

Privacy & Cookie Policy — Santal SA

PRIVACY & COOKIE POLICY

Last updated: 3 September 2026

1. About this Policy

This Privacy & Cookie Policy explains how Santal SA collects and processes personal data when you visit <https://santalarch.com>, submit an enquiry, communicate with us or otherwise interact with the Website.

This Policy is intended to meet the requirements of the Swiss Federal Act on Data Protection (**FADP**) and, where applicable, the EU General Data Protection Regulation (**GDPR**), the UK GDPR and the UK Data Protection Act 2018.

2. Controller and contact details

The controller responsible for personal data processed through the Website is:

Santal SA

Via Prati Botta 6
6917 Barbengo, Lugano
Canton of Ticino, Switzerland
UID: CHE-408.978.756
Telephone: —
Email: info@santalarch.com

Privacy enquiries and requests to exercise data-protection rights may be sent to info@santalarch.com.

3. Personal data we process

Depending on how you use the Website, we may process the following categories of personal data.

Website and server data

When you access the Website, our systems may record your IP address, date and time of access, requested page or file, referrer, browser and device information, operating system, response status, error information and security-related events.

Enquiry data

If you use the contact form, we may collect your name, email address, area of interest, whether your enquiry concerns architecture or interior design, the approximate area of the project, and any other information you choose to provide.

Please do not provide special-category or sensitive personal data, confidential third-party information, trade secrets or detailed project documentation through the Website form.

Communications

If you contact us by email or another communication channel, we process your contact details, message content, attachments where applicable, and related correspondence. Santal currently uses Microsoft services for business email.

Analytics data

If you consent to analytics cookies, Google Analytics may collect online identifiers, cookie identifiers, truncated or otherwise processed IP-related information, approximate location, device and browser information, referring pages, pages viewed, session information and interactions with the Website.

The Website is not intended to collect payment information, create user accounts, accept file uploads or provide an online purchasing facility.

4. Purposes and legal bases

We process personal data for the following purposes:

- to provide, operate, maintain and secure the Website;
- to detect errors, misuse, fraud and security incidents;
- to receive, assess and respond to enquiries;
- to take steps requested by a prospective client before entering into a contract;
- to manage business communications and professional relationships;
- to understand Website use and improve its content, where you have consented to analytics;
- to establish, exercise or defend legal claims; and
- to comply with legal and regulatory obligations.

Where the GDPR or UK GDPR applies, we rely, as appropriate, on your consent, steps taken at your request before entering into a contract, performance of a contract, compliance with legal obligations, and our legitimate interests in operating a secure Website, responding to enquiries and managing our business.

You may withdraw consent at any time through Cookie Settings. Withdrawal does not affect processing carried out before consent was withdrawn.

5. Hosting and technical operation

The Website is hosted on an ALP2 server operated by **Flow Swiss AG** in Lucerne, Switzerland. Hosting and related technical providers may process server and security data on Santal's behalf for the operation, availability, maintenance and protection of the Website.

6. Contact form and CRM

Information submitted through the contact form may be transmitted to and stored in Santal's customer-relationship management system provided by:

Propozly LLC
1611 Hubert St.
Dallas, TX 75206
United States

Santal uses the CRM to receive, organise, follow up and retain enquiries and related business communications. Propozly acts as a service provider to Santal to the extent it processes personal data on Santal's instructions.

Because Propozly is located in the United States, use of this service may involve an international transfer of personal data. Santal requires appropriate contractual, organisational and technical safeguards for such transfers, as further described in Section 10.

7. Microsoft email

Messages sent to Santal are processed using Microsoft business email services. Microsoft and its subprocessors may process account, routing, security, diagnostic and message data to provide and protect those services. Further information is available in the [Microsoft Privacy Statement](#).

8. Google Analytics

With your consent, the Website uses **Google Analytics 4**, provided by Google, to measure Website use and improve content and performance.

Google Analytics must remain disabled until you give consent. Santal does not intend to enable Google advertising features, remarketing, Google Signals or cross-service personalisation through the Website unless the Cookie Policy and consent settings are updated before those features are activated.

Google may process data in several countries, including outside Switzerland, the EEA and the United Kingdom. Information about Google's processing is available in the [Google Privacy Policy](#).

Santal configures Google Analytics user-level and event-level data retention to **14 months**, with reset on new activity disabled. Aggregated reports may remain available for longer without directly identifying individual visitors.

9. Google Maps link

The Website may include a link to a location on Google Maps. The map is not embedded on the Website. Merely viewing a Santal page containing the link does not load Google Maps through that link. If you select it, you leave the Website and Google processes information under its own terms and privacy policy.

10. Recipients and international transfers

Personal data may be disclosed, where necessary, to:

- Santal's authorised employees and internal personnel;
- external architects, designers, engineers, consultants and other professional collaborators involved in assessing or delivering a project;
- Website hosting, IT, security, email, analytics and CRM providers;
- legal, accounting, fiduciary, insurance and other professional advisers; and
- public authorities, courts or regulators where disclosure is required by law.

External consultants may be located in Switzerland, the EEA, the United Kingdom or other countries. Access is limited to what is reasonably necessary for the relevant purpose and is subject to confidentiality and, where applicable, data-processing obligations.

Where personal data is transferred to a country not recognised as providing adequate protection, Santal uses an appropriate legal mechanism where required, such as the European Commission's Standard Contractual Clauses, the UK International Data Transfer Addendum or Agreement, Swiss adaptations to recognised contractual clauses, or another lawful safeguard. Additional technical and organisational measures are applied where appropriate.

11. Retention periods

We retain personal data only for as long as reasonably necessary for the relevant purpose and applicable legal requirements. Unless a longer period is required because of a contract, dispute, security incident or legal obligation, Santal applies the following periods:

Data category	Standard retention period
Routine server and access logs	Up to 30 days
Logs required to investigate a security incident	Until the investigation and any related claims are concluded
Enquiries that do not result in a client relationship	24 months after the last meaningful communication
Client, project, contractual, accounting and material business records	Generally 10 years after the end of the relevant relationship, project or financial

Data category	Standard retention period
	year, as applicable
Google Analytics user-level and event-level data	14 months
Cookie preference	Up to 12 months, after which consent should be requested again
Evidence of consent or withdrawal	Up to 5 years, or longer where necessary for a legal claim
Deleted data remaining in rotating backups	Normally overwritten within 90 days

Data may be deleted or anonymised earlier when it is no longer needed. A request for deletion may not apply where retention remains necessary to comply with law or protect legal rights.

12. Cookies and similar technologies

Cookies are small files or similar storage technologies placed on your device. The Website uses strictly necessary technology for security and to remember your privacy choice. Google Analytics cookies are used only with your consent.

Category	Technology	Provider	Purpose	Duration
Strictly necessary	santal_cookie_consent	Santal SA	Records the user's cookie choice	Up to 12 months
Analytics	_ga	Google	Distinguishes Website visitors for analytics	Up to 2 years
Analytics	_ga_*	Google	Maintains session and campaign information for the relevant Analytics property	Up to 2 years

The exact Analytics cookie suffix is determined by the Website's Google Analytics measurement ID.

Strictly necessary technology cannot be disabled through the Website where it is required to provide the requested service. Analytics must be off by default. You may accept or reject analytics with equally accessible controls and may later change your choice through the permanent **Cookie Settings** link in the Website footer.

You can also delete or block cookies through your browser. Doing so may remove your saved preference or affect Website functionality.

13. Cookie banner text

The Website should display the following consent request before Google Analytics is activated:

Your privacy choices

We use strictly necessary technology to operate and secure this Website. With your consent, we also use Google Analytics to understand how the Website is used. You can accept or reject analytics and change your choice at any time through Cookie Settings.

Buttons: **Reject analytics** · **Accept analytics** · **Settings**

14. Your rights

Subject to applicable law and any relevant conditions or exceptions, you may have the right to:

- request information about personal data we process about you;
- obtain access to or a copy of that data;
- request correction of inaccurate data;
- request deletion or restriction of processing;
- object to processing based on legitimate interests;
- receive certain data in a portable format;
- withdraw consent at any time; and
- lodge a complaint with a competent data-protection authority.

In Switzerland, the competent federal authority is the Federal Data Protection and Information Commissioner. Individuals in the EEA may contact the supervisory authority in their country. Individuals in the United Kingdom may contact the Information Commissioner's Office.

To exercise a right, contact info@santalarch.com. We may request information reasonably necessary to verify your identity and respond securely.

15. Automated decisions and children

Santal does not use Website data to make decisions based solely on automated processing that produce legal or similarly significant effects.

The Website and Santal's services are directed to adults and professional audiences. We do not knowingly solicit personal data from children through the Website.

16. Security

Santal uses reasonable technical and organisational measures designed to protect personal data against unauthorised or unlawful access, alteration, disclosure, loss or destruction. No internet transmission or storage system can be guaranteed to be completely secure.

17. Changes to this Policy

Santal may update this Policy to reflect changes to the Website, service providers, processing activities or applicable law. The current version and its date will be published on this page. Material changes may also be communicated through the Website where appropriate.

18. Contact

Questions about this Policy or Santal's processing of personal data may be sent to:

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Via Prati Botta 6

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Canton of Ticino, Switzerland

Telephone: —

Email: info@santalarch.com