

# LUX NORDIC WEALTH MANAGEMENT S.A. RECRUITMENT PRIVACY NOTICE

### ***Preliminary Provisions***

Lux Nordic Wealth Management S.A. (“Lux Nordic” or “the Company”) is committed to protecting your privacy and ensuring the highest level of security for your personal data. This Recruitment Privacy Notice explains the types of personal data we collect, how we handle and how we protect your personal data in connection with Lux Nordic’s recruiting processes. It also provides you with information with respect to your rights.

This Recruitment Privacy Notice applies to all employment candidates of Lux Nordic that are recruited directly by the Company.

By submitting your personal data to us, you acknowledge that:

- You have read and understood this Recruitment Privacy Notice and agree to the use of your personal data as set out herein.
- You are not required to provide any requested information to us, but your failure to do so may result in our not being able to continue your candidacy for the job for which you have applied.
- All of your representations are true and correct to the best of your knowledge and belief, and you have not knowingly omitted any related information of an adverse nature. Providing any inaccurate information may make you ineligible for employment.
- This Privacy Notice does not form part of any contract of employment offered to candidates hired by Lux Nordic.

Wherever we’ve said “you” or “your”, this means you or any person connected to you namely any authorised person, anyone who deals with us for you (e.g. recruitment and temporary agencies you have authorised to liaise with us on your behalf).

Wherever we’ve said ‘we’ or ‘our’, this means Lux Nordic which acts as data controller in respect of your personal data in your candidate capacity.

### ***1. What categories of personal data do we collect?***

"**Personal data**" means any information relating to you as a data subject. As part of your recruitment, we will collect personal data about you during your job interview process from you or referees. We also collect data about you which is created by our recruiting personnel in the course of their interactions with you during the recruiting process. As part of this, Lux Nordic will collect, process and use the following categories and types of personal data about you:

- Identification data
- Contact information

- Resume data
- Data regarding responses to screening questions
- Background check information
- Previous employment information
- Data pertaining to work preferences and abilities
- Job interview notes
- Assessment results
- Any information that may be required due to legal requirements (e.g. residence or work permits)
- Travel-related records
- Other categories of data that you voluntarily decide to share with us
- We may also collect personal data about you online to the extent that you have chosen to make this information publicly available on professional social media websites such as LinkedIn.

together "**Candidate Data**".

In addition to the collection, processing and use of the Candidate Data, Lux Nordic collects, processes and uses the following special categories of personal data about you which we describe as "**Sensitive Candidate Data**":

- **health and medical data**, such as information on disability for purposes of accommodating in the workplace and compliance with legal obligations;
- **criminal record data**, in the event that Lux Nordic has conducted or received the results of criminal record background checks in relation to you, where relevant and appropriate to your role.

## **2. Use of your personal data**

We collect and use your personal data for the purpose of recruitment, including:

- Identifying and contacting potential candidates;
- Evaluating candidates for potential employment by assessing the competency and suitability of candidates applying for employment;
- Keeping records relating to recruitment;
- Providing you with more suitable career opportunities at Lux Nordic;
- Identifying candidates for future positions that may become available;
- Making hiring decisions on whether or not to offer employment to any particular candidate;
- Deciding the terms and conditions of any such offer;
- Having evidence in case a legal claim is pursued by any candidate;
- Complying with legal or regulatory requirements;

- Maintaining a talent pool in order to contact potential candidates that have given their separate consent to do so with regard to future job openings even if an actual application was unsuccessful.

We do not use your personal data for so-called “automated decision-making”. We will inform you separately if your personal data is ever made subject to automated decision-making.

### ***3. Legal basis for processing your personal data***

Our processing of your personal data for the purposes mentioned above is based on one or several of the following legal grounds:

- our legitimate business interests in evaluating your application to manage our relationship with you, to ensure that we recruit suitable employees, and to evaluate and maintain the efficacy of our recruiting process more generally. When relying on the legitimate interests basis for processing your personal data, we will balance the legitimate interest pursued by us and any relevant third party with your interest and fundamental rights and freedoms in relation to the protection of your personal data to ensure it is appropriate for us to rely on legitimate interests and to identify any additional steps we need to take to achieve the right balance;
- the performing of precontractual measures relating to our potential employment relationship with you;
- compliance with applicable law with regard to personal data necessary to satisfy our legal and regulatory obligations, including with regard to public health and workplace safety;
- your consent, if you wish to remain in our talent pool with regard to future job openings even if an actual application was unsuccessful.

If Lux Nordic does seek to rely on your consent to process Candidate Data or Sensitive Candidate Data, you can withdraw your consent at any time by contacting our DPO (see "Who can I contact if I have questions?" below) and this will not affect the lawfulness of the processing based on consent before the withdrawal.

### ***4. Data recipients and international data transfers***

Your personal data are intended for Lux Nordic but may be shared with third parties in certain circumstances:

- **Human Resources, and managers/other employees within Lux Nordic** who are involved in the recruitment and selection process and general HR management of the successful Candidate may have access to your data provided.
- **To third parties connected with business transfers:** If Lux Nordic may be sold or transferred in whole or in part (or such a sale or transfer is being contemplated), your

personal data may be transferred to the new employer or potential new employer as part of the transfer itself or as part of an initial review for such transfer (i.e. due diligence), subject to any rights provided by applicable law, including jurisdictions where the new employer or potential new employer is located. In such context, your personal data may be transferred provided that the receiving party agrees to treat your personal data in a manner consistent with this Recruitment Privacy Notice.

Except to the extent necessary to accomplish the uses and purposes described in this Privacy Notice, we do not disclose your personal data to third parties. We do not otherwise share or sell your personal data to third parties.

#### ***5. Do we transfer personal data outside the EEA?***

Your personal data will not be transferred to and stored at a destination outside the European Economic Area (“EEA”), including to locations which may not have the same level of protection for personal data as in the EEA.

#### ***6. How long do we keep your personal data?***

We endeavor not to retain your personal data for longer than it takes to complete the recruitment process. If you are hired, your personal data will be stored in our internal systems as necessary throughout the performance of your employment relationship, and you will be informed in a separate privacy notice about the specificities on how we process personal data of our employees.

If we do not employ you, and unless you object by following the process described in the Section “Your Rights” below, we may nevertheless continue to retain and use your personal data for a period of two years to consider you for potential future roles.

#### ***7. How do we protect your personal data?***

We have implemented technical and organisational security measures to safeguard the personal data. Such measures include, for example, limiting access to personal data only to employees and authorised service providers who need to know such information for the purposes described in this Recruitment Privacy Notice; adopting security protocols on networks and systems; using email security settings when sending and/or receiving highly confidential emails; applying physical access controls such as storing confidential documents in locked file cabinets; restricting access to confidential documents on a need-to-know basis; using privacy filters; disposal of confidential documents that are no longer needed, through shredding or similar means; confirming the intended recipient of personal data as well as other administrative, technical and physical safeguards.

While we endeavour to protect our systems, sites, operations and information against unauthorised access, use, modification and disclosure, due to the inherent nature of the Internet as an open global communications vehicle and other risk factors, we cannot guarantee that any information, during

transmission or while stored on our systems, will be absolutely safe from intrusion by others, such as hackers.

## **8. *What rights do I have in respect of my personal data?***

You have the following rights in relation to your Candidate Data and Sensitive Candidate Data that we collect about you:

### **(i) Right of access**

You have the right to confirm with us whether your personal data is processed, and if it is, to request access to that personal data including the categories of personal data processed, the purpose of the processing, and the recipients or categories of recipients. We do have to take into account the interests of others though, so this is not an absolute right, and if you want to request more than one copy we may charge a fee.

### **(ii) Right to rectification**

You may have the right to rectify inaccurate or incomplete personal data concerning you. We encourage you to review this information regularly to ensure that it is accurate and up to date.

### **(iii) Right to erasure (right to be forgotten)**

You may have the right to ask us to erase personal data concerning you.

### **(iv) Right to restriction of processing**

In limited circumstances, you may have the right to request that we restrict processing of your personal data, however where we process Candidate Data and Sensitive Candidate Data for the Processing Purposes we think that we have a legitimate interest in processing, that may override a request that you make.

### **(v) Right to data portability**

You may have the right to receive personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit that data to another entity.

### **(vi) Right to object and rights relating to automated decision-making**

Under certain circumstances you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data, including profiling, by us and we can be required to no longer process your personal data. This may include requesting human intervention in relation to an automated decision so that you can express your view and contest the decision.

To exercise any of these rights, please contact us as stated below ("Who can I contact if I have questions?").

You also have the right to lodge a complaint with the local data protection authority if you believe that we have not complied with applicable data protection laws. If you are based in, or the issue relates to, Luxembourg, the National Data Protection Commission (CNPD) can be contacted as follows:

Telephone: (+352) 26 10 60 -1

Email: [info@cnpd.lu](mailto:info@cnpd.lu)

Website: <https://www.cnpd.lu>

Address: 15, Boulevard du Jazz, L-4370 Belvaux

If you are based in, or the issue you would like to complain about took place, elsewhere in the European Economic Area (EEA), please click here for a list of local data protection authorities in the other EEA countries: [http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080)

### ***9. Who can I contact if I have questions?***

If you have concerns or questions regarding this Notice or if you would like to exercise your rights as a data subject, please contact:

[info@luxnordic.lu](mailto:info@luxnordic.lu) or

Data Protection Officer, Lux Nordic Wealth Management S.A., 60 Grand Rue, L-1660 Luxembourg, Luxembourg.

### ***10. Which version of this Recruitment Privacy Notice applies?***

This Recruitment Privacy Notice is written in English and may be translated into other languages. In the event of any inconsistency between the English version and the translated version of this notice, the English version shall prevail.

We reserve the right to change our Recruitment Privacy Notice from time to time. If we decide to change our Data Privacy Notice, we will notify you of these changes.