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PRIVACY NOTICE FOR JOB APPLICANTS

STONEFORT INSURANCE HOLDINGS AND ITS DIRECT AFFILIATE SUBSIDIARIES (the “COMPANY”) is committed to protecting your personal data in accordance with the EU General Data Protection Regulation (GDPR) 2016/679.

This Privacy Notice explains how the COMPANY collects, processes and protects personal data during the recruitment process which is handled centrally for all the entities of the COMPANY.

1.1 PERSONAL DATA PROCESSING

The COMPANY to which you apply for a job, collects and processes personal data on you. The COMPANY acts as the data controller for the processing of your personal data.

1.2 PROCESSING PURPOSES

The COMPANY processes your personal data for the following purposes, based on the corresponding legal bases under the GDPR:

PURPOSE OF PROCESSING	GDPR LEGAL BASIS
The COMPANY processes your data:	The processing is necessary:
- to identify and evaluate candidates for potential employment, as well as for future roles that may become available	- in order to take steps prior to entering into a contract with you (Article 6(1)(b) GDPR), and for purposes of legitimate interests pursued by the COMPANY (Article 6(1)(f) GDPR)
- to maintain records in relation to recruiting and hiring	- for purposes of legitimate interests pursued by the COMPANY (Article 6(1)(f) GDPR)
- to ensure compliance with legal requirements, including those related to diversity and inclusion	- to comply with legal obligations to which the COMPANY is subject (Article 6(1)(c) GDPR)
- to protect our legal rights to the extent authorized, permitted or required by law.	- for purposes of legitimate interests pursued by the COMPANY (Article 6(1)(f) GDPR)

1.3 DATA CATEGORIES

The COMPANY may process the following categories of personal data during the recruitment process:

- a. Personal identification data (e.g., name, contact details, nationality, gender, marital status)
- b. Information provided in job applications and CVs
- c. Education and qualification data (e.g., degrees, certificates)
- d. Interview notes, feedback and test results
- e. Background checks, if applicable
- f. Final decision

The COMPANY may also collect personal data about you from third parties, such as professional recruitment firms, your references and prior employers, to the extent this is permitted by applicable law.

The COMPANY does not collect nor process sensitive personal data as such: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.

1.4 DATA RECIPIENTS

The COMPANY may share applicants' data with other entities of the COMPANY group for other potential employment opportunities only. Data sharing will be limited to what is necessary for this purpose.

1.5 DATA TRANSFERS OUTSIDE THE EU/EEA

The COMPANY does not transfer your personal data outside the EU/EEA for its own internal purposes. If such transfers become necessary, the COMPANY will ensure that appropriate safeguards are in place to protect your personal data.

1.6 DATA RETENTION

The COMPANY will retain your personal data for up to 2 years after the completion of the recruitment process to consider you for future employment opportunities. You may however object to the COMPANY retaining your data at any time by contacting the COMPANY's Data Protection Officer at [dpo@stonefort.com].

1.7 YOUR STATUTORY RIGHTS

You have certain rights concerning your personal data under GDPR as mentioned below and can exercise them by contacting the COMPANY's Data Protection Officer at [dpo@stonefort.com]:

- a. **Right to information.** You have the right to be informed about the collection and use of your personal data by the COMPANY. This includes details about the purposes of processing, the categories of personal data processed, data retention periods, and who the data is shared with. This information is contained in this policy. Should you have any further questions about how your data is being handled, you can contact the COMPANY's Data Protection Officer at [dpo@stonefort.com].
- b. **Access right.** You have the right to access your personal data.

- c. **Right to rectification.** You can ask the COMPANY to rectify, correct or update inaccurate and/or incorrect data.
- d. **Right to Erasure, Restriction, or Objection:** In certain situations, you may request the erasure, restriction, or object to the processing of your data, subject to legal obligations.
- e. **Right to Object to automated decision-making.** If applicable, you also have the right to object to automated decision-making, including profiling, as per Article 22 GDPR.

In case of a personal data breach that poses a risk to your rights and freedoms, the COMPANY will notify you and the supervisory authority as per Articles 33 and 34 GDPR.

1.8 LODGING A COMPLAINT

You also have the right to lodge a complaint with the Luxembourg data protection authority if you believe that the COMPANY has not complied with applicable data protection laws:

National Data Protection Commission (CNPD)

Telephone: (+352) 26 10 60 -1

Email: info@cnpd.lu

Website: <https://www.cnpd.lu>

Address: 15, Boulevard du Jazz, L-4370 Belvaux

1.9 DATA PROTECTION OFFICER

The COMPANY has appointed a data protection officer, who can be contacted at [\[dpo@stonefort.com\]](mailto:dpo@stonefort.com) for any questions or concerns regarding your personal data.