

Data protection and professional secrecy / Luxembourg Candidates

In accordance with the applicable Luxembourg data protection law (including but not limited to the Luxembourg law of 1 August 2018 organizing the National Commission for data protection and the general system on data protection and the European Regulation no. 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the '**GDPR**') (the '**Data Protection Law**'), Zurich Eurolife S.A. as data controller collects, stores and processes, by electronic or other means, the personal data of candidates that apply for a job at Zurich Eurolife S.A. (the '**Data Subjects**', '**You**' or '**Your**') including but not limited to:

- Identification data: title, family name, forename(s), country and place of birth, nationality, date of birth, ID;
- Contact data: email address, telephone number;
- Data related to family situation (marital status);
- Data related to diplomas and qualifications (studies, professional experience, internships, skills);
- Compensation and benefits data;
- Any other data included in the Curriculum Vitae/Resume and where applicable the cover letter accompanying the application; and
- Sensitive data, if and when applicable: Zurich Eurolife S.A. may also process special categories of data: criminal record data, health-related data such as details of any disability that would require adaptation of the workstation

(together the '**Personal Data**').

The lawful bases for the Personal Data processing are (i) the execution of pre-contractual measures in order to potentially conclude an employment contract and, (ii) the consent of the Data Subject for the processing of their health information (where applicable), (iii) the legitimate interests of Zurich Eurolife S.A. and the legitimate interests of the Data Subject and (iv) compliance with applicable legal and regulatory obligations relating e.g. to fraud prevention and detection, anti-money laundering rules, tax reporting requirements, economic or financial sanctions laws and the legal and regulatory requirements applicable to insurance companies. In this regard, Personal Data is processed in particular for purposes of:

- a) Considering your application in respect of a role for which you have applied, as well as for potential other roles that might fit your profile;
- b) Communicating with You in respect of the recruitment process;
- c) Assessing your skills, qualifications, and background for a particular role;
- d) The assessment of your suitability (incl. fitness and probity) for the open position;
- e) Zurich Eurolife recruitment operations.

The Personal Data are collected:

- either by Zurich Eurolife S.A. when the Data Subject submits his or her application to Zurich Eurolife S.A.;
- or indirectly through professionals who assist Zurich Eurolife S.A. in the recruitment operations (e.g. temporary employment agency, recruitment firm).

The provision of Personal Data, including health data where applicable, is required for the recruitment process. Failure to provide sufficient, accurate and up-to-date information may prevent Zurich Eurolife S.A. from completing the recruitment process.

Considering our outsourcing and service provider arrangements, covering notably the assistance described above under points a) to e), and the fact that we operate in several jurisdictions in which we may be required to share Personal Data with local authorities, affiliates or other third parties, the Personal Data may be disclosed or transferred to third parties for the above-mentioned purposes. This may, depending on circumstances, include the parties listed below (the '**Recipients**')

- Zurich Group – Companies in the Zurich Group share information with each other in the context of outsourcing and service provider arrangements. Information is shared where it is relevant and appropriate.
- Other contractors or service providers who may provide services to us such as, but not limited to, selection providers or test administrators. Personal Data may be shared with them to organize the procedure as administration, information technology, telecommunication data entry, data storage, data recovery, data security mail distribution due diligence screening.
- Governmental, legal, tax and regulatory authorities, courts, dispute resolution forums (which have jurisdiction over us or our Group companies), investigators or legal process participants and their advisors.

The Recipients are established within the European Union ('**EU**'), the European Economic Area ('**EEA**'), the United Kingdom, the Isle of Man, Switzerland and Hong Kong. Where we transfer Personal Data outside the EU or the EEA, we will ensure that the transfer relies on one of the legitimacy bases set out by the Data Protection Law. We will do this by ensuring that there is either an adequacy decision of the EU Commission regarding the transfer of Personal Data or that the Personal Data is given adequate safeguards by using 'standard contractual clauses' which have been adopted by the EU Commission or, as the case may be, any other legitimacy basis provided for by the Data Protection Law. The Isle of Man and Switzerland benefit from an adequacy decision of the EU Commission. The Data Subjects have a right to request a copy of the 'standard contractual clauses' from the Data Protection Officer of Zurich Eurolife S.A.

The Recipients may, under their own responsibility, disclose the Personal Data to their agents and/or delegates (the '**Sub-Recipients**'), which shall process the Personal Data for the sole purposes of assisting the Recipients in providing their services to Zurich Eurolife S.A. and/or assisting the Recipients in fulfilling their own legal obligations. The Recipients and Sub-Recipients may, as the case may be, process the Personal Data as data processors (when processing the Personal Data on behalf and upon instructions of Zurich Eurolife S.A. and/or the Recipients), or as distinct data controllers (when processing the Personal Data for their own purposes, notably to fulfil their own legal obligations). Where we transfer Personal Data to Recipients acting as data processors, we will ensure that where such Recipients further transfer Personal Data to Sub-Recipients outside the EU or EEA, such transfer relies on one of the legitimacy bases set out in the preceding paragraph.

The Personal Data shall not be kept by Zurich Eurolife S.A. for any period longer than necessary, with respect to the purposes of the data processing and the type of Personal Data, including compliance with applicable statutory retention periods or limitations.

Your Personal Data will be kept until the end of the trial period related to the job application you candidated for.

In accordance with the conditions laid down by the Data Protection Law, the Data Subjects have the right to:

- Access their Personal Data;
- Correct their Personal Data where it is inaccurate or incomplete;
- Object to the processing of their Personal Data;
- Ask for erasure of their Personal Data;
- Ask for the restriction of processing of their Personal Data; and
- Ask for Personal Data portability – to obtain personal information in a digital format.

They may exercise their above rights by writing to the Data Protection Officer of Zurich Eurolife S.A. at the following address:

Data Protection Officer
Zurich Eurolife S.A.
Building Elise
21 rue Léon Laval
L-3372 Leudelange
Luxembourg
E-mail: ZELprivacy@zurich.com

The Data Subjects also have the right to lodge a complaint with the Luxembourg National Commission for Data Protection ('**CNPD**') at the following address: 1, Avenue du Rock'n'Roll, L-4361 Esch-sur-Alzette, Luxembourg; or with any competent data protection supervisory authority of their EU or EEA member state of residence.

Zurich Eurolife S.A. is a life insurance company incorporated under the laws of Luxembourg and registered with the Luxembourg register of commerce and companies under no. B51753.

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Zurich Eurolife S.A. is subject to the applicable Luxembourg legislation and falls under the supervision of the Luxembourg insurance regulator, the Commissariat aux Assurances (11, rue Robert Stumper, L-2557 Luxembourg, Luxembourg).

