

INFORMATION NOTICE FOR JOB APPLICANTS

This information notice for Job Applicants (the “**Notice**”) applies to the processing of your personal data by Mindful Capital Partners S.A. (“**MCP**”, “**we**” or “**us**”) through job applications and job vacancy advertisements in accordance with art. 13 of the Regulation (EU) 2016/679 – General Data Protection Regulation (“**GDPR**”), and any other applicable Luxembourg legislation on the protection of personal data (“**Data Protection Laws**”). This Notice does not apply to the processing of applicants’ data after they are hired and during their employment.

1. Contact details of the data controller

The data controller is MCP, with registered office in 10, rue Antoine Jans, L-1820 Luxembourg. If you have any requests regarding the processing of your personal data, please email our Privacy Champion at corporate@mcpinvest.com.

2. Purposes and legal bases for processing

MCP may process in whole or in part, depending on the circumstances, the categories of personal data shown below, manually or by electronic means, for the purposes and upon the legal bases indicated below:

Purpose	Legal basis	Categories of data (non-exhaustive list)
Your personal data is processed for the purpose of assessing your profile, qualifications and skills, within the framework of our recruitment policy.	Processing is necessary to take steps at your request prior to entering into a potential contract (art. 6(1)(b) of the GDPR).	Common data: name, surname, email, information relating to your qualifications, skills, academic and professional career, remuneration, assessments, and tests results. Any additional personal data provided on a voluntary basis by you within the CV, motivation letter or in the context of the recruitment process.
Your personal data may be processed for the purpose of complying with our legal obligations or other obligations arising out of the instructions received from the competent authorities.	Processing is necessary for compliance with a legal obligation to which the data controller is subject, such as Anti-Money Laundering and Counter Terrorist Financing (art. 6(1)(c) of the GDPR). Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the data controller or of the data subject in the field of employment and social security and social protection law (art. 9 (2) (b) of the GDPR).	Special categories of personal data or data relating to criminal convictions and offences

3. Data retention

The data collected in connection with your job application will be processed for the time necessary to carry out the purposes mentioned above. If you are not selected for the vacancy you applied for, we might retain your data for longer to consider your candidacy for other suitable positions that we may open in the future, and in any case up to one year from the date of your original application.

4. Provision of personal data

Your personal data is necessary for us to process your job application. If you do not provide such data, we will not be able to evaluate your candidacy and we might be in the position to exclude you from the application process. If your application or CV contain special categories of personal data (for example, data revealing your health, your ethnic origin, sexual orientation, religious belief, political affiliation or trade union membership), we will only process such data strictly for the purpose of enabling you to take part in the recruiting process, and to comply with labour laws and regulations. Moreover, we may also collect personal data included in the special categories when you spontaneously share such data.

5. With whom we share your data

We may share your data with our branches/subsidiaries, contractors, service providers, consultants and commercial partners as well as any competent judicial, administrative or regulatory authority.

6. Transfers of data

Any personal data concerning you could also be transferred outside of the European Economic Area ("EEA"). In these cases, we will take appropriate safeguards to ensure adequate protection of your personal data verifying that data is transferred to a country ensuring an equivalent level of protection of data than that set under the GDPR. Alternatively, we will adopt adequate safeguards, for example, by entering into specific agreements with the recipients of the data, including the standard contractual clauses of the EU Commission.

7. Your privacy rights

You have the following rights, as specified in the GDPR:

- The right of access to your personal data;
- The right to obtain the updating or rectification of your personal data;
- Under certain conditions, the right to obtain the cancellation of your personal data ("right to be forgotten"), the right to restrict the processing of your personal data, and right to data portability;
- The right to object to the processing of your personal data under legitimate grounds;
- Where the processing is based on your consent, the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

To exercise your rights, you may contact us, in writing by sending a letter to our headquarters, or by sending an email to our Privacy Champion at corporate@mcpinvest.com. You also have the right to lodge a complaint with the *Commission Nationale pour la Protection des Données* ("CNPD") or the judicial authority.

8. Notice update

We may modify or update this Notice, also in view of future changes in the Data Protection Laws or in case we implement new features or functionalities that will process personal data.

Last update of this notice: February 2023