



LGT (Middle East) Ltd.
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Regulated by the DFSA



Data privacy notice for natural persons in accordance with the DIFC Data Protection Law (DPL)

Applies to applicants

Valid from: May 2022

This data privacy notice is intended to provide you with an overview of the processing of the personal data held at LGT and the resulting rights under the provisions of the DIFC Data Protection Law (DIFC Law no. 5 of 2020) (hereinafter referred to as the "DPL"). Your data are processed in order to review or establish an employment or service relationship (employment relationship).

Within the context of your application, we are reliant upon compiling and processing personal data which are required for entering into an employment relationship. Without these data, we are generally not in a position to enter into an employment relationship.

Should you have any questions about particular data processing or want to exercise your rights, please contact:

The Controller:
LGT (Middle East) Ltd.
Human Resources
DIFC, The Gate Building (East), Level 4
P.O. Box 506793 Dubai, United Arab Emirates
Phone: +971 4 436 7000
E-mail: lgt.me@lgt.com

The Data Protection Officer:
LGT (Middle East) Ltd.
Data Protection Officer
DIFC, The Gate Building (East), Level 4
P.O. Box 506793 Dubai, United Arab Emirates
Phone: +971 4 436 7000
E-mail: lgt.ae.dpo@lgt.com

1 From which sources do the data originate (source) and which data are processed (categories of data)?

We process personal data we receive from applicants during the recruitment process for the purpose of managing the application process and drawing up an employment contract. In addition to the data you provided in your application, we also process the data you provide to us during interviews. Depending on the role for which you have applied, we may use a testing method from a service provider to establish candidates' profiles and suitability in greater detail. If we do this, the results will be discussed openly with you. A discussion to raise awareness may also be organized with a body defined by LGT if any further security checks are required, which again depends on the role.

In the case of speculative applications, we also check regularly to determine whether your profile may match other vacancies within LGT Group. If a suitable position is available, your application data will be forwarded by the relevant internal HR department.

If you apply for several positions at LGT Group companies at the same time, the relevant HR departments will be made aware that you have submitted multiple applications. This has no impact on the ongoing application process.

We process your personal data to assess your interests, skills and qualifications. We always do this in relation to the position for which you have applied. We also take measures to check them (e.g. checking your work references, the debt enforcement register and the register of criminal convictions), bringing information from third parties (e.g. references) into the application process in consultation with you.

We use the term "personal data" to refer to the following categories of data in particular:

- Personal details (e.g. name, date of birth, nationality)
- Address and contact details (e.g. physical address, telephone number, e-mail address)
- Image data (job application photo)
- Data from public sources and registers (e.g. debt enforcement information, register of criminal convictions)
- Details of the person and family (e.g. age, gender, professional career, marital status, hobbies, name of partner and children, partner's occupation)
- Information on professional and personal background (e.g. professional qualifications, professional experience, testimonials)
- Information on position and activities (e.g. starting date, role, salary, working hours, presence and absence)
- Information on memberships and outside mandates (e.g. lecturing)
- Information on health (e.g. physical disabilities)

2 For what purposes and on what legal basis are your data processed?

We process personal data in accordance with the provisions of the DPL for the following purposes and on the following legal bases (Art. 10 (1) DPL):

- For the performance of a contract or in order to take steps prior to entering into a contract (Art. 10 (1) letter b DPL) within the context of establishing an employment relationship and the use of applications for internal and external communications (via audio, video, screen sharing, chat features).
- For compliance with a legal obligation (Art. 10 (1) letter c DPL) or in the public interest, in particular to adhere to statutory requirements with regard to archiving obligations (e.g. application documents) and security requirements (e.g. applicant security checks).
- For the purposes of the legitimate interests pursued by us or by a third party (Art. 10 (1) letter f DPL) for specifically defined purposes, in particular for assessing the suitability of applicants (e.g. personality tests) and the use of applications for internal and external communications (via audio, video, screen sharing, chat features).
- Based on your consent (Art. 10 (1) letter a DPL), if you have given us consent to process personal data for certain purposes. Data processing with consent includes creating an applicant profile and obtaining references. You have the right to withdraw your consent at any time. The withdrawal of consent shall only be effective for the future and shall not affect the lawfulness of data processed before the withdrawal of consent.

We reserve the right to further process personal data that have been collected for one of the above purposes for the other purposes too if this is consistent with the original purpose or permitted or provided for by law (e.g. reporting obligations).

3 Who obtains access to personal data and how long are they stored for?

The internal and external bodies which require the data within the context of the application process and for complying with statutory obligations receive access to your personal data. These recipients may also receive access to personal data that we process for the purposes of legitimate interests. Relevant recipients within LGT may include bodies in charge of HR administration and HR management (e.g. line managers).

Data are only transferred to third countries (including UAE, outside the DIFC) outside of the DIFC or to international organizations provided an adequate level of protection for that personal data is ensured in the relevant third

country as determined by the DIFC Commissioner of Data Protection (hereinafter referred to as the "Commissioner") from time to time.

In the absence of an adequate level of protection, data transfers will be made provided appropriate safeguards are in place, for example implementing standard data protection clauses with entities with whom we share your personal data, or other specific derogations apply. Such derogations include you having given your explicit consent to transfer data, the data transfer being necessary for the implementation of pre-contractual measures, the data transfer being necessary for reasons of substantial public interest (e.g. for criminal law matters) or that it is required by law (e.g. reporting obligations).

We will inform you of the details separately if required by law. Processors in third countries are obligated to protect the data.

You can find out from our data protection officer to which recipients and/or recipient categories your personal data have been transferred.

Your personal data are processed during the application process. After the application process has ended, we will store your personal data for a further six months to defend against, justify or assert any legal claims. If you are hired, we will process and store your personal data for the duration of your employment relationship in accordance with the privacy policy for employees.

4 Is automated decision-making, including profiling, carried out?

No automated decision-making is used in the application process or to establish the employment relationship. However, some of your data are processed automatically with the aim of assessing certain personal aspects (profiling). In connection with applications, we use profiling to assess the suitability of applicants for a position (e.g. applicant profile, applicant assessments, psychological aptitude tests).

5 What data protection rights do you have?

You have the following data protection rights regarding your personal data (Art. 32 to 39 DPL):

5.1 Right of access

You may obtain from us information as to whether and to what extent personal data concerning you are being processed (e.g. categories of personal data concerned, purpose of processing).

5.2 Right to rectification, erasure and restriction of processing

You have the right to obtain without undue delay the rectification of inaccurate or incomplete personal data concerning you. In addition, your personal data must be erased if these data are no longer necessary in relation to the purposes for which they were collected or processed, you have withdrawn your consent or these data are being unlawfully processed. Furthermore, you have the right to obtain restriction of processing.

5.3 Right of withdrawal

You have the right to withdraw your consent for the processing of your personal data for one or more specific purposes at any time if processing is based on your explicit consent. This shall also apply to the withdrawal of declarations of consent that were submitted before the DPL came into effect, i.e. before July 1, 2020. Please note that the withdrawal of consent is only effective for the future. Processing that was carried out before the withdrawal is not affected. The withdrawal does not have any effect on data processing based on other legal bases either.

5.4 Right to data portability

You have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and to have those data transmitted to another controller to the extent the processing is based on your consent or the performance of a contract and it is carried out by automated means and this is technically feasible.

5.5 Right to lodge a complaint

You have the right to lodge a complaint with the Commissioner.

6 Right to object

6.1 In individual cases

If the processing of your personal data is carried out in the public interest or in the exercise of official authority vested in LGT, or to safeguard the legitimate interests of LGT or a third party, you have the right to object, on grounds relating to your particular situation, at any time to this processing.

6.2 Direct marketing

You have the right to object to the use of your personal data for direct marketing purposes at any time. Where you object to this type of processing, we shall no longer process your personal data for such purposes.

Requests should ideally be made in writing to the data protection officer, who is also the point of contact for any other data protection issues you may have.

We will not discriminate against you based on the exercise of your data subjects rights, such as charging different prices or rates for services, denying any services, providing a different quality of services, unless the difference of pricing or quality of services applied are reasonably directly related to the value provided by your data.

LGT reserves the right to amend or update this data privacy notice from time to time and to publish it on the LGT website. The respective date of modification can be found at the top of this data privacy notice.