

## **RECRUITEMENT PRIVACY NOTICE**

As part of Luxaviation recruitment process, we collect and process personal data relating to job applicants. While doing so, Luxaviation is committed to respect your privacy and protect your personal data.

### **What personal data do we collect?**

Luxaviation collects the following personal data about you:

- your name, address and contact details, including email address and telephone number;
- details of your education, qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which we would need to make reasonable adjustments during the recruitment process; and
- information about your entitlement to work in the country where you apply for a position.

Luxaviation may collect the above information in a variety of ways such as application forms (accessible via our website or social media), resumes, identity documents, recruitment firms or collected through interviews or other forms of assessment.

Personal data will be stored on our secured IT systems (including email) and application form in hard copy (if any).

### **Why does Luxaviation process personal data?**

We need to process your personal data to take steps at your request prior to entering into a contract with you. We may also need to process your data to enter into a contract with you.

In some cases, we need to process personal data to ensure that we are complying with our legal obligations. For example, it is mandatory to check a successful applicant's eligibility to work in a country before employment starts.

Luxaviation has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.

Luxaviation may process special categories of data, such as information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability.

### **Who has access to personal data?**

Your information may be shared within the Luxaviation Group for the purposes of the recruitment process. This includes members of the Human Resources department, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their functions.

We will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. We may then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks.

### **How does Luxaviation protect personal data?**

We take the security of your data seriously. We have internal policies as well as technical and organisational measures and controls in place to ensure that your data is kept secure against unauthorised access and loss or damage.

### **For how long does Luxaviation keep the personal data?**

If your application for employment is unsuccessful, we will hold your data on file for a maximum of one (1) year after the end of the relevant recruitment process. At the end of that period, your personal data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your Human Resources file (electronic and paper based) and retained during your employment.

### **Your rights**

As a data subject, you have the following rights. You can:

- access and obtain a copy of your personal data on request;
- require us to change incorrect or incomplete data;
- require us to delete or stop processing your data; and
- object to the processing of your data.

If you would like to exercise any of these rights, please send an email to [privacy@luxaviation.com](mailto:privacy@luxaviation.com).

If you believe that Luxaviation has not complied with your data protection rights, you may complain to the personal data supervisory authority of your country of residence.

### **What if you do not provide personal data?**

You are under no obligation to provide whatsoever personal data to Luxaviation during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.