

## Data Privacy Notice – Job applicants

### Introduction

This Privacy Notification (the “Notification”) applies to all individuals (“you”) who apply for a position with EFG Bank (Monaco) SAM, which is lawfully established in Monaco (Villa Les Aigles, 15 avenue d'Ostende - Monaco) (“we” or “us”). EFG Group means the group of companies composed of EFG International AG and its worldwide affiliates (each an “EFG Group entity”).

This Notification covers Personal Data (as subsequently defined) that is held electronically and also applies to paper-based filling systems. We are the data controller of these Personal Data.

#### **Contact of the Bank and the Data Protection Officer**

EFG Bank (Monaco) SAM

Villa Les Aigles  
15 avenue d'Ostende  
Boîte postale 37  
98001 Monaco  
+377 93 15 11 11  
[dpo-monaco@efgbank.com](mailto:dpo-monaco@efgbank.com).

#### **Contact of the Bank's representative in the European Union**

EFG Bank (Luxembourg) S.A

56 Grand-Rue  
2013 Ville-Haute Luxembourg  
+352 26 45 41.

### Types of Personal Data collected and processed

For the purposes of this Notification “Personal Data” means any information which relates to an identified or identifiable individual, or which could be used to identify an individual. The types of Personal Data that we may collect from or about you may include, on a case by case basis:

- Personal and family information: name; surname; father’s name; mother’s name; spouse’s name (if applicable); home contact information (address and telephone number); date and place of birth; gender; entitlement to residency and work permit; citizenship; military status (excluding motives of discharge for unfitness or deferment, if any); social security number(s), ID number, issue date, issuing authority; passport number, issue date and expiration date; mobile phone number; e-mail address; tax number; competent tax office; details of outside business activities and directorship(s) (where relevant for employment-related purposes); family status; and details of dependants (name, date of birth, relationship with you);
- Information on your education and experience: details of previous employers and recommendations, other information related to your previous employment, i.e. job title and/ or position and description of responsibilities/ duties; type of employment (fixed term or indefinite term); work schedule and shifts; location; term of service; previous work contact information (telephone number, address, fax number and email address); start date and end date (if applicable) of employment; supervisor/ manager/ team lead name and contact information; benefits records and related information; compensation information; training attendance information; academic record and educational record; professional training; licenses and certifications; language(s) spoken; information pertaining to any grievances raised; and employment termination grounds;
- Any other information included in your CV or otherwise submitted to us, even if not requested.

Usually, we do not request or require sensitive Personal Data regarding race, gender, ethnicity, political opinions or beliefs, membership of a trade union or political party, physical or mental health information or sexual orientation in connection with your application. If you have a disability and would like for us to consider an accommodation, you may provide that information during the recruitment process. If we ask for information such as race, ethnicity or gender for the purposes of monitoring equal opportunity and you provide us with this information, it will not be considered in the hiring or selection process. For the purposes of your application this information is voluntary. To the extent that you provide us with sensitive Personal Data, you expressly consent and authorize us to process such information in accordance with this Notification. Finally, we will only collect information about your criminal record if it is appropriate given the nature of the position and where we are legally able to do so.

## Sources of Personal Data

We collect your Personal Data:

- Directly from you;
- Employment or recruitment agencies;
- Public sources such as search engines and public sections of your social media accounts to the extent permitted by the applicable legislation/ regulations, in the context of pre-employment screening; and/or
- Third parties (e.g. individuals that make a recommendation for you, other EFG Group entities).

## Third-party Personal Data

Where you provide third-party Personal Data to us (i.e. data from a spouse and/ or family members), you are required to inform these persons about their rights in connection with the processing of their Personal Data (for example, by presenting this Notification to them). Moreover, it is your responsibility to obtain the consent of these persons, to the extent that their consent may be required by law. At the time you provide the third-party Personal Data, we consider this third-party consent (if required) as granted.

## How we use Personal Data

We will use your Personal Data for the following purposes:

- recruitment, selection, evaluation and appointment of job candidates for the job you have applied for;
- communicate with you to inform you of current status of your application;
- general Human Resources administration and management (in case you become our employee);
- carrying out satisfaction surveys (for example, to manage and improve the recruitment process);
- application analysis such as verification of the employment reference(s) that you have provided, background checks and related assessments;
- compliance with applicable laws and regulations and/or any voluntary code or industry best practice we reasonably decide to adopt;
- compliance with the request or requirement of any court of any relevant jurisdiction or any relevant tribunal, mediator, arbitrator, taxation authority or regulatory or governmental authority;
- use in connection with any legal proceedings or regulatory action (including prospective legal proceedings/ regulatory action) and for obtaining legal advice or for establishing, exercising or defending legal rights; and
- communicating with you to inform you of future opportunities (if you have told us that you do want us to keep your information for such purposes).

## Legal basis for using your Personal Data

We will only use your Personal Data when the law allows us to. Most commonly and depending on the situation in which we will use your Personal Data, we will use your Personal Data in the following circumstances:

- Where you have given your consent (usually in the form of the clear affirmative action of sending your CV to us); in case you share with us sensitive Personal Data, you explicitly consent (via the relevant clear affirmative action) to the processing of this information by us.
- Where it is necessary in order to take steps at your request prior to entering into an employment contract with you.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (e.g. ensuring compliance with our policies and procedures, improvement of the recruitment process).
- Where necessary for the establishment, exercise and defence of legal claims.

## Recipients of your Personal Data

We may disclose Personal Data in the situations described below:

- to third parties/ processors of your Personal Data who provide services to us (e.g. IT companies, recruitment agencies, consultants, attorneys);
- to other EFG Group entities, that may support us or be involved in the recruitment process or in relation to other job vacancies that correspond to your profile (in case you consent to such disclosure);
- to former employers in order to obtain references;
- to our investors, if you apply for a senior management position with us;
- to any court of any relevant jurisdiction or any relevant tribunal, mediator, arbitrator, taxation authority or regulatory or governmental authority;
- to public authorities, regulators or governmental bodies, when required by law or regulation;
- to our auditors and professional advisors; or
- otherwise if you consent to such disclosure.

## Overseas transfers

Due to the global nature of our operations, we may disclose your Personal Data to third parties (including other EFG Group entities) located outside outside the European Economic Area (“EEA”) and the Principality of Monaco. In those cases, except where the relevant country has been determined by the Principality of Monaco to provide an adequate level of protection, we require such recipients to comply with appropriate measures designed to protect personal data. A copy of these measures can be obtained by contacting our Data Protection Officer. Any transfer of your Personal Data to EFG Group entities outside of the EEA and the Principality of Monaco is made on the basis of a data transfer agreement using standard contractual clauses approved by the European Commission.

## Your rights in connection with Personal Data

Under certain circumstances and subject to applicable law, you have the right to:

- Request access to your Personal Data (commonly known as a “data subject access request”). This enables you to receive a copy of the Personal Data we hold about you.
- Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove

your Personal Data where you have exercised your right to object to processing (see below).

- Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of Personal Data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Where Personal Data is processed by automated means and:
  - where we process your Personal Data on the basis of your consent; or
  - where such processing is necessary for entering into or performing our obligations under a contract with you,
- request the transfer of your Personal Data to you or to another party (also known as “data portability”).
- Where we process your Personal Data on the basis of your consent, you may withdraw that consent at any time. If you do not give your consent or withdraw your consent this may affect our ability to assess your suitability for employment. Please note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
- In certain circumstances, request not to be subject to automated decision-making, including profiling.

Certain of these rights are not absolute under the applicable legislation (as sometimes -for example- there may be overriding interests that require the processing to continue); nonetheless we will consider your request and respond to you. Moreover, the exercise of some of these rights may result in terminating the recruitment process.

Finally, you have the right to lodge a complaint with the supervisory authority (Autorité de Protection des Données Personnelles: <https://apdp.mc>).

## Retention of Personal Data

We will retain Personal Data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory, reporting or internal policy requirements. To determine the appropriate retention period for Personal Data, we consider the applicable legal requirements (including the statutory period during which a claim arising from the recruitment process may be brought), as well as the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means. Finally, if your application for employment is successful, certain Personal Data gathered during the



recruitment process will be transferred to your Human Resources file (electronic and/ or paper based).

## How to contact us

If you have any questions or concerns about this Notification or if you would like to exercise any of your rights in connection with your Personal Data or obtain further information on the retention periods of Personal Data, please contact our Data Protection Officer by sending a letter to the mailing address (EFG Bank (Monaco) SAM (Villa Les Aigles -15 avenue d'Ostende - Boîte postale 37 - 98001 Monaco, to the attention of the Data Protection Officer) or at [dpo-monaco@efgbank.com](mailto:dpo-monaco@efgbank.com).

## Changes to this Privacy Notice

We may revise this Notification from time to time. The most current version of this Notification will govern our processing of your Personal Data and will be posted on our website at: [www.efginternational.com/mc-data-privacy](http://www.efginternational.com/mc-data-privacy).