



## Recruitment Privacy Notice - Best Vision Solutions & Services SA

Best Vision Solutions & Services SA ("**Best Vision**"), with registered office in Lugano, Switzerland, acts as data controller for the personal data processed in connection with its recruitment activities.

This notice explains what personal data Best Vision collects during a recruitment process, how and why it is used, and what rights apply to candidates.

For questions about a vacancy or to submit a spontaneous application, candidates may write to [career@bestvision.group](mailto:career@bestvision.group). For any other question regarding this notice, or to exercise the rights described below, candidates may write to [privacy@bestvision.group](mailto:privacy@bestvision.group).

### 1 Categories of personal data processed

For prospective candidates, Best Vision collects basic identification information such as name, title, photograph, date of birth, educational and professional background, and contact details.

If a candidate actively applies for a role with Best Vision, we will usually also collect further information directly from the candidate, including:

- physical and electronic contact details, such as private telephone number, private email address and postal address;
- education and employment information, including contact details for the candidate's current or former employer, academic background, prior work experience and other relevant interests;
- information gathered during the interview process, such as notes taken during interviews or assessment sessions;
- electronic communications exchanged as part of the process, including emails with attachments, chat messages and other correspondence;
- any other information the candidate voluntarily chooses to share with us during the process.

We may also take into account information from professional networking platforms, where the candidate has chosen to make that information publicly available.

Where an application is successful, we will usually also collect:

- further identification information, such as date of birth, residence and work permit status, and other identity documents as required;
- information about family status, where relevant for payroll, insurance or social security purposes;
- where permitted by, or necessary to comply with, applicable law, special categories of data, such as information relating to criminal records, and only for roles where this is genuinely justified.

### 2 How we use your personal data

We process candidate personal data solely for human resources purposes, and in particular for the following activities.



## **Recruitment and application handling**

We use personal data to assess a candidate's suitability for a given role and to manage the progress of the application, as well as to prepare for and, where appropriate, enter into an employment contract. Where an application is unsuccessful, we may consider the candidate for other suitable vacancies during the retention period indicated in section 6.

## **Staff administration**

Processing personal data may also be necessary to maintain our human resources records, such as keeping application data on file, and to communicate with candidates about current or future vacancies.

## **Onboarding**

During onboarding, we process personal data to set up the new employee's internal profile and to communicate, where required by law, with third parties such as authorities, insurance providers and pension funds.

## **3 Legal basis for processing**

Depending on the specific purpose of the processing, the legal basis will be one of the following:

- processing necessary to perform a contract with the candidate, or to take steps at the candidate's request prior to entering into one;
- processing necessary for Best Vision's legitimate interests, provided this does not unduly affect the candidate's own interests or fundamental rights, for example, to assess whether a candidate's skills and experience are suitable for a role;
- processing based on the candidate's prior, explicit consent, for instance, where we wish to contact the referees named by the candidate.

Where we process data relating to criminal records, we do so only for roles where this is necessary to assess the candidate's suitability for the role, within the limits of Article 328b of the Swiss Code of Obligations and in light of the requirements imposed by our clients in the banking and financial sector. Any other special categories of data are processed only where necessary for the establishment, exercise or defence of a legal claim, or to comply with a legal or regulatory obligation.

Candidates are under no obligation to provide personal data during the recruitment process. However, if the requested information is not provided, we may not be able to process the application properly, or at all.

## **4 How we protect your personal data**

We apply generally accepted technical and organisational security standards to protect personal data. Access is limited to authorised personnel, who are required to treat this information as strictly confidential.

## **5 Who we share your personal data with**

Your personal data are processed by:

- human resources department;



- managers working in the department where the position for which you are applying is open;
- third parties such as external service providers, where operationally necessary, as well as authorities, insurance companies and pension funds, as required by applicable law or regulation.

Where we wish to contact the referees named by a candidate, we will first ask for the candidate's explicit consent.

## **6 Retention period**

We retain personal data only for as long as necessary to fulfil the purpose for which it was collected, or to comply with legal, regulatory or internal policy requirements, whichever period is longer.

As a general rule:

- for unsuccessful candidates, we retain your personal data for 6 months from the date on which we notify the candidate that their application was unsuccessful;
- for successful candidates, personal data becomes part of the employee's personnel file and is retained in accordance with Best Vision's employee privacy notice, which is provided during onboarding.

Candidates who wish to have their personal data removed from our systems may submit a request, as described under "Exercising your rights" below.

## **7 Transfer of data abroad**

The personal data we collect is processed in Switzerland, and may be transferred to other countries whose legislation guarantees an adequate level of data protection or, absent such legislation, on the basis of appropriate safeguards, such as standard contractual clauses, binding corporate rules or recognised certifications.

## **8 Exercising your rights**

To exercise the rights described below, please contact us at [privacy@bestvision.group](mailto:privacy@bestvision.group).

As a data subject, candidates have the right to access, and to obtain a copy of, their personal data as processed by Best Vision, and to request its correction or deletion. Candidates are also entitled to object to the processing of their personal data on grounds relating to their particular situation, to request that processing be restricted, and to withdraw consent at any time where processing is based on consent.

We will handle such requests in accordance with applicable data protection law. Please note, however, that these rights are not absolute and exemptions may apply depending on the circumstances. Where we are unable to comply with a request, we will explain why.

To process a request, we may ask candidates to verify their identity and to provide further information to help us understand the request.

Candidates who believe that the processing of their personal data does not comply with applicable data protection law have the right to lodge a complaint with the Federal Data Protection and Information Commissioner, or to bring an action before the competent court in Lugano.

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