ENGELWOOD

CANDIDATE PRIVACY NOTICE

This Notice explains how the Engelwood entities (**Engelwood Asset Management**, **Engelwood Fund & Corporate Services, Engelwood Holding** and **Engelwood Management & Consulting**, hereafter "ENGELWOOD", "we", "us" or "our") collect, use, share, and/or otherwise process your personal data in connection with your relationship with us as a candidate to a job offer, acting in accordance with applicable data privacy laws and regulations, which include the General Data Protection Regulation 2016/679 (GDPR) which is applicable as of 25 May 2018.

We control the ways your personal data are collected and the purposes for which we use your personal data acting as “data controller” in the context of the GDPR

1 / PERSONAL DATA WE COLLECT FROM YOU

When using the term “personal data”, we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold.

We collect the data you include in your job application when you send us a spontaneous application or apply by email to a job offer:

- Identification data: name, surname, title;
- Contact information: postal address, e-mail address, phone number;
- Professional data: current position, work experience, educational background, CV, and cover letter.

Only the data that is strictly necessary for the purposes of processing your application is requested by us and does not include any special categories of personal data such as political opinions, religious beliefs or data concerning health.

We also collect personal data from:

- your named referees, from whom we collect the following categories of data: name, periods of previous employment, performance during previous employment;
- publicly accessible sources, such as LinkedIn, where we collect: name, email, academic and work history, and other relevant data included on your profile;
- recruitment agencies we may use for our hiring needs.

By providing your data, you expressly agree that your data will be processed by ENGELWOOD for the purposes indicated in Point 3 below. We may not be able to process your application further if you do not provide the personal data described above.

2 / DATA PROCESSING PURPOSES

We process your personal data for the following purposes:

- Processing of applications received (registering, entering information in the database…);
- Assessment of the qualifications and skills needed to perform the job you are applying for;

- Communication concerning the recruitment/hiring process (e-mails, phone calls, SMS messages, conference and meeting apps);
- Reference checks (where applicable);
- Complying with requirements relating to discrimination or equal opportunities.

3 / LEGAL BASIS FOR PROCESSING

The purposes explained in section 3 are based on the following legal grounds:

Purpose	Legal ground
Processing of applications received	Performance of precontractual measures
Assessment of the qualifications and skills needed to perform the job	Legitimate interests
Communication concerning the recruitment/hiring process	Legitimate interests or performance of a contract or precontractual measures (depending on the stage of recruitment)
Reference checks	We will only check your references if you give us your explicit consent
Complying with requirements relating to discrimination or equal opportunities in case a conflict arises	Legitimate interests

Furthermore, we rely on legitimate interests as legal basis when using conference and meeting apps to conduct online job interviews. This allows us to reduce time to hire and screen the candidates easily without the need for one or both parties to travel. Interviews are never recorded.

Whenever we process your personal data on the basis of your consent, you have the right to withdraw your consent at any time by contacting us as indicated below. Please, note that the withdrawal of your consent does not affect the lawfulness of the personal data processing based on consent prior to its withdrawal.

4 / RECIPIENTS OF DATA

To achieve the purposes listed in section 2, the data is transferred to the relevant HR Departments, managers involved in the recruitment process and third-party providers such as IT service providers acting as data processors and on instruction from ENGELWOOD. In this case, a contract is drawn up between ENGELWOOD and the data processor in question and appropriate technical and organizational measures are put in place in accordance with Articles 28 and 32 of the GDPR.

As a general rule, no personal data is transferred outside the EU/EEA. However, when your personal data is to be transferred (including in the case of remote access) to a country outside the EU/EEA that is not subject to an adequacy decision, appropriate safeguards in accordance with Chapter V of the GDPR are put in place, such as standard contractual clauses adopted and approved by the European Commission.

5 / DATA RETENTION PERIOD

Your personal data is stored only for the time needed in relation with the purposes pursued by ENGELWOOD and will be deleted 3 months after the end of the recruitment process.

Also, we retain your personal data in order to prove, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment process and the pre-employment screening in a fair and transparent way.

6 / DATA SECURITY

ENGELWOOD undertakes to put in place technical measures to ensure the security of personal data. This includes protecting the data against a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access to the data.

These measures must provide for a level of security considered appropriate considering the technical standards and the type of personal data processed but also:

- the state of the art and implementation costs;
- the nature, scope, context, and purposes of processing; and
- the likelihood and severity of the risk to the rights and freedoms of natural persons.

Security requirements are continually evolving, and effective security requires frequent assessment and regular improvement of outdated security measures. We are committed to continuously evaluate, strengthen, and improve the measures we implement.

7 / YOUR RIGHTS REGARDING YOUR PERSONAL DATA

As a natural person, you have a number of rights regarding your personal data.

- **The right of access**: You can request access to the data concerning you at any time as well as a copy of the data.
- **The right to rectification:** You can request at any time that inaccurate or incomplete data be rectified.
- **The right to erasure:** You can request that your data be deleted when, e.g., the data is no longer necessary for the purposes for which it was collected or processed.
- **The right to restriction of processing**: You can request that we restrict the processing of data if, e.g., you question the accuracy of the data concerning you or if you object to the processing of the data.
- **The right to portability**: you have the right to have your data transferred to another data controller in a structured, commonly used and machine-readable format, if the processing is carried out by automated means or if it is based on prior consent.
- **The right to object to processing:** you can object to the processing of the data and can withdraw your consent if the processing is based on consent, e.g., if the data is used for commercial prospecting purposes.

You can exercise your rights by contacting the Data Protection Officer (DPO) at one of the following addresses:

- **Engelwood Asset Management:** dpo@engelwood.eu
- **Engelwood Fund & Corporate Services:** data.protection@engelwood.lu

Requests will be dealt with by the relevant DPO and will be responded to within 1 month at the latest, starting from the moment of your identity confirmation. This time limit may be extended to an additional 2 months in case the request is complex or in case we have received a high number of requests. The requests will be granted within the limits provided for by law, and in particular articles 15 to 23 of the GDPR.

If you are not satisfied with our response, you also have the right to lodge a complaint at any time with the competent supervisory authority of an EU member state, depending on your habitual residence (where you live most of the time), on the place where you work or on the place where you believe infringement may have happened. In Luxembourg, the competent supervisory authority is the Commission nationale pour la protection des données (CNPD).

8 / UPDATE TO THE PRIVACY NOTICE

We keep this Notice under regular review, and we may change, modify, add, or remove portions from the Notice at any time. We will post any modifications or changes to this Notice on our website prior to such changes taking effect.

Last updated: 10 March 2023