

## Utmost Luxembourg S.A.

### Recruitment Privacy Notice

In this Privacy Notice, references to "we" or "us" are to **Utmost Luxembourg S.A.**, with its offices at 4, rue Lou Hemmer, L-1748 Luxembourg, Grand Duchy of Luxembourg, and registered with the Luxembourg Trade and Companies Register under reference number B37604.

#### What is Personal Data?

**"Personal Data"** means any information relating to an identified or identifiable natural person (data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

#### Who is responsible for your Personal Data?

As part of our recruitment process, we collect Personal Data relating to job applicants. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

For the purpose of the General Data Protection Regulation (GDPR), Utmost Luxembourg S.A. acts as controller for the processing of your Personal Data.

#### What Personal Data do we collect from you?

During the recruitment process, we collect a range of information from you. This includes:

- Identification information and contact details (including your name, address, telephone number and email address);
- Information about your entitlement to work in the European Union (EU) (including visa status);
- Details of your qualifications, skills, experience and employment history;
- Information about your current and expected level of remuneration;
- Health and safety related information, where relevant.

Utmost Luxembourg S.A. is an equal opportunities employer and does not in any way discriminate against any individual who provides information in line with Equal Opportunity categories should you choose to provide this. Information provided is only used for reporting on the diversity of our candidate base across the organisation.

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## What Personal Data do we collect from others sources?

In addition to the information that we collect directly from you, we also collect information from other sources:

- Official authorities (for financial, immigration and criminal history);
- Your previous employers and named references;
- The educational institutions you attended;
- The recruitment agency, if applicable;
- From publicly accessible sources, such as LinkedIn, etc.

We also collect information from other sources at the offer stage:

- Health data (obtained through our Occupational Health provider ASTF-Association pour la Santé au Travail du Secteur Financier, who acts as an independent controller for that purpose);
- Results of background checks performed by our third-party service provider.

## Why do we process your Personal Data?

We need to process your Personal Data to take steps upon your application prior to entering into a contract with you. If your application is successful, we may also need to process your Personal Data to enter into a contract with you. In some cases, we need to process Personal Data to ensure that we are complying with our legal obligations. For example, it is mandatory to check a successful applicant's eligibility to work in the EU.

We also have a legitimate interest in processing Personal Data during the recruitment process and for keeping records of the process. Processing Personal Data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.

We may process Equal Opportunity data, language details and education institutions to monitor recruitment statistics. We may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. We process such information to carry out our obligations and exercise specific rights in relation to employment.

## Who has access to your Personal Data?

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the Human Resources recruitment team, managers in the business area with a vacancy, interviewers involved in the recruitment process, and other internal department such as IT, DPO, Audit, etc only where access to the data is necessary for the performance of their roles.

Your information is shared with third-parties in the context of the provision and the management of the recruitment platform managed by our service provider. If your application is successful and we make you an offer of employment, we will then share your data with a third-party service provider to obtain necessary background checks. These third-

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parties service providers will collect and process your Personal Data on our behalf and in accordance with our instructions.

We may also share your contact details with third-party providers for the performance of psychometric assessments.

If your Personal Data are transferred to a recipient in a country that does not provide an adequate level of protection of Personal Data, we will take measures to ensure that your Personal Data are adequately protected, such as entering into EU Standard Contractual Clauses with these third-parties. In other cases, your Personal Data will not be supplied to third-parties, except when required by law.

### **How are your Personal Data secured?**

Utmost Luxembourg S.A. has taken adequate safeguards to ensure the confidentiality and security of your Personal Data. We have implemented appropriate technical, physical and organisational measures to protect Personal Data against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorised disclosure or access, and against all other forms of unlawful processing (including, but not limited to unnecessary collection) or further processing.

Utmost Luxembourg S.A. is ISO 27001 and ISO 27701 certified.

### **How long do we keep your Personal Data?**

We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Notice, and to comply with our legal and regulatory obligations.

We will retain your Personal Data for a period of 2 years after the position you applied for has been filled. We retain your Personal Data for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your Personal Data in accordance with our data retention policy.

If your application for employment is successful, Personal Data gathered during the recruitment process will be transferred to your Human Resources file (electronic and paper based) and retained during your employment.

### **Your rights**

Under the General Data Protection Regulation, you have a number of important rights. You have the right to access any Personal Data concerning you that has been collected and processed by Utmost Luxembourg S.A. as controller. You also have the right to rectification of any inaccurate Personal Data. Finally, you have the right to erasure of Personal Data in addition to the restriction and/or the objection to processing as well as the right to data portability.

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You can exercise your rights by sending a written dated request addressed directly to our Data Protection Officer whose contact details are provided below. We may ask for a copy of your ID card, passport or other proof of identity if we need it to verify your identity.

We will respond without delay and within one month of receipt of your request.

We will not ask for a fee to exercise any of your rights in relation to your Personal Data, unless your request is unfounded, repetitive or excessive, in which case we may charge a reasonable amount in the circumstances. We will let you know of any charges before completing your request.

If you have any questions related to the processing of your Personal Data by Utmost Luxembourg S.A. or you have concerns regarding the way your Personal Data is processed, you can contact our Data Protection Officer whose contact details are provided below.

You also have the right to lodge a complaint with the data protection supervisory authority in Luxembourg, the Commission Nationale pour la Protection des Données (CNPD), using the form available on their website: <https://cnpd.public.lu/en/particuliers/faire-valoir/formulaire-plainte.html>; or with the respective supervisory authority in your country of habitual residence, place of work or with the supervisory authority of the country in which an alleged data protection infringement occurred.

#### **How to contact our Data Protection Officer**

Utmost Luxembourg S.A.  
C/o the Data Protection Officer

4, rue Lou Hemmer  
L-1748 Luxembourg  
Grand Duchy of Luxembourg.

Email: [data.privacy@utmostgroup.lu](mailto:data.privacy@utmostgroup.lu)

#### **Changes to our Recruitment Privacy Notice**

This Privacy Notice is subject to regular review and may be updated from time to time.

Last update: 17/10/2025

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