
	LAR GROUP DATA PROTECTION	REVISION 0
	DPN-02-02-01-EN	2021
	PRIVACY NOTICE CANDIDATES	EFF: ALL

1. PRIVACY POLICY - CANDIDATES

- 1.1 DATA PROCESSING. LAR Group collects and processes personal data (**Personal Data**) in relation to candidates and applicants (**you**) as part of a recruitment and hiring process. LAR Group is committed to respecting your privacy and protecting your Personal Data in accordance with the EU General Data Protection Regulation 2016/679 (**GDPR**). LAR Group processes your Personal Data as a controller in relation to this activity.
- 1.2 DATA **PROTECTION** OFFICER. LAR Group has appointed a data protection officer (**DPO**), who can be contacted at dpo@lar.lu
- 1.3 PERSONAL DATA. The following categories of Personal Data may be processed by us,
- a. The information you have provided to us in your CV and the personal information contained in your cover letter, including name, title, home address, telephone number, personal e-mail address, date of birth, gender, professional history, qualifications, nationality, social media accounts, occupation, professional memberships, educational qualifications, diplomas, transcripts, languages-skills, computer skills, completion of military service (if applicable), identification number and any information that you have provided to us during job interviews at our premises,
 - b. financial data: bank account numbers e.g. for the reimbursement of expenses;
 - c. only if applicable, information relating to your immigration status (visa, residency);
 - d. referees (reference letters, names and contact details of referees); and
 - e. limited health data as strictly required under labour law or aviation safety requirements for pilot recruitment.


Only if applicable, besides information you provide to us on a voluntary basis, we may also collect Personal Data from third parties, for example, Personal Data provided by employment or interim agencies, head-hunters, insurers or public sources (e.g., professional social networks such as LinkedIn).

- 1.4 PURPOSES. We process your Personal Data for the following purposes:
- a. processing recruitment applications and selection;
 - b. for the assessment of your skills, qualifications and suitability for the role;
 - c. to conduct background and reference checks, if necessary;
 - d. to communicate with you about the recruitment process;
 - e. for compliance with work permit and visa requirements.
- 1.5 Legal BASIS. The processing of your Personal Data is based on the following grounds:
- a. for pre-contractual measures necessary to establish a contractual relationship with you or take steps in this direction at your request;
 - b. for compliance with legal obligations to which we are subject (for example, in relation to employment, immigration, accounting and other obligatory work processes notably in relation to aviation safety);
 - c. for our legitimate interests (such as managing applications and hiring activities, evaluating qualifications, conducting interviews, making a hiring

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decision, planning the induction and re-employment process, communicating with you, for billing, conducting market and opinion research, improving of our recruitment services).

- 1.6 **DATA RECIPIENTS.** LAR Group may share your Personal Data internally. We may also share your Personal Data with certain third-party parties and service providers as necessary to achieve our above-mentioned purposes. We may also share your Personal Data with competent local authorities as necessary in accordance with applicable law. Third-Parties in this context could be for example: Headhunter or Employment Agencies, administrative or support service companies for example Anti-Fraud-Services, Governmental, judicial, tax, regulatory or similar agencies. Accountants, auditors, financial and tax advisors, lawyers, notaries and other outside professional advisors.
- 1.7 **DATA TRANSFERS OUTSIDE THE EU/EEA.** We do not transfer your Personal Data outside the EU/EEA for our internal recruitment process. However, if a specific situation requires to transfer Personal Data to a recipient outside of the EU/EEA, you should be aware that, in general, legal protection for personal data in countries outside the EU/EEA may not be equivalent to the level of protection in the EU/EEA. However we take steps to put in place suitable safeguards to protect your Personal Data, such as entering into EC approved standard contractual clauses. Further information on such safeguards can be obtained by contacting our DPO: dpo@lar.lu.
- 1.8 **DATA RETENTION.** We will retain your Personal Data for as long as required to manage our recruitment process (generally for no longer than 24 months after our last contact with you).
- 1.9 **YOUR STATUTORY RIGHTS.** You have certain rights concerning your Personal Data as mentioned below, and can exercise them by contacting our DPO at :
 - a. **Access right.** You have the right to access your Personal Data. We process a large quantity of information, and can thus request, in accordance with the law, that before the information is delivered, you specify the information or processing activities to which your request relates.
 - b. **Right to rectification.** You can ask us to rectify, correct or update inaccurate and/or incorrect data;
 - c. **Other rights.** In certain limited cases (in which case we will analyse whether the conditions for the exercise of such rights are fulfilled, in line with the law), you may object to, or request the limitation of, the processing of your Personal Data, or request the erasure or portability of your Personal Data. You should note that the law authorizes us to retain and continue processing certain Personal Data, even where you have exercised your rights to object or erasure, for legitimate and compelling reasons such as compliance with applicable law. Finally, you can contact the Luxembourg data protection authority: *Commission nationale pour la protection des données (CNPD)* to introduce a claim.
- 1.10 **CHANGES TO THE POLICY.** Changes may occur in the way we process Personal Data. This Privacy Policy will be updated to reflect these changes. The revision number and the date are recorded on this page. All changes become effective when a new update is posted unless indicated otherwise. Thus, we encourage you to check this page regularly.

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1.11 TRANSLATION. These present legal notes are written in French, English and German but only the French version will be decisive in cases of litigation.