

Privacy notice candidates

During the recruitment process, Andbank Luxembourg (we), process your data. This notice provides you with certain information required under the 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 (the “GDPR”) and the Act of 1st August 2018 on the protection of individuals with regard to the processing of personal data in criminal and national security matters, notably on how your personal data will be processed for the purposes of the recruitment process.

Data controller:

The data controller is the natural or legal person, which, alone or jointly, determines the purposes and means of the processing of personal data. Andbank Luxembourg is data controller for the purpose of the recruitment process.

Personal data:

Personal data is defined as any information relating to an identified or identifiable natural person.

To process your application, we process notably the following categories of personal data:

- the data provided in your resume (CV) and any cover letter;
- any personal data provided to us by your referees, head hunter or interim company;
- any additional data you may have provided us with; and
- data accessible from publicly accessible sources, such as LinkedIn, jobs.lu.
- data regarding your remuneration and salary expectations.

The above will notably include your name, gender, title, address, contact details, education, diplomas, photography and employment history, etc...

We will process this data (i) internally notably by the concerned department, HR, compliance, and management; and (ii) externally with the head office located in Andorra which benefits from an adequacy decision of the EU Commission.

GDPR principles:

We will process your personal data in compliance with the GDPR as laid down in chapter 2 of the regulation, namely:

- lawfulness, fairness and transparency;
- purpose limitation;
- data minimization;
- accuracy;
- storage limitation;
- integrity and confidentiality.

Purpose of the data processing:

Your personal data will for the purpose of our legitimate interest to assess your skills, qualifications, and *in fine* to determine your suitability for the role. It will also be used to carry out background, reference checks and comply with regulatory requirements.

You may object to providing such personal data. If so, we may not be able to take your application any further.

Processing of special categories of personal data:

We will need to process sensitive data notably any disability to consider whether we need to provide appropriate adjustments during the recruitment process.

Security measures in place to protect your data:

We have appropriate security measures in accordance with the principles laid down in the GDPR notably to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data on a need-to-know basis to be processed based on our specific instructions and subject to a duty of confidentiality. We have procedures in place to deal with any suspected data security breach and will notify you and the CNPD (as defined below) of any suspected breach where legally required.

Retention period:

We retain your personal data for a period of three years after your last exchange related to your latest application.

Your rights:

Your rights in connection with your personal data are:

- the rights of access: you have the right to obtain from us confirmation as to whether or not personal data concerning you is being processed (art. 15 GDPR);
- correction: you have the right to obtain from us, without undue delay, the rectification of inaccurate personal data (art. 16 GDPR);
- erasure ('right to be forgotten'): you have the right to request the erasure of personal data concerning you without undue delay when it is possible and not in contradiction with other legal obligations (art. 17 GDPR);
- restriction: you may request the restriction of processing notably when the processing is unlawful or if you have doubts on the accuracy of the information processed (art. 18 GDPR);
- transfer (data portability): under certain circumstances you may ask to receive the personal data concerning you, in a structured, commonly used and machine-readable format and you also have the right to transmit those data to another controller (art. 20 GDPR);
- right to object: you have the right to object, on grounds relating to your particular situation, at any time to processing of personal data (Art. 21 GDPR).

The above mentioned rights may be exercised by contacting the DPO as detailed below.

Contacts related to your data protection rights:

For any questions in relation to the processing of your personal data or the exercise of your rights you may contact the Data Protection Officer ("**DPO**") at + 352 27 49 76 1 or by email at dpo@andbank.lu.

You also have the right to make a complaint at any time to the National Commission for Data Protection (*Commission Nationale de Protection des Données* "**CNPD**") <https://cnpd.public.lu/en/support/contact.html>.