
BASS INTELLIGENCE WORKING GROUP®

Privacy Policy

<https://biwgru.ch>

EFFECTIVE DATE

June 27, 2026

1. INTRODUCTION

This Privacy Policy describes the data practices of BASS INTELLIGENCE WORKING GROUP® ("we," "us," "our," or "the Organization") with respect to the website located at <https://biwgru.ch> (the "Website").

The Organization is committed to respecting the privacy of every individual who visits the Website. Our operational principle is straightforward: we have designed this Website so that it does not collect, store, process, or transmit any personal data or personal information from its visitors through any mechanism under our direct control. We do not use cookies, analytics services, tracking pixels, web beacons, fingerprinting technologies, advertising networks, user account systems, contact forms, or any other tool or method intended to gather information about you or your activity on this Website.

This policy explains our practices in detail, addresses the role of third-party infrastructure that operates outside our direct control, and identifies major privacy law frameworks and why, in the absence of data collection on our part, the data-controller obligations imposed by those frameworks do not apply to the Organization with respect to this Website.

2. WHAT WE DO NOT COLLECT

To be explicit, the Organization does not, through any mechanism under its direct control, engage in any of the following activities on this Website:

- a. Collection of personally identifiable information (PII), including but not limited to names, email addresses, mailing addresses, phone numbers, or government-issued identifiers.
- b. Use of cookies, including first-party cookies, third-party cookies, session cookies, or persistent cookies of any kind.
- c. Deployment of any analytics, telemetry, or usage-tracking software or services, including but not limited to Google Analytics, Adobe Analytics, Matomo, or comparable platforms.
- d. Use of tracking pixels, web beacons, clear GIFs, or similar tracking technologies.
- e. Use of browser fingerprinting or device fingerprinting techniques.
- f. Deployment of advertising networks, retargeting tools, or any technology that serves targeted or behavioral advertising.
- g. Provision of user account creation, login functionality, or any form requiring the submission of user input.
- h. Server-side logging of personal data, such as IP addresses or user-agent strings, by any system under the Organization's direct operational control and for the Organization's own purposes.
- i. Sale, rental, licensing, or any other commercial transfer of visitor data to third parties.

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- j. Profiling, automated decision-making, or any form of data processing that evaluates personal aspects of a visitor.

We do not maintain databases containing visitor information. We do not create visitor profiles. We do not engage in cross-site tracking. We have no data to share, sell, or disclose because we do not collect it.

3. THIRD-PARTY INFRASTRUCTURE AND TECHNICAL DISCLOSURE

While the Organization does not collect personal data through any mechanism under its direct control, we acknowledge the following technical reality in the interest of full transparency:

3.1 Hosting and Content Delivery

This Website is served to you through third-party infrastructure, which may include web hosting providers, content delivery networks (CDNs), domain name system (DNS) resolvers, and related internet infrastructure services. These services, by the nature of how internet protocols function, necessarily receive and may temporarily process certain technical data in the course of delivering web content to your browser. This technical data may include, but is not limited to:

- Your IP address
- The date and time of your request
- Your browser type and version
- The referring URL (the page you visited before arriving at this Website)
- The specific page or resource requested

This processing occurs at the infrastructure level, is inherent to the operation of the internet's Hypertext Transfer Protocol (HTTP/HTTPS), and is outside the Organization's direct operational control. The Organization does not direct these infrastructure providers to collect, retain, or use this technical data for any purpose beyond what is strictly necessary for the delivery of web content and the security of their own systems. The Organization does not access, retrieve, analyze, or otherwise make use of any such data.

3.2 Internet Service Providers and Network Intermediaries

Your Internet Service Provider (ISP), employer network administrator, mobile carrier, or other network intermediaries may independently log, monitor, or retain records of your internet activity, including your visit to this Website. Such activity is entirely outside the Organization's control, and the Organization has no relationship with, access to, or influence over these entities or their data practices.

3.3 Government and Regulatory Surveillance

Local, state, federal, transnational, or international government agencies, law enforcement bodies, intelligence services, or regulatory authorities may, pursuant to their own legal authorities or through other means, monitor, intercept, collect, or retain data about your internet activity, including data related to your visit to this Website. The Organization has no control over, knowledge of, or participation in any such activity.

3.4 Client-Side Software and Browser Extensions

Software installed on your own device — including but not limited to web browsers, browser extensions, antivirus programs, VPN clients, and potentially malicious software (malware) — may independently collect, intercept, modify, or transmit data about your browsing activity on this Website. The Organization has no control over, visibility into, or responsibility for the behavior of software operating on your device.

4. LIMITATION OF LIABILITY AND THIRD-PARTY DISCLAIMER

4.1 No Liability for Third-Party Data Practices

To the fullest extent permitted by applicable law, the Organization shall not be held liable, responsible, or accountable for any collection, processing, storage, interception, disclosure, breach, misuse, or loss of personal data, business data, or any other information carried out by any third-party entity, whether public or private, including but not limited to:

- Hosting providers, CDN operators, and other infrastructure services;
- Internet Service Providers, telecommunications carriers, and network intermediaries;
- Government agencies, departments, law enforcement bodies, intelligence services, or regulatory authorities at any jurisdictional level — local, state, federal, transnational, or international;
- Operators of other websites linked from or to this Website;
- Developers or distributors of browser extensions, plugins, or other client-side software.

This disclaimer applies whether the third party's data collection or processing is intentional, inadvertent, lawful, or unlawful.

4.2 Scope and Legal Limitation of This Disclaimer

This disclaimer is a statement of the Organization's position regarding activities that are factually and operationally outside its control. It is not intended to, and should not be construed to, waive, limit, or disclaim any legal rights that you may have under applicable law against any third party that collects or misuses your data. Your legal rights and remedies against any such third party are fully preserved and are independent of this policy.

Nothing in this section shall be construed as an assumption of liability by the Organization for any matter, nor as a warranty or guarantee regarding the data practices of any third party.

4.3 No Legal Advice

This Privacy Policy is provided for informational purposes and does not constitute legal advice. If you have concerns about how third parties may handle your data when you access the internet, we encourage you to consult a qualified legal professional and to review the privacy policies and terms of service of your ISP, browser vendor, and any other relevant service providers.

5. APPLICABLE LAW FRAMEWORKS

The Organization acknowledges the existence and importance of domestic and international privacy and data protection laws. The following section identifies major legal frameworks and explains the Organization's position regarding their applicability to this Website.

5.1 United States — California (CCPA/CPRA)

The California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively, "CCPA/CPRA"), grants California residents specific rights regarding their personal information and imposes obligations on entities that qualify as a "business" under the statute and that collect such information.

Because the Organization does not, through any mechanism under its direct control, collect, sell, share, or otherwise process the personal information of California residents in connection with this Website, the data-controller obligations of the CCPA/CPRA — including but not limited to the obligations to provide a notice at collection, to honor opt-out requests, and to respond to consumer data access or deletion requests — are not triggered with respect to the Organization's operation of this Website.

5.2 United States — Other State Privacy Laws

Comprehensive consumer data privacy laws have been enacted in multiple U.S. states, including but not limited to Virginia (VCDPA), Colorado (CPA), Connecticut (CTDPA), and Utah (UCPA). These laws generally impose transparency and data-subject-rights obligations on entities that meet specified thresholds for the collection and processing of personal data.

For the same reasons stated in Section 5.1, the Organization's position is that these state-level data-controller obligations are not triggered by the Organization's operation of this Website, as the Organization does not collect or process the personal data of residents of these states through any mechanism under its direct control.

5.3 European Union — General Data Protection Regulation (GDPR)

The GDPR applies to any organization that processes the personal data of individuals located in the European Economic Area (EEA). The GDPR defines "personal data" broadly and imposes extensive

obligations on "data controllers," including requirements for transparency, lawful basis for processing, data minimization, and the facilitation of data subject rights.

The Organization does not, through any mechanism under its direct control, collect or process the personal data of individuals located in the EEA in connection with this Website. Accordingly, the Organization does not act as a "data controller" within the meaning of the GDPR with respect to this Website, and the data-controller obligations of the GDPR — including but not limited to the obligations under Articles 13 and 14 — are not triggered with respect to the Organization.

The Organization acknowledges that third-party infrastructure providers involved in delivering this Website may process certain technical data (as described in Section 3.1) of EEA visitors. Any such processing is governed by those providers' own privacy policies and legal obligations under the GDPR.

5.4 European Union — ePrivacy Directive

The ePrivacy Directive (Directive 2002/58/EC) regulates, among other things, the storage of and access to information on a user's terminal equipment (commonly referred to as "cookie rules"). Because this Website does not deploy cookies or any analogous technology that stores information on or accesses information from a visitor's device, the consent requirements of the ePrivacy Directive are not applicable to the Organization's operation of this Website.

5.5 United Kingdom — UK GDPR and Data Protection Act 2018

The UK GDPR, as supplemented by the Data Protection Act 2018, mirrors the EU GDPR in most material respects. For the same reasons stated in Section 5.3, the Organization does not act as a data controller under UK data protection law with respect to this Website, and the corresponding obligations are not triggered.

5.6 Canada — PIPEDA

Canada's Personal Information Protection and Electronic Documents Act (PIPEDA) applies to the collection, use, and disclosure of personal information in the course of commercial activities. As the Organization does not collect personal information from Canadian visitors through this Website, the substantive obligations of PIPEDA are not engaged with respect to this Website.

5.7 Brazil — LGPD

Brazil's Lei Geral de Proteção de Dados (LGPD) establishes a comprehensive framework for the processing of personal data. As the Organization does not process the personal data of individuals located in Brazil through this Website, the data-controller obligations of the LGPD are not triggered with respect to the Organization's operation of this Website.

5.8 Other International Frameworks

The Organization is aware that numerous other jurisdictions have enacted or are developing comprehensive data protection legislation, including but not limited to Australia (Privacy Act 1988), Japan (APPI), South

Korea (PIPA), and India (Digital Personal Data Protection Act, 2023). The Organization's position with respect to each of these frameworks is consistent with the reasoning set forth above: because the Organization does not collect or process personal data through this Website via any mechanism under its direct control, the data-controller or data-fiduciary obligations imposed by these laws are not triggered with respect to the Organization's operation of this Website.

5.9 Important Qualification

The positions stated in this Section 5 pertain exclusively to the Organization's own activities in connection with this Website. They do not address, and should not be construed as addressing, the legal obligations of third-party infrastructure providers, ISPs, government agencies, or any other entity that may independently process data in connection with your visit to this Website. Those entities are independently responsible for their own compliance with applicable privacy and data protection laws.

6. CHILDREN'S PRIVACY

This Website is not directed at children under the age of thirteen (13), or under the age of sixteen (16) in jurisdictions where a higher age of digital consent applies. The Organization does not knowingly collect personal information from children of any age because, as stated throughout this policy, the Organization does not collect personal information from any visitor to this Website.

To the extent that the U.S. Children's Online Privacy Protection Act (COPPA), the GDPR's provisions regarding children's data (Article 8), the UK's Age Appropriate Design Code, or comparable laws in other jurisdictions impose obligations on operators who collect data from children, those obligations are not triggered with respect to the Organization because no data collection occurs on this Website under the Organization's direct control.

Parents and guardians should be aware that third-party infrastructure, ISPs, and other entities described in Section 3 may process technical data from all visitors, including children, independently of the Organization.

7. EXTERNAL LINKS

This Website may contain links to external websites or resources that are not owned or controlled by the Organization. The Organization is not responsible for the privacy practices, content, or data collection activities of any external website. We encourage you to review the privacy policy of any external website you visit.

The inclusion of a link to an external website does not imply endorsement of that website, its operators, or its content by the Organization.

8. CHANGES TO THIS POLICY

The Organization reserves the right to modify, amend, or replace this Privacy Policy at any time and at its sole discretion. Any changes will be effective immediately upon posting the revised policy on this Website with an updated effective date.

Because the Organization does not collect contact information from visitors, we are unable to provide individual notice of changes to this policy. We encourage you to review this page periodically to stay informed of any updates.

Your continued use of the Website after the posting of any revised Privacy Policy constitutes your acknowledgment of such changes.

9. CONTACT INFORMATION

If you have any questions, concerns, or inquiries regarding this Privacy Policy or the Organization's privacy practices, you may contact us at:

BASS INTELLIGENCE WORKING GROUP®

Email: legal@strategicsolutions.services

We will make reasonable efforts to respond to legitimate inquiries in a timely manner.

10. GOVERNING LANGUAGE

This Privacy Policy is drafted in the English language. In the event that this policy is translated into any other language, the English language version shall prevail in the event of any conflict or inconsistency.

— END OF PRIVACY POLICY —

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