

CANDIDATE PRIVACY NOTICE

1. Scope of Candidate Privacy Notice

1.1.1 This Privacy Notice ("**Notice**") explains how Investments AG and the companies directly and indirectly controlled by it ("**LynxCap**", the "**Company**", "**we**", "**us**" or "**our**") collects, uses, shares, and otherwise processes your personal data in connection with your relationship with us as a candidate to a job offer, acting in accordance with applicable data privacy laws and regulations, which include the General Data Protection Regulation 2016/679 ("**GDPR**") which is applicable as of 25 May 2018.

1.1.2 We control the ways your personal data are collected and the purposes for which we use your personal data acting as "data controller" in the context of the GDPR

2. Type of Personal Data

2.1 The When using the term "personal data", we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold.

2.2 We collect the data you include in your job application when you send us a spontaneous application or apply by email to a job offer:

- Identification data: name, surname, title;
- Contact information: postal address, e-mail address, phone number
- Professional data: current position, work experience, educational background, CV, and cover letter.

2.3 Only the data that is strictly necessary for the purposes of processing your application is requested by us and does not include any special categories of personal data such as political opinions, religious beliefs or data concerning health.

2.4 We also collect personal data from:

- your named referees, from whom we collect the following categories of data: name, periods of previous employment, performance during previous employment;
- our referral program enabling our employees to recommend potential new hires;
- publicly accessible sources, such as LinkedIn, where we collect: name, email, academic and work history, and other relevant data included on your profile;
- recruitment agencies we use for our hiring needs.

2.5 By providing your data, you expressly agree that your data will be processed by **LynxCap** for the purposes indicated in the section 3 below. We may not be able

to process your application further if you do not provide the personal data described above.

3. Purpose of Processing

We process your personal data for the following purposes:

- a. Processing of applications received (registering, entering information in the database...);
- b. Assessment of the qualifications and skills needed to perform the job you are applying for;
- c. Communication concerning the hiring process (e-mails, phone calls, SMS messages);
- d. Reference checks (where applicable);
- e. Holding unsuccessful applicants' CV on file (where applicable);
- f. Complying with legal and regulatory requirements relating to discrimination or equal opportunities.

4. Legal Basis for Processing

4.1 By For the purposes explained under in section 3.:

- a) Performance of a contract or precontractual measures;
- b) Legitimate interest;
- c) Consent: we will only contact your former employers if you give us your explicit consent;
- d) Consent: we need your explicit consent to keep your CV for a longer period of time in case you are a fitting candidate for another vacant role;
- e) Legitimate interest.

4.2 We rely on legitimate interests as legal basis when using conference and meeting apps to conduct online job interviews. This allows us to reduce time to hire and screen the candidates easily without the need for one or both parties to travel. Interviews are never recorded.

4.3 Whenever we process your personal data on the basis of your consent, you have the right to withdraw your consent at any time by contacting us as indicated below. Please, note that the withdrawal of your consent does not affect the lawfulness of the personal data processing based on consent prior to its withdrawal.

5. Security of Personal Data

5.1 **LynxCap** undertakes to put in place technical measures to ensure the security of personal data. This includes protecting the data against a breach of security

leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access to the data.

5.2 These measures must provide for a level of security considered appropriate considering the technical standards and the type of personal data processed but also:

- the state of the art and implementation costs;
- the nature, scope, context, and purposes of processing; and
- the likelihood and severity of the risk to the rights and freedoms of natural persons.

5.3 Security requirements are continually evolving, and effective security requires frequent assessment and regular improvement of outdated security measures. We are committed to continuously evaluate, strengthen, and improve the measures we implement.

6. Retention Period

6.1 Your personal data is stored only for the time in relation to the purposes pursued by **LynxCap**. Thus, if you are unsuccessful and upon your explicit consent, we will retain your personal data for up to 2 years after the end of the recruitment process, so we can contact you in case a similar role becomes vacant for which you could be a fitting candidate.

6.2 Also, we retain your personal data in order to prove, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment process and the pre-employment screening in a fair and transparent way.

7. Recipients of Personal Data

7.1 To achieve the purposes listed in section 2, the data is transferred to the HR Department, managers involved in the recruitment process and third-party service providers acting as subcontractors and on instruction from **LynxCap**. In this case, a contract is drawn up between **LynxCap** and the subcontractor in question and appropriate technical and organizational measures are put in place in accordance with Articles 28 and 32 of the GDPR.

7.2 When your personal data is transferred (including in the case of remote access) to a country outside the European Union that is not subject to an adequacy decision, appropriate safeguards in accordance with Chapter V of the GDPR are put in place, such as standard contractual clauses adopted and approved by the European Commission.

7.3 Should third parties use your personal data for their own purposes (as a data controller), we are not responsible for the handling of such data. In such

instances, we encourage you to refer to their privacy notice for further details on how your personal data is being handled.

8. Your Rights

8.1 As a natural person, you have a number of rights regarding your personal data.

8.2 The right of access: You can request access to the data concerning you at any time as well as a copy of the data.

8.3 The right to rectification: You can request at any time that inaccurate or incomplete data be rectified.

8.4 The right to request the erasure: You can request that your data be deleted when, e.g., the data is no longer necessary for the purposes for which it was collected or processed.

8.5 The right to restriction of processing: You can request that we restrict the processing of data if, e.g., you question the accuracy of the data concerning you or if you object to the processing of the data.

8.6 The right to data portability: you have the right to have your data transferred to another data controller in a structured, commonly used and machine-readable format, if the processing is carried out by automated means or if it is based on prior consent.

8.7 The right to object to processing: you can object to the processing of the data and can withdraw your consent if the processing is based on consent, e.g., if the data is used for commercial prospecting purposes.

8.8 You can exercise your rights by contacting the DPO at dpo@lynxcapinvestments.com

8.9 Requests will be dealt with by the DPO and will be responded to within 1 month at the latest, starting from the moment of your identity confirmation. This time limit may be extended to an additional 2 months in case the request is complex or in case we have received a high number of requests. The requests will be granted within the limits provided for by law, and in particular articles 15 to 23 of the GDPR.

8.10 If you are not satisfied with our response, you also have **the right to lodge a complaint** at any time with the competent supervisory authority of an EU member state, depending on your habitual residence (where you live most of the time), on the place where you work or on the place where you believe infringement may have happened:

- Swiss Federal Data Protection and Information Commissioner (FDPIC): <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html>
- Slovenian Information Commissioner: <https://www.ip-rs.si/>
- Croatian Personal Data Protection Agency (AZOP): <http://azop.hr/>
- Czech Office for Personal Data Protection: <https://www.uoou.cz/en/>
- Spanish Data Protection Agency (AEPD); you can find their contact details at <https://www.aepd.es/es/la-agencia/bienvenida-la-agencia>
- Serbian Commissioner for Information of Public Importance and Personal Data

Protection; you can find their contact details at <https://www.poverenik.rs/en/>

- Personal Data Protection Agency in Bosnia and Herzegovina; you can find their contact details at <http://azlp.ba/kontakt/Default.aspx?pageIndex=1&langTag=en-US>.