

PRIVACY NOTICE

“Squarepoint”, “we”, “us” and “our” means the relevant Squarepoint group company contracting or proposing to contract with you on the date that you receive this notice (whether under an employment, consultancy or services contract).

About this privacy notice

For the purposes of data protection law, we are a data controller in respect of your personal data. We are responsible for ensuring that we use your personal data in compliance with data protection law.

This privacy notice applies if you are applying for a job with our organisation. The privacy notice sets out the basis on which any personal data about you will be processed by us. Please take the time to read and understand this privacy notice.

Personal data that we collect about you

We will collect and process the following personal data about you:

- **Information that you provide to us or one of our affiliates.** This includes information about you that you give to us by filling in forms or by communicating with us, whether face-to-face, by phone, e-mail or otherwise through the recruitment process. This information is likely to include:
 - personal details such as, but not limited to, your full name, date of birth, email address, home address, contact details, employment history and qualifications (both academic and professional), the languages that you speak, visa and/or immigration information, and details of any health conditions or disabilities that we may need to take into account; and
 - any other details that you provide in support of your job application, such as information contained in your resume and/or covering letter.
- **Information we collect or generate about you.** This includes:
 - information that we collect through your communication and correspondence with us (such as the content, date and time of your email correspondence); and
 - information that we record about you in relation to any interviews or other discussions with you, and any assessments that you participate in.
- **Information we obtain from other sources.** This includes, where permitted by applicable law:
 - personal data that we obtain from background checks we perform on you in advance of you commencing work with Squarepoint, which may include your current address, your personal e-mail address, your date of birth, your national security number/social security number or equivalent, employment history, credit history (where applicable), your qualifications (both academic and professional), details of any criminal records and actual or alleged criminal offences; and
 - any information that we obtain from the referees that you provide to us.

Uses of your personal data

Your personal data may be stored and processed by us in the following ways and for the following purposes:

- to consider your job application, verify the information that you provide to us, and assess your suitability for the job for which you have applied;
- to maintain a record of positions that you have applied for with us and the outcome of those applications;
- to meet our legal, contractual and regulatory obligations;
- to maintain appropriate and consistent practices and procedures with respect to the recruitment of personnel across all entities within our corporate group; and
- to avoid conflicts of interests.

We are entitled to use your personal data in these ways because:

- we need to do so in order to consider you for a position at Squarepoint and, if the application is successful, take the necessary steps to enter into an employment contract with you;
- we may need to do so in order to assess your fitness to work at Squarepoint;
- we may need to do so in order for us to perform our obligations and exercise our rights under laws that relate to you commencing work with Squarepoint;
- we have legal and regulatory obligations that we have to discharge;
- we may need to do so in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings; or
- the use of your personal data as described may be necessary for our legitimate business interests (or the legitimate interests of one or more of our affiliates), such as:
 - allowing us to effectively assess and verify the information that you provide to us, the merits of your job application and your suitability for the role applied for with us;
 - allowing us to effectively and efficiently administer and manage the operation of our business;
 - ensuring a consistent approach to recruitment of personnel within our corporate group;
 - maintaining compliance with internal policies and procedures; or
 - being able to contact you in relation to your job application and the recruitment process.

If you are subsequently offered and accept employment at Squarepoint, the information we collect during the recruitment process will become part of your employment record.

Disclosure of your information to third parties

Inside the Squarepoint group

We may disclose your personal data to our affiliates (i.e. other members of our corporate group) for the purposes of:

- the management and administration of our business and our affiliates' business;
- meeting legal, contractual and regulatory obligations;
- undertaking the functions that each entity within our corporate group may perform relating to regional or global HR activities and decisions; and
- the administration and maintenance of the databases storing personal data relating to prospective employees.

Where personal data is disclosed to our affiliates, we will take steps to ensure that the personal data is accessed only by those personnel that are entitled to do so under applicable data protection law and have a need to do so for the purposes described in this notice.

Outside the Squarepoint group

In addition to the above, we (and our affiliates to whom your personal data is disclosed) may share your personal data with the following third parties outside of our corporate group for the following purposes:

- to third party agents and contractors for the purposes of providing services to us, including outsourced HR providers, IT and communications providers, law firms, accountants and auditors. These third parties will be subject to confidentiality requirements and they will only use your personal data as described in this privacy notice;
- to third party entities which were members of the Squarepoint group, for business operations and compliance with applicable laws and regulations;
- to the extent required by law, regulation or court order. For example if we are under a duty to disclose your personal data in order to comply with a legal obligation;
- if we sell any of our business or assets, in which case we may disclose your personal data to the prospective buyer for due diligence purposes; and
- if we are acquired by a third party, in which case personal data held by us about you will be disclosed to the third party buyer.

Transfers of personal data outside the country in which you are located

Note that references below to jurisdictions other than the jurisdiction in which you are located may not be applicable to you.

Transfers of personal data outside the European Economic Area

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“**EEA**”). It may also be processed by individuals operating outside of the EEA who work for our affiliates or for one of our suppliers.

Where (i) your personal data is processed by a Squarepoint group company established in the EU or where you are located in the EU and we are processing your personal data, and (ii) we transfer your personal data outside the EEA, we will ensure that it is protected in a manner that is

consistent with how your personal data will be protected by us in the EEA. This can be done in a number of ways, for instance:

- the country that we send the data to might be approved by the European Commission as offering a sufficient level of protection;
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal data; or
- where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme.

In other circumstances the law may permit us to otherwise transfer your personal data outside the EEA. In all cases, however, we will ensure that any transfer of your personal data is compliant with data protection law.

You can obtain more details about the protection given to your personal data when it is transferred outside the EEA (including a copy of the standard data protection clauses which we have entered into with recipients of your personal data) by contacting us in accordance with the “Contacting us” section below.

Transfers of personal data outside Singapore, the US and Canada

The personal data that we collect from you may be transferred to, and stored at, a destination outside Singapore, the US or Canada, respectively.

In all cases, however, we will ensure that any transfer of your personal data is compliant with applicable data protection law.

Transfers of personal data outside Switzerland

The personal data that we collect from you may be transferred to, and stored at, a destination outside Switzerland. It may also be processed by individuals operating outside of Switzerland who work for our affiliates or for one of our suppliers.

Where (i) your personal data is processed by a Squarepoint group company established in Switzerland or where you are located in Switzerland and we are processing your personal data, and (ii) we transfer your personal data outside Switzerland, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in Switzerland. This can be done in a number of ways, for instance:

- the country that we send the data to might be approved by the Swiss Federal Data Protection and Information Commissioner as offering a sufficient level of protection;
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the Swiss Federal Data Protection and Information Commissioner, obliging them to protect your personal data; or
- where the recipient is located in the US, it might be a certified member of the Swiss-US Privacy Shield.

In other circumstances the law may permit us to otherwise transfer your personal data outside Switzerland. In all cases, however, we will ensure that any transfer of your personal data is compliant with data protection law.

You can obtain more details about the protection given to your personal data when it is transferred outside Switzerland (including a copy of the standard data protection clauses which we have entered into with recipients of your personal data) by contacting us in accordance with the “Contacting us” section below.

Retention of personal data

How long we hold your personal data for will vary. The retention period will be determined by the following criteria:

- the purpose for which we are using your personal data – we will need to keep the data for as long as is necessary for that purpose; and
- legal obligations – laws or regulation may set a minimum period for which we have to keep your personal data.

In some instances, we may retain your information to consider you for other roles and future opportunities at Squarepoint which may be of interest to you. If you do not want us to retain your information, or want us to update it at any stage, please contact us in accordance with the “Contacting us” section of this notice.

Your rights under the EU General Data Protection Regulation

Where your personal data is processed by a Squarepoint group company established in the EU, or where you are located in the EU and we are monitoring your behaviour (for example, by monitoring and recording your use of our email and IT systems), the EU General Data Protection Regulation grants you a number of legal rights in relation to the personal data that we hold about you. These rights include:

- the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
- the right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so;
- in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us;
- the right to request that we rectify your personal data if it is inaccurate or incomplete;
- the right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it;
- the right to object to, and the right to request that we restrict, our processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally entitled to continue processing your personal data and / or to refuse that request; and
- the right to lodge a complaint with the local data protection regulator if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details set out in the “Contacting us” section below.

Your rights under the Swiss Data Protection Act

Where your personal data is processed by a Squarepoint group company member in Switzerland, or you are located in Switzerland, the Swiss Data Protection Act grants you a number of legal rights in relation to the personal data that we hold about you. These rights include:

- the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
- the right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so;
- the right to request that we rectify your personal data if it is inaccurate, or that we make mention of any claimed inaccuracy in the data that we hold about you if its accuracy cannot be established;
- the right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it;
- the right to object to, and the right to request that we restrict, our processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally entitled to continue processing your personal data and / or to refuse that request; and
- the right to lodge a complaint with the Swiss Federal Data Protection and Information Commissioner if you think that any of your rights have been infringed by us.
- **Personal data of third parties**
 - Where you disclose personal data of third parties to us or our affiliates, you warrant that you have obtained the prior consent of such third parties for us and our affiliates to collect, use and disclose such personal data for the relevant purpose for which you made the disclosure or as was notified to you at the relevant time and/or such other purposes as described in the “Uses of your personal data” section above, in accordance with any applicable laws, regulations and/or guidelines

Contacting us

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed above, please address questions, comments and requests to Dataprotection@squarepoint-capital.com.