

## **Information on processing your applicant data**

We hereby inform you about the processing of your personal data by Swiss Life Asset Managers and the rights to which you are entitled under data protection law.

### **Who is responsible for data processing?**

For applications with Swiss Life Asset Managers Luxembourg ("SLAM") is responsible for data processing:

Swiss Life Asset Managers Luxembourg  
4a, rue Albert Borschette  
L-1246 Luxembourg

Phone: +352 267585 0

E-mail: [data\\_protection@swisslife-am.com](mailto:data_protection@swisslife-am.com)

### **Which data categories do we use and where do they come from?**

The categories of personal data that are processed when you apply via our career site include in particular your key data (such as first name, surname, name extensions, nationality, date of birth), contact data (such as private address, telephone number, e-mail address) as well as the data of the entire application process (in particular cover letter, curriculum vitae, certificates, questionnaires, interviews, qualifications and previous roles).

When you register for a "Job Subscription", your email address will be processed so that you can receive information on open positions according to your selection.

If you have voluntarily provided special categories of personal data, such as health data, religious affiliation or a degree of disability, in your letter of application or in the course of the application process, further processing will only take place if you have consented to this by means of a separate declaration of consent or if this data processing is permitted by law.

As a rule, your personal data will be made available directly by you as part of the recruitment process. In addition, we may have received data from third parties (e.g. employment agencies) to whom you have made your data available for disclosure. We also process personal data that you have made available to us from publicly accessible sources (e.g. professional social networks).

### **For what purposes and on what legal basis is data processed?**

We process your personal data in compliance with the provisions of the EU General Data Protection Regulation (GDPR) <sup>1</sup> and all other relevant laws (e.g. Code du Travail etc.).

Primarily, data processing serves to carry out and process the application procedure and to assess the extent of suitability for the position in question. The processing of your applicant data is necessary in order to be able to decide on the establishment of an employment relationship. The primary legal basis for this are Art. 6 para. 1 a) and b) GDPR and the equivalent basis in the other applicable data protection laws.

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<sup>1</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

At the beginning of the application process you have to register in the application portal and create an account. To create your personal applicant account, your e-mail address and your self-chosen password are required. With this applicant account you can then apply for jobs and manage your applications.

For the application process, the required information and personal data, such as name, address, e-mail address or details of your educational and professional background, are collected. You also are required to upload individual application documents (e.g. cover letter, CV, certificates) in the application portal. The information provided and uploaded documents are stored in our job portal.

In order to submit your application, it is necessary that you create an applicant account so that we can keep you informed on the status and contact you. You can also use the account to withdraw your application

### Consent

**Our online application portal can only be used with your consent. The legal basis results from Art. 6 para. 1 a) GDPR and the equivalent basis in the other applicable data protection laws. By creating an applicant account, you give your consent in data processing for the purposes described in this document.**

**This declaration of consent is freely given. There is no obligation for you to give consent.**

**A withdrawal of the consent is possible at any time. Please send the withdrawal to**

**Data\_protection@swisslife-am.com**

**After receiving the withdrawal, we will close your applicant account. The applicant process ends.**

**Also in some other areas we may rely on your separate consent pursuant to Art. 6 para. 1 a), 7 GDPR and the equivalent provisions in the other applicable data protection laws., e.g. to also use your application documents for other vacancies within the Swiss Life Group or if special categories of personal data (e.g. health data) are processed.**

**In the event of such consent, you have the right at any time to revoke it with effect for the future.**

We also process your data in order to fulfil our legal obligations as a potential employer. These are, for example, obligations arising from supervisory regulations or legal provisions with respect to the fight against money laundering and terrorist financing (e.g. EU Regulations 2580/2001 and 881/2002), which require your data to be compared with so-called sanctions lists. This is done on the basis of Art. 6 para. 1 c) GDPR and the equivalent basis in the other applicable data protection laws.

In addition, we also use your data for statistical purposes (e.g. studies on applicant behaviour). The statistics are compiled exclusively for the company's own purposes and the evaluation results are under no circumstances personalised but anonymised.

If we wish to process your personal data for a purpose not mentioned above, we will inform you in advance.

### **Who receives your data?**

Your applicant data will be treated confidentially at all times. Within SLAM, only those persons and positions (e.g. specialist departments, staff council) who need your personal data for the recruitment decision and for the fulfilment of our pre-contractual and statutory obligations will receive it.

For the job advertisement and the application process we use the services of Workday Ltd. (Dublin, Ireland). The e-mails of the job subscription are also sent by this service provider. You can change or delete Job Subscriptions at any time in your account settings.

If you know an employee within SLAM, you have the possibility to indicate the name of the employee during the application process. We would like to point out that it is possible that we may contact this employee with regard to your person. The named employee will at no time have access to your application data.

In addition, we may transfer your personal data to other recipients outside SLAM to the extent necessary to establish the employment relationship. The Corporate Human Resources Department of Swiss Life Asset Managers in Zurich is involved in the hiring decision and also receives the applicant data. We would like to point out that your application data can be viewed worldwide by all recruiters within the Swiss Life Group if you apply via the online application system.

### **How do we transfer data outside Europe (third countries)?**

We only pass on personal data to service providers or Group companies outside the European Economic Area (EEA) if the third country in question has been confirmed by the EU Commission to have an appropriate level of data protection or if other appropriate data protection guarantees have been provided, e.g. binding internal company data protection regulations or an agreement on the standard contractual clauses of the EU Commission. Any transfer of Personal Data to a recipient in Switzerland relies on EU Commission decisions pursuant to which Switzerland is considered to offer an adequate level of protection for Personal Data.

### **How long is your data stored?**

We will delete your personal data six months after completion of the application procedure if an employment relationship does not materialise. This does not apply if legal provisions prevent the deletion or if further storage is necessary for the purpose of presenting evidence or if you have consented to longer storage.

If we are unable to offer you a vacant position, but are of the opinion, based on your profile, that your application may be of interest for future vacancies, we will process your personal application data in our applicant database for up to 18 months, provided we have your express consent.

Regardless of the status of your application, your applicant account will remain active until you revoke your consent to this. After receipt of your revocation we will immediately delete your applicant account. Please contact the known contact address for this purpose.

**Are you obliged to provide your data?**

As part of your application, you must provide the personal information necessary to complete the application process and assess your suitability. Without this information, we will not be able to complete the application process and make a decision about the establishment of an employment relationship.

**What data protection rights can you assert as a data subject?**

You can request information about your personal data and, under certain conditions, its correction or deletion or the restriction of its processing. You can also object to the processing or assert your right to data transfer.

If consent to the processing of your personal data is required and you have also given it, you can revoke your consent at any time with effect for the future, i.e. the revocation of the consent does not impair the legality of the processing on the basis of the consent before the revocation. In the event of a revocation of consent, we will only process the personal data further if there is another legal basis for the processing. You can address the revocation or any other of your rights to SLAM at [data\\_protection@swisslife-am.com](mailto:data_protection@swisslife-am.com).

If you have any concerns about how we process your personal data or wish to file a complaint, you can contact us at the above contact addresses to have this investigated. If you are not satisfied with our response or if you believe that we are not processing your personal data in accordance with applicable law, you can file a complaint with the Luxembourg Data Protection Authority or another competent supervisory authority pursuant to Art. 77 GDPR or based on equivalent provisions in the other applicable data protection laws. You have the choice of contacting the supervisory authority that has local jurisdiction over you or the supervisory authority that has jurisdiction over us.