

## Privacy Policy (as of May 20, 2018)

### 1. General Information

Protecting your privacy is important to P-Connect GmbH, Stampfenbachstrasse 57, CH-8006 Zürich, Switzerland. This Privacy Policy explains how P-Connect GmbH collects, uses, and discloses the personal information.

Please find below the most important information about typical data processing sorted by groups of data subjects. For data processing activities, which relate only to specific groups, the obligation to provide information are met separately.

Where the term "data" is used in the text, in each case it refers only to personal data as defined in the GDPR.

### 2. Website Visitors

#### 2.1. Server log data

Our web server processes a range of data for each request, which your browser automatically transmits to our web server. This includes the IP address allocated to your device, the date and time of the request, the time zone, the specific page or file accessed, the http status code and the data quantities transmitted; in addition, the website from which your request originated, the browser used, the operating system of your device and the language used. The web server uses these data to make the contents of this website available in the best possible way on your device.

#### 2.2. Web analysis

We use Google Analytic, a web analytics service of Google Inc. ("Google"). Google Analytics uses small text files ("cookies") on your device to enable us to analyse your visitor behaviour with a pseudonym. Information about your visitor behaviour stored in such cookies will be transferred to web servers of Google in the USA and will be stored there. For this website the function anonymize IP has been activated, therefore Google will anonymize your IP address on Google servers within the EU or the EEC prior to the transfer of data to the USA. In rare cases full IP addresses may be transferred to the USA and will then be anonymized there. Google will use the information transferred as a Processor (Article 28 GDPR) to analyse your visitor behaviour, to provide reports about web activities and to provide further services in relation to website use and internet use to the Controller. Your IP address will not be combined with other data of Google. You may prevent the storage of cookies (including your IP address) by using appropriate settings in your browser or object to further processing by downloading and installing a browser plugin.



### 2.3. The purpose of the data processing

The purpose of the data processing is the online presentation of P-Connect GmbH and our services as well as the interaction with communication partners. The purpose of the analysis of user behavior on the website is the needs-oriented design of the website.

### 2.4. The legal basis

The legal basis for the processing while using the website is Article 6(1)(f) GDPR (legitimate interest, specifically operation of a website and user interaction). The legal basis for the analysis of user behavior is Article 6(1)(f) GDPR (legitimate interest, specifically the needs-oriented design of the website).

### 2.5. Log and communications data

Log and communications data are not passed on to third parties except under special circumstances. In the event of the suspicion of a crime or in investigative proceedings, data may be transmitted to the police and the public prosecutor's office. We use processors by means of service agreements to perform services, in particular to provide, maintain and support IT systems.

### 2.6. IP Addresses

IP addresses are anonymized at the latest after 24 hours. Communication content is deleted after six calendar years.

### 2.7. Use of the website

Use of the website without disclosure of personal data such as the IP address is not possible. Communication via the website without providing data is not possible. Use of the website is possible if the user has objected to pseudonymous usage analysis.

## 3. Definition of Candidates

Under the term 'Candidates' P-Connect GmbH summarizes personalities identified / processed within search mandates as well as personalities within Outplacement and Coaching offerings and services.

### 3.1. Potential Candidates

3.1.1 Data of all potential candidates are collected and processed by P-Connect GmbH, who is responsible for the processing of your data.

3.1.2 P-Connect GmbH collects and processes name, title, position, employer and business contact data (business card data) from potential candidates.



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- 3.1.3 We collect data from the following publicly accessible sources: Public business websites, services such as LinkedIn, Xing or other business press or publications. Your data are processed for the purpose of providing executive search services to potential employers worldwide and outplacement / coaching services for any candidate. The legal basis for the processing activity is our legitimate interest to provide such services (Article 6 (1) point (f) GDPR).
  - 3.1.4 No retention period has been defined for your data. It is deleted upon your request.
  - 3.1.5 The transmission of your data to recipients outside EU and the European Market will not take place without your explicit consent.

### **3.2. Effective Candidates**

- 3.2.1 Data of all potential candidates are collected and processed by P-Connect GmbH, who is responsible for the processing of your data.
- 3.2.2 P-Connect GmbH may process personal data like name, business and private contact data, résumé (including place of birth and nationality), qualifications, skills, testimonials, certifications, records of interviews and assessments, personal interests, hobbies, marital status and background check information (like identity verification, education and employment history, criminal, civil and regulatory judgements, financial and credit checks) or any other details you choose to share with us.
- 3.2.3 Your data may be collected from you, from publicly accessible sources like websites (e.g. Company or private websites, LinkedIn) and third parties that you or your testimonials have named as potential references.
- 3.2.4 Your data are processed for the purpose of providing you with employment opportunities and job or career related information as well as providing executive search services to potential employers worldwide.
- 3.2.5 The legal basis for our processing activity is your consent (Article 6 (1) point (a) GDPR) and – as far as only your business card details or data collected from publicly available sources are processed – for our legitimate interest to provide such services (Article 6 (1) point (f) GDPR).
- 3.2.6 The data retention period is seven calendar years from the last completion of the client engagement or documented contact with you, whichever is later.
- 3.2.7 The transmission of your data to recipients outside EU and the European Market will not take place without your explicit consent.
- 3.2.8 You are not obliged to provide personal data. Without your personal data we will not be able to provide you with employment opportunities.



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## 4. Service Providers, Business Partners and their Employees

### 4.1. Purpose

We process your data for the purpose of preparation and performance of the contractual relationship and for the fulfilment of legal requirements. No change in these purposes is planned.

### 4.2. The legal bases

The legal bases for processing are in case of contracts with natural persons Article 6(1)(b) GDPR (contract), in case of contracts with legal entities Article 6(1)(f) GDPR (legitimate interest, specifically communication with contact persons relevant to the contract), as well as always Article 6(1)(c) GDPR (legal obligations, in particular commercial and tax provisions). When checking, asserting or rejecting claims, the legal basis is Article 6(1)(f) GDPR (legitimate interest, specifically asserting or defending claims).

### 4.3. Recipients of data

Recipients of data may include banks for the processing of payments. Public authorities and offices may receive data within the scope of their duties, insofar as we are obligated or entitled to transmit data. More over in specific cases data may be transmitted to collection service providers, legal advisors and courts. We also use processors by means of service agreements to perform services, in particular to provide, maintain and support IT systems.

### 4.4. Storage Periods

All contractual data and data relevant for accounting are stored for ten calendar years in accordance with the storage periods under tax and commercial law. Inquiries and communication data are automatically deleted after ten years.

### 4.5. Service Providers

Processing of the contact data from service providers and business partners is necessary in order to perform the contract or order. If the data are not provided, the contract cannot be established or carried out. The provision of data is required for prospective service providers, business partners and their employees. The communication is not possible without the data.

## 5. Business Contacts and Communication Partners

### 5.1. Purpose

We process the data from prospective business contacts and communication partners for the purpose of communication with the data subjects.

### 5.2. The legal basis

The legal basis for processing data from prospective business contacts and communication partners is Article 6(1)(f) GDPR (legitimate interest, specifically communication with prospective business contacts and communication partners).



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### 5.3. Service Providers

We also use processors by means of service agreements to perform services, in particular to provide, maintain and support IT systems.

### 5.4. Storage Period

Inquiries and communication data are automatically deleted after ten years.

### 5.5. Necessity

The provision of data is required for prospective business partners and communication partners. The communication is not possible without the data.

## 6. Your rights

Provided the GDPR applies to our processing of your data, in particular if you are in the European Union, you have the following rights:

### 6.1. Withdrawal

You may withdraw your consent at any time, if your data is processed based on your consent. The withdrawal of consent does not affect the lawfulness of processing before the withdrawal of consent.

### 6.2. Objection

You may at any time object to the further processing of your data if your data is processed based on our legitimate interest.

### 6.3. Inquiry

You may at any time request access to your personal data processed by P-Connect GmbH. Data Portability If the processing is based on your consent you have the right to data portability.

### 6.4. Rectification

You may request rectification of your personal data at any time.

### 6.5. Deletion

You may request erasure of your personal data at any time provided that no right or legal obligation of the Controllers requires further processing of your personal data.

### 6.6. Restrictions

You may request restriction of processing for your data at any time.

### 6.7. Complaint

You may at any time lodge a complaint with a supervisory authority.

For inquiries regarding data protection please e-mail to: [dsg-privacy@p-connect.ch](mailto:dsg-privacy@p-connect.ch)