



# DATA PROTECTION NOTICE FOR JOB APPLICANTS

April 2024

## 1 INTRODUCTION

The protection of your personal data is of utmost importance to Advanzia Bank S.A. (“the Bank”), a financial institution based in Luxembourg, Trade Register under number B 109 476, operating the website <https://www.advanzia.com/en-gb/>. This notice applies to the job applicants of the Bank (“you”) in the context of the Bank’s recruitment process.

The Bank ensures the right to the protection of personal data for you, a fundamental right, as part of the Bank’s social responsibility. Our compliance with the transparency obligations set by the General Data Protection Regulation (“GDPR” or “Regulation (EU) 2016/679”) is key for this purpose. This Data Protection Notice ensures that the Bank’s processing activities are transparent to you and that you are able to exercise your rights under GDPR.

In addition, considering that the Bank is located in Luxembourg, this Data Protection Notice was drafted with respect to the data protection law of Luxembourg, namely the Act of 1 August 2018 on the Organization of the National Commission for Data Protection and Implementing the GDPR.

Please note this Data Protection Notice is also available on the Bank’s website: <https://www.advanzia.com/en-gb/privacy-policy>.

## 2 WHAT DATA CATEGORIES ARE PROCESSED?

- a) For recruitment purposes (depending on the stage of the recruitment process and your personal circumstances): your CV, name, nationality, date and place of birth, telephone number, email, marital status, address, children, social security number, photo, background information, social activities, motivation letter, work permits.
- b) Additional information in case of hiring: ID card information, copy of ID, name, emergency contacts, bank account details.
- c) Evidence of a clear criminal record.

## 3 WHY DO WE PROCESS YOUR DATA?

### 3.1 For the Bank’s legitimate interest to recruit new employees

The Bank has a legitimate interest to recruit new employees. For this purpose, the Bank may request some or all the information from you specified in Section 2, point a).

### 3.2 To enter into a contract with you

With regard to you information specified in Section 2, point b), additional information is requested from you in case of hiring in order to identify you and to take steps prior entering into an employment contract with you.

### **3.3 For legal obligations under employment law**

As for the data categories in Section 2, point c), it is necessary for compliance with legal obligations with Luxembourg law, as the Bank is required to request criminal records of new employees. With regard to new employees, the Bank is required to set up a process for all the staff to ensure that all employees fulfil the criteria of adequate professional standing according to the risk of money laundering and terrorist financing related to the duties and functions to be carried out. Please note that the Bank is required to conduct a background check for this purpose.

The Bank does not hold a register of criminal convictions as such, as per Article 10 GDPR.

## **4 WHO CAN ACCESS YOUR DATA?**

The Bank does not provide access to its job applicant's data to third parties. In case you are applying through a recruitment agency, that agency forwards your data to the Bank.

## **5 HOW LONG IS YOUR DATA STORED?**

The Bank is storing personal data related to job applications for 12 months. Your data is deleted following that period.

## **6 WHICH RIGHTS DO YOU HAVE?**

### **6.1 Right of access**

If you wish to have access to your personal data, the Bank will provide you a copy of your personal data in accordance with your request.

### **6.2 Right to rectification**

If you believe that your personal data is inaccurate or incomplete, you can ask the Bank to correct it. The Bank recommends exercising this right by contacting our HR department or the recruitment agency you are in contact with.

### **6.3 Right to erasure ("right to be forgotten")**

If you wish, you can ask the Bank to delete your personal data, within the limits of the Bank's legal obligations.

### **6.4 Right to restriction of the processing**

You can also ask to restrict the processing of your personal data, in particular if you consider it inaccurate or if you object to the processing of your personal data. Please note that in that case the data in question will be restricted for the time it takes the Bank to investigate your request.

### **6.5 Right to data portability**

You can request the Bank to receive your personal data in a structured, commonly used and machine-readable format. The Bank can also send it to third parties if you wish so. However, please note that this right is limited to personal data where it is processed based on your consent or contract, and where the processing is carried out by automated means (i.e. not paper-based).

## **6.6 Right to object**

You may object to the processing of your personal data, in particular if you do not agree with a process carried out based on legitimate interest, for reasons specific to your specific circumstances, by precisely indicating which processing you are objecting to. If you object to a processing activity, the Bank will stop processing your personal data related to that activity, unless there are compelling legitimate grounds for them, or if this is necessary in order to establish, exercise or defend legal claims.

## **7 HOW CAN YOU CONTACT THE BANK?**

Should you have any questions related to the protection of your personal data, or if you would like to exercise your rights under the GDPR, you can contact our Data Protection Officer at [dpo@advanzia.com](mailto:dpo@advanzia.com). Our HR department is also at your disposal to fulfil your requests under the GDPR.

## **8 WHERE CAN YOU FILE A COMPLAINT?**

Should you wish to lodge a complaint at a supervisory authority, you can contact CNPD, based in Luxembourg (<https://cnpd.public.lu/en/particuliers.html>).