

R+V AIFM S.à.r.l

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*RECRUITMENT PRIVACY NOTICE*

*May 2025*



## 1 Introduction

Within R+V AIFM S.à r.l (“AIFM” or “Company”), we value your privacy and ensure that personal data is processed transparently and in accordance with article 13 of the General Data Protection Regulation (“GDPR”).

**The current Privacy Notice describes to candidates (“Data Subjects”) how their personal data is collected and processed by the AIFM and provides further explanation on the purposes, legal basis, sharing and transfer of personal data, as well as the rights that Data Subjects have in relation to their personal data.**

We may update this notice from time to time and timely include the latest version within the Company website or application forms. If you have questions, please feel free so send an email to AIFM Data Protection Coordinator (dataprotection@ruv-aifm.lu).

## 2 What are the applicable legal basis, purpose for processing and categories of personal data?

Legal basis	Processing purposes	Personal data
<p><b>Request of the data subject prior to entering into a contract</b> (Article 6(1)(b) GDPR)</p> <p><b>Legitimate interest</b> (Article 6(1)(f) GDPR)</p>	<ul style="list-style-type: none"> <li>Collect applications from candidates, perform recruitment activities, assess and confirm a candidate's suitability for employment and decide to whom to offer a job</li> </ul>	<ul style="list-style-type: none"> <li><b>Identity and personal information</b> (e.g., name, surname, gender, date of birth, nationality)</li> <li><b>Contact information</b> (e.g., email address, telephone number, address)</li> <li><b>Recruitment information</b> (e.g., title, qualifications and competences, diploma, CV, photo, declarative data provided during interview or within motivational letter)</li> <li><b>Family information</b> (e.g. civil status and dependents)</li> </ul>
<p><b>Legal obligations</b> (article 6(1)(c) GDPR)</p>	<ul style="list-style-type: none"> <li>Perform relevant checks on eligibility to work in Luxembourg before employment starts</li> </ul>	<ul style="list-style-type: none"> <li><b>Employment verification information:</b> right-to-work and residence status.</li> </ul>
<p><b>Legitimate interest</b> (article 6(1)(f) GDPR)</p>	<ul style="list-style-type: none"> <li>Assurance of security of the Company's facilities and assets</li> <li>Respond to and defend against legal claims</li> </ul>	<ul style="list-style-type: none"> <li><b>Security information</b> (e.g., access control related information, login data used to access the Company website or Wi-Fi)</li> <li><b>Identity, contact and professional information</b></li> <li>Any data needed to respond to and defend against legal claims</li> </ul>

## 3 Transfers of personal data to third parties

Personal data will not be exchanged with any third parties, except to entities required for the performance of the processing of personal data for the aforementioned purposes. To this end, the AIFM may exchange personal data with external service providers (e.g. recruitment companies), affiliates or other entities at the group level.

In such cases, the AIFM ensures that relevant third parties use personal data only in accordance with dedicated instructions and/or based on adequate privacy and data protection measures and contractual framework. The third parties are generally located in the European Union, ensuring an adequate level of protection of personal data. Otherwise, the Company and the third parties put in place appropriate transfer safeguards, such as EU standard contractual clauses to ensure the relevant personal data is adequately protected. Please note that,

regarding personal data we receive from recruitment agencies, we are not responsible for the processing of your information by those third parties; reference should be made to their privacy notice.

#### **4 Further processing and change of purpose**

We will not use your personal data for any purpose other than those mentioned above. We ensure that the information you provide to us or that we collect through various channels (our website, our correspondence, conversations and interviews with our employees and recruitment consultants) are only used for the purposes indicated in this privacy notice.

If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

#### **5 Personal data retention period**

Personal data will be stored for the longest of the following periods: (i) as long as is necessary for the purpose of which it was collected (up to 3 months from receipt of the relevant application), (ii) any retention period that is required by law or (iii) the end of the liability period in which litigation or investigations might arise in respect of our services and business.

After the applicable retention period(s) have expired, personal data will be deleted or anonymized.

#### **6 Your rights in respect of your personal data**

Each Data Subject has the right to access his/her personal data and may ask for such personal data to be rectified when it is inaccurate or incomplete. Each Data Subject also has a right to be informed and to object to the processing of such personal data, to ask for erasure of such personal data, to ask for data portability and for the limitation of processing of such personal data. You will not be subject to decision solely based on automated decision-making without human intervention.

In relation thereto, the Data Subject may exercise the above rights by writing to the AIFM Data Protection Coordinator [dataprotection@ruv-aifm.lu](mailto:dataprotection@ruv-aifm.lu). The Data Subject also has a right to lodge a complaint with the Luxembourg data protection supervisory authority, the National Commission for Data Protection (CNPD).

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