

Data protection information for applicants

Information on data protection regarding our data processing pursuant to Articles (Art.) 13, 14 and 21 of the General Data Protection Regulation (GDPR)

Preliminary remark: If you apply for a position via our career page, you have the opportunity to register in our application portal and create a Candidate Home account. The creation of a Candidate Home account is optional. If you have your documents submitted via a recruitment agency or apply on the basis of an internal recommendation, you will need to create a Candidate Home account in order to process your documents. You need an e-mail address and password to create the account. Should you change your e-mail address, you can enter the new address in your account settings. Once you have created an account, you can apply for open positions at Swiss Life Asset Managers. After applying for one or more positions, you will be able to view your submitted application(s) and the status of your application. You also have the option of withdrawing your application(s). In addition to submitting applications, you can create a job alert to notify you when a suitable position arises. You are free to edit or delete your job alert preferences at any time. You may delete your information (applications, job alerts) at any time through the account settings.

1 Responsible body and contact details for data processing

Swiss Life Asset Managers Luxembourg
Compliance / Data Protection
4a, rue Albert Borschette
L-1246 Luxembourg

E-mail: Data_Protection@swisslife-am.com

Should you have any questions about data protection, you can contact the responsible office in confidence at any time.

2 Purposes and legal basis according to which we process your data

We process personal data in accordance with the provisions of the GDPR, the FADP and other applicable data protection provisions (details below). Further details or additions to the purposes of data processing can be found in the relevant contract documents, forms, declaration of consent and other information made available to you.

2.1 Purposes of contract fulfilment or pre-contractual measures

The processing of your personal data is necessary in order to process your application in response to a specific job advertisement or a speculative application, especially for the following purposes: examination and assessment of your suitability for the position in question, performance and conduct assessment to the extent permitted by law, if applicable to register and authenticate the application via our website, if applicable to create the employment contract, verifiability of transactions, mandates and other agree-

ments plus for quality control through corresponding documentation, measures to fulfil general due diligence, statistical evaluations for company management, travel and event management, booking travel and settling the resulting expense, authorisation and ID document management, cost recording and controlling, reporting, internal and external communication, settlement and fiscal evaluation of operational benefits (e.g. canteen meals), use of the company credit card, security and health protection in the workplace, contract-related communication (including appointments) with you, assertion of legal claims and defence in case of legal disputes; safeguarding of IT security (including system and plausibility tests) and general safety, including building and equipment safety, upholding and exercising domiciliary rights through corresponding measures and, if applicable, video surveillance for the protection of third parties and our staff and the securing of evidence in the event of criminal offences and for the purpose of their prevention; ensuring the integrity, prevention and investigation of criminal offences; data availability and authenticity, monitoring by supervisory bodies or authorities (e.g. audit).

2.2 Purposes in the event of a legitimate interest on our part or that of a third party

We may process your data beyond the actual fulfilment of the contract or preliminary contract if this is necessary for upholding our own legitimate interests or those of third parties. Processing of your data takes place only if and to the extent that no overriding interests on your part oppose such processing, in particular for the following purposes: measures for the introduction and further development of existing systems, processes and services; comparisons with European and international anti-terror lists insofar as these exceed legal obligations; enrichment of our data, including by using or researching publicly available data where necessary; benchmarking; development of scoring systems or automated decision-making processes; building and plant security (e.g. through access control and video surveillance) to the extent that this exceeds the general due diligence obligations; internal and external investigations, security clearances;

2.3 Purposes within the framework of your consent

Processing of your personal data for certain purposes (e.g. obtaining references from previous employers or using your data for future vacancies) may also take place with your consent. You can revoke this at any time. You will be informed separately in the text of the declaration of consent about the purposes and the consequences of revocation or not granting consent.

The revocation of consent only applies to the future. Any processing taking place prior to the revocation is not affected by this and remains lawful.

2.4 Purposes for the fulfilment of statutory requirements or in the public interest

Like all parties participating in economic affairs, we are also subject to a large number of statutory obligations. These are primarily legal requirements (e.g. labour laws, commercial and tax laws), but also, where applicable, regulatory or other official requirements. The purposes of processing may include identity and age verification, prevention of fraud and money laundering (e.g. checking against European and international anti-terror lists), occupational health management, ensuring occupational safety, compliance with tax control and reporting obligations, and archiving of

data for the purposes of data protection and data security as well as for the purposes of verification by tax advisors/business auditors, tax and other authorities. The disclosure of personal data can also become necessary within the scope of official/judicial measures for the purposes of evidence collection, criminal prosecution or the enforcement of civil claims.

3 The data categories processed by us for data we do not receive directly from you, and their origin

Insofar as this is necessary for the contractual relationship with you and the application submitted by you, we may process data permissibly received from other bodies or from other third parties. In addition, we process personal data that we have permissibly obtained, received or acquired from publicly accessible sources (such as commercial and association registers, civil registers, press, internet and other media), insofar as this is necessary and we are permitted to process this data in accordance with statutory provisions.

Relevant personal data may in particular, and where applicable, include:

- address and contact data (reporting and comparable data, such as e-mail address and telephone number)
- information about you on the internet or on social networks
- video data

4 Recipients or categories of recipients of your data

Within our company, those internal offices or organisational units receive your data that require it for the fulfilment of our contractual and legal obligations (such as managers and specialists who are looking for a new employee or assist in the decision on the allocation of vacancies, accounting, occupational physician, occupational safety, employee representation if applicable, etc.) or in the context of processing and implementing our legitimate interests. Any forwarding of your data to external bodies takes place **exclusively**

- for purposes for which we are obliged or authorised to disclose, report or forward data to comply with legal requirements (e.g. financial authorities) or for which the disclosure of data is in the public interest (see 2.4);
- if external service providers process data on our behalf as processors or function holders (e.g. credit institutions, external data centres, travel agencies/travel management, printers or data disposal companies, courier services, post office, logistics);
- on the basis of our legitimate interests or the legitimate interests of third parties for the purposes stated in 2.2 above (e.g. to authorities, information bureaux, lawyers, courts, experts, Group companies, committees and supervisory authorities);
- if you have granted us your consent to the transmission of your data to third parties.

We will not pass on your data to third parties without informing you about this separately. Insofar as we commission service providers for processing an order, your data is subject to the security standards specified by us in order to adequately protect it. In all other cases the recipients may make use of the data for the purposes for which it has been transmitted to them.

5 Duration of the storage of your data

We process and store your data for the duration of your application. This also includes the initiation of a contract (pre-contractual legal relationship).

In addition, we are subject to various retention obligations and duties to keep records, which arise, among other things, from company, commercial and supervisory law.. The periods specified therein for retention and/or documentation may be up to ten years following the end of the contractual relationship or pre-contractual legal relationship. If you are not hired, your application documents will be returned to you in their original form after six months. Electronic data will be deleted accordingly after six months. If we wish to store your data for longer for future vacancies or if you have entered your data in an applicant pool, the data will be deleted at a later point in time; details of this will be provided to you in connection with the respective process.

Data no longer required for the fulfilment of contractual or statutory obligations and rights is deleted at regular intervals unless its further processing (for a limited period) is necessary in order to fulfil the purposes derived from an overriding legitimate interest of our company, as listed under 2.2. Such an overriding legitimate interest exists, for example, if deletion is not possible or would entail disproportionately high effort due to the special type of storage. In these cases, we may also store your data after termination of our contractual relationship for a period commensurate with the purposes and, if necessary, use it to a limited extent. As a rule, in these cases the deletion is replaced by restricting the processing of the data. In other words: appropriate measures are taken to block the data from normal use.

6 Processing of your data in a third country or by an international organisation

Data will be transferred to positions in countries outside Luxembourg within the European Union and outside the European Union (so-called third countries) if required for the performance of a contractual obligation towards you (e.g. application for a position abroad) or if it is within the scope of a legitimate interest held by us or a third party or if you have given us your consent.

The recipients of your data may be located in Switzerland, the European Economic Area (EEA), the UK, the USA and any other country in the world.

The processing of your data in a third country can also take place in connection with the commissioning of service providers for the purpose of order processing. If, for the third country in question or for specific sectors in the third country, there is no decision by the EU Commission or the Luxembourg Competent Data Protection Authority on an appropriate level of data protection in the third country, corresponding agreements (such as EU standard contractual clauses with the necessary adjustments to ensure that they comply with GDPR) and additional measures may be used as a basis for the transfer.

7 Your data protection rights

Under certain conditions, you can assert your data protection rights towards us.

Each data subject has the right to **information** (with limitations under national law where applicable), the right to **cor-**

rection, the right to **deletion**, the right to **restriction** of processing and the right to **data portability**. You are also entitled to **revoke consent** granted to us for the processing of personal data at any time with future effect. You may also have recourse, if the conditions are met, to a **right of complaint to a data protection supervisory authority** (in Luxembourg this is the Commission Nationale pour la Protection des Données, 15, Boulevard du Jazz, L-4370 Belvaux).

If possible, your requests to exercise your rights should be addressed in writing to the responsible body indicated above or directly to our data protection advisor.

8 Scope of your obligations to supply us with your data

You only need to supply the data that is required for processing your application or for a pre-contractual relationship with us or that we are legally obliged to collect. Without this data we will normally be unable to proceed with the application and selection process. Should we request any further data from you above and beyond this, we will notify you separately of the voluntary nature of such disclosures.

9 Existence of automated decision-making in each case (including profiling)

We do not use purely automated decision-making processes. Should we use such a procedure in individual cases in the future, we will inform you about this separately insofar as this is required by law.

Information about your right to object in accordance with the GDPR

1. You are entitled at any time to register an objection to the processing of your data taking place for the purposes of legitimate interests or in the public interest. The prerequisite is, however, that there are reasons for your objection arising from your particular personal situation. This also applies to profiling based on this provision.

Should you register an objection, we will no longer process your personal data unless we are able to provide evidence of compelling legitimate grounds for such processing that outweigh your interests, rights and freedoms, or processing serves the assertion, exercise or defence of legal claims.

You are naturally free to withdraw your application at any time.

2. There are no plans to use your personal data for direct marketing purposes. Nevertheless, we must inform you that you have the right to object to advertising at any time; this also applies to profiling insofar as it is related to such direct advertising. We will observe this objection in the future.

The objection can be made informally and should, if possible, be addressed to the controller named in section 1.

Our data protection information regarding our data processing may change from time to time.

Status of data protection information as at 1 September 2023