

## Privacy policy for employees and members of European Academy of Allergy and Clinical Immunology (EAACI)

With this privacy policy, EAACI (hereinafter "**EAACI**", "**we**" or "**us/our**") informs its employees and members (hereinafter "**employees**" "members" or "**you/your**") about which of their personal data is collected and processed. It also explains the purposes for which this personal data is used, with whom it is shared and what rights employees/members have in relation to their personal data.

The term "**personal data**" includes all information relating to identified or identifiable, future, current or former employees/members. The term "**processing**" means any operation or set of operations which is performed on personal data, such as the collection, storage, use, adaptation, disclosure and erasure of personal data.

If you provide us with personal data about a third party (e.g. a family member), we assume that you have informed this third party about this privacy policy, that you are authorized to provide the relevant personal data and that the relevant personal data is correct.

### 1. Responsible body

Unless otherwise stated, EAACI is the controller responsible for processing your personal data:

EAACI  
Hagenholzstrasse 111  
3rd Floor  
8050 Zurich  
Switzerland

### 2. Processing of personal data

We process the following categories of personal data:

- Application data: Personal data that is transmitted or disclosed to us for the purpose of assessing suitability for an open position, membership or to carry out the application/membership process, including application/membership documents.
- Employee/Member master data: Personal data processed for the purpose of performing the employment/membership relationship and our related legal obligations, including name, function, position, date and place of birth, business postal addresses, business e-mail addresses, business telephone numbers, and for employees photograph, social security number, nationality, residence status, ID card/passport number and other national identification numbers, religion, marital status, family information (including marriage certificate, number of children and dates of birth of spouse and children), private postal addresses, private e-mail addresses, private telephone numbers, identification number, health insurer, consent forms and license plate numbers.
- Identification data: Personal data collected for access controls and the creation of user accounts, including login data such as user name, password and access authorizations.
- Technical data: Personal data generated when using our IT and other electronic systems, including IP address, operating system details, date, region and time of use, browser type, referrer URL, login data and sound and image recordings.
- Financial data: Personal data required to meet financial obligations arising from our employment/membership relationship with you and/or as required by law, including bank account details, recovery/enforcement and tax information.
- Other data: In particular, personal data from employees/members' personnel files, including information on recruitment/membership, election, training, education, promotion, position, job change, performance appraisal, career development, disciplinary measures, salary, bonuses, pension entitlements, insurance

benefits and other benefits, attendance records and, where applicable, information on illnesses, accidents, degree of disability or absence for medical or other reasons.

EAACI may also collect and process other personal data. If this is the case, EAACI will inform employees/members accordingly in writing in advance.

We also collect particularly sensitive personal data (in particular health data) insofar as this is necessary for the fulfilment of contractual or legal obligations of EAACI or if employees/members have voluntarily consented to the corresponding data collection. Please note that if employees/members voluntarily transmit particularly sensitive personal data to EAACI, it is assumed that they consent to the processing of this personal data.

The personal data that EAACI processes about employees/members comes from various sources. This includes personal data that we receive or collect in connection with pre-employment/membership activities or in preparation for employment/membership. In addition, we may receive certain personal data directly from you. Where permitted, we may also obtain personal data from publicly available sources or receive it from authorities and other third parties (e.g. from recruitment agencies, other companies affiliated with EAACI or from other employees/members in connection with complaints or disciplinary reports submitted about you).

### **3. Purposes of data processing**

Personal data is processed for the following purposes: (i) assessing the suitability of employees/members for an employment/membership relationship, (ii) initiating, implementing and terminating employment/membership relationships and (iii) fulfilling the legal, regulatory and contractual obligations associated with an employment/membership relationship. In particular, we process your personal data for the following purposes:

- Conducting recruitment and application activities, including related eligibility assessments, background checks, application processing and documentation.
- Managing the employment / membership relationship, including the administration of our workforce, payroll, expenses and benefits administration, performance and absence management, staff development, internal reviews and audits, business travel, emergency contacts, transfers and promotions.
- Communication between EAACI and employees / members, in particular by post, telephone, e-mail or other means of communication.
- Assessment of information obtained from data analysis.
- Disclosure of personal data to third parties in connection with the performance of the employment/membership relationship and/or business relationships.
- Security and access control, including monitoring, control, analysis and testing of networks and IT infrastructures as well as buildings and facilities, system and error testing, documentation, backups, monitoring systems and communication of security updates.
- Compliance with laws, regulatory requirements and recommendations and guidelines of supervisory authorities, including investigation and compliance with disclosure, information and reporting obligations; compliance with archiving obligations; prevention, identification and investigation of criminal offenses.
- Safeguarding and protection of legal claims, including the assertion, enforcement and defense of legal claims.

### **4. Legal basis**

We process your personal data on the basis of the following legal bases:

- Initiation or execution of a contract/membership.
- Consent: If the processing of your personal data is based on your consent, we will inform you separately about the specific purposes of the processing. You can withdraw your consent at any time, free of charge

and without giving reasons. As soon as we receive notification of the withdrawal of your consent, we will no longer process your personal data for the purposes for which you originally consented, unless we have another legal basis for doing so. The withdrawal of your consent does not affect the lawfulness of processing based on consent before its withdrawal.

- Pursuing the legitimate interests of us or a third party.
- Compliance with legal obligations and the public interest.

## **5. Obligation to provide us with personal data**

The provision of your personal data is generally necessary in order to enter into and/or maintain the employment / membership relationship with you. If you do not provide us with your personal data, we may not be able to establish the employment/membership relationship with you or at least not be able to perform it in accordance with the statutory and contractual provisions.

## **6. Disclosure and transfer of personal data**

Within EAACI, we may disclose and/or transfer your personal data to those entities that require this information in order to fulfil our contractual and/or legal obligations or as otherwise described in this Privacy Policy. THIS includes, in particular, your line manager and the HR and IT departments.

We only pass on your personal data to recipients outside EAACI if this is required by law, is necessary to establish or implement the employment/membership relationship or if you have given your consent. We transfer your personal data to the following recipients in particular:

- Group companies affiliated with EAACI for the purpose of outsourcing data processing activities, including in the areas of IT services, personnel services, logistics, printing services, telecommunications and consulting.
- Other companies with which EAACI maintains business relationships and where personal data of employees/members may be transferred or must be transferred in order to conduct these business relationships, including in the context of business cooperation with potential and existing customers.
- Service providers, including pension funds, payroll accountants, trustees, social security institutions, banks, insurance companies, auditors, consultants, providers of telecommunications and IT systems as well as payment and recruitment services.
- Authorities, including tax authorities, law enforcement authorities, courts or commercial registers, if there is a contractual and/or legal obligation to do so.
- (Potential) buyers or merger partners, if their legitimate interest in the disclosure of your personal data outweighs yours.
- Other recipients to whom you have given your consent to the disclosure of your personal data in individual cases.

The above-mentioned recipients are mainly located in Switzerland, but can in principle be located anywhere in the world.

The recipients are obliged to protect your personal data in accordance with the agreed contractual obligations and the applicable data protection laws. If the level of data protection in a country does not correspond to the Swiss or European standard, we contractually ensure that the protection of your personal data is always equivalent to that in Switzerland or the European Union. To achieve this, we conclude contracts with the recipients using the EU standard contractual clauses and implement additional technical and organizational measures where necessary.

## **7. Retention periods**

We store your personal data for as long as is necessary to achieve the purpose for which it was collected or to fulfill our contractual or legal obligations. If there are no legal or contractual obligations, we anonymize or delete your personal data after expiry of the storage or processing period in accordance with recognized deletion procedures.

## **8. Data security**

We have implemented appropriate technical and organizational measures and procedures to protect your personal data from loss, misuse, alteration or destruction.

We generally restrict access to your personal data. Persons who have access to your personal data are obliged to maintain the confidentiality of this information. To improve the protection of personal data, we may use methods such as pseudonymization or anonymization.

Despite these measures, it is not possible to guarantee the absolute security of your personal data. Please note that personal data transmitted via an open network, such as the Internet or an e-mail service, is publicly accessible. We cannot guarantee the confidentiality of personal data transmitted via such networks.

## **9. Data protection rights**

You have the following rights with regard to the processing of your personal data:

- Information: You have the right to request information from us as to whether and what personal data we process about you.
- Rectification: You have the right to ask us to rectify our records if they contain inaccurate or incomplete personal data about you.
- Deletion: You have the right to delete your personal data if you withdraw your consent to processing or if we no longer need the personal data for the original purpose for which it was used and are not obliged to retain it.
- Restriction of processing: You have the right to temporarily restrict the processing of your personal data by us if you have doubts about the accuracy of the personal data or if you prefer a restriction of the use of the personal data to deletion.
- Data output and transfer: You have the right to have us provide you with your personal data in a commonly used electronic format, provided this is technically feasible.
- Right to lodge a complaint: You have the right to lodge a complaint with a competent supervisory authority about the way in which your personal data is processed (for Switzerland: Federal Data Protection and Information Commissioner (FDPIC), [notification form](#)).
- Right to withdraw consent: You can withdraw your consent to the processing of your personal data at any time without giving reasons and free of charge. THIS does not affect the lawfulness of the processing that took place before you withdrew your consent.

To exercise your data protection rights, please contact us in writing or, unless otherwise stated or agreed, by e-mail at the contact address given in section 1.

To prevent misuse, we may ask you for proof of identity. We will endeavour to respond to your application within 30 days of receipt. No fee will be charged for processing your application, unless the application is manifestly unfounded or objectionable.

## **10. Changes to this privacy policy**

We reserve the right to amend this privacy policy at any time without prior notice. The currently published version of this privacy policy applies. In the event of changes that affect you, we will inform you of the changes by e-mail or other suitable means.