

# Data Protection Privacy Statement

September 2022

We would hereby like to explain how your personal data will be processed by **Elips Life Ltd ("elipsLife")** and inform you of your rights under data protection law.

## **1. Who is responsible for processing your data, and how can you reach the Data Protection Officer?**

The party responsible for processing your data is:

Elips Life Ltd, Gewerbeweg 15, 9490 Vaduz, Liechtenstein

T: +423 239 95 55

F: +423 239 95 54

[contact@elipslife.com](mailto:contact@elipslife.com)

You can reach our Data Protection Officer by regular mail to the aforementioned address, marked for the attention of "Data Protection Officer", or by e-mail under the following address: [compliance@elipslife.com](mailto:compliance@elipslife.com)

## **2. What Personal Data will we collect?**

The categories of personal data that we will process particularly include:

- Your basic information (such as first name, surname, title, nationality)
- Contact data (e.g. home address, mobile number, telephone number, e-mail address)
- Data from the application process (particularly your cover letter, cv, picture, reference letters, questionnaires, interviews, qualifications and previous experience)
- Information stored in your professional social media profiles (e.g. LinkedIn, Xing, etc.) which you voluntarily provide us
- Any other personal information (including special types of personal data such as medical information, degree of disability) only if you voluntarily disclose it to us in your application letter or during the application process, and your consent or a statutory rule allows us to use it.
- Data collected through video surveillance at certain buildings, such as at the entrance to the Main Building, the security doors, or entrance to the parking garage.
- Data from third parties (e.g. personnel agencies), to whom you have made your data available for disclosure.

## **3. For which purposes, and on what legal basis, will we process your Personal Data?**

We will process your data on the basis of the applicable relevant laws.

Except with your consent or otherwise permitted by law, your Personal Data will only be used or otherwise processed for the following purposes:

- Our data processing mainly serves to run and complete the application process, and to evaluate whether candidates are suited to fill the respective position. It is necessary for us to process your data in order to decide whether there are grounds for offering you an employment contract. Art. 6 para. 1 b) of the GDPR in conjunction with national member state law constitute the main legal bases for this.
- In some cases we base ourselves on any consents you may have given, as per Arts. 6 para. 1 a) and 7 of the GDPR (e.g. to apply your application documents for other job openings at elipsLife). If you provide such consent, you have the right to revoke it for the future at any time.
- We will also process your data to fulfil our legal duties as a potential employer, e.g. based on supervisory provisions or to screen your data against sanctions lists to comply with counter-terrorism rules (e.g. Council Regulation 2580/2001) based on Art. 6 para. 1 c) of the GDPR.

- For our legitimate interests (such as to protect elipsLife from harm by preventing or detecting illegal activities, fraud or similar threats; to establish, exercise or defend against legal claims; or to create anonymized reports to gain further insights to improve our offering and to perform statistical analysis).

#### **4. Who will have access to your Personal Data?**

We handle your data confidentially at all times. For the purposes mentioned above, we will disclose your Personal Data to the following recipients or categories of recipients:

- HR-related functions and certain managers within elipsLife and its branches to the extent any of these functions need access to your personal data in connection with their job responsibilities
- Other company belonging to Swiss Life Group (elipsLifes parent company)
- Third party agents, service providers and advisers (for example, for providing HR or IT maintenance and support, or legal advice) and if your application is successful, we may use verification services provided by specialist agencies.

On your request we will provide you with a complete and update list of our service providers.

#### **5. Where will my Personal Data be processed?**

Due to the multinational character of the elipsLife, your data may be shared within EU/EEA and with whitelisted third countries (Switzerland).

Some of the recipients mentioned in Section 4 above may also be located in countries that do not provide a level of data protection equivalent to that set forth by the law in Your home country.

elipsLife will take steps to make sure that such recipients act in accordance with applicable law and provide an adequate level of protection for Your Personal Data by the means of:

- Contractual measures, mostly standard contractual clauses approved by the European Commission which bind the recipients to respect Your rights equivalent to how this is set out in EU law.
- Appropriate technical and organizational security measures.

#### **6. How do we protect your Personal Data?**

elipsLife maintains appropriate technical and organizational security measures designed to protect your Personal Data against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. All our employees and contractual partners are bound by confidentiality and may only process your Personal Data based on the "need-to-know" principle.

#### **7. How long do we keep your Personal Data?**

We strive to retain Your Personal Data no longer than is necessary to carry out the purposes listed in this Data Protection Notice or than required by law. Therefore, your Personal Data will generally be deleted according to the following deletion rules:

- Your Personal Data will be deleted if you request its deletion.
- Your Personal Data will be deleted 3 months after the end of the application process, or for 12 months if you have consented to a longer period.

Please note that, depending on the elipsLife branches to whom you submit your application, a longer or shorter period may apply if the applicable local requirements so require. Please contact our Data Protection Officer via the contact details in Section 1.

## **8. What are your rights in respect of your Personal Data?**

To the extent permitted by applicable data protection laws and regulations, you have the right to:

- Access your Personal Data that you provided to us or to request additional information such as, for example, the recipients (or categories thereof) of your Personal Data;
- Update or correct your Personal Data so that it is always accurate;
- Delete your Personal Data;
- Restrict the processing of your Personal Data in certain circumstances, for example, where you have contested the accuracy of your Personal Data, for the period enabling us to verify its accuracy;
- Withdraw your consent at any time where your Personal Data is processed with your consent, without affecting the lawfulness of processing based on consent before its withdrawal and on processing done based on other legal bases, e.g. legitimate interest;
- File a complaint with a competent data protection authority.

You may exercise these rights as far as this is possible by contacting us via email at [hr.recruiting.services@elipslife.com](mailto:hr.recruiting.services@elipslife.com) or as detailed in Section 1 below, by providing your name, e-mail address and the purpose of your request.

## **9. Are you obligated to provide your data?**

In your application you must provide the personal data that is necessary for us to run the application process and assess whether you are suited. Without such data, we will not be able to complete the application process and make a decision about whether to conclude an employment contract with you. This also applies for certain restrictions in case you exercise your rights as listed under Section 8.

## **10. Complaints**

Should you wish to discuss a complaint, please feel free to contact us using the details provided in Section 1. All complaints will be treated in a confidential manner.

Should you feel unsatisfied with our handling of your data, or about any complaint that you have made to us about our handling of your data, you are entitled to escalate your complaint to your competent data protection supervisory authority.

## **11. When was this Notice last updated?**

This Notice was last updated in September 2022. We review this Notice regularly and reserve the right to make changes at any time to take account of changes in our business activities, legal requirements, and the manner in which we process personal data.