

## INCOFIN CANDIDATE PRIVACY STATEMENT

Please read this Employee Privacy Notice carefully. It explains you why and how we collect information about you, what your rights are and our obligations. We keep your data as safe and secure as reasonably possible in strict compliance with applicable data protection laws, in particular the General Data Protection Regulation 2016/679 of 27 April 2016 ('GDPR').

The 'Data Controller' of your personal data will be the following legal entity (hereinafter: 'Incofin'):

Incofin Investment Management  
Sneeuwbeslaan 20  
2610 Antwerpen  
Belgium

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## Why do we collect your personal data?

Incofin processes your personal data to enable us to register your application for a job and, if this application leads to start our selection procedure, to assess your job application in view of a potential recruitment.

We only collect the necessary personal data and do not process your personal information in any way, other than specified in this privacy notice.

The personal data that Incofin collects are:

- standard data related to your identity (family name, name(s), address...);
- personal data (date and place of birth, nationality, gender, phone number, email address, hobbies and interests, ...);
- your picture if you have sent it to us voluntarily (e.g. included in your CV);
- data with regard to your professional experience (profile, data on previous employers, termination of last employments and work carried out, special projects, ...), including reference checks if you have provided us this information in your CV;
- data regarding your education (diploma's, certificates, internships, special trainings, ...)
- language skills;
- if applicable, whether you possess a permit of working and/or reside in the European Economic Area (EEA);
- any other personal data that you present us with as part of your application, related to the exercise of the role;
- any other personal data (than mentioned above) that require processing by virtue of the law.

## We collect the data in the following ways:

- submitted CV's
- direct from candidates & employees
- digital assessment through the internet (social media presence), insofar as this presence is open for us to see;
- direct search agencies.

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## How do we use your personal data (legal basis)?

The processing of your data is necessary to take steps prior to entering into a selection and recruitment process and is thus to be considered as a processing of personal data based on Incofin's legitimate interest.

In case of positive evaluation and decision to hire, we will also use your personal data to prepare an employment contract.

In case of a decision not to hire you, we will retain your personal data for 12 months as well which is in the legitimate interest of Incofin, i.e. in order to be able to contact you if any future job opportunities would seem to match your profile.

Automated decisions are defined as decisions about individuals that are based solely on the automated processing of data and that produce legal effects or that significantly affect the individuals involved. As a rule, Incofin does not make use of automated decision-making as described above. Incofin does not base its decision whether or not to hire you solely on automated processing of your personal data.

## What are your rights as a data subject?

You have several rights in relation to the processing of personal data and you can exercise these rights by contacting us using the contact details at the end of this document.

Your rights include:

- Access your personal data. This also includes the right to ask a copy;
- Request information about the data retention period;
- Request information about the purposes of the processing;
- If Incofin didn't collect directly the data from you, information about the source.
- Rectify your personal data including supplementing incomplete data should the data not be kept accurately ;
- Erase your personal data if there is no (longer a) lawful ground for the processing;
- Restrict your personal data if you were to object to the processing or to the accuracy of the processed data or if you wish to retain certain personal data in the context of a possible claim while Incofin no longer needs the data in the light of the purposes mentioned above;

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- Object to the processing for which Incofin based itself on the legitimate interest. Incofin will then cease the processing unless there are compelling legitimate grounds. For example, you can object to the processing of your personal data after a non-successful application. In such case, Incofin will immediately erase your personal data and stop any further processing.

If Incofin receives a request from you to exercise any of the above-mentioned right, Incofin might request your identify before acting on the request. This is to ensure that you are the rightful person and that you data is protected.

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## Do we share or disclose your personal information?

Incofin will never disclose or share your personal data without your explicit prior consent, unless this is required to do so by law. We do not pass on your information to any other third party, with the possible exception of assessments centres etc. or any other third party unless it is relevant for the recruitment process. In case of such a data transfer, we will inform you beforehand.

In the context of the selection & recruitment process the following stakeholders *might* have access to your personal data: HR, your envisaged hierarchic superior(s), the IT department and auditors on a strict 'need-to-know' basis for the purposes described above.

## Transfers of personal data outside EU

Personal data in the EU is protected by the General Data Protection Regulation, but other countries may not have necessary the same standards on privacy or protection of your personal data.

Because of your job application, it may be necessary that a Incofin affiliate requires access to your personal data to process and/or store these personal data. This Incofin affiliate may be located within or outside the EEA.

For these purposes, all Incofin affiliates have concluded an internal agreement including EU standard contractual clauses in accordance with the data protection principles.

## What if you refuse to provide your personal data?

You are not required to provide us with these data. However, not doing so might adversely affect your chances of recruitment.

## How long do we keep your data?

We will only hold your personal data for as long as it is necessary for the purposes described above.

In case the recruitment does not result in an employment relationship, your personal data will be retained for a maximum period of one year after the end of the job application procedure for the purposes described above.

## Where and how can you file a complaint?

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If you feel that Incofin did not act in line with the data protection regulation or you wish to raise a complaint about the processing of your personal data or you are unsatisfied with the handling of your personal information, you can contact Incofin Im using the contact details at the end of this document.

Additionally, you also have the right - if you feel that Incofin did not act in line with data protection legislation - to lodge a complaint with the supervisory authority of your habitual residence, your place of work or of the place of the alleged infringement.

The full list of the EU data protection supervisory authorities can be found here:  
<https://ec.europa.eu/newsroom/article29/news-overview.cfm>

## Who can I contact?

Main contact: Privacy Officer of Incofin IM

e-mail: [privacy@incofin.com](mailto:privacy@incofin.com)

address: Sneeuwbeslaan 20 PB2 - 2610 Antwerp - Belgium

We may edit this Privacy Notice from time to time, within the limitations set out by the relevant privacy and data protection laws.

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