

# Artifact Data Privacy Policies

## Who are we?

This Privacy Policy applies to Artifact SA.

Artifact is a professional service provider in the field of Data Science and AI. We help our business clients to accelerate their journey and leverage the best ideas to find pragmatic, innovative and sophisticated solutions to deliver real impact.

## Data protection principles

Under the data protection law, the personal data we may hold about you complies to the following principles. Personal data is:

- Processed lawfully, fairly and in a transparent manner;
- Collected only for legitimate purposes that have been communicated to you and not further processed in a way that is incompatible with those purposes;
- is stored adequately (with relevant rules in relation to those purposes of storage);
- Accurate and, where necessary kept up to date;
- Kept in a form which permits your identification for no longer than is necessary for those purposes;
- Processed in a way that ensures appropriate security of the data.
- Secure, if necessary remote deletion of the data on Artifact devices are possible
- Artifact SA is responsible to comply with these principles.

## How do we collect personal data?

**Directly:** We obtain personal data directly from individuals in a variety of ways, for example during our hiring process via our application platform, when establishing a work contract, during the development of a business relationship, when we deliver professional services through a contract, or through our hosted software applications, when obtaining business cards or contact emails via our website or special promotional activities with personalized login. We also obtain personal data through social networking sites such as LinkedIn when you connect with us and access to your personal profile is given.

**Indirectly:** We obtain personal data indirectly from a variety of sources, including recruitment services and our client interactions and discussions. We may attach personal data to our customer relationship management records to better understand and serve our business clients, prospects, and individuals, satisfy legal obligations or pursue our legitimate interests.

- Public sources – personal data may be obtained from public registers such as commercial registers, news articles, internet searches and social media;
- Recruitment services – we may obtain personal data about candidates from an employment agency or through recruitment applications such as the Recrutee hiring platform;
- Business clients - We may be engaged to perform services which having access to personal data our business clients' control. In such cases, separate contracts with additional restrictions will typically be required to address these.

## What category of personal data we collect?

### **Personal data we commonly collect to conduct our business activities:**

- Contact details (name, company name, job title work, mobile telephone numbers, work and personal email, postal addresses);
- Professional details (published articles, LinkedIn profile, job and career background, event participation, personal background).

### **Personal data we commonly collect to conduct our hiring process:**

- Contact details (name, address, telephone numbers, email);
- Personal information shared in the CV, application form, cover letter or interview notes;
- References & motivation letters;
- Information about citizenship, or information to assess the right to work in Switzerland and copies proofing this;
- Copies of qualification certificates;
- Information about your current salary level, including benefits and pension entitlements;
- Work history with previous employers, skills, experiences, and qualifications;
- Personal background and interests to assess a fit into our working culture.

However, if your job application is unsuccessful, we may wish to keep your personal information on file for a duration of 1 year in case there are future suitable employment opportunities with us. We will ask for your consent before we keep your personal information on file for this purpose or to extend this period. Your consent can be withdrawn at any time in written form.

## Personal data we commonly collect for our employees:

Personal data of our employees is used to comply with all requirements of personnel and work processes. All employees receive a further information about personal data collection purpose, storage and processing when signing their work contract.

Sensitive data will only be collected with the specific consent of the data subject.

Through its cybersecurity tooling, Artifact has the possibility to localize, lock or delete devices with personal data.

## What lawful reasons do we have for processing personal data?

- Contract – we may process personal data to perform our contractual obligations;
- Consent – we may rely on your freely given consent at the time you provided your personal data to us;
- Legitimate interests – we may rely on legitimate interests based on our evaluation that processing is fair, reasonable, and balanced. These include:
  - Delivering services and products – to deliver services and products our clients have engaged us to provide;
  - Marketing – to deliver timely industry insights and professional knowledge, offerings and invitations we believe are welcomed by our business clients, prospects and other individuals;
  - Sales – to contact prospects to pursue our business objectives;
  - Recruitment – to seek qualified candidates.
- Security – we may store the collected information on local drives for backup purposes.

## Why do we need personal data?

We aspire to be transparent when we collect and use personal data. The reasons typically include:

- Performing contractual obligations which may include processing personal data;
- Promoting our professional services to existing and prospective business clients;
- Sending invitations and providing access to events or webinars;
- Processing specific email request, including responding to communications from individuals or requests for proposals and quotations;
- Accomplishing employment and work processes;
- Seeking for qualified candidates.

## Do we share personal data with third parties?

We may share personal data with trusted third parties to help us deliver efficient and qualified services. These recipients are contractually bound to safeguard the data we entrust to them. We may engage with several or all of the following categories of recipients:

- Professional advisors including lawyers, auditors, and insurers;
- Financial and payroll service provider;
- Recruitment service provider;
- IT providers and cloud-based software provider.

## Do we transfer your personal data outside Switzerland?

We store personal data on secured servers and storage devices located in Switzerland and in Europe. We may transfer personal data to third party organisations for example the cloud-based accounting software or external data processor. Each third-party organisation is required to safeguard personal data in accordance with our contractual obligations and applicable data protection legislation.

## Do we use cookies on our website?

A cookie is a small file that contains letters and numbers that is downloaded on to your computer when you visit a website. It is sent to your browser and stored on your computer's hard drive, tablet, or mobile device. When you visit our websites, it can allow us to recognize and remember you.

We use a restricted number of cookies on our website. The sole purpose is to:

- Understanding how you use our site, for instance how long you stay on a page;
- Monitoring how users interact with pages on our site to identify and remedy interface issues.

Hence, we monitor and optimize our web appearance and performance based on the collected information. We have the following services enabled on our website:

- Google Analytics, to monitor the website performance and high level, anonymized website usage information;
- Matomo Analytics, to monitor the website performance and high level, anonymized website usage information.

## Do we use profiling and automated decision-making?

Personal data is not subject to any automated decision-making. We do not conduct profiling with personal data.

## What are your data protection rights?

If Artifact processes personal data about you, you have the right listed below. Before responding to any request from your side regarding your personal data, we might ask for proof of identity. This helps us to ensure that personal data is not disclosed to any person who has no right to receive it.

- Access – you can ask us to verify whether we are processing personal data about you and if so, to provide more specific information;
- Correction – you can ask us to correct your personal data if you believe they contain incorrect or incomplete information;
- Delete – you can ask us to delete your personal data after you withdraw your consent to processing or when no longer needed for the purpose it was originally collected and no retention requirement exist;
- Right to withdraw consent – you can withdraw your consent that you have previously given to one or more specified purposes of processing your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. It may mean we are not able to provide certain products or services to you and we will advise you if this is the case;
- Restrict – You can ask us to temporarily restrict our processing of your personal data if you contest the accuracy of it and you prefer to restrict its use rather than having us erase it;
- Data portability – in some circumstances, where you have provided personal data to us, you can ask to transmit that personal data in electronic form if technically feasible.

To submit a data request, please direct your correspondence to

Artifact SA  
Data Privacy Officer  
Rue Saint-Martin 7  
CH-1003 Lausanne  
Switzerland  
[privacy@artifact.swiss](mailto:privacy@artifact.swiss)

Please remind that you clearly need to prove your identity in order to exercise specific rights (e.g. by presenting a copy of your ID card if your identity is not otherwise clear/cannot otherwise be verified).

## How long do we retain personal data?

We retain personal data to provide our services, make offers, validate job applications, stay in contact with you and to comply with applicable laws, regulations, and professional obligations that we are subject to.

We retain personal data for so long as the personal data is needed for the purposes for which it was collected or in line with legal and regulatory requirements or contractual arrangements.

We will dispose of personal data when we no longer need it except when legal retention requirements exist.

## Who can you contact for privacy questions or concerns?

If you have questions or comments about this Privacy Policy or how we handle your personal data, please direct your correspondence to:

Artifact SA  
Data Privacy Officer  
Rue Saint-Martin 7  
CH-1003 Lausanne  
Switzerland  
[privacy@artifact.swiss](mailto:privacy@artifact.swiss)

To report concerns you may have about our data handling practices you can contact the responsible data protection supervisory authority in Switzerland:

Federal Data Protection and Information Commissioner (FDPIC)  
Feldeggweg 1  
CH-3003 Berne  
Telefon: +41 (0)58 462 43 95 (mon.-fri., 10-12 am)  
Telefax: +41 (0)58 465 99 96  
<https://www.edoeb.admin.ch/edoeb/en/home/deredoeb/kontakt.html>

Artifact SA  
Data Privacy Office  
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