



## CREUTZ & PARTNERS

THE ART OF ASSET MANAGEMENT

### INFORMATION ON THE USE OF PERSONAL DATA BY CREUTZ & PARTNERS GLOBAL ASSET MANAGEMENT S.A. (CREUTZ & PARTNERS) IN THE APPLICATION AND SELECTION PROCESS

As part of the application and selection process, applicants provide Creutz & Partners with a series of personal data. This personal data essentially consists of the following:

- Personal master data such as surname, first name, date of birth, marital status, residential address and contact details (telephone no., email address, etc.);
- Personal outline data such as curriculum vitae, evidence of professional training/certificates, social security number and health insurance;
- Performance data such as training certificates, job references and assessments.

Creutz & Partners processes the aforementioned data to implement the application and selection process in accordance with the provisions of the EU General Data Protection Regulation (GDPR)<sup>1</sup> and the data protection provisions that apply in Luxembourg. Personal data is processed in particular in order to perform pre-contractual measures as defined in Article 6 (1) b) GDPR. Creutz & Partners processes the data in physical or electronic form. Within Creutz & Partners, those people who require the personal data to implement the application process have access to this data. Creutz & Partners processes the personal data at the company's headquarters in Luxembourg.

Applicants' personal data is in principle retained by Creutz & Partners for the duration of the application and selection process. The data is then returned to the applicant or erased or destroyed.

Creutz & Partners may retain applicants' personal data for a longer period in individual cases so that it can include the applicants in future job advertisements and application processes. In all cases, Creutz & Partners will erase/destroy applicants' personal data no later than 2 years after receipt.

Applicants have the following rights in relation to their personal data:

#### a) Information about personal data and data portability

Applicants are entitled to receive information about their personal data provided to Creutz and Partners and they may obtain a copy thereof.

They also have the right to receive the personal data concerning them in a structured, commonly used and machine-readable format and they have the right to have these data transmitted directly by Creutz & Partners to third parties.

#### b) Rectifying, updating and/or erasing personal data

Applicants have the right to have their personal data rectified, updated or erased. After receiving an instruction to erase personal data, Creutz & Partners will erase it (electronic data) or destroy it (data in physical form) immediately.

#### c) Right to withdraw consent

Applicants have the right to withdraw their consent to the processing of their data by Creutz & Partners at any time. A withdrawal of consent does not affect the lawfulness of the data processing carried out before consent was withdrawn. If consent is withdrawn, Creutz & Partners will cease processing the personal data immediately. The withdrawal of consent may mean that Creutz & Partners may not (or may no longer) be able to reply to applicants' enquiries or no longer be able to include them in future application processes.

#### d) Right to restriction of data processing and right to object

Applicants have the right to restrict the processing of their personal data if the personal data is not correct, if the processing is unlawful but they have objected to the erasure of their personal data, if Creutz & Partners no longer requires their personal data for the purposes of processing but applicants wish such data to be stored so that they can assert, exercise or defend legal claims in court, or if the employer may continue to assert a legitimate interest in the personal data concerned.

Applicants have the right to object at any time to the processing of their personal data collected and processed for the purposes of the legitimate interests of Creutz & Partners.

In order to claim their rights, applicants can contact Creutz & Partners in writing using the details below:

#### Creutz & Partners Global Asset Management S.A.

18, Duarrefstrooss  
L-9944 Beiler  
datenschutz@creutz-partners.com

Applicants may lodge a complaint against Creutz & Partners concerning a data breach at any time. If applicants are not satisfied with the handling of their complaints, they may contact the Luxembourg data protection authority at the address below:

#### Commission nationale pour la protection des données

15, Boulevard du Jazz  
L-4370 Belvaux  
www.cnpd.lu

The confidentiality and thus the security of personal data are of great importance to Creutz & Partners. Creutz & Partners has therefore adopted suitable technical and organisational measures to ensure the security of the processed data.

<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.