

Privacy Statement of Master Management AG

Master Management AG (“MMAG”) is a provider of various psychological test processes, which are operated on the ‚Master People Platform‘. All products offered by MMAG are scrupulously documented and are based on international test quality standards. Protecting the privacy of our customers and of our website users is a concern of the highest priority for us, and for this reason we subject the processing of all personal data to the strictest standards. In this document we explain for what purposes and according to what principles we collect and process personal data (information that identifies you or makes you identifiable for us) through this website and through other applications operated by MMAG (hereafter, the “Website”).

1. Controller / contact partner for data protection issues

If you have any questions concerning this Privacy Statement or any concerns relating to your personal data please send a letter to:

Master Management AG
Schwättenmos 15
CH – 8126 Zumikon

or an email to: master@master.ch

2. Collection & processing of personal data

As a general matter, our website may be used without providing any personal data. However, should a data subject wish to use particular services through our website, it may be necessary to process personal data. If it is necessary to process personal data and there is no legal basis for such processing, we shall obtain the consent of the data subject. We only collect and process your personal data for the purposes described in this Privacy Statement and only to the extent necessary for these purposes. We only retain your personal data to the extent and for as long as is necessary in order to provide our services or where we are obliged to do so by law.

We only process data in accordance with the above-mentioned principles and at all times in accordance with Swiss data protection law and the EU General Data Protection Regulation (“GDPR”). In addition, the data security requirements and standards set forth in the document ‚Master People Platform - Security and Compliance‘ also apply.

3. Intended purpose and categories of personal data

a. Usage of the ‚Master People Platform‘

Our customers (or licensees) use products through the ‚Master People Platform‘ for the purpose of staff recruitment and development. As part of this process, sensitive individual test results (“Data”) are collected by customers and their test subjects, and thus in particular from their existing and future employees, following which an analysis or as the case may be a personality profile of the test subject is drawn up as part of the recruitment and advanced training process. The fact that Data are procured, and in particular the purpose, is made known to test subjects prior to collection.

The customer of MMAG creates a profile for the test subject including the following personal data:

- surname, first name, email address

The test subject then supplements his/her profile with the following personal data:

- Year of birth, gender, country of origin, preferred language, highest educational qualification, current employment status, current business function (industry), answers and results of the test procedures
In signing the licence agreement, the licensee is vested by MMAG with the right to process Data collected using the MMAG tools in accordance with this Privacy Statement.

The ‚Master People Platform‘ in principle allows customers to collect and store the Data of test subjects and to access these Data. We do not carry out any processing ourselves of the Data of test subjects in addition to merely collecting, storing and making them available, unless we receive a written enquiry or order from the customer to this effect.

The customers of MMAG are reminded that Data may only be processed lawfully both by themselves and by MMAG if the test subjects have been informed of the Data collection (e. g. by using the pre-drafted MMAG invitation letter) and the test subjects have granted their consent. Customers are obliged to abide by the Swiss Federal Act on Data Protection (DPA), and as the case may be the GDPR and, if the ‚Master People Platform‘ is used within an employment context, Article 328b of the Swiss Code of Obligations. Customers shall allow Data concerning test subjects to be assessed exclusively by persons who have been trained and certified by MMAG for this purpose.

b. Contact form

If you would like to contact us using the contact form, we shall collect the following personal data in order to answer your enquiry:

- name, email address, telephone number

Your personal data will only be used in order to deal with your particular enquiry. If compatible with the nature of your enquiry, you can contact us by telephone without providing any personal data.

c. Registration for courses

We also offer training and workshops in the area of personal diagnostic tests for employees of our customers. Course participants have the option of signing up using an online form. We shall collect the following personal data in order to process your application:

- first name, surname, company name, position, street/no., post code, locality, email address and direct telephone number

Your personal data will only be used in order to enable you to participate in the course.

4. Publication and disclosure of personal data

Ownership of the Data remains at all times with the customers of MMAG. Data are not under any circumstances used for any purpose other than that indicated, and are in particular not disclosed to third parties for advertising purposes.

In order to provide the services requested by you, we may pass on your personal data to external service providers both in Switzerland and abroad. If any Data are stored abroad, we are scrupulous in ensuring that the country in question has an adequate standard of data protection according to the assessment of the Swiss Federal Data Protection and Information Commissioner (FDPIC).

The Data entered into the *Master People Platform* are stored on a data server operated by Windows Azure, a subsidiary of Microsoft, in Ireland (Dublin) and the Netherlands (Amsterdam). Both countries have been classified as secure for data protection purposes within the FDPIC country list and are subject to the strict requirements of the GDPR. In addition, Windows Azure is obliged under contract only to process the Data stored in accordance with the hosting mandate, i.e. Windows Azure is prohibited from processing the Data stored for any purpose other than maintenance and security enhancement, and is hence prohibited from passing on Data to third parties (details may be found on the Windows Azure Privacy Statement, which is available online).

In addition, the contact details (surname, first name, telephone number and email address) of actual and prospective customers are stored within the online Customer Relationship Management System Zoho CRM of Zoho Corporation Pvt. Ltd. The Data entered into Zoho CRM are stored exclusively on data servers in the EU. (www.zoho.eu/security.html)

We reserve the right at any time to carry out statistical assessment (standard calculations) and to disclose or otherwise use anonymised Data from which any reference to persons has been removed. In such cases, MMAG warrants that the Data processed no longer contain any reference to a specific person, or enable such a reference to be established. We also reserve the right to comply with any disclosure obligations in relation to any judicial or administrative legal proceedings.

5. Data security

We protect your personal data by appropriate safeguards and on secure servers. The Website is secured by appropriate technical and organisational measures against loss, erasure and interference and against access, alteration or dissemination by unauthorised persons.

As a general matter, we only work with partners that follow the highest international data protection standards and that undertake under contract towards MMAG to treat personal data in confidence and to refrain from disclosing such Data. Alongside the applicable legal frameworks, priority is afforded to technical and organisational measures for physically protecting Data.

Our ‚Master People Platform‘ partner Windows Azure complies with the highest international data protection standards and is in particular certified according to ISO/IEC 27001, SOC 1- and SOC 2-SSAE 16/ISAE 3402 (www.windowsazure.com/de-de/support/trust-center/compliance). These are globally applicable standards for the certification of information security management systems. The servers of Windows Azure are located in a data centre that is secured 24/7/365. In addition, 2048-bit SSL encryption and firewalls provide effective protection against the loss, misuse, unauthorised access and unauthorised disclosure of Data.

Our Zoho CRM provide complies with the highest international data protection standards and is in particular certified according to ISO/IEC 27001 and SOC 2 (www.zoho.com/de/security.html). The Zoho servers are located in a secure data centre at a secret location. All Data transfers to Zoho Services occur according to TLS 1.2 protocols. In addition, firewalls provide effective protection against the loss, misuse, unauthorised access and unauthorised disclosure of Data.

6. Your rights

You have the legal right to access, rectify or erase your personal data. The revocation of consent will prohibit any further data processing with immediate effect.

You can access free of charge at any time the Data stored by us concerning you and exercise your right to rectify or erase your Data. In order to do so, please use the contact details indicated in clause 1 above. You also have the right to lodge a complaint with the national supervisory authority that is competent for you.

7. Updates and amendments

This Privacy Statement may be amended or updated by us without any requirement to inform you in advance. Please check the relevant version of the Privacy Statement before using our products in order to ensure that you aware of any possible amendments or updates. Any amendments shall apply from the time they are published on our Website.

Master Management AG, April 2024