

Privacy Policy of Keytrade Bank regarding candidates

This document is intended to inform you in a clear and transparent way about the conditions under which Keytrade Bank, the data controller, processes the personal data that you have sent in connection with your application.

Keytrade Bank needs some of your personal data in order to analyse your application and ensure that it is followed up (written answer, organising an invitation, etc.).

Keytrade Bank attaches great importance to protecting personal data against unauthorised disclosure or processing. Keytrade Bank undertakes to process these personal data solely when necessary for a specific purpose and within the strict regulatory framework¹.

¹ - Regulation 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data (GDPR) and the Belgian Act of 30 July 2018 on the protection of natural persons with regard to the processing of personal data

- The Act of 30 July 2018 on the protection of natural persons with regard to the processing of personal data
- The Act of 13 June 2005 on electronic communications

TABLE OF CONTENTS

1. Collection of personal data	3
2. Data processing – legal basis and purpose	3
2.1 Management of the application	3
2.1.1 Analysis of your application e-mail and attachments	3
2.1.2 Collection of information made public and information contained in Keytrade Bank’s databases	3
2.1.3 First meeting with Human Resources Department	4
2.1.4 Acknowledgement by competent manager	4
2.1.5 Second meeting with a member of the Human Resources Department and the manager	4
2.1.6 Verification of transmitted data	4
2.1.7 Drafting of an employment contract	5
2.1.8 Transfer of your data to the ‘employees’ file	5
3. Personal data retention period	5
3.1.1 Data transmitted in writing and not followed up	5
3.1.2 Teams online interview	6
3.1.3 Telephone calls	6
4. Transfers of personal data	6
5. Security measures in place	6
6. Human decision based on automated analyses	7
7. Your rights	7
7.1 Right to rectification: accuracy and change in your personal data	7
7.2 Right of access	8
7.3 Right to be forgotten	8
7.4 Right to restrict processing	8
7.5 Right to data portability	8
7.6 Right of objection	8
8. If you have any questions	8
9. The Data Protection Officer	9
10. Complaints	9

1. Collection of personal data

Personal data include any information relating to an identified or identifiable natural person. In other words, as soon as a person can be identified on the basis of information available to the data controller, any detail relating to this person (age, professional experience, hobby, etc.) constitutes personal data.

Keytrade Bank collects personal data about you from three different sources:

- **Declared data:** all data that you provide directly to Keytrade Bank, whether in writing or verbally (name, address, telephone number, e-mail address, documents, summary of interviews, etc.);
- **Public sources:** during or after recruitment, Keytrade Bank may consult and collect data about you that is made public (e.g. your LinkedIn profile);
- **Data collected by third parties:** Keytrade Bank may also receive data from third parties (information sent by a recruiter, contact with former colleagues, managers, etc.).

2. Data processing – legal basis and purpose

2.1 Management of the application

Keytrade Bank collects and processes your data exclusively for the management of your application by following the procedure described in this section. The legal basis for processing is the taking of pre-contractual measures relating to your application.

2.1.1 Analysis of your application e-mail and attachments

Initially, the Human Resources Department analyses the content of your application e-mail and the attached documents (CV, covering letter, etc.). If the Human Resources Department considers that you might present the qualities sought by a Keytrade Bank manager, the information included in your e-mail is kept in a file on a server accessible only to the people in charge of recruitment of the Human Resources Department.

2.1.2 Collection of information made public and information contained in Keytrade Bank's databases

The Human Resources Department may consult public databases on the Internet (LinkedIn profile, etc.) to complete your application and obtain additional information.

The Human Resources Department will also consult its own databases, namely its e-mail inbox cv@keytradebank.com, the file containing the documents of candidates with whom an interview took place and the file containing the information of former employees, provided that the respective retention periods have not yet been met. Keytrade Bank processes these data in

order to check whether there have already been contacts between you and Keytrade Bank in the past and, if applicable, the content of the information exchanged (for the retention periods applied, please consult the “Personal data retention period” section).

Any data collected in the databases consulted by the Human Resources Department will be included in your file on the server, which may be accessed only by those in charge of recruitment in the Human Resources Department. The same shall apply to any written information you provide to Keytrade Bank in connection with your application.

2.1.3 First meeting with Human Resources Department

If those in charge of recruitment in the Human Resources Department believe that, based on the information available to them, a first telephone/online interview is necessary, someone from Human Resources will contact you. Written notes relating to this interview will be drawn up by the person from Human Resources. These notes will be stored in your file on the server which can only be accessed by the people in charge of recruitment in the Human Resources Department.

If additional documents or information are provided by you as a result of the interview, these will also be attached to your file.

2.1.4 Acknowledgement by competent manager

If the Human Resources Department considers that your application must be brought to the attention of one or more managers at Keytrade Bank, your application and the elements necessary for them to take a position are made available to them. The necessary technical measures shall be taken to ensure that only the persons concerned by the recruitment have access to the data and are able to read them.

2.1.5 Second meeting with a member of the Human Resources Department and the manager

In the event of positive feedback from one or more managers regarding your application, an interview is organised between the manager(s), a member of the Human Resources Department and yourself. During this interview, notes are also taken and added to your file on the server which may be accessed solely by the people in charge of recruitment in the Human Resources Department.

Any information you provide in hard copy during this interview will be scanned, added in digital format to your file and then destroyed via SHRED-IT.

2.1.6 Verification of transmitted data

In the event that you give your consent and only in this case, the references you actively provide may be checked by our Human Resources Department. When making contact, notes are taken to reflect the interaction with the person. These notes are also attached to your file.

2.1.7 Drafting of an employment contract

If Keytrade Bank wishes to offer you an employment contract, your personal data necessary for this purpose will be processed.

Keytrade Bank may also ask you for specific documents (copy of qualifications, certificate of good conduct, etc.) depending on the position for which Keytrade Bank makes an offer and your career path.

2.1.8 Transfer of your data to the ‘employees’ file

If you sign the employment contract that has been submitted to you, all your personal data stored in your file in the “application” section will be transferred to a personal file on the “employees” part of the server, which is only accessible to the Human Resources Department.

Your data will be processed in accordance with the Employee Privacy Policy as soon as they are transferred.

3. Personal data retention period

3.1.1 Data transmitted in writing and not followed up

All data transmitted by e-mail are retained for a period of one year. However, there are two exceptions to this principle:

- Firstly, if you send us a complaint within one year, your data will be kept for a period of five years. The same applies in the event of legal proceedings. Your data will be retained until legal proceedings have become final.
- Secondly, if the person in charge of recruitment considers that your profile could correspond to a Keytrade Bank need in the near future, your data will be kept for a period of two years.

If, following your application, a person in charge of recruitment of the Human Resources Department organised an interview, your data will have been transferred to a personal file kept in the “application” section of the server which may be accessed solely by those in charge of recruitment in the Human Resources Department. These files shall be kept for a period of two years.

If you enter into a working relationship with Keytrade Bank, all your data are transferred to an 'employee' location on the server which is only accessible to the Human Resources Department. In this case, your data will be kept for the period specified in the Employee Privacy Policy.

3.1.2 Teams online interview

Interviews that take place online via Teams with the Human Resources Department and/or one or more Keytrade Bank representatives are not recorded and saved unless you make an express written request beforehand.

3.1.3 Telephone calls

Telephone calls you have with the Human Resources Department and possibly with the Keytrade Bank representative(s) are not recorded.

4. Transfers of personal data

All data transmitted in connection with your application are exclusively processed internally and, therefore, are not the subject of any transfer to a third party or partner, whether located within the European Union or outside the European Union. By not transferring any data, Keytrade Bank undertakes to guarantee the confidentiality of your application and the data transmitted.

5. Security measures in place

Data security is one of the priorities of the Crédit Mutuel Arkéa Group, to which Keytrade Bank belongs. The storage and processing of your personal data are therefore carried out in accordance with strict rules and procedures.

To ensure the accuracy and confidentiality of your data, we take various measures including:

- Technical measures:
 - Your data are transferred solely to those managers who need to see them in connection with the analysis of your application;
 - Access to the Human Resources Department's server is restricted to the members of that department;
 - Access to the operating system is via a password and additional controls have been implemented for remote connections (access by VPN).
- Physical measures:
 - No data about you are kept on paper in order to avoid compromising the confidentiality of the data.

- Additional measures
 - When you communicate a change in your personal data, the data are changed by the Human Resources Department in your file.
 - Audits and checks are continuously carried out to monitor compliance with regulations.
 - Employees receive training in order to raise their awareness of the protection of personal data and the need for compliance with regulations.

6. Human decision based on automated analyses

Keytrade Bank does not apply fully automated decisions within the meaning of Article 22 of the GDPR to applicants' data.

7. Your rights

To exercise your GDPR rights, you may contact cv@keytradebank.com using the e-mail address that you used for previous exchanges.

7.1 Right to rectification: accuracy and change in your personal data

In the event of a change in your personal data, you may inform Keytrade Bank by e-mail at the above-mentioned address so that we have up-to-date and accurate data.

7.2 Right of access

Any person whose personal data Keytrade Bank processes has a right of access. This right allows you to read the data about you that Keytrade Bank has and to ensure that these are correct, up-to-date, complete and relevant.

7.3 Right to be forgotten

Keytrade Bank needs some of your personal data to process your application. All your personal data may be deleted from our computer systems only if you withdraw your application. If you wish to delete any particular personal data and continue your application, this is possible as long as the details in question are not essential for the processing of your application.

Keytrade Bank may, however, refuse to exercise your obligation to be forgotten if your data are necessary for the establishment, exercise or defence of its legal claims.

7.4 Right to restrict processing

This right allows you to ask Keytrade Bank to stop processing your personal data temporarily in specific cases defined by regulations.

If you have exercised this right, Keytrade Bank may retain your data but it will no longer be able to process them unless you provide your consent to do so, or in order to establish, exercise or defend its rights (or the rights of another person) or in cases provided for by the regulations.

7.5 Right to data portability

By virtue of this right, you may ask Keytrade Bank to send your personal data to you or to send them directly to another data controller, where this is technically possible. This right applies solely to data which you yourself have supplied to Keytrade Bank and which are automatically processed on the basis of the contract or your consent.

7.6 Right of objection

You always have the right to object, at any time, to any processing of your personal data that is based on Keytrade Bank's legitimate interest. Keytrade Bank does not process the data you provide to us in the context of your application on the basis of legitimate interest.

8. If you have any questions

If you have any questions or problems related to your personal data, you may contact our DPO Team:

- By e-mail at dpo@keytradebank.com
- By post at Boulevard du Souverain/Vorstlaan 100, B-1170 Brussels for the attention of the DPO Team

9. The Data Protection Officer

Keytrade Bank has appointed a Data Protection Officer ("DPO"), whose role is in particular to inform and advise Keytrade Bank on all matters relating to the protection of personal data. You may contact the Data Protection Officer:

- By post: Data Protection Officer – Crédit Mutuel Arkéa – 1 rue Louis Lichou, 29808 Brest Cedex 9, France
- By e-mail at protectiondesdonnees@arkea.com

10. Complaints

Should you have any complaints about how your personal data are being processed, you may submit a mediation request to the Data Protection Authority at the following address:

Data Protection Authority
Rue de la Presse/Drukpersstraat 35
1000 Brussels
Tel: +32 2 274 48 00
E-mail: contact@apd-gba.be