



CREUTZ & PARTNERS

THE ART OF ASSET MANAGEMENT

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

As part of the application and selection process, the applicant provides Creutz & Partners with a range 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)¹ and the data protection provisions that apply in Luxembourg. Personal data is processed in particular on the basis of your consent pursuant to Article 6(1), point a) GDPR and in order to perform pre-contractual measures pursuant to Article 6 (1), point b) GDPR. Creutz & Partners processes the data in physical or electronic form. Within Creutz & Partners, access to the personal data is granted to those persons who require the data to conduct the application process. Creutz & Partners processes the personal data at the company's headquarters in Luxembourg.

Creutz & Partners generally retains the applicant's personal data for the duration of the selection and application process. Thereafter, the data will be returned to the applicant or deleted or destroyed.

Creutz & Partners may also retain the applicant's personal data for a longer period of time in individual cases (at the explicit request or with the explicit consent of the applicant) in order to be able to consider the applicant for future job advertisements and application procedures. In any case, Creutz & Partners will delete/destroy the applicant's personal data no later than 2 years after receipt.

Further information on data processing when contacting us via e-mail or our contact form on the website <https://www.creutz-partners.com> is available to the applicant in the privacy policy for the use of the websites, the CP NVST app and social media, accessible via the following link: <https://www.creutz-partners.com/de/creutz-und-partners/privacy-statement>

1. Data protection rights of the applicant

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

a) Access to the personal data and data portability

The applicant has the right to obtain confirmation as to whether or not personal data concerning him/her is being processed. If this is the case, he/she is entitled to receive a range of information about this personal data, such as information about the purpose of the processing or the origin of the data if the data was not provided to us by the applicant (Art. 15 GDPR). On request, the applicant can also receive a free copy of this information.

The applicant also has the right to receive the personal data concerning him/her, which he/she has provided to Creutz & Partners, in a structured, commonly used and machine-readable format and has the right to have this data transmitted directly from Creutz & Partners to third parties, provided that the processing is based on consent or on the fulfilment of a contract and is carried out using automated procedures.

b) Correcting, updating and/or deleting personal data

The applicant has the right to have his/her personal data corrected, updated or deleted. After receipt of the deletion instruction, the personal data will be deleted (electronic data) or destroyed (data in physical form) by Creutz & Partners immediately, provided that there are no legal/regulatory retention periods or other reasons listed under Art. 17 (3) GDPR to prohibit deletion.

c) Right to withdraw consent

The applicant has the right to withdraw his/her consent to the data processing by Creutz & Partners at any time and without negative consequences. The withdrawal of the consent does not affect the lawfulness of the data processing carried out prior to the withdrawal. As soon as consent is withdrawn, Creutz & Partners shall immediately cease processing the personal data, unless further processing or storage is permitted or required in accordance with the applicable legislation relating to personal data or other applicable laws and regulations. The withdrawal of consent may mean that Creutz & Partners may not (or may no longer) be able to respond to enquiries from the applicants or may no longer be able to consider the applicant in future application procedures.

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

The applicant has the right to restrict the processing of his/her personal data (i) if the personal data is incorrect, (ii) if the processing is unlawful but he/she prefers the restriction of the data processing to the deletion of the personal data, (iii) if Creutz & Partners no longer needs the personal data for processing purposes, but the storage of such data is requested by the applicant for the assertion, exercise or defence of legal claims in court or (iv) if the applicant has lodged an objection to the processing of his/her personal data in order to safeguard the legitimate interests of Creutz & Partners, but it has not yet been determined whether the applicant wishes to exercise his/her right of objection, exercise or defence of legal claims, or (iv) if the applicant has objected to the processing of his/her personal data for the purposes of the legitimate interests pursued by Creutz & Partners, but it has not yet been established whether the legitimate interests of Creutz & Partners override the interests, fundamental rights and freedoms that require the protection of his/her personal data.

The applicant has the right to object at any time to the processing of his/her personal data collected and processed for the purposes of the legitimate interests of Creutz & Partners or for the performance of a task carried out in the public interest. In such case, the processing of the applicant's personal data will cease, unless the data processing serves the establishment, exercise or defence of legal claims of Creutz & Partners or is justified by legitimate grounds which override the interests, rights and freedoms of the applicant.

¹ 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.



CREUTZ & PARTNERS

THE ART OF ASSET MANAGEMENT

e) Right to lodge a complaint/Enforcing your rights as a data subject

To assert his/her rights, to obtain additional information or in the event of a complaint, the applicant can contact Creutz & Partners in writing at any time using the following contact details:

Creutz & Partners The Art of Asset Management S.A.

18, Duarrefstrooss

L-9944 Beiler, Luxembourg

Phone: +352 978 22 11

E-Mail address: datenschutz@creutz-partners.com

Should the applicant not be satisfied with the response or the treatment of his request, he/she has the right to lodge a complaint with a data protection authority.

In Luxembourg, the competent data protection authority is the National Commission for Data Protection («Commission nationale pour la protection des données»). Applicants can contact the Luxembourg data protection authority as follows:

Commission nationale pour la protection des données

15, Boulevard du Jazz

L-4370 Belvaux

Phone : +352 261 06 01

E-mail address : info@cmpd.lu

Website: www.cnpd.lu

2. Automated decision-making/Profiling

Creutz & Partners does not use any automated decision-making, including profiling, in the processing of personal data. This means that we do not make any decisions about applicants based on their personal data through automated means and without human intervention.

3. Security of processing

The confidentiality, and therefore the security of personal data is very important to Creutz & Partners. We have therefore taken appropriate technical (e.g. virus scanners, firewalls) and organisational measures (e.g. access controls/ restrictions) pursuant to Article 32 GDPR in order to guarantee the security of personal data and to protect these against unlawful processing, unlawful or unintentional modification or erasure and against unauthorised forwarding or unauthorised access.

All employees of Creutz & Partners who have access to personal data must comply with our internal guidelines and procedures for processing personal data in order to protect these data and guarantee their confidentiality.