

# *Privacy Notice*

## *Recruitment and vacancies*

SWISS LIFE LUXEMBOURG S.A.

Swiss Life Luxembourg S.A. (Swiss Life) aims to be transparent with how we collect and use personal information we gather about our candidates (“Personal Data”). Our applicants, prospects, website and building visitors’ privacy is important to us, and we will protect and respect the personal information in accordance with the EU regulation 2016/679 of 27 April 2016, General Data Protection Regulation (“GDPR”), and other legal provisions applicable in this respect, if any.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are aware of how and why we are using such information.

### *Data controller*

Swiss Life is the Data Controller and is responsible for deciding how we hold and use Personal Data.

If you have any questions, concerns or comments regarding our processing of Personal Data, please contact our Data Protection Officer by email [dpo.sli@swisslife.com](mailto:dpo.sli@swisslife.com) or by post at 6, rue Eugène Ruppert L-2453 Luxembourg.

### *Information collected*

The categories of Personal Data processed by Swiss Life are the following:

- Personal identification data: (e.g. first name, last name, national registration number);
- Contact data (e.g., phone number, e-mail address, post address);
- Personal details (e.g., date of birth, nationality, civil status);
- Data regarding Academic curriculum; Certifications; Professional experience, career, and current employment;
- Cover letter and other information included in a CV such as references, publications; membership status (for example to associations, charities) and leisure activities and interests.

## *Special categories of data processed*

Swiss Life will request extract of criminal record as part of the recruitment process and might perform background checks.

## *Purpose and legal basis*

Swiss Life collects and processes Personal Data provided to it (e.g., by sending an application, be it by responding to a job posting by submitting your CV, etc.) for the purpose of selecting and recruiting new collaborators. Legal basis for the processing is the performance of contract or taking steps to perform a contract (Art. 6. (1) b GDPR). In case of spontaneous application, the legal basis for the processing is consent of the data subject (Art. 6. (1) a GDPR). You have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact [hr@swisslife.com](mailto:hr@swisslife.com).

Regarding background checks and collection of criminal record extract, in the context of recruitment process, the legal basis for the processing is compliance with a legal obligation (Art. 6. (1) c GDPR).

## *Retention period*

Swiss Life does not keep Personal Data longer than necessary for managing recruitments. Personal Data will be deleted six months after the candidate has not been selected.

In case of spontaneous application, your CV will be deleted 6 months after the application.

Extracts of criminal records are kept only three days.

## *Personal data transfers to third parties*

We may provide some specific Personal Data of candidates to external companies that provide recruitment services on our behalf.

## *Recipients of data*

While processing Personal Data for the above-mentioned purpose, Swiss Life will use its internal HR system and platform and at this occasion, a limited number of employees of Swiss Life AG in Switzerland might have access to the Personal Data.

## *Your rights*

At any time, you may exercise your right to request access to or rectification of and erasure of any Personal Data. You may also object to data processing or request a restriction of processing and benefit of a right to data portability (as the case may be), in compliance with applicable data protection law.

You may do so by sending a signed request with a copy of your ID card or other proof of identity by email to [dpo.sli@swisslife.com](mailto:dpo.sli@swisslife.com) or by post to Swiss Life (Luxembourg) S.A., attn. of Data Protection Officer, 6 rue Eugène Ruppert, L-2453 Luxembourg.

As a data subject, you have the right to lodge a complaint with a supervisory authority (in the Member State of the European Union of your usual place of residence, your place of work or the place where the violation occurred) if you consider that the processing of Personal Data infringes the applicable legislation relating to data protection.

### *Information security*

We have put in place appropriate security measures to prevent Personal Data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process Personal Data on our instructions, and they are subject to a duty of confidentiality. Third parties will only process Personal Data on our instructions and where they have agreed to treat the information confidentially and to keep it secure. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.