

Privacy Policy

The website www.genioo.com is operated by Genioo AG, with registered office at Bundesplatz 1, 6300 Zug, Switzerland, registered in the Commercial Register of the Canton of Zug under the number CHE-351.818.455.

Accordingly, we are responsible for the collection, processing and use of your personal data in accordance with the law.

We take data protection very seriously and are committed to the protection of your personal data. We comply with the legal requirements of the Swiss Federal Data Protection Act (FDPA), the Ordinance on the Federal Data Protection Act (OFDPA) and other data protection provisions that may be applicable, in particular the General Data Protection Regulation of the European Union (GDPR).

The contact details of our data protection representative in the EU are as follows:

MLL Brussel SPRL
222, Av. Louise
1050 Brussels
Belgium

genioo@mll-gdpr.com

In the following, we would like to inform you on how we treat your personal data.

Please note that we may amend this privacy policy from time to time, by posting the amended version on our website. We therefore recommend that you consult this privacy policy regularly.

1. Scope and purpose of the collection, processing and use of personal data

1.1. When you visit our website

When you visit our website, our servers temporarily store each access in a log file. The following data is collected and stored, without any action on your part, until it is automatically deleted after twelve months at the latest:

- the IP address of the requesting computer,
- the name of your Internet access provider (usually your Internet access provider),
- date and time of access,
- name and URL of the data retrieved,
- the website from which our domain was accessed (referrer URL), and the search term used, as applicable,
- the operating system of your computer and the browser used (type, version and language), and
- the transmission protocol used (e.g. HTTP/1.1).

This data is collected and processed for the purpose of allowing the use of our website (establishing a connection), ensuring system security and stability in the long term and allowing our Internet offering to be optimized, as well as for internal statistical purposes. We rely on our legitimate interests within the meaning of Art. 6 para. 1 lit. f GDPR, to process the data for these purposes.

The IP address will be evaluated for clarification and defense purposes only in the event of an attack on the websites network infrastructure or in case of a suspicion of unauthorized or abusive use of the website. It may further be used for identification purposes in criminal proceedings and in the context of civil and criminal proceedings against the concerned individual, as necessary and required. We rely on

our legitimate interests within the meaning of Art. 6 para. 1 lit. f GDPR to process the data for these purposes.

Lastly, when you visit our websites, we use cookies as well applications that are based on the use of cookies. Please see Sections 5 Cookies and 6 Tracking Tools for further details.

1.2. *When you use the contact form*

If you contact us by using the contact form located on our website, we collect the following information from you:

- First name*
- Surname*
- Email-Address*
- Telephone number*
- Company
- Your message

The fields marked with * are mandatory.

We use this data to respond to your query or provide the services you request and, if necessary, to contact you by telephone. We never use your telephone number for marketing purposes.

We rely on our legitimate interests within the meaning of Art. 6 para. 1 lit. f GDPR to process your above data for the mentioned purposes. You can object to this data processing at any time (see Section 12 Contact).

1.3. *When you contact us via email*

You may contact us by using the email-address info@genioo.com. In this case we collect the personal data you provide us. We need this information to process your contact request. You are responsible for any communications or content you transmit to us. We recommend that you do not transmit sensitive information via email. Personal data is only collected if you voluntarily provide it to us. It is therefore up to you what information you provide us with. In order to be able to answer your contact inquiries, we may require additional information from you, e.g. your address, your telephone number, etc. We will only collect personal data from you if required to process and answer your enquiry or to deliver the services you request.

We use such data to respond to your query or provide the services you request and, if necessary, to contact you by telephone. We never use your telephone number for marketing purposes.

We rely on our legitimate interests within the meaning of Art. 6 para. 1 lit. f GDPR to process your data for the mentioned purposes. You can object to this data processing at any time (see Section 12 Contact).

1.4. *When you apply for our business team*

If you apply for our business team through our website, we collect the following information from you:

- First Name*
- Last Name*
- Email*
- Phone*
- Resume (file upload)*
- Cover Letter (file upload)*

Depending on the position that you apply for, additional information may be collected from you, such as:

- LinkedIn Profile
- Expected total compensation*
- Possible start date*
- Authorized to work in Switzerland, the EU or US*
- Willingness to travel*
- Number of years working in the respective industry*
- Working experience in the position you apply for*
- Number of years of working experience*
- Fluent in German?
- Fluent in English?*

The fields marked with * are mandatory.

We process the personal data you provide us for the purpose of examining your application. Please note that you are responsible for the content of the files that you transmit to us. It is therefore up to you what information you provide us with. In order to assess your application, we may ask you to provide us with additional information, e.g. testimonials, etc. We will only collect those personal data from you which are necessary to assess your application.

For this purpose, we will use your consent in accordance with Art. 6 para. 1 lit. a GDPR as the basis to process your personal data and further base the data processing on steps to be taken prior to entering into a contract according to Art. 6 para. 1 lit. b GDPR. You may withdraw your consent for this processing at any time with effect for the future (see Section 12 Contact).

1.5. *When you apply to become an independent consultant with us*

If you apply to become an independent consultant with us through our website, we collect the following information from you:

- First Name*
- Surname*
- Email Address*
- Telephone number*
- Source*
- CV (file upload)*

Moreover, we collect the following additional information through the skill self assessment:

- Name *
- Surname*
- Email Address*
- Phone Number*
- Country of residence*
- Source*
- Registered Status*
- Address*
- Earliest start date*
- CV (file upload)*

The fields marked with * are mandatory.

Additional information in the skill self assessment are voluntary and relate to past jobs, experiences, languages spoken and other relevant information to assess your application. In the skill self assessment you can provide the following information (voluntary):

- Personal information
- Registered status
- Earliest start date
- Willingness to travel
- Valid work permit/visa
- Additional CV information
- Experience/skill level in the different fields (e.g. Life Sciences, Healthcare, Financial Services, Consumer Goods & Retail, Transportation & Logistics, High Tech & IT, Industrial Products, Services, Strategy, Operations, Organization, Corporate Finance, Marketing & Sales, Market Research, Leadership Skills, Change Management Skills, Technical Skills, Project Skills etc.)
- CV (file upload)
- Professional Photo (file upload)
- Project examples (file upload)

We process the personal data you provide us for the purpose of examining your application. Please note that you are responsible for the content of the files you upload or the information that you transmit to us. It is therefore up to you what information you provide us with. In order to assess your application, we may ask you to provide us with additional information, e.g. testimonials, etc. We will only collect those personal data from you which are necessary to assess your application.

For this purpose, we will use your consent in accordance with Art. 6 para. 1 lit. a GDPR as the basis to process your personal data and further base the data processing on steps to be taken prior to entering

into a contract according to Art. 6 para. 1 lit. b GDPR. You may withdraw your consent for this processing at any time with effect for the future (see Section 12 Contact).

1.6. When you login to the professional portal (<https://portal.genioo.com/public/login.php>)

If you login the professional portal on our website, we collect the following information from you:

- Email-Address*
- Password (encrypted)*

The fields marked with * are mandatory.

Alternatively, you can log in with your "Genioo Account" provided by Genioo and operated by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"), using the so-called Single Sign On technique (see Section 8 Note on data transfers to the US). The Google-Login on our website can be recognized by a button with the Google logo. Alternatively you can sign up with any other personal email-address to the professional portal.

The purpose and scope of the data collection and the further processing and use of the data by Google as well as your rights and setting options for the protection of your privacy can be found in Google's privacy policy: <https://policies.google.com/privacy?hl=en&gl=ZZ>

We use this data to provide you with a tool where you as an independent contractor can upload your personal data, timecards and expenses.

For this purposes, we base this data processing on a contract in accordance with Art. 6 para. 1 lit. b GDPR and further base the data processing on our legitimate interests within the meaning of Art. 6 para. 1 lit. f GDPR. You can object to this data processing at any time (see Section 12 Contact).

1.7. *Analysis of you application data with Talent Fit Index*

When you apply through our website and provide us with the information as outlined above, we store your personal data in the web application ("Talent Fit Index"). When you take the analytical test we store your name and email-address as well as your results of the test and the time management.

Talent Fit Index data is stored by Greenhouse Software, Inc., 110 5th Ave 3rd Floor, NY 10011, New York, USA ("Greenhouse"; see Section 8 Note on data transfers to the US). Please note that data is shared with Greenhouse. Additional information on how Greenhouse processes personal data can be found under: <http://www.greenhouse.io/privacy-policy>

Through Talent Fit Index we run analytical assessments of your application that allows us to evaluate, if an application fits the profile of an open position. For this purpose, we will use your consent in accordance with Art. 6 para. 1 lit. a GDPR as the basis to process your personal data and further base the data processing on steps to be taken prior to entering into a contract according to Art. 6 para. 1 lit. b GDPR. You may withdraw your consent for this processing at any time with effect for the future (see Section 12 Contact).

2. Central Storage

We store the data indicated in the above-mentioned section in a central electronic data processing system. The data concerning you is systematically recorded, linked and evaluated for processing your application and contractual services.

At the same time, we inform you that the personal data mentioned in the previous sections is migrated to our CRM system, which is operated by Salesforce Inc., 1 Market St #300, San Francisco, CA 94105, USA, where they can be stored and processed centrally. The data in the central CRM system is

evaluated by us for providing you with tailored opportunities. We also evaluate the data in the CRM system to improve services. In addition, we use the relevant data for the other purposes mentioned in this Privacy Policy. These evaluations can create user profiles about you.

We base this processing on our legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR. Our legitimate interest lies in a customer-friendly and efficient customer data management. In addition, we base the processing of this data on the fulfilment of the contract within the meaning of Art. 6 para. 1 lit. b GDPR.

3. Disclosure of data to third parties

We will only transfer your personal data to third parties if you have given your explicit consent, if there is a legal obligation to do so, or if it is necessary for the enforcement of our rights, in particular to assert claims arising out of the contractual relationship.

In addition, we will transfer your data to third parties as far as it is necessary for the use of the website, the processing of your contact requests, the sending of marketing communications, and the analysis of your user behaviour. The use of the data forwarded for these purposes by third parties is strictly limited to the stated purposes.

Third-party service providers are explicitly mentioned in this Privacy Policy. An additional service provider to whom personal data collected via the website is passed on or who has or may have access to, is our hosting provider flow.ch, innofield AG, Zwickystrasse 7, 8304 Wallisellen, Switzerland. The data is passed on for the purpose of providing and maintaining the functionalities of our website. For this processing we rely on our legitimate interests within the meaning of Art. 6 para. 1 lit. f GDPR.

4. Transmission of personal data abroad

We may transfer your data to third parties located abroad for the purpose of the data processing described in this Privacy Policy.

Any such third-party companies are obliged to protect the privacy of individuals to the same extent as we do. If the level of data protection in a country does not correspond to the Swiss or European level, we ensure by contract that the protection of your personal data corresponds to that in Switzerland or the EU at all times.

Certain third-party service providers have their registered office in the US. Further explanations on the data that may be transferred to the US can be found under Section 8 Note on data transfers to the US.

5. Cookies

When you access our website we collect information by means of cookies.

Cookies are information files that your web browser automatically stores on your computer's hard drive when you visit our website. Cookies neither damage the hard disk of your computer nor do they transmit your personal data to us.

Among other things, cookies help us make your visit on our website easier, more pleasant and more meaningful.

Most Internet browsers automatically accept cookies. However, you can configure your browser so that no cookies are stored on your computer or that a warning message will always appear when a new cookie arrives.

On the following pages, you will find explanations as to how to configure the processing of cookies in the most common browsers:

- [Microsoft Windows Internet Explorer](#)
- [Microsoft Windows Internet Explorer Mobile](#)
- [Mozilla Firefox](#)
- [Google Chrome for Desktop](#)
- [Google Chrome for Mobile](#)
- [Apple Safari for Desktop](#)
- [Apple Safari for Mobile](#)

Please note that deactivating cookies may prevent you from using all the features of our website.

6. Tracking Tools

For the purposes of needs-based design and the continuous optimisation of our web pages, we use the web analysis service Google Analytics. In this respect, pseudonymised user profiles are created and small text files (see Section 5 Cookies) stored on your computer are used. In addition to the data listed under Section 1 above, we may receive the following information generated by the cookie about your use of our website:

- the navigation path that a visitor takes on the site,
- the duration of stay on the website or subpage,
- the subpage on which the website is left,
- the country, region or city from which it is accessed,
- the terminal (type, version, color depth, resolution, width and height of the browser window), and
- returning or new visitor.

These data are sent to servers of Google Inc., a company of the holding company Alphabet Inc., in the US and stored there. As part of this, before this data is sent within EU member states or other states that are party to the agreement on the European Economic Area and Switzerland, the IP address is truncated through this website's IP anonymization ("anonymizeIP"). The anonymized IP address transmitted by your browser in the context of Google Analytics is not consolidated with other data from Google. The entire IP address is sent to a Google server in the US and truncated there only in exceptional cases. In this case, we ensure by contractual means that Google Inc. observes a sufficient level of privacy protection.

The information is used to analyze the use of the website, to compile reports about website activities and to provide us with further services relating to websites and internet use for the purposes of market research and needs-based design for these websites. This information is also forwarded to third parties where this is required by law or if third parties have been commissioned to process this data. Under the terms of Google, under no circumstances will the IP address be used in connection with other data relating to the user.

Users can prevent Google's collection of the data generated by the cookie that relates to a user's use of the website (including their IP address) and Google's processing of this data by downloading and installing the browser plug-in available via the following link:

<http://tools.google.com/dlpage/gaoptout?hl=en>

By doing so, an opt-out cookie is stored on the user's end device. To delete user cookies (see Section 5 Cookies), the link must be clicked again.

We also use Google Tag Manager in order to manage cookies and pixels for tracking tools and other tools. The Tag Manager tool itself is a cookie-free domain and does not collect any personal data. Instead, the tool triggers other tags that may in turn collect data. If you have performed a deactivation at domain or cookie level, this remains in place for all tracking tags implemented using Google Tag Manager.

Our website further uses DoubleClick by Google, a service provided by Google to serve ads based on the use of previously visited websites. Google uses the so-called DoubleClick cookie, which enables your browser to be recognized when you visit other websites. The information generated by the cookie about your visit to these websites (including your IP address) will be transmitted to and stored by Google on servers in the US (see Section 8 Note on data transfers to the US).

For uniform representation of fonts, our website uses web fonts provided by MyFonts. When you open a page, your browser loads the required web fonts into your browser cache to display texts and fonts correctly. Our website uses the MyFonts Counter, a web analytics service provided by MyFonts Inc., 500 Unicorn Park Drive, Woburn, MA 01801, USA (see Section 8 Note on data transfers to the US). Due to the license terms, a page view tracking is performed by counting the number of visits to our website for statistical purposes and transmitting them to MyFonts. MyFonts collects anonymous data. If your browser does not support web fonts, a default font will be used by your computer. The passing on of the data takes place by the activation of Java Script code in the browser of the user. In order to prevent the execution of Java script code from MyFonts as a whole, the user can install a Java Script Blocker. Further information on data protection and the cookies used by MyFonts can be found at: <http://www.myfonts.com/info/terms-and-conditions/#Privacy>

7. Links to our social media presences

On our website, we have incorporated links to our social media profile on the following social network:

- LinkedIn, LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA.

If you click on the relevant social network icon, you will be automatically redirected to our profile on the relevant social network. In order to use the functions of the relevant network, you must partially login to your user account.

When you open a link to our social media profile, a direct connection is established between your browser and the server of the relevant social network. This gives the network the information that you have visited our website with your IP address and accessed the link. If you access a link to a network while being logged in to your account on the relevant network, the content of our website may be linked to your profile in the network, which means that the network can link your visit to our website directly to your user account. If you want to prevent this, you should logout before clicking on the relevant links. An assignment takes place in any case, if you login to the relevant network after clicking on the link.

For more information about the purpose and scope of the data collection and further data processing by the above mentioned social media network and your particular rights and data protection options, please see its respective privacy policy.

8. Note on data transfers to the US

For the sake of completeness, we note that, as part of US legislation, US authorities are able to take surveillance measures, under which the general storage of all data sent from the European Union to the US is possible. This takes place without distinction, limitation or exception, on the basis of the objective pursued and without objective criteria that would allow it to limit access by US authorities to personal data and its subsequent use to specific, strictly limited purposes that justify access to this data.

Furthermore, we would like to point out that there are no legal remedies available in the USA for the data subjects from Switzerland or the EU that would allow them to gain access to the data concerning them and to obtain their correction or deletion, and there is no effective legal protection against general access rights of US authorities. We explicitly draw attention to this legal and factual situation to the data subject so that he or she may make an informed decision as to the consent to the use of his or her data.



For individuals residing in EU Member States, please note that from the point of view of the European Union, the US does not have sufficient data protection levels due, inter alia, to the issues mentioned in this Section. To the extent that we have explained in this Privacy Policy that recipients of data are located in the US, we will ensure that your data is adequately protected by our partners, either by way of a contract or by requiring certifications from the companies at issue under the Swiss/EU-US - Privacy Shield.

9. Right to information, deletion and correction

You have the right to obtain information on the personal data that we store about you on request at any time.

In addition, you have the right to ask us to correct inaccurate data and to ask us to delete your personal data (including the data you provide us in the context of an application), as long as there is no legal retention duty that requires us or legal basis that allows us to further process such data.

We note that in the case of deletion of your data, the full use of our website may no longer be possible or not possible to the full extent.

You can withdraw your consent to certain data processing at any time with effect for the future.

You also have the right to demand the release of the data you have given us (right to data portability). On request, we will also forward the data to a third party of your choice. You have the right to receive the data in a common file format.

For the aforementioned purposes, you can contact us via the email address privacy@genioo.com. We may, at our discretion, require proof of identity to process your request.

This does not affect your right to complain to a data protection authority at any time.

10. Data retention

We only store personal data for as long as necessary to:

- provide you with services that you have requested or for purposes as to which you have given your consent,
- enable the above-mentioned analysis services within the scope of our legitimate interests.

Please note that legal retention periods may apply for certain data. Such data must be stored by us until the end of the retention period. We block any such data in our system and use them exclusively to comply with our legal obligations.

11. Data security

We take reasonable technical and organizational security measures that we deem appropriate in order to protect your stored data against manipulation, loss, or unauthorized third party access. Our security measures are continually adapted to technological developments.

We also take internal data privacy very seriously. Our employees and the service providers are required to maintain secrecy and to comply with applicable data protection legislation. In addition, they are granted access to personal data only insofar as this is necessary for them to carry out their respective tasks or mandate.

12. Contact

If you have any questions regarding data protection, if you would like to receive information or if you would like to request the deletion of your personal data, please contact us by email at privacy@genioo.com.

Alternatively, you can write to:

Genioo AG
Data Privacy
Bundesplatz 1
6300 Zug
Switzerland

13. Right to complaint to a data protection supervisory authority

You have the right to complain to a data protection supervisory authority at any time.