

PROVISIONAL DOCUMENT - PRIVACY POLICY

The Website ufundservices.com (hereinafter referred to as the “Website”) is operated by U Fund Services S.à r.l. (hereinafter referred to as “UFS” or “we”). The protection of your personal data is a central concern for us. As part of this privacy policy, we inform you about the type, scope and purpose of the collection, processing and use of your personal data.

I. PRINCIPLES

- We collect, process and use your personal data exclusively in compliance with the applicable data protection regulations. Primarily this is the General Data Protection Regulation (GDPR) as well as the applicable national laws.
- Personal data is all individual information about the personal or factual circumstances of an identified or identifiable natural person. This includes so-called inventory data such as your name, postal address, e-mail address and telephone number, but also usage data, such as information about the time of your visit to our pages, the browser you use, and other data generated when you visit our pages.

II. SCOPE OF DATA COLLECTION, PROCESSING AND USE

- We collect, process and use your personal data only for the purposes of providing information about UFS on this website.
- The processing of your personal data is lawfully carried out based on the applicable data protection regulations, and – depending on the case – specifically on the basis of your consent, a legal obligation, the conclusion of a contract with you or after weighing up legitimate interests in the individual case.
- Insofar as we process personal data based on consent, we will only do so as long as you do not object or revoke your consent.
- For a large part of your visit to the website, it is not necessary for you to provide us with any personal data. For specific interactions the provision of personal data may be required (e.g. application, contact form).
- This website is not directed to anyone under the age of 16. We ask that anyone under the age of 16 to not provide any personal information to us. If we learn that we have collected personal information from anyone under the age of 16, we will take steps to delete the information immediately. If you become aware that a user of our website is under the age of 16, please contact us via dataprivacy@ufundservices.com.
- We would like to inform you exactly which data we collect and process about you in the following data protection information. If you have any questions about data protection, please contact dataprivacy@ufundservices.com. All contact details can be found at the end of this Privacy Notice.

COOKIES

This website does not place any cookies on your device.

SERVER LOG FILES

As is common practice with almost all websites, the server on which our websites are located (hereinafter referred to as the “web server”) automatically collects information from you when you visit us on the Internet.

The web server automatically detects certain data, such as

- IP address
- Date and time of access as well as time zone
- The operating system used
- Type, version and language setting of the browser used
- URL of the document page from which the user was referred

Our service provider (Infomaniak Network AG, Rue Eugène Marziano 25, 1227 Les Acacias (GE)) regularly evaluates these server logs anonymously for technical purposes. The data has no personal reference. For further information you can find their data privacy policy at <https://www.infomaniak.com/en/legal/confidentiality-policy>.

This data will be deleted no later than 14 days after it has been collected unless there is a suspicion of misuse or other system security errors.

This data is also generated when accessing any other website on the Internet. It is not a special feature of our website.

The legal basis for collecting this information is Art. 6 para. 1 sentence 1 lit f) GDPR, our legitimate interest to ensure the functionality of this website.

CONTACT FORM / E-MAIL

When contacting us (e.g. via contact form or e-mail), personal data is collected. The data collected in the case of a contact form can be seen from the respective contact form. The information you provide will be stored and used exclusively for the purpose of answering your request or for contacting you and the associated technical administration.

To answer your questions, the following data will be collected and processed:

- When you contact us via the contact form. The form data you provide (surname, first name, email address, telephone number, message and attachments), date and time of transmission.
- When you send us an email. Recipient – email, the different mail servers that passed through the email, report of the spam server, address of the recipient – mail server, date and time of the email, sender – email, subject, content of the e-mail
- Any kind of attachments

Please note that when communicating via the contact form, UFS cannot guarantee data security on the Internet and that we recommend sending confidential information by post to prevent the loss of this confidential information. For a secure transmission we use the services of Brevio with the contact form.

We store your data until the purpose described has been fulfilled and there are no other statutory retention obligations. In the event of termination or a request for deletion, the data will be deleted; Data that is subject to retention will be blocked. If you have given us your consent, we will store your data until you revoke your consent.

The processing of this data serves the purpose of the user contacting us and replying from us to the user. It is carried out in accordance with Art. 6 para. 1 sentence 1 lit. a) and f) GDPR. If your contact is aimed at concluding a contract, the legal basis for the processing is Art. 6 para. 1 sentence 1 lit. b) GDPR.

APPLICATION VIA CONTACT FORM, E-MAIL, PERSONIO, OR BY POST

To use the applicant portal of UFS, contact details such as name, address, telephone number, e-mail address, etc. are collected.

Your application data, which you provide to us via the application portal, will only be used by us for the application process, i.e. for the purpose of storing, evaluating, assigning and forwarding your application internally, as well as for contacting you. As part of the application process, your application data will only be accessible to the respective HR managers of UFS and will be made available to the colleagues in the department of the respective department at UFS and/or the respective group company of UFS who have been entrusted with filling the position. Your application data will not be passed on to third parties outside of UFS and its parent company.

It should be noted that the processing and use of the data takes place exclusively in the territory of the European Economic Area.

We will not ask you to provide us with so-called special types of personal data on our application portal. However, if you voluntarily provide us with such information, you allow us to store this information as part of the registration process and to use it for the purposes of this application portal.

In the case of applications that you send us by post or e-mail, your personal data will also be stored and processed via our applicant management system for the purpose of processing your application. The data protection regulations apply accordingly to these cases.

For the data storage, administration and processing of your data, we work with the applicant management system of Personio SE & Co. KG (Seidlstraße 3, 80335 München).

For its part, Personio SE & Co. KG might cooperate with other processors. Further information can be found in their data privacy policy: <https://www.personio.com/privacy-policy>

Your application data will be stored for a maximum of six months after a possible rejection and then completely deleted unless we have received your consent from you in accordance with Art. 6 para. 1 sentence 1 lit. a GDPR for a longer storage of your applicant data. For further information on the storage and retention periods, please refer to the privacy policy of the applicant portal.

If, following a rejection of your application, you receive an inquiry from us as to whether you would like to be included in our pool of applicants, you have the following options:

You agree to the pool inclusion: Your application, including your personal data, will be stored in our applicant management system for a further 18 months and then deleted.

You refuse to be accepted: Your application will be treated as a normal rejection, i.e. Your personal data will be deleted 6 months after completion of the application process.

You do not respond to our request within 20 days: this case will be considered a rejection, and your application will be treated as a normal rejection, i.e. Your personal data will be deleted 6 months after completion of the application process. If you are hired by our company following the application process, we will incorporate your data into our regular personnel management process.

III. DURATION OF STORAGE

We store your personal data for as long as this is necessary to achieve the respective storage purpose. Your consent to the storage has been obtained. Subsequently, your data will be deleted by us, unless we are obliged to store your data for a longer period of time in accordance with Art. 6 (1) sentence 1 (c) GDPR due to tax, commercial or other statutory retention or documentation obligations or, in the event that the storage purpose ceases to exist, you have consented to further storage in accordance with Art. 6 (1) sentence 1 (a) GDPR.

Your application data will be stored for a maximum of six months after a possible rejection and then completely deleted unless we have received your consent from you in accordance with Art. 6 para. 1 sentence 1 lit. a GDPR for a longer storage of your applicant data. For further information on the storage and retention periods, please refer to the privacy policy of the applicant portal.

IV. EXTERNAL LINKS

You may find links on our pages that refer to third-party sites. UFS has no influence whatsoever on whether its operator complies with the data protection regulations.

V. YOUR DATA PROTECTION RIGHTS

Under data protection law, you have rights including:

- Your right of access – You have the right to ask us and access a copy of the personal data we hold about you.
- Your right to rectification – You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure – You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing – You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing – You have the the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability – You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- Your right to complain – Lodge a complaint with a supervisory authority if you believe that we have not complied with data protection laws.

The responsible supervisory authority for UFS is:

National Commission for Data Protection
15, Boulevard du Jazz
L-4370 Belvaux

Tél. : (+352) 26 10 60 -1

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at dataprivacy@ufundservices.com if you wish to make a request.

VI. CONTACT

You can contact us at any time if you want to exercise your rights or have any further questions:

U Fund Services S.à r.l.
76-78 rue de Merl
L-2146 Luxembourg
Grand Duchy of Luxembourg

Phone: +352 2767 3824

E-Mail: dataprivacy@ufundservices.com

Data protection:

U Fund Services S.à r.l.
Youssef Oussine
76-78 rue de Merl
L-2146 Luxembourg
Grand Duchy of Luxembourg

E-Mail: y.oussine@ufundservices.com

Last Update: April 2024