



# GHR data protection management system

## Data protection policy

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## Legal foundations

In order to be able to fulfill our business tasks, it is absolutely necessary to store, process and, in specific cases, pass on our customers' and/or candidates' personal data. In so doing, we strictly comply with the provisions set out in the Swiss federal and cantonal data protection legislation.

## Data collections and personal data

Any stock of personal data that is composed in a way that allows retrieval of data according to the persons affected is considered a data collection. Personal data are information about a specific or identifiable individual person or legal entity.

## Data protection management system

To protect these data from mistreatment, we deploy a data protection management system (DSMS) in compliance with GoodPriv@cy®. The purpose of the DMS is to ensure adherence to the legal data protection regulations and to guarantee information security. With regard to the DSMS, the training and consistent further education of staff is of central importance. In order for the system to be developed further and improved on an ongoing basis, internal and external tests are run periodically.

## Proportionality

We consider proportionality to be a central principle of data processing. This means that we only store and process the data that we actually need to perform our tasks.

# Provision of information from data collections

## Provision of application documents to customers

The Global Human Resources Group is entitled to transfer personal data (pertaining to one or several candidates) to customers in the form of (personalized or anonymized) application documents. Provision of personalized documents to customers requires the explicit consent of the applicants concerned.

## Provision of individual information to private persons

The Global Human Resources Group is entitled to provide reference information from the staff file, provided that the internal/external employee has granted the necessary authorization.

## **Provision of data to public authorities**

Under the following conditions, personal data may be disclosed to public authorities:

- The authority concerned is legally bound or authorized to receive such information in order to fulfill their task; or
- The authority that requests personal data proves that they are legally entitled to process such data and that such disclosure is not barred by any obligation to maintain secrecy; or
- The person concerned has expressly agreed or such disclosure is in the interest of the person concerned, despite contradictory purposes.

## **Rights of the persons concerned**

### **Right to block data**

Every person is entitled to block publication of their personal data. Proof of an interest worthy of protection is not necessary. If such blocking of publication is in place, publication is nevertheless permitted if the authority concerned (e.g. the police) is legally bound to publish such information or if the person concerned acts in abuse of the law.

### **Right to obtain access, information and deletion**

Every person is entitled to view the data collection registry and to request information from GHR stating what data about the person concerned is processed in a data collection. On request, this information is provided in writing. In addition, every person is entitled to rectification or deletion of incorrect or unnecessary personal data and deletion of illegally processed personal data or removal of the consequences of such illegality.

## **Data security**

GHR takes all reasonable technical and organizational precautions to protect personal data against access by third parties, manipulation, modification, falsification or loss.

## **Contact**

We welcome your suggestions, questions and advice. You can reach us via email at [ghrdsg@g-hr.ch](mailto:ghrdsg@g-hr.ch).