

How We Use Your Information

Data Privacy Notice for Candidates

Background

This notice is to help you understand how and why we collect your personal data and what we do with it. It also explains the decisions that you can make about your personal data.

For the purposes of this notice, Sommet Education refers to Sommet Education Sàrl and its global subsidiaries which includes: Gesthôtel Sàrl, GIHE Sàrl, GIHE UK Limited, Escuela Superior de Alta Gestion de Hotel, S.L., Les Roches Chicago, LLC, Sommet Education Europe Online B.V., Sommet Education UK Limited, Sommet Education France SAS, Sommet Education Services Spain Ltda, Hospitality Education PTE Ltd., Sommet Commercial Consulting (Shanghai) Co., Ltd. And Haute école spécialisée Les Roches-Gruyère SA

This notice applies to the personal data of our candidates and is supplemental to our websites' privacy policies. If you are a member of Sommet Education's staff you should refer to the Sommet Education's staff privacy notice which is available on the Sommet Education intranet.

What is "personal data"?

Personal data is information that Sommet Education holds about you and which identifies you or could identify you when combined with other data which Sommet Education either holds or is likely to obtain.

We may collect and process the following types of personal data about you based on local regulations:

- data necessary to verify employment eligibility (e.g., name, date of birth, nationality, immigration status, gender, contact information, marital status);
- your resume, CV, education and work history, including references;
- information collected during application related tests, assessments, interviews and phone screenings;
- CCTV footage if you attend our premises;
- information related to background checks, including data provided by third parties (if applicable, and as allowed by law);
- where appropriate we may also collect details of criminal convictions and information concerning your health and medical conditions you consent to sharing, or as required to be collected by law (e.g. disability and work restrictions and accommodations); and
- access and authentication information (e.g., user name, passwords).

The examples provided above are not all-inclusive. We also may collect similar or related information and in particular information you choose to share voluntarily about you.

We may also collect data of others (e.g., references). If you provide us with such personal data you have the obligation to ensure they have granted consent to provide such personal data to Sommet Education.

Where does Sommet Education get your personal data from?

We obtain personal data regarding you from the following sources:

- **You** when you:
 - create an account on the Career portal;
 - provide your details through an application form;
 - send hard copy CV or email your CV; and
 - give us any information in person, via email or other messaging channel, e.g. LinkedIn, Facebook, WhatsApp, SMS, phone calls etc.

- **Third party sources:**
 - we may obtain information about you from searching for potential candidates from third party sources, such as LinkedIn and other job boards and recruitment agencies and sites; and
 - from internal or external Referrals.

Why does Sommet Education collect and use your personal data?

All such data will be processed in accordance with applicable laws and regulation and Sommet Education Data Protection Policy as amended from time to time, for the purposes of carrying out your application, recruiting and staffing processes, including, but not limited to the following activities:

- storing (and updating when necessary) your details on our databases;
- assessing your skills, qualifications and interests against our career opportunities;
- verifying your personal information;
- communicating with you about current and/or future career opportunities at Sommet Education and
- complying with applicable laws and regulations.

If you are offered a job or become employed by Sommet Education, we will also use your personal data for employment-related purposes.

Our legal grounds for using your information

Contractual commitment

If you have posted your professional CV information on a job board, professional networking site or on our Career portal, we assume that you are happy for us to collect and otherwise use your personal data to assess your skills against our vacancies. Once we believe that you may get the job, we may also want to double check any information you have given or to confirm your references and qualifications, to the extent that this is appropriate and in accordance with local laws. Therefore, Sommet Education may be processing your personal data often on the basis that it is necessary to enable it to meet its contractual and pre-contractual commitments.

Legal obligation

Sommet Education may also be required to process the above personal data in order to comply with its legal obligations. For instance, as regards certain roles, we may need to contact professional and/or regulatory bodies in relation to the confirmation of qualifications, professional registration or check your criminal records.

Legitimate interest

Certain activities are necessary for the purpose of the legitimate interest of Sommet Education and other third parties, including candidate qualification and assessment. These interests are not overridden by your interests and fundamental rights or freedoms.

Consent & Sensitive personal data

Where none of these legal bases apply, your consent to process your personal data will be sought. If we ask for your consent to use your personal data you can take back this consent at any time. Any use of your personal data before you withdraw your consent remains valid.

Some of the information we collect and use may include sensitive personal data, the processing of which is either based on a legal obligation or on your consent as appropriate in each case.

Sharing information with others

For operational reasons and as is necessary and proportionate for intended purposes, your information may be shared between different entities in the Sommet Education Group.

For the purposes referred to in this privacy notice and relying on the bases for processing as set out above, we may also share your personal data with certain third parties:

- professional and regulatory bodies in relation to the confirmation of qualifications, professional registration and conduct;
- government departments and agencies and local authorities where we have a legal obligation to provide information (e.g. in connection with visas and immigration);
- crime prevention or detection agencies (e.g. the police, the department for work); We may also need to share information with or our legal advisers; and
- contractors, suppliers, agencies, or any other parties acting on Sommet Education's behalf (collectively, "External Parties") where there is a legitimate reason for their receiving the information, including but not limited to third parties contracted to provide IT services for us.

Sommet Education contractually requires External Parties processing candidates' personal data on behalf of Sommet Education to follow this policy, whether they are utilizing Sommet Education's and/or their own electronic systems and data management tools. Employees are responsible for ensuring that any External Parties they work with in support of Sommet Education operations comply with this policy.

There are certain situations where you will share personal data directly with service providers associated with Sommet Education, where Sommet Education does not control how your data is processed (e.g., job boards or recruitment agencies). In those situations, please ensure you read and understand the privacy policies and practices of such providers.

Sending information to other countries

Some of the personal data we process about you will be transferred to, and stored at, a destination outside of Switzerland or the European Economic Area ("EEA"), for example where it is processed by staff operating outside the EEA who work for us or for one of our suppliers, or where personal data is processed by one of our suppliers who is based outside the EEA or who uses storage facilities outside the EEA.

In these circumstances, your personal data will only be transferred on one of the following bases:

- a European Commission decision provides that the country or territory to which the transfer is made ensures an adequate level of protection;
- where the transfer is subject to one or more of the "appropriate safeguards" for international transfers prescribed by applicable law (e.g. standard data protection clauses adopted by the European Commission); or
- there exists another situation where the transfer is permitted under applicable law (e.g. where we have your explicit consent).

How Do We Secure your Personal Data?

We implement appropriate physical, administrative and technical measures designed to protect your personal data against accidental, unlawful or unauthorized destruction, loss, alteration, disclosure or access or use, and all other unlawful forms of processing.

Sommet Education contractually requires that External Parties provide equivalent levels of protection when handling your personal data and only process the data in accordance with our instructions.

For how long do we keep your personal data?

If we have not had meaningful contact with you for a period of one year, we will delete /anonymize your personal data from our systems unless we believe in good faith that the law or other regulation requires us to preserve it.

When we refer to "meaningful contact", we mean, for example, communication between us (either verbal or written), or where you are actively updating your candidate's profile or applying through the Career Portal.

What decisions can you make about your personal data?

Sommet Education makes reasonable efforts to ensure that your personal data is reliable for its intended use. However, you are equally responsible for updating and checking the accuracy of the information provided to Sommet Education. As an active user of the Career Portal you can do this directly through the Career Portal or by contacting jobs@sommet-education.com.

Moreover, you are able to make various decisions about your personal data. Your rights are as follows:

- to obtain access to, and copies of, the personal data that we hold about you;
- to require that we cease processing your personal data if the processing is causing you damage or distress;

- to require us not to send you marketing communications;
- to require us to correct the personal data we hold about you if it is incorrect;
- to require us to erase your personal data;
- to require us to restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller; or
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that:

- the above rights are not absolute, and we may be entitled to refuse requests where legal exceptions apply;
- information request will be fulfilled free of charge unless in case of repetitive, manifestly unfounded or excessive requests or for further copies;
- where our processing of your personal data relies on your consent and where you then withdraw that consent, it may affect the provision of the services.

Further information and guidance

Sommet Education reserves the right to modify this notice as needed, for example, to comply with changes in laws, regulations, Sommet Education practices and procedures, or to respond to new threats or new requirements imposed by data protection authorities. Please just visit this page if you want to stay up to date, as we will post any change here.

If you have questions about your personal data, contact jobs@sommet-education.com or email the Data Protection Officer at: dpo@sommet-education.com.

If you are not satisfied with how we are processing your personal data, you can make a complaint to the relevant data protection authorities.

Last update: May 2018

The Career Portal is operated under the Sommet Education name by Sommet Education Sàrl, a company registered in Switzerland at Chemin du Pierrier 1, 1815 Clarens. Please note that Sommet Education outsources the platform maintenance, technical support and data storage to Cornerstone OnDemand, a company registered in 1601 Cloverfield Blvd., Suite 620 South, Santa Monica, California 90404, USA.