorised PTGR staff member before any decision is made. You have the right to request human review of any automated assessment that affects your application. Contact: [excursions@ptgr.ch](mailto:excursions@ptgr.ch)

### 6.2 Internal Application Scoring

PTGR may use structured scoring criteria to rank applications. This scoring assists human reviewers and is not a fully automated decision. Final selection decisions are always made by authorised PTGR personnel.

### 6.3 Your Right to Object

If you believe an automated process has produced an incorrect or unfair outcome affecting your application, you have the right to:

- Request human review of the decision
- Receive an explanation of the logic involved
- Contest the outcome

To exercise this right, contact: [excursions@ptgr.ch](mailto:excursions@ptgr.ch)

## 7. Third Parties & Data Processors

We share your data with third parties only to the extent strictly necessary for the purposes described in this policy. All third-party processors are contractually bound to handle your data in accordance with applicable data protection law.

Category	Details
<b>DiDIt (Identity &amp; AML verification)</b>	Third-party provider processing identity documents and AML screening data. DiDIt operates as a data processor under contract with PTGR. Data is processed solely for verification purposes and is not retained by DiDIt beyond what is required for the service. See DiDIt's privacy policy for further details.
<b>Swiss Embassy / Consular authorities</b>	For selected applicants only: relevant application documents (passport copy, financial documents, invitation letter) are submitted to the Swiss Embassy in Addis Abeba to support the Schengen visa application. This transfer is necessary for the visa process.
<b>Authorised PTGR personnel</b>	Only staff directly involved in the application review and program management process have access to applicant data. Access is restricted and logged.
<b>Future service providers</b>	Should we engage additional processors (e.g. analytics providers, payment processors, cloud storage), we will update this policy, inform users, and obtain consent where required prior to any such engagement.

### No data sales or marketing sharing

PTGR does not sell, rent, trade, or share your personal data with any third party for marketing, advertising, profiling, or commercial purposes. Your data is used solely for the purposes described in this policy.

## 8. Data Retention

We retain your personal data only for as long as necessary for the purposes for which it was collected or as required by law. The following retention periods apply:

Category	Details
<b>Successful applicants (excursion participants)</b>	5 years from the date of the excursion. After this period, all personal data is permanently and securely deleted unless a longer period is required by law.
<b>Unsuccessful applicants (rejected or not selected)</b>	5 years from the end of the application period. This allows us to consider candidates for future excursions (candidate pool). You may request earlier deletion – see Section 10.

<b>Withdrawn applications</b>	12 months from the date of withdrawal, then permanently deleted.
<b>AML &amp; compliance records</b>	Minimum 10 years as required by applicable Swiss AML legislation (AMLA / GwG). This period overrides shorter retention requests.
<b>Communication data (emails, correspondence)</b>	3 years from last contact, unless tied to an application (in which case the application retention period applies).
<b>Website &amp; technical data (logs, session data)</b>	Maximum 12 months from collection.
<b>Cookie &amp; analytics data</b>	As specified in the cookie settings at time of collection. Currently: session cookies expire at browser close.

*After the applicable retention period expires, data is permanently deleted from all PTGR systems and confirmed deleted by third-party processors where applicable.*

## 9. Cookies & Tracking Technologies

*Cookies are small text files stored on your device. We distinguish between strictly necessary cookies and optional cookies.*

### 9.1 Currently Active Cookies (Strictly Necessary)

*The following cookies are required for the platform to function. They are activated automatically and do not require your consent:*

Category	Details
<b>Session cookie</b>	Maintains your login session and application form auto-save state. Expires when the browser session ends. No personal data stored beyond session ID.
<b>Authentication cookie</b>	Keeps you logged in during an active session. Expires on logout or after session timeout.
<b>CSRF protection cookie</b>	Protects against cross-site request forgery attacks. Technical security cookie, no personal data.

### 9.2 Future Cookies (Not Yet Active)

*We plan to introduce analytics and performance tracking tools in the future (e.g. Google Analytics or equivalent). Before activating any non-essential cookies we will:*

- Implement a compliant cookie consent banner
- Obtain your explicit consent before setting any non-essential cookies
- Update this policy with full details of all tools, data collected, and retention periods
- Offer granular controls to accept or decline specific cookie categories

### 9.3 Managing Cookies

*You can control and delete cookies through your browser settings at any time. Disabling strictly necessary cookies may affect the functionality of the platform. Instructions for major browsers:*

- Chrome: Settings > Privacy and security > Cookies and other site data
- Firefox: Settings > Privacy & Security > Cookies and Site Data
- Safari: Preferences > Privacy > Manage Website Data
- Edge: Settings > Cookies and site permissions

## 10. Your Rights Under Swiss DSG

The Swiss Federal Act on Data Protection (nDSG, effective 1 September 2023) grants you the following rights regarding your personal data:

<b>Right of Access (Art. 25)</b> Request a copy of all personal data we hold about you, including information on processing purposes, retention periods, and third parties.	<b>Right to Rectification (Art. 32)</b> Request correction of inaccurate, incomplete, or outdated personal data.	<b>Right to Erasure (Art. 32)</b> Request deletion of your personal data. Note: AML records (10-year retention) cannot be deleted early due to legal obligation.
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<b>Right to Restriction</b> Request that we limit processing of your data while a dispute or review is ongoing.	<b>Right to Object</b> Object to processing based on legitimate interest. We will cease processing unless we can demonstrate compelling legitimate grounds.	<b>Right to Portability</b> Request your data in a structured, machine-readable format (e.g. JSON or CSV) for transfer to another controller.
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<b>Right re Automated Decisions</b> Request human review of any automated decision that significantly affects you. See Section 6.	<b>Right to Withdraw Consent</b> Withdraw consent at any time for consent-based processing. Withdrawal does not affect prior lawful processing.	<b>Right to Lodge a Complaint</b> File a complaint with the Swiss FDPIC if you believe your rights have been violated.
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### How to exercise your rights

To exercise any of the above rights, contact us at:

**Email:** [info@ptgr.ch](mailto:info@ptgr.ch) (subject line: Data Protection Request)

**Response time:** We will respond within 30 days. In complex cases this may be extended to 60 days with prior notice.

**Identity verification:** We may ask you to verify your identity before fulfilling a request to protect against unauthorised access.

### Swiss Federal Data Protection and Information Commissioner (FDPIC)

If you are not satisfied with our response, you have the right to lodge a complaint with the FDPIC: Feldeggweg 1, 3003 Bern, Switzerland · [www.edoeb.admin.ch](http://www.edoeb.admin.ch) · Tel: +41 58 462 43 95

## 11. Data Security

*PTGR implements appropriate technical and organisational measures (TOMs) to protect your personal data against unauthorised access, loss, alteration, or disclosure. Measures include:*

- Encrypted data transmission via HTTPS/TLS across the entire platform
- Access control: data accessible only to authorised PTGR personnel on a need-to-know basis
- Third-party processors contractually bound to equivalent or higher security standards
- Regular review of access rights and security configurations
- Secure deletion procedures upon expiry of retention periods

### Data Breach Notification

In the event of a personal data breach that poses a risk to your rights and freedoms, PTGR will:

- Notify the relevant supervisory authority (FDPIC) without undue delay and within 72 hours where feasible
- Notify affected individuals directly where the breach is likely to result in high risk to their rights
- Document all breaches internally regardless of notification obligation

## 12. International Data Transfers

*Your personal data may be transferred to countries outside Switzerland. We ensure all such transfers comply with Swiss DSG requirements for international data transfers:*

Category	Details
<b>DiDIt (verification provider)</b>	Data may be processed in jurisdictions outside Switzerland. DiDIt operates under appropriate data protection safeguards and is contractually bound to PTGR via a Data Processing Agreement. Details available on request.
<b>Swiss Embassy, Addis Abeba (Ethiopia)</b>	Application documents for selected candidates are submitted to Ethiopian authorities as part of the visa process. This transfer is necessary for the contractual purpose and cannot be avoided.
<b>Future providers</b>	Any future international transfers will be disclosed in this policy prior to implementation.

*For transfers to countries without an adequate level of data protection as recognised by Switzerland, we rely on standard contractual clauses or other appropriate safeguards.*

## 13. Consent & Withdrawal

*Where we process your data based on consent, you have the right to withdraw that consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out prior to withdrawal.*

### Consent given at application

By submitting your application on pan-excursions.com, you explicitly consent to:

- The processing of your personal data as described in this Privacy Policy
- Identity verification and AML screening by DiDIt
- The review of public professional profiles (e.g. LinkedIn) for consistency checks
- The submission of relevant documents to the Swiss Embassy for visa purposes (selected applicants only)

### How to withdraw consent

To withdraw consent, contact us at [info@ptgr.ch](mailto:info@ptgr.ch). We will cease consent-based processing within 30 days. Note that withdrawal may affect your ability to participate in the program.

## 14. Changes to This Policy

*We may update this Privacy Policy from time to time. The version number and effective date at the top of this document always reflect the most recent version.*

Category	Details
Minor changes	Corrected wording, clarifications, or formatting. Updated without direct user notification. New version posted on website.
Material changes	Changes to data types collected, new third-party processors, new purposes, or changes to retention periods. Registered users notified by email at least 14 days before changes take effect.
Legal obligation changes	Changes required by new or amended legislation. Effective immediately upon legal requirement.

## 15. Contact

*For any questions, requests, or concerns regarding this Privacy Policy or the processing of your personal data:*

Category	Details
Organisation	PTGR AG
Postal address	Ibelweg 18a, 6300 Zug, Switzerland
Data protection email	info@ptgr.ch (subject: Data Protection)
Excursions email	excursions@ptgr.ch
Phone	+41 78 218 44 72
Website	pan-excursions.com
FDPIC (supervisory authority)	www.edoeb.admin.ch