

1. General

The following data protection information provide an overview of the collection and processing of your data by us and your rights under the data protection law.

2. Who is responsible for data processing and who can I contact?

Responsible body is:

International Fund Services & Asset Management S.A.
25, rue Edmond Reuter
L-5326 Contern
Tel.: (+352) 27 07 31 – 611
E-Mail: info@ifsam.lu
Website: www.ifsam.lu

You can contact our data protection officer at:

International Fund Services & Asset Management S.A.
Data protection officer
25, rue Edmond Reuter
L-5326 Contern
Tel.: (+352) 27 07 31 – 611
E-Mail: dataprotection@ifsam.lu
Website: www.ifsam.lu

3. What kind of sources and data do we use?

We process personal data that we receive from the applicant as part of the application process. In addition, we process - to the extent necessary for your application - personal data that we have obtained and are permitted to process from publicly accessible sources (e.g. press, media, Internet). On the other hand, we process personal data that we have received from other third parties (e.g. credit agencies). We collect various types of information as part of an application process. This includes in particular your personal data with contact information as well as a description of your education, work experience and skills. In addition, you have the option of providing us with electronically stored or paper documents such as certificates or cover letters. Processing can also take place electronically. This is particularly the case if an applicant submits corresponding application documents to us electronically, for example by e-mail, via a web form on the website or via an Internet application platform.

4. For what reason do we process your data (purpose of data processing) and on which legal basis?

We process the aforementioned personal data in accordance with the provisions of the EU General Data Protection Regulation (GDPR) and the Luxembourg Act on the protection of personal data for the processing of data.

a) For the purpose of the legitimate interest (Article 6 paragraph 1f EU-GDPR)

If required, we process your data beyond the actual fulfilment of the contract to protect the legitimate interests of us or third parties. Examples:

- Consultation of and data exchange with credit agencies
- Assertion of legal claims and defense in legal disputes
- Prevention of criminal offences
- Measures to ensure the domiciliary right

b) Due to your consent to the processing of data (Article 6 paragraph 1a EU-GDPR)

With your application you give us your consent according to article 6 paragraph 1a EU-GDPR for the processing of your data in the context of the application process.

If your application is successful, the data provided may be used for administrative purposes within the scope of employment. Please consider in this case our data protection information for employees, which will be handed over to you with the employment contract.

Thus, the lawfulness of this processing is given on the basis of your consent. Your consent can be revoked at any time. This also applies to the revocation of declarations of consent given to us before the EU Data Protection Basic Regulation came into force, i.e. before 25 May 2018. Please note that the revocation will only take effect in the future. Processing that took place before the revocation is not affected by this. You can request a status overview of your consents at any time.

5. Who receives my data?

Within International Fund Services & Asset Management S.A., those departments which are involved in the application process have access to your data. This includes those cases in which data processing is permitted as part of the legitimate interests. Service providers and vicarious agents employed by us may also receive data for these purposes if they comply with our written data protection instructions. We may only disclose information about you if this is required by law, if you have consented, if we are authorized to provide information and / or if

contract processors commissioned by us guarantee compliance with professional secrecy and the requirements of the EU General Data Protection Regulation (EU-GDPR) and the Luxembourg Act on the protection of personal data for the processing of data.

Under these conditions, recipients of personal data are for example:

- Public authorities and institutions (e.g. CSSF, CAA, tax authorities, criminal prosecution authorities) in the case of a legal or official obligation.
- Processors to whom we transfer your personal data as part of the application process. In detail: Information agencies, law firms.

6. Is data transferred to a third country or to an international organization?

Data is not transferred to countries outside the EU or the EEA (so-called third countries).

7. How long will my data be stored?

Should we not be able to offer you an employment contract, we will immediately delete the data you have transmitted. A longer storage period is possible if this is contrary to the legitimate interest of International Fund Services & Asset Management S.A.. A legitimate interest in this sense is, for example, a duty to provide evidence in proceedings under the General Equal Treatment Act (AGG). If an employment contract is concluded with an applicant, the data transmitted will be stored for the purpose of processing the employment in compliance with the statutory provisions. Please then consider the data protection notices for employees. Furthermore, there is a justified interest if your application documents should be interesting, taking into account the future vacancies. In this case you will be notified by email.

8. Which data protection rights do I have?

Every concerned person (by law defined as data subject) has the right to:

- access to personal data being processed according to article 15 EU-GDPR,
- rectify according to article 16 EU-GDPR,
- erasure according to article 17 EU-GDPR,
- restriction of processing according to article 18 EU GDPR and
- data portability according to article 20 EU-GDPR.

In addition, there is a right of complaint to a data protection supervisory authority (Article 77 EU-GDPR). You can revoke your consent to the processing of personal data at any time. This also applies to the revocation of

declarations of consent given to us before the EU Data Protection Basic Regulation came into force, i.e. before 25 May 2018. Please note that the revocation will only take effect in the future. Processing that took place before the revocation is not affected by this.

9. Is there an obligation for me to provide data?

As part of your application, you must provide the personal data required for the application process. Without this information, we will generally not be able to consider your application.

10. To what extent is there an automated decision process?

As a matter of principle, we do not use a fully automated decision-making process in accordance with Article 22 EU-GDPR within our application process framework. Should we use these procedures in individual cases, we will inform you separately if this is required by law.

11. Does profiling take place?

There will be no profiling during the application process.

12. Information on your right to object according to article 21 EU-GDPR

a) Right to object in individual cases

You have the right, for reasons arising from your particular situation, to object at any time to the processing of your personal data, which concerns you on the basis of Article 6 para. 1 e EU-GDPR (data processing in the public interest) and Article 6 para. 1 f EU-GDPR (data processing on the basis of a weighing of interests). If you object, we will no longer process your personal data. Unless we can prove compelling reasons for processing that are worthy of protection and outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

b) Form of the opposition

The opposition can be made without any formal requirements.