

# Coople Privacy Policy

(Version as of July 2025)

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## 1. General information

Users of the Website [www.coople.com](http://www.coople.com) ("Website") and/or the Coople App ("App") should note that user data is transmitted via a publicly accessible network. In certain instances, Coople may transfer personal data outside Switzerland, the United Kingdom, or the European Economic Area (EEA). Such transfers will only occur in accordance with this privacy policy. It is not possible to guarantee that data transmitted over the Internet or via the Website or the App is protected against attacks. Communication between Coople and its users via email, SMS etc. is not encrypted. There is a risk of virus attacks and attacks by hackers. We implement all commercially reasonable physical, electronic and procedural safeguards to protect your personal data in compliance with applicable data protection legislation.

Coople recommends the use of anti-virus software and the latest browser versions at all times. Emails from unknown sources or unexpected email attachments should never be opened.

## 2. Controller

The term "Controller" refers to the legal entity that determines the purposes and means of processing your personal data. Depending on the relationship with you, the Controller is defined as follows:

If you have entered into a contract with Coople, the Controller is the specific legal entity with which you have concluded that contract. This will be either:

- Coople (Switzerland) Ltd, Albisriederstrasse 253, 8047 Zurich, Switzerland; or
- Coople (UK) Limited, 2nd Floor Classic House, 174-180 Old Street, London EC1V 9BP, United Kingdom.

In case you have not entered into a contract with one of these entities, the Controller is the Coople legal entity listed above that is based in the country where you are using Coople's services.

Throughout this privacy policy, references to "Coople", "We", "Us", and "Our" shall mean the Controller as defined above.

### 3. Protection of the internal data transfer

Within Coople, personal data is transmitted and stored in a protected format. Coople takes all appropriate steps to prevent personal data being viewed by unauthorised third parties. The disclosure of data based on legal provisions remains reserved.

### 4. Data collection for statistical purposes

Service Optimisation: To continuously improve Our services, Coople collects and analyses aggregated usage metrics, such as shift fill rates, pool performance, feature adoption, booking and cancellation frequencies, and shift coverage. We also use these aggregated patterns for churn analysis and client-health scoring. This data is generally processed in aggregate and cannot be traced back to any individual user. Where this is the case, it does not constitute personal data under this privacy policy.

Labor Market Analysis: Coople may collect anonymised statistical data for the purposes of labour market analysis. Such data may cover, for instance, total number of hours worked per profession and industry, rations of working hours to workers and the number of unfilled shifts due to workforce shortages. All such data remains fully anonymized and cannot be linked to any individual.

### 5. Privacy policy

This privacy policy describes how We collect, use, share and protect your personal data when you use Our Website or App as a user (e.g. Worker, Internal Worker, designated contact of a client company). It also explains your rights regarding your personal data under applicable data protection laws.

We collect and process the personal data you provide in order to provide the recruitment, temporary employment and/or workforce planning services you have requested. This may include, among other things, verifying your identity, qualifications, and work history, as well as sharing them with potential or actual client companies and other users. In some cases, We may process sensible personal data, that requires your consent. When this occurs, We will inform you of the specific purpose and give you an opportunity to agree or to decline.

This Website and the App contain links to other third party websites. If you follow a link to any of those third party websites, please note that they have their own privacy policies and that We do not accept any responsibility or liability for their policies or processing of your personal data. Please check these policies before you submit any personal data to such third party websites.

## 6. Information we may process about you

### 6.1. In general

We may process various types of personal data about you, including:

- a. Information you provide directly: This is information you give Us when you fill out forms on the Website or App. This includes information provided during registration, when using Our services, uploading documents and profile information or requesting additional services. We may also ask you for information when you report a problem with Our Website or App;
- b. Correspondence records: If you contact Us, We may keep a record of that correspondence;
- c. Survey responses: We may invite you to complete surveys for research purposes, although you are not obligated to respond;
- d. Website and App usage data: Subject to Our interactive cookie policy and consent-management tool, We may collect details of your visits to the Website or the App through cookies and other tracking technologies. This includes your IP address and domain name, your browser version, operating system (including your smartphones), traffic data, location data, web logs, your screen content when using the App, such as your browsing and click-stream activity, session heatmaps as well as scrolls, and other communication data, and the resources you access; and,
- e. Referral scheme information: If you participate in Our referral scheme and a new person register using your unique referral link, We will link that registration to your user profile.

### 6.2. Where you are a Worker

For the purpose of this policy, a "Worker" is an individual who is employed by Us via our staff leasing services (Temp Staffing & Payrolling) and is assigned to client companies.

#### 6.2.1. Personal information We may process

We may also process the following personal data about you:

- a. **Information collected during onboarding and registration.** As part of the onboarding/registration process We may collect the following personal data:
  - Biographical and contact details: Such as your name, date of birth, nationality, gender, postal address, email address, telephone number, mobile number, and a photograph if you choose to upload one;
  - Employment and qualification details: Such as your CV details, identification and eligibility to work (such as your social insurance number, passport, and/or visa details), rating data, interview details, recommendations by former employers (if you provide them), work-related details (e.g. department, job title, work address) and educational details (e.g. degree, university name). We may also collect additional details regarding your qualifications as required or volunteered by you;
  - Financial information: Such as your bank account number; and,

- Account numbers: Such as your membership or loyalty cards if you participate in such programs.
- b. **Additional information We may process.** Depending on the industry, the specific work assignment and/or other specific circumstances, We may also process:
- Mobility data: Information such as your mobility options and driving license category;
  - Personal attributes: Tattoos and/or piercings;
  - Family Status and emergency contacts: Information such as Marriage certificates, details relating to your next of kin in order to contact them in case of emergency as well as for tax and social security purposes. Please inform your nominated next of kin that We hold those details for this purpose;
  - Publicly available information: Publicly available social media profiles (excluding sensitive personal data);
  - Background checks: Where justified by the role or client requirements, results financial probity checks or other independent searches; and
  - Benefits information: Details relevant to any benefits that We may administer on your behalf for that purpose (such as statutory or contractual sick pay or family allowances).
- c. **Information related to platform operations.** We may also process the following personal data to run and improve our services:
- Workforce management: Shift planning, scheduling, worker time logs, attendance tracking, ratings, publishing of work shifts and potential analytics modules (e.g. shift fill rate).

#### 6.2.2. Sensitive personal data We may process

Where circumstances require it (e.g., specific job requirement or legal obligations), We may process the following categories of sensitive personal data about you:

- a. Health information: Details about your physical and mental health information, medical records, prescriptions, and non-specific health information (e.g. "Allergy to peanuts");
- b. Criminal records: Where justified by the role or client requirement, We may also collect information regarding the commission or alleged commission by you of any offence;
- c. Biometric data: Your photos and videos for identity verification and for right-to-work purposes. We may collect biometric data (e.g. facial recognition data, voice recognition etc.) for identity verification and right-to-work purposes; and,
- d. Other sensitive data: Where justified and necessary, We may collect information regarding racial or ethnic origin, religion and trade union membership.

### 6.3. Where you are an Internal Worker

For the purpose of this policy, an “Internal Worker” is an individual who is employed by or engaged as a contractor through a client company, as a user in the context of Our Workforce Planning (“WFP”) service.

We may collect and process the following personal data about you to run Our services:

- a. Biographical and contact details: Such as your name, date of birth, email address, telephone number, address of the location where you are seeking work; and,
- b. Workforce management: Such as shift planning, scheduling, worker time logs, attendance tracking, ratings, publishing of work shifts and potential analytics modules (e.g. shift fill rate).

Where voluntarily provided by you, we may also collect the same types of data as described for Workers in section 6.2.

### 6.4. Where you are a designated contact of the client company

If you are a designated contact of a client company using our platform on its behalf, We may process personal data about you as part of the onboarding/registration process such as your name, job title, gender and contact details including your email address.

## 7. Purpose of processing personal data and legal basis

This section sets out the purposes of processing and the legal justifications. We process your personal data in accordance with applicable data protection laws and only if justified under one or more of the following legal basis:

- a. Consent: where you have consented to Our use of your information, either because We have informed you of the specific purpose and given you the opportunity to agree or to decline, or because you have voluntarily disclosed information to Us. In both cases, you are providing your informed and freely given consent in relation to any such use, and may withdraw your consent at any time by notifying Us;
- b. Contract performance: where your information is necessary to enter into or perform Our contract with you;
- c. Legal obligation: where We need to use your information to comply with Our legal obligations;
- d. Legitimate interests: where We use your information to achieve a legitimate interest and Our reasons for using it outweigh any prejudice to your data protection rights; and
- e. Legal claims: where your information is necessary for Us to defend, prosecute or make a claim against you or a third party.

### 7.1. Where you are a Worker

We process your personal data for the following purposes:

- a. To evaluate your suitability for a job role and, where appropriate, to verify your Right to Work status, employment reference and other qualifications, We may contact former employers, educational or professional bodies, public or private

references, or other sources. Where your consent is required, We will obtain it before making such enquiries.

**Legal basis:** Legal obligation (to confirm your right to work), legitimate interests (to assess your suitability to work for Us) or consent

- b. To evaluate your suitability for certain job roles, We may verify your criminal history and/or financial probity. By disclosing this information, you consent to its processing.

**Legal basis:** Consent

- c. To verify your identity and right to work status We may collect and process biometrical information such as facial recognition and voice recognition. Your explicit consent will be obtained separately at the relevant stage of the onboarding process.

**Legal basis:** Consent

- d. To match you with Our client companies via an automated system ("Matching Application"). The Matching Application evaluates the information and preferences you and Our client companies have provided to decide which client companies will receive your profile in response to a job application. The Matching Application considers, among other parameters, your job profile and positive engagement signals such as past applications, past jobs worked, ratings, attendance history and overall engagement. We have implemented appropriate safeguards to protect your rights, freedoms and legitimate interests. If you would like more information about how the automated matching process works, please contact Us.

**Legal basis:** Contract performance (to enable Us to provide Our services to you)

- e. To organise uploaded documents (e.g., your CV) in a structured format and streamline Our processing, We may parse and extract the relevant personal data contained within them.

**Legal basis:** Contract performance (to enable Us to provide Our services to you)

- f. To process the ratings you provide after an assignment and share them in aggregated form with client companies, as well as to process ratings you receive from client companies and share them with other client companies who have created assignments you apply to, via your profile.

**Legal basis:** Legitimate interest (to enable Us to manage and improve Our services)

- g. To process payments due to you and administer applicable benefits on your behalf (e.g. statutory sick pay).

**Legal basis:** Contract performance; legal obligation

- h. To enable you to securely post, edit, and manage your submissions, share content with other users, and participate in the interactive features of Our Website and App.

**Legal basis:** Contract performance (to enable Us to provide Our services to you)

- i. To send you essential employment updates such as your start date confirmation, salary payment schedule, and notification of when your salary statement for tax purposes will be issued.

**Legal basis:** Legal obligation (employer's duty to inform, payroll and tax reporting), contract performance (to enable Us to provide Our services to you)

- j. To keep you informed about important changes to Our services and any administrative matters related to you.

**Legal basis:** Legitimate interests (to enable Us to manage and improve Our services)

- k. To inform you about Our own products and services (e.g. newsletters, employment opportunities) and, with your consent, offers from Our selected business partners. You can opt out or withdraw consent at any time.

**Legal basis:** Legitimate interests (for marketing Our own services), consent (where marketing relates to third-party goods or services)

- l. To operate and manage Our referral programme, including issuing any related benefits. By participating in the programme and providing the required information, you consent to this processing.

**Legal basis:** Consent

- m. To transmit assignment data (e.g. hours worked) to the training fund for temporary workers, in order to verify your eligibility for subsidised training opportunities under applicable collective labour agreement.

**Legal basis:** Legal obligation (compliance with collective agreement requirements), contract performance (to facilitate your access to services associated with your assignment).

- n. To improve Our systems and services We may, in isolated cases, analyse non-anonymised usage data.

**Legal basis:** Legitimate interest (to enable Us to refine Our systems and services)

## 7.2. Where you are an Internal Worker

We process your personal data for the following purposes:

- a. To display shifts and job offers that match the profiles defined by our client companies and to facilitate shift assignments and attendance tracking, We may process personal data such as contact details, shift history and user profiles.

**Legal basis:** Contract performance (to enable Us to provide Our services to you)

- b. To enable you to securely post, edit, and manage your submissions, share content with other users, and participate in the interactive features of Our Website and App.

**Legal basis:** Contract performance (to enable Us to provide Our services to you)

- c. To process the ratings you provide after an assignment and share them in aggregated form with client companies, as well as to process ratings you receive from client companies and share them with other client companies who have created assignments you apply to, via your profile.

**Legal basis:** Legitimate interest (to enable Us to manage and improve Our services)

- d. To send you essential employment updates such as your start date confirmation.

**Legal basis:** contract performance (to enable Us to provide Our services to you)

- e. To inform you about Our own products and services (e.g. newsletters, employment opportunities) and, with your consent, offers from Our selected business partners. You can opt out or withdraw consent at any time.

**Legal basis:** Legitimate interests (for marketing Our own services), consent (where marketing relates to third-party goods or services)

- f. To improve Our systems and services We may, in isolated cases, analyse non-anonymised usage data.

**Legal basis:** Legitimate interest (to enable Us to refine Our systems and services)

### 7.3. Where you are a designated contact of a client company

When you act as a designated contact of a client company, We may process personal data to provide Our services to the client company and to manage the business relationship. In some cases, We may share limited personal data with third party credit reference agencies to perform credit checks on that company.

**Legal basis:** Contract performance (to enable us to provide Our services and manage our business relationship to the client company), legitimate interests (to enable Us to manage Our risks)

## 8. Uploading content

As part of the registration, you are required to upload your information onto the Website or the App. Any information which you upload into your profile section of the Website or the App may be visible to other registered users of the Website or the App who may contact you via the contact details you provide. Therefore, please do not upload any information that you do not want to be viewed by other users. We are not responsible for the use of that information by other users.

## 9. Disclosure to third parties and legal basis

We may disclose your personal data to third parties in the following situations. Such disclosures are made only where justified by a valid legal basis under applicable data protection laws.

### 9.1. Where you are a Worker

- a. Once you have been matched with a client company, We will share relevant personal data with that client company, including your identity and information relevant to your suitability for the role (e.g. CV data, prior assignments, ratings,



right-to-work documentation), for the purpose of enabling the assignment and assessing your suitability.

**Legal basis:** contract performance (to enable Us to provide Our services to you), legal obligation

- b. To fulfil our statutory obligations, We may disclose relevant personal data, such as identification, assignment, and income details to social security and tax authorities. Such disclosures may vary depending on your country of work or residence and the applicable legal requirements.

**Legal basis:** Legal obligation (compliance with tax and social security regulations)

- c. For internal administrative and payroll purposes, We enable client companies to export certain personal data (e.g., shift and user information) from Our systems. We may also transmit personal data (e.g. hours worked) to the training fund for temporary workers, in order to verify your eligibility for subsidised training opportunities under applicable collective labour agreement.

**Legal basis:** Contract performance (to enable Us to provide Our services to you and to facilitate your access to services associated with your assignment), legal obligation (compliance with collective agreement requirements)

- d. As part of our payment processing, We may assign receivables against client companies to factoring institutions. In this context, it may be necessary to transmit invoices containing your name and possibly other personal data to factoring institutions, including those located outside of Switzerland.

**Legal basis:** Legitimate interests (to optimise and ensure the efficiency of Our payment processes)

Where personal data is disclosed to a client company, such client company acts as an independent data controller and is responsible for its own compliance with applicable data protection law. We encourage you to review the privacy policies of any client companies you engage with to understand how they process personal data.

## 9.2. Where you are an Internal Worker

- a. We may disclose your profile data, including contact details, shift history, ratings, and relevant work activity to the client company that employs you. If you maintain a pre-existing worker profile with Us, your employer may also have access to your historical activity data on Our Website and App.

**Legal basis:** Contract performance (to enable Us to provide Our services to you)

- b. For internal administrative and payroll purposes, We may enable the client company that employs you to export certain personal data (e.g., shift and user information) from Our systems.

**Legal basis:** Contract performance (to enable Us to provide Our services to you)

Where personal data is disclosed to a client company that employs you, such client company acts as an independent data controller and is responsible for its own compliance with applicable data protection law. We encourage you to review the

privacy policies of any client companies you engage with to understand how they process personal data.

### 9.3. Where you are a designated contact of a client company

When your company has been matched with a worker, We will provide that worker with your contact details to facilitate operational coordination. In addition to the situation set out in section 7 We may share your personal data with Our group companies (within or outside of Switzerland) for administrative and operational purposes, subject to appropriate safeguards for international transfers.

**Legal basis:** Legal obligation, legitimate interests (to enable Us to provide Our services).

### 9.4. General disclosure applicable to all categories

- a. In the event that We (or a part thereof) are (i) subject to negotiations for the sale of its business or (ii) is sold to a third party or (iii) undergoes a reorganisation, We may transfer your personal data to that re-organised entity or third party, provided that such data is used only for the same purposes as set out in this policy or for the purpose of analysing any proposed sale or re-organisation. We will ensure that no more of your information is transferred than necessary.

**Legal basis:** legal obligation, legal claims, legitimate interests (to cooperate with law enforcement and regulatory authorities)

- b. We may disclose your personal data to third parties, the court service and/or regulators or law enforcement agencies in connection with proceedings or investigations anywhere in the world where compelled to do so. Where permitted, We will direct any such request to you or notify you before responding unless to do so would prejudice the prevention or detection of a crime.

**Legal basis:** legal obligation, legal claims, legitimate interests (to cooperate with law enforcement and regulatory authorities)

- c. We may also disclose your personal data to third parties to conduct credit checks and checks to prevent fraud. If false or inaccurate information is provided and fraud is identified or suspected, details may be passed to fraud prevention agencies.

**Legal basis:** legal obligation, legal claims, legitimate interests (to assist with the prevention of fraud and to assess your risk profile)

- d. Law enforcement agencies may access and use your personal data for the purposes of crime detection and prevention, in accordance with applicable law.

**Legal basis:** legal obligation, legal claims, legitimate interests (to assist with the prevention of fraud)

## 10. Transmission, Storage and Security of your personal data

### 10.1. Security over the internet

No data transmission over the Internet, the Website or the App can be guaranteed to be secure from intrusion. However, We maintain commercially reasonable physical, electronic and procedural safeguards to protect your personal data in accordance with data protection legislative requirements.

All information you provide to Us is stored on Our or Our subcontractors/business partners (only as necessary for Us to perform Our services and in accordance with section 9 above) secure servers and accessed and used subject to Our security policies and standards. Where We have given you (or where you have chosen) a password which enables you to access certain parts of Our site, you are responsible for keeping this password confidential and for complying with any other security procedures that We notify you of. We ask you not to share a password with anyone.

Any damage suffered as the result of the loss of a username or password, or from its becoming known to third parties, must be borne exclusively by the user. Any liability on the part of Coople is excluded.

### 10.2. Cross-border data transfer

Your personal data may be transferred to, or stored in, countries outside of Switzerland, the United Kingdom (UK) and/or the European Economic Area (EEA). These countries may not offer the same level of data protection as those recognised by the Swiss Federal Data Protection and Information Commissioner (FDPIC), the UK Information Commissioner's Office (ICO), or the European Commission.

Where such transfers occur, We will ensure that appropriate safeguards are in place to protect your personal data in accordance with applicable data protection laws. These safeguards may include:

- The use of standard contractual clauses approved by the relevant authorities in Switzerland, the UK and the EEA; or,
- other appropriate mechanisms or assurances recognised by the relevant authorities as providing an adequate level of protection.

We will only transfer your personal data to jurisdictions that do not benefit from an adequacy decision where such safeguards are implemented, unless a legal exemption applies (e.g., performance of a contract with you, your explicit consent, or another permitted legal ground).

You may request further information about these safeguards or obtain a copy of them by contacting us as set out in section 11.7.

### 10.3. Restrictions regarding data storage

It should be noted that, from the moment that you accept an offer of employment and have completed an assignment for Coople, Coople is required by law to save and store the data associated with this assignment, including your personal data.

We store personal data for as long as necessary to fulfil the purpose for which it was collected or in accordance with legal obligations. To this end, We apply criteria for determining appropriate time limits, such as the period of 5 years during which legal claims can be asserted and the statutory retention period of 10 years. If data is used

for different purposes, We retain it until the period for the purpose with the longest retention period has expired, whereby We will no longer use the data for the purpose with the shorter retention period after this shorter period has expired.

We restrict access to your personal data to those persons who need to use it for the relevant purpose(s). Our retention periods are based on business needs and your information that is no longer needed is either irreversibly anonymised (and the anonymised information may be retained) or securely destroyed.

## 11. Your rights & contacting Us

Under applicable data protection laws, you have the following rights in relation to your personal data. All of these rights can be exercised by contacting Us as set out in section 11.7 below.

### 11.1. Right of Access

You have the right to request that We provide you with a copy of your personal data free of charge. Whilst your account is active, you have access to all of your profile data which can be accessed at any time. The first copy you request of the personal data undergoing processing will be provided free of charge, but We may charge you an administration fee for any further copies. Repeated, excessive or manifestly unfounded requests will be subject to a reasonable fee to meet Our costs in providing you with details of the personal data We hold about you, or We may refuse to act on such requests.

### 11.2. Right of Rectification

We will use reasonable endeavours to ensure that your personal data is accurate. In order to assist Us with this, you should notify Us of any changes to the personal data that you have provided to Us by updating your details on your user profile settings page on the Website or the App.

### 11.3. Right to Deletion

In certain circumstances you have the right to request that We delete all of your personal data, such as if processing of your data is based solely on agreement and there is no other legal basis, as described below, for such data processing on Our part. It should be noted that, from the moment that you accept an offer of employment and have completed an assignment for Coople, Coople is required by law to save and store the data associated with this assignment, including your personal data, and to retain this data for at least five years.

You can deactivate your profile at any time either via the Website or the App or via Our support desk.

### 11.4. Right to Restrict Processing

You have the right to ask Us to restrict processing of your personal data in certain situations, for example during the period where We are verifying the accuracy of your personal data.

### 11.5. Right to Data Portability

You have the right to receive your personal data which you have provided to Us in a structured, commonly used and machine-readable format and have the right to

transmit such data to another data controller in certain circumstances and where technically feasible.

#### 11.6. Information on the Effects of Exercising Certain Rights

Asking Us to stop processing your personal data or deleting your personal data will likely mean that you are no longer able to use Our services, or at least those aspects of Our services which require the processing of the types of personal data you have asked Us to delete. This may lead to you being unable to seek work using Our services.

Where you request We rectify or erase your personal data or restrict any processing of such personal data, We may notify third parties to whom such personal data has been disclosed of such request. However, such third parties may have the right to retain and continue to process such personal data in their own right, for example, any client companies which have received your personal data may need to retain it on lawful grounds without your consent.

#### 11.7. Contacting Us

We can be contacted in relation to your rights or any questions or complaints you may have in respect of this Privacy Policy or Our processing of your personal data at the following e-mail address, depending on the country where you are using Coople's services:

- Switzerland: [info.ch@coople.com](mailto:info.ch@coople.com)
- United Kingdom: [info@coople.com](mailto:info@coople.com)

Our data protection officer is Latda Keopaseuth.

Whilst We encourage you to engage with Us in the event you have any concerns or complaints, you also have the right to lodge a complaint with the competent data protection authority. Depending on the country where you are using Coople's services, this will generally be the Swiss Federal Data Protection and Information Commissioner (FDPIC) for Switzerland, or the UK Information Commissioner's Office (ICO) for the United Kingdom.

## 12. Changes to Our Privacy Policy

Our Privacy Policy may be subject to change in the future. We therefore encourage you to review it from time to time.