

Consent for the Processing of Personal Data of Natural Persons (Version I.0 of 29.01.2024)

Responsible for the described data processing is:

University of St.Gallen (HSG)
Career & Corporate Services (CSC)
Dufourstrasse 50
9000 St.Gallen
Switzerland

+41 71 224 31 00

csc@unisg.ch

in connection with your registration and use of the career platform my.hsgcareer.ch of the Career & Corporate Services. The use of the career platform is possible after your acceptance of the terms of use.

This consent for data processing exclusively concerns data processing carried out directly by the Career & Corporate Services in connection with the career platform. It does not apply to data processing that the natural person voluntarily undertakes or initiates with companies. In this context, point 12 is to be observed.

Upon initial registration on the career platform, my.hsgcareer.ch, and your acceptance of the terms of use, you consent to the processing of the data collected from you for the purposes specified under point 5 for the period specified under point 7. Any processing of your data beyond the described purpose or dissemination through disclosure to third parties, other than those mentioned in this consent, is prohibited unless you explicitly consent to such disclosure to third parties.

This consent document consists of six [6] pages and has been read and understood.

1 Data Protection Officer / Information Office

Switzerland: <u>datenschutz@unisg.ch</u>
EU: RA Frank Diem fdiem@diempartner.de

2 Legal Basis for Data Collection

All data processing is based on:

- DPA SG (Data Protection Act of the Canton of St.Gallen, sGS 142.1): Art. 4, Art. 5, Art. 11, Art. 13
- DPA CH (Federal Data Protection Act of Switzerland): Art. 6, Art. 19, Art. 31
- GDPR (General Data Protection Regulation of the European Union): Art. 6, Art. 7, Art. 13



3 Type of Data Collection

3.1 Registration Data

- a. For the initial registration of a natural person on the career platform my.hsgcareer.ch, a valid SWITCH edu-ID must be created in advance and linked to the HSG account ("HSG LinkingApp"). Linking to the HSG account is only possible if there is an affiliation with the University of St.Gallen (HSG) (e.g., enrollment of students, employment relationship for employees).
- b. Both during initial registration and with each login during the ongoing use of the career platform, the affiliation of the natural person to the University of St.Gallen (HSG) as described in a is verified.

3.2 Profil Data

Registration on the career platform includes the creation of an access-protected individual profile.

- a. The **mandatory** information of this individual profile includes:
 - i. Contact information: Title, First Name, Last Name, Address (Street/No., Postal Code, City), Email
 - ii. Short summary: Date of Birth, Nationality, Correspondence Language
- b. Natural persons can **optionally** supplement their individual profile with additional information or upload documents. These may include, among others:
 - i. Education, Work Experience
 - ii. Individual skills, abilities, and interests
 - iii. Career-related preferences
 - iv. Uploads (Profile Photo, CV, Certificates, Confirmations, etc.)

3.3 Usage Data

- a. During active use of the career platform, usage data associated with the personal account is generated (especially time and number of logins, time and number of views of job/event listings or company profiles, time and clicks on external links, setting and management of personal subscriptions and mailings).
- b. If **further contractual agreements** are made with the Career & Corporate Services or third parties on the career platform, additional data of the natural person may be generated in this context. These data may remain associated with the individual profile for the duration of the contractual relationship (especially application time or application/participation status, messages sent via the career platform, additional documents). The natural person will be informed at the conclusion of the contract.
- c. All data stored on the career platform may contain **meta-information**. This includes, in particular, administrative information (e.g., when and by whom, which data was created, modified, or deleted).



4 Access and Management of Data

4.1 Technical Infrastructure

The career platform of the Career & Corporate Services is provided by an external service provider, namely:

TalentWerk AG Rosenbergstrasse 60 9000 St.Gallen Switzerland

This service provider is contractually bound to the Career & Corporate Services via a data processing agreement (DPA). Your personal data is thus accessible to the Career & Corporate Services as well as to the service provider. Data will not be disclosed to third parties without your explicit consent.

4.2 Profile Data

- a. The information provided during registration regarding title, first name, and last name can be adjusted by the Career & Corporate Services and upon written request by the natural person.
- b. All other profile information can be independently adjusted or removed by the natural person in their individual account. The natural person can deactivate their individual profile on the career platform at any time.
- c. Registered natural persons can manage the visibility of their profiles to contractually bound and registered third parties on the career platform at any time.
- d. The shared profile information can be viewed and exported by contractually bound and registered third parties of the career platform. These third parties are responsible for the lawful use of profile data.

4.3 Usage Data

The usage data listed under point 3.3 can be partially viewed and modified by the natural person to a limited extent.

4.4 Further software/infrastructure used in addition to the software of TalentWerk

In addition to TalentWerk's software and infrastructure, the Career & Corporate Services may use data from the career platform for additional external tools. These include:

- MailChimp for sending mailings
- Microsoft Outlook for email communication
- Microsoft Teams for virtual meetings
- Zoom for virtual meetings
- EvaSys for event evaluation
- Wepow for video training
- Umbraco for document upload



5 Purpose of the Collection and Processing of Personal Data

The Career & Corporate Services are the point of contact for natural persons of the University of St.Gallen (HSG) for all questions regarding careers and offer various services in addition to the career platform to network students and companies. Data processing is carried out, in particular, for the following purposes:

- a. Ensuring the eligibility for using the career platform
- b. Management of profile and usage data in connection with the provision of services by the Career & Corporate Services to natural persons and contractually bound third parties
- c. Management of profile and usage data in connection with the provision of services by contractually bound third parties to natural persons
- d. Management of profile and usage data for sanctioning measures in case of misconduct by natural persons
- e. Analyses within the Career & Corporate Services to optimize existing services or develop new offerings for students and/or companies
- f. Reporting and analyses based on aggregated data for statistical, marketing, or sales purposes
- g. Sending information to natural persons related to their careers, career-related topics, and services provided by the Career & Corporate Services

6 Countries and Locations of Storage

All personal data on the career platform my.hsgcareer.ch or the associated database (CRM) as well as the Microsoft services, are stored or kept in Switzerland.

The personal data of other software used according to point 4.4 are stored in the following countries:

- MailChimp: USA
- Zoom: USA, Europe
- EvaSys: worldwide
- Wepow: Europe
- Umbraco: worldwide

7 Duration of Storage

- Personal data will be retained for as long as necessary for the purposes defined in this document under point 5.
- b. If registered natural persons no longer wish to use the career platform, they can deactivate their account via the corresponding "Delete Personal Account" button. As a result, access to the career platform and all shared profile information will be deactivated immediately. To prevent abuse, the records will be retained and irreversibly deleted no later than 24 months.
- c. The natural person may exercise their right to erasure of data in writing to the Career & Corporate Services (csc@unisg.ch). The Career & Corporate Services undertake to process this request within ten [10] working days of receipt, as described under point b.
- d. In case of inactivity of the natural person on the career platform for a period of 24 months, the Career & Corporate Services reserve the right to irreversibly delete the profile and all associated records.



8 Information about the Rights of the Affected Persons

- Right to Information
- Right to Rectification or Correction
- Right to Erasure of Data
- Right to Restriction of Processing
- Right to Data Portability
- Right to Withdraw Consent to Processing

A request for partial deletion is equivalent to a complete deletion of all data. Please note the storage period as per point 7.

9 Right to Lodge Complaints with Authorities

Right to lodge complaints (primarily) in connection with the applicability of DPA CH:

Federal Data Protection and Information Commissioner (FDPIC)
Feldeggweg 1
3003 Bern
Switzerland
+41 58 462 43 95

Right to lodge complaints (secondarily) in connection with the applicability of DPA SG:

Data Protection Authority of the Canton of St.Gallen Government Building 9001 St.Gallen Switzerland +41 58 229 14 14 datenschutz@sg.ch

In case of applicability of the GDPR, there is a right to lodge complaints with the competent supervisory authority.

10 Automated Decision Making and Profiling

The Career & Corporate Services do not carry out automated decision-making or profiling for behavioral prediction purposes.

11 Cookies and Web Tracking

The Career & Corporate Services do not employ web tracking within defined purposes of the career platform.



12 Additional Information

12.1 Language Versions

This statement is available in German and English; the German version shall prevail.

12.2 Communication & Mailings

- a. As part of using the career platform, automated emails may be sent (especially appointment confirmations, notifications about registration status, reminder messages). Such notifications cannot be deactivated by the registered natural person.
- b. Events on the career platform may include participant management. In connection with these events, contractually bound third parties may deliver messages to applicants or participants (natural persons) via the career platform. Conversely, natural persons can send messages to contractually bound third parties via the career platform.
- c. The natural person can set up individual job and event subscriptions in their account on the career platform. Automatically generated messages will be sent from the platform based on the selected filters and frequency. These settings can be adjusted by the natural person in their profile at any time.
- d. The Career & Corporate Services regularly send mass mailings to the natural person, especially in the form of newsletters, event or targeted mailings. The natural person can unsubscribe from these mailing lists.