

Summary

We collect and process personal data (including CVs) you submit to deliver our AI-powered feedback and to improve our Service. You remain the Data Controller; we act as Data Processor. We use OpenAI's models as a sub-processor. Your rights under GDPR and Swiss law are respected, with transparent retention, security measures, and options to exercise your data-subject rights.

1. Data Controller, Processor, and Sub-Processors

We act as a "Data Processor" for all personal data you submit and you remain the "Data Controller" [. We engage OpenAI, L.L.C. as a sub-processor to provide large language model \(LLM\)](#)

services; a list of sub-processors is available on request.

2. Personal Data We Collect

2.1 Data You Provide

- **CV Data.** All CVs, resumes, cover letters, and related materials you upload ("User Data") are collected to analyze and generate feedback.
- **Account Information.** Name, email address, and password required to create your account.

2.2 Automatically Collected Data

- **Usage Data.** Logs of your interactions (e.g., pages viewed, features used) to improve functionality and user experience.

3. Purposes and Legal Bases for Processing

We process your personal data for the following purposes:

- 1 **Service Provision.** To analyze CVs and generate personalized feedback. (Art. 6(1)(b) GDPR)
- 2 **Product Improvement.** To aggregate and de-identify usage data and CV data to enhance algorithms and features. (Art. 6(1)(f) GDPR – legitimate interests)
- 3 **Compliance.** To comply with legal obligations under GDPR and Swiss FADP. (Art. 6(1)(c) GDPR)

4. Data Retention and Deletion

We retain personal data only as long as necessary for the purposes above and to meet legal obligations; thereafter it is securely deleted. Typical retention periods:

- **Account Data:** Until account deletion + 12 months.
- **User Data:** Until account deletion + 6 months.

5. Data Subject Rights

Under GDPR Articles 15–22 and Swiss FADP, you have the right to:

- Access your data
 - Rectify inaccuracies
 - Erase your data (“right to be forgotten”)
 - Restrict or object to processing
 - Data portability
- To exercise these rights, contact our DPO at dpo@cvconsultant.app.

6. Data Security Measures

We implement technical and organizational measures, including encryption in transit and at rest, access controls, regular audits, and staff training, to protect your personal data against unauthorized access, alteration, or loss.

7. International Transfers

If your data is transferred outside the EU/EEA or Switzerland (e.g., to OpenAI in the U.S.), we ensure one of the following safeguards:

- Standard Contractual Clauses approved by the European Commission
- Binding corporate rules for intra-group transfers.

8. Cookies and Tracking Technologies

We use cookies and similar technologies to remember user preferences and analyze usage. You can manage cookie preferences via your browser settings.

9. Children's Privacy

Our Service is intended for adults (18+). We do not knowingly collect data from minors under 18. If we learn that we have inadvertently collected data from a minor, we will delete it promptly.

10. Changes to This Policy

We may update this Privacy Policy; material changes will be communicated by email or via a prominent notice in the Service. Continued use after changes constitutes acceptance.

11. Contact Information

Controller & Processor: CV Consultant GmbH

Email: support@cvconsultant.app | DPO: dpo@cvconsultant.app