



HAFS  
Group

## INFORMATION ON DATA PROTECTION in the context of the job application process

The protection and security of your personal data is very important to us. We would therefore like to inform you below about the data protection principles of the HAFS Group, which we are committed to complying with in accordance with Articles 13 and 14 of the General Data Protection Regulation (GDPR) in order to enable you to apply for a job with confidence.

The HAFS Group comprises the companies Hauck & Aufhäuser Fund Services S.A. and its two affiliates, Hauck & Aufhäuser Administration Services S.A. and HAL Fund Services Ireland Ltd.

### 1. Who is responsible for data processing?

Hauck & Aufhäuser Administration Services S.A.  
1c, rue Gabriel Lippmann  
L-5365 Munsbach  
Telephone +352 45 13 14 500  
Email: HAAS-FS-QM@hauck-aufhaeuser.com

### 2. What are the contact details of our data protection officer?

DURY Consult GmbH  
Obertorstr. 1  
D-66111 Saarbrücken  
Tel.: +49 681 9580440  
Email: dsb@dury-consult.com

### 3. What does "processing" your data mean?

For the purposes of this statement, the term "processing" refers to any operation performed on personal data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### 4. What data do we process?

We will only collect data about you that is required by law or important for the conduct of our business and that is necessary to achieve the purposes stated in this information on data protection.

We process the following personal data:

- Personal data such as names, addresses, contact details, date of birth, nationality, place of birth, gender, marital status
- Application data such as CV data (employment history, qualifications, skills, licenses), interview transcripts, references, employment references, school/university certificates
- Police clearance certificate (if necessary for the position you are applying for), application photo, secondary employment, residence permit/visa (only in the case of non-EU citizens)

- Where applicable, information from external sources such as publicly accessible professional networks (LinkedIn, Xing, etc.).

We only ask you for data that is necessary for reviewing your application/your suitability for the advertised position or for conducting applicant management. If you do not wish to provide us with this data, this may mean that we are unable to give you sufficient consideration as an applicant. The provision of further data is voluntary.

## **5. On what legal basis and for what purposes do we process your personal data?**

We only process your data to the extent permitted by applicable data protection laws and our internal guidelines.

Specifically, we process your data on the following legal basis and for the following purposes:

- The processing is necessary for the performance and fulfilment of a contract to which you are a party, or for the implementation of measures requested by you prior to entering into a contract (Art. 6(1)(b) GDPR). In summary, the processing serves to decide on your recruitment, application and appointment, as well as the terms and conditions of your employment contract and the verification of any existing work permit.
- To safeguard legitimate interests in the event of legal claims arising from the application process (Art. 6(1)(f) GDPR),
- To include your data in our internal applicant pool for the purpose of checking against other job vacancies, based on your express consent (Art. 6(1)(a) GDPR). You can revoke your consent at any time and free of charge using the contact details above, with effect for the future.
- The processing is necessary for compliance with legal and regulatory obligations to which we are subject in the context of entering into an employment relationship (Art. 6(1)(c) GDPR).

We will only use your data for purposes consistent with those stated in this privacy policy, unless another use is required by law or you have previously consented to another use.

## **6. Who has access to your personal data?**

We use technical and organizational security measures to protect your data against accidental or intentional manipulation, loss, destruction or access by unauthorized persons. In particular, your data is transmitted in encrypted form. The security measures are regularly reviewed and revised in line with technological developments.

### **a. Career portal:**

If you apply for an advertised position or submit a speculative application via our career portal, your data can only be viewed and processed by the recruiting and human resources departments of our company's employees involved in the application process in order to review your profile for the desired position or, if applicable, other suitable job offers.

The career portal also allows you to upload individual application documents (e.g. cover letter, CV, references). The information provided and documents uploaded will be added to our career portal and stored there. The data you upload (documents and text content) will be temporarily stored for processing in selected data centers, all of which are located in Germany.

The subsequent processes in the application procedure take place exclusively at our company.

**b. Outside the career portal:**

If you provide us with your application documents outside the career portal, your personal data will also be viewed and processed exclusively by the recruiting and human resources departments and by our company's employees involved in the application process in order to review your profile for the desired position or, if applicable, other suitable job offers.

**c. Other access:**

Within the HAFS Group, your data will only be passed on to those persons who need your data to fulfil the above-mentioned processing purposes.

In addition, your data may also be transferred to the following external parties to the extent necessary:

- Service providers who process personal data on our behalf, i.e. in accordance with our instructions and on the basis of a contract for order processing (in accordance with Art. 28 GDPR) (e.g. in the areas of recruiting/applicant management, IT, software, hosting, maintenance, communication, printing/shipping);
- Providers of databases accessible to credit institutions in the context of sanctions checks;
- Authorized representatives and service providers who process the data themselves as controllers (e.g. lawyers, payment service providers, banks).

Your data will only be passed on beyond this if we are obliged to do so in order to comply with legal requirements or if you have given us your consent.

Data is not regularly transferred to countries outside the EU or EEA (third countries). In rare cases, it may be necessary to transfer data to countries outside the EU or EEA. Where applicable, the transfer is based on an adequacy decision by the EU Commission or subject to appropriate safeguards, a copy of which we will provide to you on request.

**7. How long do we store your personal data?**

We store your personal data upon receipt of your application. If we accept your application and an employment relationship is established, we will store your applicant data for as long as it is necessary for the employment relationship and insofar as legal regulations establish an obligation to retain it. If we reject your application, we will store your applicant data for a maximum of six (6) months after rejecting your application, unless you give us your consent to store it for longer or we need your data to defend against legal claims.

**8. What rights do you have with regard to your personal data?**

In accordance with the GDPR, you have the following rights, which you can assert against us. Please note that some of these rights are subject to certain conditions.

- Information about your personal data
- Rectification of your personal data
- Deletion of your personal data

- Restriction of the processing of your personal data
- Objection to the processing of your personal data
- Withdrawal of consent given to us, with effect for the future
- Data portability

To exercise your rights, please contact us or our data protection officer using the contact details provided above.

You also have the right to lodge a complaint with any data protection supervisory authority.

The supervisory authority responsible for us is the  
National Commission for Data Protection, Grand Duchy of Luxembourg – CNPD  
1, avenue du Rock'n'Roll  
L-4361 Esch-sur-Alzette  
<https://cnpd.public.lu.html>