



## Privacy Notice

of

Lightrock LLP  
(**Lightrock**)

to

Job Applicants

### General Information

Lightrock cares about the protection of your personal data. This Privacy Notice ("**Notice**") explains how and for what purposes Lightrock uses your personal data. Please note that certain contents of the Notice, including data subject rights, may apply only where our processing of your personal data falls within the scope of the UK General Data Protection Regulation ("**GDPR**").

For the purposes of the Notice, "**Data**" shall mean personal data, i.e. any information relating to an identifiable natural person. The terms "**you**", "**your**" shall refer to you as a job applicant applying for one or more vacancies at Lightrock.

"**Lightrock**", "**we**", "**us**" or "**our**" shall mean Lightrock LLP and/or Lightrock Holding Ltd., as applicable, and any direct or indirect subsidiary that is active in the business of impact investment advice (hereinafter collectively referred to as "**Lightrock Companies**", individually "**Lightrock Company**"). Lightrock Holding Ltd. is a limited company incorporated under the laws of the Principality of Liechtenstein with registered address at Herrengasse 12, 9400 Vaduz, Liechtenstein.

### Important note

In the course of your application process, it might be necessary for us to process Data of other natural persons related to you such as references or former employers. If this is the case, the Notice has to be brought to the attention of the affected persons and we hereby kindly ask you to do so.

### Getting in touch

With regard to our use of your Data that falls within the scope of GDPR, you may contact our Data Protection Officer at:



Lightrrock LLP  
Data Protection Officer  
1 St James's Market  
London, SW1Y 4AH  
Telephone: +44 (0) 207 484 2600  
E-Mail: [compliance@lightrrock.com](mailto:compliance@lightrrock.com)

If you have applied for a job at a Lightrock Company which has its registered office outside of the United Kingdom or the European Economic Area ("EEA"), the company acting as representative in the United Kingdom is Lightrock LLP and in the EEA is Lightrock Holding Ltd.

### **The Data we collect and process**

In connection with your application and the ensuing process ("Application Process"), we will collect and process your Data. Such Data includes all information contained in your curriculum vitae, diploma, personal statement, job references and any other documents you may provide us with in the course of the Application Process. We may further process all information that you reveal to us during job interviews. For certain positions, we require our applicants to take computer-based tests, the results of which will be processed. If we, with your prior approval, contact your references (e.g. former supervisors, university lecturers, teachers), we may also process the information obtained by such references.

The Data we typically obtain and process in the course of the Application Process includes, but is not limited to, your name, application photo (if any), residential and email addresses, telephone number, place and date of birth, gender, nationality, immigration status, marital status, your academic education, professional training and experience, previous employers (including periods of employment), former, current and envisaged functions, work hours, salary (including bonus and other salary components), criminal and debt records, adverse media, career objectives, information on directorships, non-vocational activities or other external mandates (e.g. lectureships). Where necessary, we may also process Data regarding your state of health (e.g. possible physical disabilities). Finally, we will also process all evaluations of your eligibility, whether elaborated by us or obtained by third parties (e.g. references), whether based on interviews, documentation and/or results of computer-based tests.

### **Purposes and legal basis for our use of your Data**

We collect and process your Data for the purpose of evaluating your eligibility. If we enter into an employment contract with you, we will also process your Data to prepare the respective contract. In case of unsolicited applications, we may use your Data in order to regularly screen our internal database for possible matches with vacant positions. Since we process your Data following your job application, we deem our processing activities to be at your request and in view of entering into an employment contract with you.

As a financial services provider, we operate in a regulated, highly competitive and increasingly complex environment. In order to remain a leading market player, we rely on highly qualified and motivated employees who share our values of integrity, honesty and sustainability. We therefore have a legitimate interest in thoroughly

scrutinizing all of our applicants. Besides reviewing your documentation and conducting interviews, we may use computer-based tests in order to establish your suitability in greater detail. If we deem such test to be necessary, you will be previously informed and the results of such test will be discussed with you afterwards. Some positions allow access to highly sensitive information such as data of private banking clients. In such cases, we may schedule an additional interview with an external expert in order to establish your eligibility for the job. You will be informed in good time if such additional interview is envisaged. We will seek to obtain your explicit consent where GDPR requires us to do so (e.g. prior to contacting your job references or processing your health data).

### **To whom we transfer your Data**

In the course of the Application Process, we will transfer your Data to the line manager and other superiors of the team or department you applied for. We may also disclose your Data or parts thereof to other persons you would be working with on a regular basis (e.g. co-workers). Furthermore, we may transfer your Data to categories of recipients such as external service providers (e.g. for evaluation of computer based tests or pre-employment screening) and external advisers (e.g. in case of additional interviews for sensitive positions), travel agents, occupational health providers and training providers. We may also share your Data with other Lightrock Companies, particularly with the HR departments of such Lightrock Companies.

The abovementioned recipients of your Data may be located outside of the EEA in which case we will ensure that adequate safeguards with regard to data protection such as model contract clauses approved by the European Commission are in place.

### **Your rights**

Under GDPR, you have the following rights regarding our use of your Data:

- the right to access your Data and to be informed of, inter alia, the purpose of our use of your Data, the categories of Data concerned and the recipients to whom we disclose your Data;
- the right to obtain from us without undue delay the rectification of inaccurate Data concerning you;
- under certain circumstances defined by GDPR, the right to obtain from us without undue delay the erasure of your Data. By way of example, you may request erasure if your Data are no longer necessary in relation to the purposes for which they were collected;
- under certain circumstances defined by GDPR, in particular if you contest the accuracy of the Data we use, the right to obtain from us restriction of our processing of your Data;
- where we rely on our legitimate interests to use your Data and provided that you can claim overriding interests, the right to object at any time to our use of your Data;
- where your consent for our use of your Data is required pursuant to GDPR, the right to withdraw your consent at any time;



- the right to data portability where processing is carried out by automated means and based on either the performance of a contract or, where applicable, your consent;
- the right to lodge a complaint with our lead supervisory authority in the United Kingdom

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

<https://ico.org.uk/make-a-complaint/>

You may also lodge a complaint with your local supervisory authority within the EEA.

#### **For how long we store your Data**

We will be processing your Data during the entire period of the Application Process. If the Application Process leads to the conclusion of an employment contract between you and a Lightrock Company, we shall continue to store your Data in accordance with a separate Privacy Notice for employees which will be provided to you in the course of the onboarding process. In all other cases, we will delete your Data upon conclusion of the Application Process, unless you agree to our continued storage of your Data (e.g. in order to consider your dossier for future job opportunities). Furthermore, we may keep your Data for a period exceeding the abovementioned term where our continued use of your Data is necessary for the establishment, exercise or defense of legal claims.