

# Privacy Policy for Pool Workers

*campcomp GmbH / Tempstr*

## 1. Data controller

The party responsible for the processing of your personal data under the Swiss Federal Act on Data Protection (FADP/DSG, SR 235.1) is:

campcomp GmbH Aargauerstrasse 157 4600 Olten contact@tempstr.ch Operator of the Tempstr platform (www.tempstr.ch) Switzerland

(hereinafter "campcomp", "we" or "us")

If you have any questions about data protection, you can reach us using the contact details given on our website.

## 2. Applicable law

The processing of your personal data is governed exclusively by:

- the Swiss Federal Act on Data Protection (FADP/DSG, SR 235.1) in the version in force since 1 September 2023,
- the Data Protection Ordinance (DPO/DSV, SR 235.11),
- the Code of Obligations (CO/OR, SR 220) as regards bookkeeping and contractual retention obligations,
- other applicable Swiss laws (in particular AHVG, UVG, BVG, AVG).

## 3. What personal data do we process?

### 3.1 Registration and master data

When you register through Tempstr and within the scope of HR administration, we collect:

- Personal details: surname, first name, date of birth, nationality, residential address
- Contact data: email address, telephone number
- AHV (Swiss old-age and survivors' insurance) number (for social-insurance declarations)
- ID-card or residence-permit number (where required by law)
- Bank details: IBAN and account holder (for salary payments)
- Tax-relevant information: liability for tax at source, canton of residence
- Emergency contacts

### 3.2 Qualification and assignment data

- Educational qualifications, professional qualifications and certificates
- CV (where voluntarily submitted and released)
- Availability information
- Assignment history (number and type of assignments performed)
- Client reviews from past assignments

### **3.3 Usage data**

- Login data and access logs of the Staffcloud app
- Technical device information (operating system, app version) for support and security purposes

## **4. Purposes of data processing**

### **4.1 Performance of contract (Art. 31 para. 2 lit. a FADP)**

Processing is necessary for the performance of our duties as employer and contracting party:

- Performance of staff-leasing and placement contracts pursuant to the Swiss Federal Act on Employment Services and the Hiring of Services (AVG)
- Payroll processing and salary payment
- Coordination and administration of assignments via Staffcloud ([www.staff.cloud](http://www.staff.cloud))
- Communication regarding job offers via the Staffcloud app

### **4.2 Statutory obligations (Art. 31 para. 2 lit. c FADP)**

Various processing activities are required by law:

- Declarations to social-insurance institutions (AHV, ALV, UVG, BVG)
- Withholding-tax accounting vis-à-vis the cantons
- Notifications to immigration and migration authorities
- Retention of payroll and personnel records (Art. 958f CO)

### **4.3 Overriding legitimate interests (Art. 31 para. 1 FADP)**

In the following cases, processing is based on our overriding legitimate interests, which are not outweighed by your interest in the protection of your data:

- Secure operation and continued development of our IT systems
- Quality assurance of our services
- Protection against abusive use of our platforms

### **4.4 Consent (Art. 31 para. 2 lit. b FADP)**

Where we transfer your profile data (name, qualifications, reviews and, where applicable, CV) to client companies, we do so only with your explicit and informed consent. You may withdraw this consent at any time with effect for the future. Withdrawal does not affect the lawfulness of processing carried out up to that point.

## 5. Disclosure of personal data

### 5.1 Disclosure to client companies

With your explicit consent, client companies that have posted assignments via Tempcloud ([www.tempcloud.com](http://www.tempcloud.com)) receive access to the following profile data — provided that you have applied for an assignment:

- Surname and first name
- Professional qualifications and certificates
- Client reviews from past assignments
- Number of assignments performed
- CV (only if expressly released by you)

Client companies may use this data exclusively to assess your application for the relevant assignment. You may withdraw your consent at any time; from the moment of withdrawal, your profile data will no longer be made available to new client companies.

### 5.2 Data processors

To carry out our tasks, we engage the following service providers, which process personal data on our behalf and are contractually bound to comply with the FADP:

- **Staffcloud AG** ([www.staff.cloud](http://www.staff.cloud)): software for staff scheduling and coordination. Staffcloud takes extensive technical and organisational measures to protect data.
- **Payroll-processing software** (in-house): payroll, social-insurance declarations and salary statements. This system likewise meets the requirements of the FADP.

### 5.3 Authorities

In the event of a legal obligation or a lawful order from the authorities, we disclose personal data to the competent authorities (e.g. social-insurance institutions, tax authorities, immigration and migration authorities).

## 6. Disclosure of personal data abroad

Where personal data is disclosed abroad (e.g. in connection with cloud services of the software used), we ensure in accordance with Art. 16 and 17 FADP that an adequate level of data protection is guaranteed in the recipient country — either through a determination by the FDPIC (EDÖB) regarding

the adequacy of the level of protection, or through appropriate safeguards such as standard contractual clauses.

## 7. Retention and deletion

We retain personal data only for as long as is necessary for the relevant processing purpose, or for as long as statutory retention periods apply:

- Payroll and personnel records: at least 10 years from the end of the employment relationship (Art. 958f CO)
- Accounting records and contracts: 10 years (Art. 958f CO)
- Application records without employment: deletion no later than 6 months after the end of the application process
- App usage and log data: deletion after 12 months of inactivity

After the relevant retention period has expired, personal data is securely and irreversibly deleted or anonymised.

## 8. Data security

campcomp and all engaged data processors take appropriate technical and organisational measures pursuant to Art. 8 FADP to protect your personal data against unauthorised access, loss, misuse or destruction. These include in particular:

- Encryption of data transmission (TLS/HTTPS)
- Access restrictions and role-based access concepts in all systems
- Regular security audits
- Contractual data-protection obligations on all service providers

## 9. Your rights under the FADP

You have the following rights vis-à-vis campcomp regarding your personal data:

- **Right of access** (Art. 25 FADP): you may at any time request information about the personal data we process about you.
- **Right to rectification** (Art. 32 FADP): you may at any time have inaccurate or incomplete personal data corrected.
- **Right to erasure** (Art. 32 FADP): you may request the deletion of your personal data, provided no statutory retention obligations stand in the way.
- **Right to restriction of processing** (Art. 32 FADP): under certain conditions, you may request that the processing of your data be restricted.

- **Right to data portability** (Art. 28 FADP): you may request that we provide you with your personal data in a common electronic format.
- **Right to object**: you may object to the processing of your personal data where it is based on overriding legitimate interests.
- **Withdrawal of consent**: you may at any time withdraw a consent given, with effect for the future.

To exercise your rights, please contact us in writing. We will reply to your request within 30 days. In duly justified exceptional cases, we may extend this deadline by a further 30 days; we will inform you accordingly.

## 10. Right to lodge a complaint with the FDPIC

If you consider that the processing of your personal data by campcomp violates the FADP, you have the right to request an investigation of the facts by the Federal Data Protection and Information Commissioner (FDPIC / EDÖB):

Federal Data Protection and Information Commissioner (FDPIC / EDÖB) Feldeggweg 1, 3003 Bern  
[www.edoeb.admin.ch](http://www.edoeb.admin.ch)

## 11. Changes to this Privacy Policy

campcomp reserves the right to amend this Privacy Policy at any time, in particular when the FADP, the DPO or our services change. The version in force from time to time is available on our website. In the event of material changes that affect you as a pool worker, we will inform you separately.

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*Status: April 2026 | campcomp GmbH | Tempstr*