

EMPLOYEE PRIVACY NOTICE

Last updated 21/05/2018

What does this notice cover?

References in this Privacy Notice to **La Prairie, we** or **us** shall mean the La Prairie group company to which you are applying or by which you are currently employed or engaged (see list of entities here: <http://www.laprairiegroup.ch/contact.htm>).

This Privacy Notice applies to La Prairie employees, applicants and, where applicable, to contractors who provide services to La Prairie.

This Privacy Notice describes the use of your personal data that La Prairie makes during your recruitment process and your ongoing employment within La Prairie. It also describes your data protection rights, including a right to object to some of the processing which La Prairie carries out. More information about your rights, and how to exercise them, is set out in "**What rights do I have in relation to my personal data?**" section below.

What personal data do we collect?

In connection with your recruitment and employment (to the extent permitted by local law), we, as a data controller, collect and process the following types of personal data about you:

- **Contact information:** such as your name, gender, home address, personal email address, personal phone number and other similar information;
- **Identification information:** such as your employee ID number, date of birth, passport number, marital status, nationality, citizenship, immigration status and copies of identity documentation, as permitted and required in order to check your right to work;
- **Financial information:** such as bank account and payment details, salary or other compensation, Social Security Number (AHV/AVS) for payment and taxation purposes. We may collect information about religious beliefs that we will process only for church tax purposes;
- **Information relating to company benefits and resources:** such as work expenses (e.g. out of pocket expenses, corporate credit cards, mobile phone costs and company cars or private cars where an allowance is claimed), the benefits you register for, your use of company equipment and resources, travel preferences, beneficiaries' details in relation to life insurance or other benefits, emergency contacts, marital status, information about family members including minors where necessary for the provision of applicable benefits, guarantees or relocation assistance and information about your health and any disability and illness;

- **Information concerning your career progression:** such as job title, professional experience, education, performance history, training records, skills, career plans, conduct and, where permissible, information about violation of laws or breach of company policies, details of professional registrations, sanctions with professional bodies or criminal convictions, where you have consented to a background check; and
- **Any other information you submit to us (including during the course of any correspondence with us):** such as signatures, photographs, opinions, your location if you chose to enable it on a company device and any other information you provide.

On occasion, we may receive personal data from private and public third parties, such as from training, recruiting, employment or coaching agencies. These personal data include details of a certification or training you obtained and feedback or references concerning your performance or personality.

We may also receive personal data from social insurance companies or other private third parties concerning your insurance coverage, medical conditions or disabilities. These types of personal data will be processed only to comply with legal obligations.

Why do we need your personal data?

We process your personal data for the following purposes:

- **Where necessary to establish, perform and terminate your employment contract::**
 - Recruiting and hiring;
 - Administration of payroll and benefits, absence, compensation, sales quota commission and expense management;
 - To allow you to access medical insurance, occupational health, retirement plans, stock plans, access to company cars, childcare benefits and other benefits offered by La Prairie and other service providers. Some benefits may require you to provide personal data concerning family members, partners or next of kin, in which case you must inform them before providing such personal data to us;
 - Employee transfer management from different subsidiaries and branches of La Prairie.
- **Where necessary to comply with a legal obligation:**
 - Making deductions from payroll for tax and social security purposes and providing information to tax and social security authorities as required by law;
 - Complying with health and safety legislation;
 - Managing statutory entitlements including sick pay and maternity pay.

- **Where necessary for La Prairie's legitimate interests, as listed below, and where our interests are not overridden by your data protection rights:**
 - Managing and developing our personnel – for example performance and talent management, training and leadership development, succession management, award recognition, and employee surveys where permissible;
 - Arranging professional travel and accommodation;
 - Planning our workforce
 - Protecting our legitimate business interests and legal rights. This includes but is not limited to, use in connection with legal claims, compliance, regulatory, auditing, investigative and disciplinary purposes (including disclosure of such information in connection with legal processes or litigation) and other ethics and compliance reporting tools;
 - Managing the performance and security of our equipment, facilities, intellectual property and electronic platforms. This includes administering access rights, monitoring compliance with information security and other company policies, and where permitted by local law and in accordance with relevant policies, for investigations and disciplinary actions;
 - Publishing internal directories and providing other internal communication tools. This includes the information you provide for your internal company profile (including any photos);
 - To analyse and monitor the diversity of the workforce in accordance with applicable laws. This includes for example, compliance with equal opportunity employment laws.
- **Where you have given your consent:** for example we ask for your consent where permitted by local law, to carry out background checks to evaluate eligibility for employment and to collect medical information if a regular or onboarding health check is required or to evaluate eligibility for applicable benefits. Where we ask for your consent, you are free to withhold or revoke it.

Who will we share this personal data with, and where?

Personal data will be transferred to La Prairie's group companies (see list of entities here: <http://www.laprairiegroup.ch/contact.htm>) and other service providers who perform functions on our behalf which are based in Switzerland and other countries, including outside the European Economic Area. The personal data will be stored and processed manually and electronically through global systems and tools for the purposes above.

La Prairie has appropriate safeguards in place to protect this data, including standard contractual clauses. To obtain a copy of the document being used to protect your personal data, please contact your local Human Resources Manager.

We share some of your personal data with other members of the La Prairie group to administer and manage group functions, including to assess your performance and the performance of the La Prairie group companies. We also share your personal data with any other group company to whom you make an application and communicate with.

Service providers with whom your personal data may be shared with are:

- companies providing services under contract to the La Prairie group such as IT hosting and maintenance providers, and payroll service providers;
- third party benefit providers, such as for the purposes of obtaining health insurance, childcare vouchers and other applicable benefits providers.
- where permitted, survey service providers, investigators, employee hotline administrators and data custodians; and
- government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

In the event that the business is sold or integrated with another business, your personal data may (in accordance with applicable law) be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business.

What rights do I have in relation to my personal data?

You may be entitled to ask La Prairie for a copy of your personal data, to correct it, erase or restrict its processing. You may also be entitled to obtain the personal data you provide us for a contract or with your consent in a structured, machine readable format and ask us to share (port) this personal data to other organisations. You may also have rights to object to some processing.

Where we have asked for your consent, you may withdraw consent at any time. If you ask to withdraw your consent to La Prairie processing your personal data, this will not affect any processing which has already taken place at that time.

These rights may be limited in some situations – for example, where we have to process your personal data to comply with legal obligations.

It is important that we maintain up to date your personal data. Please notify your Human Resources Manager or the persons responsible for Human Resources matters at your affiliate of any changes in your personal data as soon as they occur (e.g. change of address, marital status, emergency contacts). From time to time we may ask you to complete a new personal information form to ensure our records are up to date.

Where we require personal data to comply with legal or contractual obligations, then provision of such data is mandatory. If such data is not provided, then we will not be able to manage the employment relationship, or to meet obligations placed on us. In all other cases, provision of requested personal data is optional.

We hope that we can satisfy queries you may have about the way we process your personal data. If you have any concerns about how we process your personal data or you wish to exercise any of the rights described above, please contact your relevant local Human Resources Manager or one of the global Human Resources Managers (contact details here: [http://intranet.laprairiegroup.local/HR-CoreValues/SitePages/HR-Team International.aspx](http://intranet.laprairiegroup.local/HR-CoreValues/SitePages/HR-Team%20International.aspx)).

If you have any unresolved concerns in relation to your personal data you also have the right to complain to data protection authorities. The relevant data protection authority will be the supervisory authority in the same country as your employing company or the company which has engaged you.

Which La Prairie company is my data controller, and which group company might my data be shared with?

The data controller for your personal data is your employing company or the company to whom you are applying for a job or the company to whom you are engaged under a contract (see list of entities here: <http://www.laprairiegroup.ch/contact.htm>).

How long will you hold my data?

La Prairie will keep your personal data, including personal data retained from the application and selection process for a certain period of time based on the following criteria: (i) as long as necessary to execute the employment relationship; (ii) any applicable legal requirements that oblige La Prairie to hold certain personal data for specific periods; and/or (iii) once the employment relationship ends, during an appropriate period to protect itself from legal claims, or to administer its business with regard to employment matters.

Updates to this Privacy Notice

This Privacy Notice may be updated periodically. We will update the date at the top of this Privacy Notice accordingly and it will be available at any time at La Prairie's intranet site in the section called HR & Core Values. On some occasions, we may also actively advise you of specific data handling activities or significant changes to this Privacy Notice as required by applicable law.