



**LGT Group Holding Ltd.**  
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## **Data privacy notice for natural persons in accordance with the EU General Data Protection Regulation (GDPR) and Data Protection Act (DPA)**

Applicable to applicants

Valid from: July 2020

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 EU General Data Protection Regulation (GDPR) and the Data Protection Act (DPA). 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:

### **Contact details of the data protection officer:**

LGT Group Holding Ltd.  
Data Protection Officer  
Herrengasse 12  
9490 Vaduz  
Liechtenstein  
Phone: +423 235 11 22  
E-mail: lgt.datenschutz@lgt.com

Controller:  
LGT Group Holding Ltd.  
Group Human Resources  
Herrengasse 12  
9490 Vaduz  
Liechtenstein  
Phone: +423 235 11 22  
E-mail: info@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 organised 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 GDPR and the DPA for the following purposes and on the following legal bases (Art. 6 (1) GDPR):

- *For the performance of a contract or in order to take steps prior to entering into a contract (Art. 6 (1) letter b GDPR)* within the context of establishing an employment relationship.
- *For compliance with a legal obligation (Art. 6 (1) letter c GDPR) or in the public interest (Art. 6 (1) letter e GDPR)*, 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. 6 (1) letter f GDPR)* for specifically defined purposes, in particular for assessing the suitability of applicants (e.g. personality tests).

- *Based on your consent (Art. 6 (1) letter a GDPR)*, 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. This shall also apply to the withdrawal of declarations of consent that we received before the GDPR came into effect, i.e. before 25 May 2018. 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 countries outside the European Union (EU) or European Economic Area (EEA) (so-called third countries) provided that this is necessary for the implementation of pre-contractual measures, that you have given us your explicit consent, that it is necessary for important reasons of public interest (e.g. for criminal law matters) or that it is required by law (e.g. reporting obligations under tax law). 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 with regard to your personal data (Art. 15 to 21 GDPR):

#### 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 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.

#### 5.4 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 GDPR came into effect, i.e. before 25 May 2018. 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.

#### 5.5 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 (e.g. another bank).

#### 5.6 Right to lodge a complaint

You have the right to lodge a complaint with the competent supervisory authority<sup>1</sup>.

The contact details for the competent supervisory authority<sup>1</sup> are:

Data Protection Office Liechtenstein<sup>1</sup>  
Städtle 38  
P.O. Box  
9490 Vaduz  
Liechtenstein  
Phone: +423 236 60 90  
E-mail: info.dss@llv.li

Österreichische Datenschutzbehörde<sup>1</sup>  
Barichgasse 40-42  
1030 Vienna  
Austria  
Phone: +43 1 52 152-0  
E-mail: dsb@dsb.gv.at

### 6 Right to object

#### 6.1 In individual cases

If the processing of your personal data is carried out in the public interest 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 informally 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.

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 start of this data privacy notice.

<sup>1</sup> You may also contact another supervisory authority of an EU or EEA member state, for example in your habitual residence, place of work or the place of an infringement of the GDPR.