

UEFA RECRUITMENT PRIVACY NOTICE

GENERAL INFORMATION

The Union des Associations Européennes de Football (UEFA) and its subsidiaries (jointly the “UEFA Parties”, “us” or “we”), acting as controllers under data protection law, are committed to respecting your privacy and protecting your personal data.

This UEFA Recruitment Privacy Notice (“Privacy Notice”) describes how we handle and protect your personal data in connection with the UEFA Parties’ recruitment processes and programmes. In the event of a conflict between this Privacy Notice and the applicable law, the latter shall prevail.

This Privacy Notice applies only to the personal data of job applicants, potential candidates for employment or partnership, and those who participate in our recruitment programmes.

If you have any questions regarding the processing of your data in the course of your application, please contact our data privacy team at privacy@uefa.ch.

PERSONAL DATA THAT THE UEFA PARTIES PROCESS

By submitting an application via our recruitment portal, you express your interest in working with us. In this context, we will use and store the personal data that you transmit to us exclusively for the purpose of conducting the recruitment process and preparing contracts.

“Personal data” means any information concerning the personal or material circumstances of an identified or identifiable individual. This includes information such as, for example, your name, address, telephone number and date of birth as well as data relating to your career, etc. by reference to which, with reasonable effort, you can be identified as a specific individual. Information that cannot be directly or indirectly associated with your real-life identity is not considered personal data.

In particular, UEFA Parties will collect and store the following personal data:

- **Contact details.** Your full name, email address, phone number and address.
- **Information included in the application.** Any additional personal data, such as your date of birth, gender, photo, nationality or address, that may be contained in your CV, cover letter, work samples, references, letters of recommendation or other documents or information that you provide as part of your application.
- **Data collected during interviews and assessments.** Notes from interviews conducted with you, the results of assessments or tests, and details of your expectations, salary requirements and availability.
- **Communications data.** Your communications with us, together with any information that we receive with these communications.
- **Special categories of personal data (“sensitive data”).** If you include sensitive data in your communications with us or in your CV, we will process it only to the extent necessary and justified in accordance with the consent you have given us.

Only authorised human resources staff and/or staff involved in the recruitment process will have access to your data.

HOW YOUR PERSONAL DATA WILL BE USED AND THE LEGAL GROUNDS FOR PROCESSING

Your personal data will be stored exclusively for the purpose of filling the vacancy for which you have applied.

Article 31 (2) (a) of the Swiss Federal Act on Data Protection (FADP) sets out the legal grounds for processing personal data for the purpose of deciding whether to establish an employment relationship (“recruitment data”).

We process your personal data for the following purposes on the basis of the legal grounds described:

- **To administer incoming applications.** Your personal data will be processed in order for us to administer and manage incoming applications. This processing is based on a balance of interests, where our legitimate interest is having a structured application and selection process.
- **For the recruitment and selection process.** We will process your personal data during the recruitment process in order to determine whether you are a good fit for us. This is based on our legitimate interest of recruiting personnel with relevant competence and also allows a background check to be conducted, where required and subject to your consent.
- **To communicate with you.** Your contact details will be used to communicate with you. This processing is necessary to facilitate our legitimate interest of communicating effectively with you in connection with your application and/or the recruitment process.
- **To protect our legitimate business interests and legal rights.** We will save and store information if we believe it is necessary to protect and enforce our legal rights, interests or the interests of others, for example in connection with legal claims, discrimination cases and compliance, regulatory and audit functions. This processing is based on a balance of interests, where we have a legitimate interest to defend and enforce legal claims.
- **To be able to consider you and your application and contact you for future job openings.** We keep your data as it is in our legitimate interest, and we believe also in your interest, to be able to consider you and your application and to contact you with regard to future job openings.
- **For further processing with your consent.** Your personal data may be used for purposes other than those stated above if you ask us to or if you give us your consent. Any sensitive data with which you have provided us will be processed based on your consent.

HOW WE GATHER YOUR PERSONAL DATA

Information you give us. Most of the information we process about you is received from you. You may directly or indirectly give us information about yourself in different ways, for example when you contact us or through your application. You can always choose not to provide us with certain information. However, some personal data is necessary in order for us to process your application.

Information we collect about you from other sources. We may also obtain your personal data from your current employer or the website of your employer and/or through third parties such as a recruitment service provider, in a process commonly known as "sourced recruiting". Furthermore, our employees may recommend potential candidates. This privacy policy also applies to personal data collected through sourced recruiting.

HOW WE SHARE YOUR PERSONAL DATA

Sometimes we need to share your personal information with other trusted individuals and companies. Your personal information may be shared with:

- **Our consultants.** Your personal data may, if appropriate, be shared with our trusted consultants. However, we will limit access only to consultants who need the data to perform their jobs, for example to provide us with recruitment services. Our consultants are, of course, subject to strict confidentiality rules.
- **Our service providers.** We may transfer or share your personal data with service providers who help us in daily operations requiring the processing of personal data.
- **Authorities and other public actors.** Sometimes we may be legally obliged to share information about you with law enforcement agencies, regulatory agencies or other public and government authorities in response to lawful requests. We may also disclose information if necessary to detect and prevent fraud.
- **Parties involved in legal proceedings.** In the event of potential legal proceedings, your personal data may be shared with the parties involved in the case or their lawyers, including during the preparatory work to allow us to defend or enforce a legal claim.

- **Parties involved in a merger or acquisition.** We may share or transfer your personal data in connection with a merger, sale of company assets, financing or acquisition of all or part of our business in relation to another company.
- **Other parties.** We may share your personal data with other parties if you request or permit us to do so.

WHERE WE PROCESS YOUR PERSONAL DATA

Your personal information may, in some cases, be transferred to and stored at destinations outside the EU/EEA where the privacy laws may not be the same as, and in some cases may be less protective than, privacy laws in the EU/EEA. We will, however, take all the necessary steps to ensure that adequate safeguards, such as standard EU contractual clauses including supplementary safety measures or an adequacy decision by the Swiss Federal Council, are in place to protect your personal information and make sure it is treated securely and in accordance with the FADP. Please contact us for more information about the safeguards in place in a specific case or for more information about the applicable countries.

HOW LONG WE KEEP YOUR PERSONAL DATA

We keep your personal data only for as long as necessary to fulfil the purposes for which it was collected. How long this is depends on the type of information and why we process it. We regularly review our need to keep data, taking into account the applicable legislation.

If you apply for a job, we generally keep the collected data during the recruitment process. If you become an employee, we will keep your personal data throughout your period of employment. You will be informed if your personal data is kept for any other purpose than those stated above. Article 31 (2) (a) of the FADP provides the legal basis for processing personal data for the purpose of concluding an employment contract ("employee data").

In the case of sourced recruiting, we will keep your personal data for up to 12 months from the date on which we receive it.

If your application for employment is unsuccessful, we may keep your personal data in order to consider you for future job openings for up to 12 months from the day your application was submitted.

Furthermore, we save the personal data necessary for us to be able to defend ourselves against any claims made by you.

Personal data processed on the basis of your consent will be deleted when your consent is withdrawn or upon expiry of the purpose for which your consent was given.

Your data may also be stored for a longer period if required by the applicable statutory retention periods.

After the expiration of the periods defined above, we are obligated to delete or anonymise your data. In the case of anonymisation, the data will be available to us only in the form of metadata, without any direct personal references, for statistical analysis (for example, proportion of male and/or female applicants, number of applications received during specified period of time, etc.).

YOUR RIGHTS

- **Right to access your data.** You have the right to request a transcript of all personal data that has been processed by us, and additional information on how that data was collected, processed, shared, etc. The first such transcript will be supplied free of charge; however, if you make repeated and unreasonable requests for copies, we may charge you an administrative fee.
- **Right to object.** You have the right to object to processing of your personal data based on legitimate interest. This means that we may no longer process your personal data unless we can demonstrate compelling legitimate grounds that override your interests. You can contact us at any time for more information about how the balance of interests is assessed. Furthermore, you have an unconditional right to object to your personal data being processed for direct marketing purposes.

- **Right to transfer your data.** You have the right to transfer the personal data with which you have provided us to another controller under certain conditions.
- **Right to rectification.** You have the right to correct inaccurate or incomplete information about yourself.
- **Right to erasure (“right to be forgotten”).** You have the right to request that we delete your personal data, for example if the data is no longer necessary in relation to the purposes for which it was collected or otherwise processed, or if there is no legal basis for processing the data.
- **Right to restriction.** You are entitled to request that the processing of your personal data be limited until inaccurate or incomplete information about you has been corrected or until an objection from you has been resolved.
- **Right to withdraw your consent.** You may, at any time, withdraw any consent you have given us. However, please note that this will not affect any processing that has already taken place.
- **Right to complain.** You have the right to lodge a complaint with the Swiss supervisory authority via this [link](#), or the supervisory authority in the country in which you live or work, if you believe that we have not complied with our obligations regarding your personal data.

You can assert these rights by clicking on the dedicated link in the confirmation email you received after submitting your application or by clicking [here](#). This service is provided by Jobylon AB, acting as processor under data protection law on behalf of the UEFA Parties.

Please note that if you request restriction or erasure, this may affect our ability to process your application or consider you for a job. Moreover, legal rights or obligations may prevent us from disclosing or transferring all or part of your information or from immediately deleting your information.

Please contact us at privacy@uefa.ch if you need assistance.

CONCLUDING PROVISIONS

We reserve the right to amend this Privacy Notice at any time to ensure that it is always in line with the current legal requirements or to accommodate changes in our recruitment process or other processes.

Last updated: 25 September 2024