

Privacy policy for applicants



Data controller	Privacy contact Equity Real Estate SA
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Equity Real Estate SA



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Privacy policy for applicants

As a data subject, we wish to inform you that the information and data you provide or that we otherwise acquire will be processed in accordance with the provisions of Articles 19 of the Federal Act on Data Protection (FADP) and 13 of the Federal Ordinance on Data Protection (OPDa), as well as the confidentiality obligations that guide the activities of Equity Real Estate SA (hereinafter "Equity" or "Company").

1. Data controller of personal data

The data controller of personal data is:

Equity Real Estate SA
Via Serafino Balestra 33
6900 Lugano

represented by persons with signing authority in accordance with the entries in the Cantonal Commercial Register (CHE-463.314.127).

The list of data processors and any authorized persons appointed is kept at the Data Controller's headquarters and made available upon request by the data subject.

2. Definitions

Pursuant to Art. 5 of the Federal Act on Data Protection (FADP), we provide the following definitions:

- **personal data:** all information relating to an identified or identifiable natural person;
- **data subject:** the natural person whose personal data is being processed;
- **processing:** any operation relating to personal data, regardless of the means and procedures used, in particular the collection, recording, storage, use, modification, communication, archiving, erasure, or destruction of data;
- **disclosure:** the transmission of personal data or making it accessible;
- **Data Controller:** the private individual or federal body which, alone or jointly with others, determines the purposes and means of the processing;
- **Data Processor:** the private individual or federal body that processes personal data on behalf of the Data Controller.

3. personal data subject to processing

To the extent permitted by applicable law, the Company may process your common personal data and, by way of example and without limitation, the following personal data:

- personal, identification, and contact details (of the data subject) such as first name, last name (including maiden name), gender, marital status, nationality, place and date of birth, place of residence, address, domicile, marital status, telephone number, postal and email address, and any residence permit;
- information relating to professional and educational profile, level of education, and work experience contained in the CV, cover letter, and any assessments and educational information, as well as information relating to training, advanced training, and professional development courses attended for compulsory, complementary, or motivational training purposes;
- any additional personal data contained in the CV sent to the Company.



The Company does not process data worthy of special protection (such as, for example, data revealing health status) which, if contained in the CV, will be immediately deleted by the Company.

Please note that, where deemed necessary in relation to the specific position, further information may be requested for the purpose of verifying any conflicts of interest that may arise in the context of the activities involved in the job.

Personal data will be collected directly from the data subject or through employment agencies.

4. Purpose of processing

The Company processes your personal data, acquired through your CV and/or collected from correspondence with candidates and/or through interviews, as well as personal data communicated to the Company itself for the following specific purposes:

- a) recruiting and selecting personnel and/or managing requests following open positions or unsolicited applications;
- b) asserting rights in court, out of court, or administratively, and exercising the right of defense in legal disputes;
- c) for requirements related to the prevention, detection, and investigation of crimes.

5. Legal basis and justified reason

In accordance with Article 6 of the FADP, the Data Controller processes your personal data within the applicable legal framework. Where required, and depending on the purpose of the processing activity, the processing of your personal data may be based on one of the following grounds:

- o for processing relating to recruitment and personnel selection: the overriding interest of the Data Controller, specifically the performance of activities necessary for the implementation of pre-contractual measures taken at the request of the data subject (Article 31 of the FADP, paragraph 2);
- o to assert rights in court, out of court, or administratively and to exercise the right of defense in legal disputes, for requirements related to the prevention, detection, and investigation of crimes: the overriding interest of the Data Controller (Art. 31 FADP c.2).

The provision of personal data through your CV is not mandatory, but it is necessary in order to carry out the selection process.

Failure to provide the above personal data may therefore make it impossible for the Company to proceed with the selection process and the possible establishment of an employment relationship.

In any case, the Company invites all those who intend to apply not to provide data worthy of special protection under the FADP (such as, by way of example and without limitation, data relating to health, religious beliefs, judicial data, or data concerning racial and ethnic origin).

If the legal basis for the processing is the legitimate interest of the Data Controller, the latter guarantees that it has carried out a prior assessment ("balancing test") to ensure the proportionality of the processing so that the rights and freedoms of the Data Subjects are not prejudiced, taking into account their reasonable expectations in relation to the specific processing activity carried out.

If the Company intends to use your personal data for any other purpose incompatible with the Purposes for which it was originally collected or authorized, the Company will inform you in advance and, where required, request your consent for such processing activity.



6. Methods of processing personal data

Your personal data will be processed using manual, computerized, and telematic tools.

It is possible to collect, record, store, use, modify, communicate, archive, delete, or destroy data using tools and procedures that guarantee the security and confidentiality of the data.

Personal data will not be processed using fully automated tools, including profiling.

7. Storage period

Your personal data will be stored in accordance with the provisions of Article 6(4) of the FADP, based on the principle of necessity of processing, for a limited period of time and strictly related to the purpose for which it was collected and in accordance with applicable legal or regulatory obligations.

Specifically, candidates' personal data will be processed and stored for the period necessary to carry out the selection procedure and in any case for no longer than 2 years from the date of receipt of the same.

Subsequently, once the aforementioned reasons for processing no longer apply, your personal data will be deleted or destroyed.

8. Security measures

All Company personnel who have access to personal data are required to comply with internal rules and procedures relating to the processing of personal data in order to protect it and ensure its confidentiality. We have also implemented appropriate technical and organizational measures to protect personal data from destruction, loss, alteration, misuse, disclosure, or unauthorized, accidental, or unlawful access, as well as from all other unlawful forms of processing.

9. Recipients

Your personal data may be disclosed, where necessary, to the following recipients:

- Managers;
- natural persons acting under the authority of the Data Controller and the Data Processor for the purposes set out above;
- firms or companies providing assistance and consulting services (e.g., accounting, tax, legal, administrative);
- entities that provide services for the management of the information system used by the Company and telecommunications networks (including email);
- subjects who have the right to access your data by law, secondary legislation, or EU regulations;
- Competent authorities for the fulfillment of legal obligations and/or provisions of public bodies upon request.

Where the Data Controller transfers your data to third-party service providers, it ensures that they meet the same security standards.

Third-party service providers are therefore required to comply with a series of technical and organizational security measures, regardless of their location, including measures relating to: (i) information security management; (ii) information security risk assessment; and (iii) information security measures (e.g., physical access controls, logical access controls; protection against malware and hacking; data encryption measures; backup and recovery management measures). The third parties described above shall process the personal data shared under this provision in accordance with the purpose for which such data was originally collected and at least to the same level of protection as in Switzerland.

The list of Data Processors is constantly updated and available at the Data Controller's headquarters.



10. Communication of data outside the Confederation

Your personal data, as well as that of your family members, processed for the purposes referred to in Article 4, will be kept in Switzerland and will not be transferred to third countries that do not have the same data protection laws as the country in which the information was initially provided.

For the sake of completeness, it should be noted that, pursuant to Articles 16 and 17 of the FADP, the transfer of personal data may only be communicated abroad if the Federal Council has determined that the legislation of the recipient state or international organization guarantees adequate data protection, or if: the data subject has given their consent; the communication is directly related to the conclusion or execution of the contract; the communication is necessary to protect an overriding public interest or to ascertain, exercise, or enforce a right before a court or competent foreign authority; the communication is necessary to protect the life or physical integrity of the data subject or a third party; the data subject has made the personal data accessible to anyone; the data comes from a register provided for by law that is accessible to the public or to persons with a legitimate interest.

Your personal data will not be subject to dissemination or any fully automated decision-making process.

11. Rights of the data subject

In accordance with the provisions of the FADP, the Data Controller recognizes the following rights in particular (non-exhaustive list):

- to be subject to transparent processing (Articles 19-21 of the FADP)
- obtain confirmation as to whether or not personal data is being processed and, if so, obtain access to the personal data - including a copy thereof - and the communication, among other things, of the following information: the purposes of the processing, the categories of personal data processed, the recipients to whom the data has been or will be disclosed, the period of storage of the data (right of access - Article 25 of the FADP);
- obtain, without undue delay, the rectification of inaccurate personal data and/or the integration of incomplete personal data (right of rectification - Article 32(1), (3) and (4) of the FADP);
- obtain, without undue delay, the erasure of personal data (right to erasure – Article 32(2)(c) of the FADP);
- receive personal data in a structured, commonly used and machine-readable format, transmit them to another controller without hindrance and, where technically feasible, have the personal data transmitted directly from the company to another controller, if the processing is based on consent and is carried out by automated means (right to data portability – Article 28 of the FADP);
- object to the processing at any time, for reasons related to their situation (right to object - Article 30(2)(b) and (3) of the FADP). If this right is exercised, the Company will refrain from further processing the personal data, unless there are compelling legitimate grounds for proceeding with the processing;
- obtain restriction of processing (right to restriction of processing) if the accuracy of the personal data is contested (for the period necessary for the Data Controller to verify the accuracy of the personal data) or if the data subject has objected to the processing (pending verification of whether the legitimate grounds of the Data Controller override those of the data subject);
- assert their point of view with regard to automated decisions and, in particular, demand a review of the decision by a human being (right not to be subject to an automated individual decision – Art. 21 FADP);
- lodge a complaint with the competent authority (in Switzerland, the Federal Data Protection and Information Commissioner - FDPIC);



- if neither the correctness nor the inaccuracy of the personal data can be proven, request the addition of a note to indicate the dispute;
- request that the correction, destruction, blocking, and, above all, communication to third parties, in addition to the note on the dispute or judgment, be communicated to third parties or published;
- have the processing of personal data declared unlawful.

The data subject may exercise their rights in the following ways:

- by email: by sending a request to the Company at the following email address: privacy@equityrealestate.ch
- by regular mail to the Company's headquarters: Equity Real Estate SA, Via Serafino Balestra 33, 6900 Lugano.

When contacting the Data Controller, the user must ensure that they include their name, email address, postal address, and/or telephone number(s) to ensure that the Data Controller can correctly handle their request. The Company will comply with such requests, revocations, or objections as required by applicable data protection laws, at the latest within one month of receiving the request. This period may be extended depending on the complexity or number of requests, and the Company will explain the reason for the extension.

12. Privacy re

The Company has appointed a privacy officer, who can be contacted at the address of the Data Controller indicated above or by sending an email to privacy@equityrealestate.ch.

13. Updating this policy

The Data Controller reserves the right to modify, update, add or remove parts of this privacy policy at its discretion and at any time.

Effective date: July 1, 2025