

PRIVACY NOTICE
of ODDO BHF (Switzerland) Ltd
for Job Applicants
in accordance with the Federal Data Protection Act

Foreword

a. What is the purpose of this privacy policy?

With this Privacy Policy, ODDO BHF (Switzerland) Ltd ((hereinafter "the Bank" or also "we", "us")) would like to inform you about the types of personal data we process in connection with the recruitment of employees ("Recruiting"), including HR communication measures and HR marketing, for what purposes and to what extent we process data, and what rights you have under the Swiss Federal Data Protection Act ("DPA"). The terms used are not gender-specific.

b. Who are we?

ODDO BHF (Switzerland) Ltd is a bank within the meaning of the Swiss Banking Act, with its registered office in Zurich.

We are part of the French-German ODDO BHF Group with ODDO BHF SE, based in Frankfurt, Germany, our parent company.

c. To whom does this privacy policy apply?

The data protection declaration applies to all processing of personal data carried out by us in connection with the recruitment of employees.

When we process personal data, this means that we collect, store, use, transmit or delete it, for example. This data protection notice deals with personal data of:

- interested parties who apply for job advertisements of the Bank,
- all other natural persons who come into contact with us in connection with a job advertisement or an application process, e.g. authorized representatives, legal guardians, messengers and representatives or employees of legal entities, but also visitors to our website.

Which data is processed and used in detail depends largely on the advertised position and the intended employment relationship. Therefore, some parts of this information may not apply to you.

To the extent that the Bank provides separate or more extensive information (e.g., consent forms, etc.) on how it uses personal data of job applicants for a particular purpose, such information must also be considered.

1. Who is responsible for data processing and whom can I contact?

Responsible is:

ODDO BHF (Switzerland) Ltd
Human Resources
Gartenstrasse 14
8002 Zurich
Switzerland
Email: HR@oddo-bhf.ch
Phone: +41 43 209 75 11

Contact details of the company data protection officer:

ODDO BHF (Switzerland) Ltd
Data Protection Officer
Gartenstrasse 14
8002 Zurich
Switzerland
Phone: +41 44 209 75 11
E-mail: dataprotection@oddo-bhf.ch

Contact details of the Bank's representative in the European Union (in accordance with Article 27 GDPR):

ODDO BHF SE
Data Protection Officer
Bockenheimer Landstrasse 10
60323 Frankfurt am Main
Phone: +49 69 718-0
E-mail: dataprotection.frankfurt@oddo-bhf.com

If you have any questions or comments about this privacy notice, please contact our data protection officer at dataprotection@oddo-bhf.ch.

2. What sources and data do we use in the application process?

We process personal data that we have received from you by mail, by e-mail or by other means (including via our application portal or third-party job portals) in the context of applying for a job and initiating an employment relationship.

In addition, to the extent necessary for the initiation of the employment relationship, we process personal data that we permissibly obtain from publicly accessible sources (e.g. professional networks on the Internet) or that is transmitted to us by other affiliated companies from the ODDO BHF Group or by other third parties (e.g. operators of job platforms and job exchanges, personnel consultants, head-hunters, former employers). In certain constellations, your personal data will also be collected from other bodies due to legal requirements.

Relevant personal data are: general personal data (e.g. name, address, e-mail and other contact data, date and place of birth, nationality, work permit if applicable), family data (e.g. marital status, details of children), religious affiliation, health data (if relevant to the employment relationship, e.g. in the case of a severe physical limitation), any previous convictions (criminal record extract), identification data (e.g. ID card data), social security number, bank details and details of qualifications and previous employers as well as other data comparable with the above categories.

3. What do we process your data for (purpose of processing) and on what legal basis?

The processing is carried out on the basis of the following purposes:

a. On pre-contractual measures in connection with possible establishment of an employment relationship

Data is processed primarily for the purpose of carrying out the application procedure and other pre-contractual measures (e.g. drafting the employment contract) for the (possible) initiation of an employment relationship and the collection of the data required for this purpose.

b. To protect legitimate interests of us or third parties

We will process your personal data as necessary beyond the actual implementation of the application process to protect our legitimate interests or those of third parties.

Examples:

- Measures of HR marketing and HR communication of the Bank and its affiliated companies of the ODDO BHF Group,
- Demonstrate compliance with legal requirements related to the application process and assert legal claims and defend against legal disputes,
- Prevention and investigation of criminal acts or serious breaches of duty (cf. also Art. 328b CO),
- Building and facility security measures (e.g., access controls),
- Measures to ensure the right of domicile (e.g. video surveillance of properties and business premises).

c. Based on your consent

Insofar as employees have given the Bank consent to process personal data (e.g. obtaining references from previous employers) for specific purposes, the lawfulness of this processing is based on their consent. Consent given can be revoked at any time. This also applies to the revocation of declarations of consent given to the Bank prior to the entry into force of this Privacy Policy.

Please note that revocation of consent does not affect the lawfulness of any processing of data up until the time of revocation of consent. However, we would like to point out that the Bank may still be permitted to process your personal data insofar as it can cite other legitimate reasons for doing so.

Data is also processed after the application process for a specific position has ended, insofar as you have given us consent to process your data for specific purposes (e.g. extended storage of application documents as agreed in individual cases for possible consideration in future job postings, processing of your contact data in order to receive invitations or newsletters from us or our affiliated companies or to remain in contact (HR communication and HR marketing)).

d. Due to statutory, legal requirements or in the public interest

In addition, as a bank we are subject to various legal obligations, i.e. statutory requirements (e.g. social security law, labor law, banking law, anti-money laundering law, financial services law, MifID II, tax laws) and banking supervisory requirements (e.g. FINMA, Swiss Bankers Association).

Legal basis:

We process personal data in accordance with the provisions of the DPA.

If we ask you for your consent for certain processing (e.g. for the processing of particularly sensitive personal data, for marketing mailings), we will inform you separately about the corresponding purposes of the processing. You can revoke your consent at any time with future effect by written notification (by post) or, unless otherwise stated or agreed, by e-mail to us; you will find our contact details in section 1.

Where you have a user account, revocation or contact with us may also be carried out via the relevant website or other service, if applicable. Once we have received notification of the withdrawal of your consent, we will no longer process your data for the purposes to which you originally consented, unless we have another legal basis for doing so. The revocation of your consent does not affect the lawfulness of the processing carried out on the basis of the consent until the revocation.

Where we do not ask job applicants for their consent for processing, we base the processing of their personal data on the fact that the processing is necessary for the initiation of the employment relationship with the job applicant (or the positions you represent) or that we or third parties have a legitimate interest in doing so, so in particular in order to pursue the purposes and associated objectives described above under section 3 and to be able to implement appropriate measures. Our legitimate interests also include compliance with legal requirements, insofar as this is not already recognized as a legal basis by the applicable data protection law in each case. This also includes managing and further developing our company, including its operations, in a secure and efficient manner.

If we receive particularly sensitive data of job applicants (e.g. health data, information on political, religious or ideological views or biometric data for identification purposes), we may also process the job applicants' data on the basis of other legal grounds, e.g. in the event of disputes due to the need for processing for a possible lawsuit or the enforcement or defense of legal claims.

In individual cases, other legal grounds may come into play, which we will communicate to you separately where necessary.

4. Who has access to my data?

Within the Bank, access to your data is granted to those units involved in the recruitment of employees, including the implementation of the application process, or in the implementation of HR marketing or HR communication, to the managers of the department responsible for the respective positions, to the Executive Board and its closest employees, to the Board of Directors if required, as well as to those units that need the data to fulfill our (pre)contractual and legal obligations (e.g. supervisors, Human Resources).

Service providers and vicarious agents used by us may also receive data for these purposes. These are companies in the categories of IT service providers, providers of recruitment and personnel management software, consultants such as recruitment agencies that you have used to apply to the bank, printing service providers, legal counsel, other consulting services.

With regard to the transfer of data to recipients outside the Bank, it should first be noted that as a potential employer we only pass on necessary personal data in compliance with the applicable data protection regulations.

Under these conditions, recipients of personal data may be, for example:

- auditors and other internal and external auditors to perform their statutory duties,
- public bodies and institutions (e.g. FINMA, law enforcement agencies) in the event of a legal or regulatory obligation,
- Service providers that we use in the context of order processing relationships.

The Bank is part of a German-French group. Within the framework of the group-wide cooperation, personal data of applicants will be passed on to the parent company of the bank ODDO BHF SE in Frankfurt, the group company ODDO BHF SCA in Paris and other group-affiliated companies or their employees, if and to the extent that there is a legitimate purpose under data protection law, cf. points 3 a) to d) above.

Other data recipients may be those bodies for which employees have given us their consent to transfer data or insofar as this is necessary for the performance of the employment contract.

5. Is data transferred to a third country or to an international organization?

The recipients of personal data mentioned in section 4 are primarily located in Switzerland, Germany and France or in another country within the EU and the EEA. In exceptional cases, data will also be transferred to countries outside Switzerland, the EU and the EEA.

Transfers of personal data to recipients in countries outside Switzerland, the EEA and the EU will take place where

- this is necessary for the execution of contracts (e.g. employment agencies abroad);
- this is required by law;
- this is in connection with commissioned data processing (Group-affiliated companies or external service providers);
- as part of the balancing of interests or to safeguard legitimate interests; or
- you have given your consent.

When disclosing personal data abroad, the Bank shall ensure that the country concerned has adequate data protection or that appropriate data protection is contractually ensured with the recipient. An exception may apply in particular in the case of legal proceedings abroad, but also in cases of overriding public interests or if the execution of a contract requires such disclosure, if you have given your consent or if the data in question has been made generally accessible by you and you have not objected to its processing.

Detailed information on this and on the level of data protection at our service providers abroad can be requested by job applicants using the contact information above.

6. How long will my data be stored?

We will retain Personal Data only as long as necessary to fulfill the purpose(s) for which it was collected or to comply with legal, regulatory or internal policy requirements, whichever is longer.

In general, data about unsuccessful candidates for roles at the Bank will be retained for 6 months from the date we inform you that your last application was unsuccessful. Data on potential candidates for roles within ODDO BHF Group will be retained for 6 months from the date of our last recorded communication with you. If you have agreed to a longer retention period for your application (for the purpose of applying for a possible other job in the future), the relevant period will apply. Any maximum retention period set by applicable local law will apply.

If your application is successful, your application will be retained as part of your personnel file. Personal data about successful applicants will be handled by the employee privacy statement provided to you when you join the Bank.

If you would like your personal information to be removed from our databases, you may submit a request (as in item 7), which we will be happy to review.

7. What data protection rights do I have?

You have the right to access your personal data processed by the Bank and to receive a copy of this data. If you believe that information we have collected about you is incorrect or incomplete, you may also request that your personal data be corrected.

In addition, you have the following rights:

- object to the processing of your personal data,
- request the deletion of your personal data,
- request a restriction on the processing of your personal data,
- revoke your consent if the Bank has received your consent to process its personal data (without such revocation affecting the lawfulness of any processing prior to your revocation) and/or
- right to obtain, on request, further information necessary for the exercise of these rights.

The Bank recognizes these requests, revocations or objections in accordance with the applicable data protection regulations, but these rights do not apply without restriction.

Employees can assert their rights against the data protection officer. In addition, it is possible to file a report with the Federal Data Protection and Information Commissioner (FDPIC) if you believe that data processing may violate data protection regulations.

8. Is there an obligation for me to provide data?

As part of the initiation of an employment relationship, you must provide the personal data that is required for the commencement of the employment relationship and for the fulfillment of the associated contractual obligations or which we are required to collect by law. Without this data, we will generally not be able to conclude a contract with you or execute it.

In part, you may be at a disadvantage if you do not provide certain personal data, e.g., lack of facilitating work equipment if you have a physical impairment.

9. To what extent is there automated decision-making? Does profiling take place?

As a matter of principle, we do not use fully automated decision-making or profiling for recruiting and initiating the employment relationship.

If we use these procedures in individual cases, we will inform you about this separately if this is required by law.

10. How up-to-date is this privacy policy?

This privacy policy was last updated on September 1, 2023.

The Bank may amend or update this Applicant Privacy Policy from time to time.