

Employee Privacy Notice

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1. Purpose of the Notice

As an employer HACA Partners must meet its contractual, statutory and administrative obligations.

We are committed to ensuring that the personal data of Our employees is handled in compliance with the EU's General Data Protection Regulation (referred to as the "GDPR").

This Employee Privacy Notice describes why and how We collect and use personal information about You during and after Your working relationship with Us, with whom We might share it and how long We usually keep it. This also makes You aware of Your rights under the GDPR.

This Employee Privacy Notice applies to the personal information of all individuals who are/have been in the process of being employed, currently employed or have been employed by HACA. This Notice does not form part of any contract of employment or other contract to provide services. We may update this Notice at any time but if We do so, We will inform You.

For the purposes of this Employee Privacy Notice:

- **You** (referred to as either "You", "Your") means current and former employees.
- **Company** (referred to as either "the Company", "HACA", "We", "Us" or "Our" in this Notice) refers to HACA Partners S.à r.l., 6, route d'Esch, L-1470 Luxembourg.

It is important that You read and understand this Notice. If You have questions or do not understand it fully, please contact Your Line Manager.

2. Personal Data We collect about You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

HACA collects and processes personal data relating to its employees primarily to manage the employment relationship. HACA is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

We will collect, store and use personal information about You including

2.1. Personal Identification and Communication Information :

- Your name
- gender
- date of birth
- personal contact details: home address, personal email address(es), personal phone number(s)
- emergency contact information
- marital status and dependents
- government-issued identification numbers, such as national social security ID number
- bank account details

- nationality
- languages
- photo

2.2. Data related to employment relationship:

- work contact details
- type of contract, contract details, employment ID number
- title, position description, working history and records, working location, years of services
- salary, benefits, tax and pension-related information and historical records
- performance-related data, such as Your objectives, performance discussions and assessment records, feedback and tests results
- qualifications and personal development related data, such as records of development discussions and competence assessments, learning and development records, certificates, licenses and vocational records, records of career and succession planning
- information about working hours, vacation and absences
- recruitment history – CV details, previous work experiences and educational background, certificates, licenses and vocational records, information of general interest, membership to associations, any information You have provided Us during the interviews, information gathered from reference persons whose contact details You have provided to Us
- leaving date and Your reason for leaving
- information related to immigration, right-to-work and residence status
- travelling and travel expenses related data as well as user account details
- information relating to misconducts and disciplinary actions, background check reports and security data
- data related to incident reporting, including time and place of accident and “near misses” at work, description of the respective incident including information relating to the persons involved in such incidents, consequences of the incident including data relating to insurance reports and other proceedings
- information relating to specific assignments e.g. meeting records, project reports etc.
- user logs and access control related information, information about Your use of Our information and communications systems and other HACA’s assets, e.g. outlook, computers, servers etc.

Events: We may request additional information for events (such as Your dietary requirements) and We may use professional photographers who may capture photographs of You at such events.

3. Legal basis for collecting and using Your Data

We primarily based Our processing of Your personal data in order for Us to perform Our contract obligations as an employer (“**Contractual obligations**”) and to enable Us to comply with legal obligations (“**Legal obligations**”). In some cases, We process Your personal information based on Our legitimate interests (“**Legitimate interests**”), when Your interests and fundamental rights do not override

those interests. Our main and general legitimate interest is to continue to develop Our business, both qualitatively and quantitatively, and improve the performance of HACA.

We have listed some purposes and grounds for processing Your personal data in the table below (this list is not exhaustive):

Checking if You are legally entitled to work in the country where We operate and Your resident status	Legal obligations
Payments of agreed compensation (salary, bonuses) and as applicable deducting tax, mandatory social contributions and national insurance contributions in accordance with the legislation	Contractual obligations Legal obligations
Making decisions about salary reviews and compensation package based on salary review processes and best practises	Contractual obligations
Attendance monitoring, vacation, absence and sick/leave administration	Contractual obligations Legal obligations
Determining performance requirements, setting individual targets, conducting regular performance reviews and assessments, managing performance records and analytics in accordance with performance and development processes	Legitimate interests
Employee's development - composition of overall and individual development programs, arrangement of trainings and development activities	Legitimate interests
Travel management – arrangement of accommodation and flights, managing travel expenses reports and payments, arranging visa invitations and/or visas	Legal obligations Legitimate interests
Dealing with legal disputes involving You, or other employees, workers and contractors, including accidents at work	Legal obligations Legitimate interests
Equal opportunities monitoring	Legal obligations Legitimate interests
Assurance of network and information security, including access management to prevent unauthorised access to Our computers and electronic communications systems and preventing malicious software distribution	Legal obligations Legitimate interests
To conduct data analytics studies to review and better understand employee retention and turnover rates	Legitimate interests
Making decisions about Your continued employment or engagement	Legitimate interests
Business Development opportunities	Legitimate interests
Internal and external communication	Legitimate interests

Some of the above grounds for processing will overlap and there may be several grounds which justify Our use of Your personal information.

4. Change of purpose

We will only use Your personal information for the purposes for which We collected it, unless We reasonably consider that We need to use it for another reason and that reason is compatible with the original purpose. If We need to use Your personal information for an unrelated purpose, We will notify You and explain the legal basis which allows Us to do so.

5. Failure to provide personal information

HACA requires personal information from You for the purposes set out in this Notice, including the performance of its contract with You and compliance with its legal obligations.

You have some obligations under Your employment contract to provide the organisation with data. For example, You are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith. You may also have to provide the organisation with data in order to exercise Your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that You are unable to exercise Your statutory rights, and We may not be able to comply with contractual obligations and perform the contract We have entered into with You (such as paying You, reporting Your taxes, or providing a benefit), or We may be prevented from complying with Our legal obligations.

Except in cases where it is indicated that the provision of information is purely voluntary, the failure to supply the personal data required could lead to disciplinary action up to and including dismissal or the termination of Your engagement. If You have any questions about HACA's need for Your information please raise Your questions with the person making the request, HR, Your line manager.

6. Your duty to inform Us of changes to Your personal details

It is important that the personal information We hold about You is accurate and current.

In order to enable HACA to meet its legal obligations You are required to notify HR with any changes to Your personal details within 72 hours.

7. How is Your personal information collected?

We collect personal information about You from You directly during the contracting employment relationship.

We collect personal information about You also through the application and recruitment process either directly from You, from recruitment service providers or consultants if they were involved, and from Your LinkedIn Profile.

We sometimes collect additional information from third parties including former employers or former colleagues (references), authorities or other information providers. To get further information on how We collect information please contact Your Line Manager.

Data will be stored in a range of different places, including in Your personnel file, in the organisation's Payroll and HR management system, and in other IT systems (including the organisation's email system).

8. Personal information sharing

Your information may be shared internally, including with members of the HR team (including payroll), Your line manager, partner in the business area in which You work and IT staff if access to the data is necessary for performance of their roles and where required by law.

We share Your personal information with different governmental authorities, institutions or agencies (or similar), or insurance companies where required by law for the purpose of their regulatory tasks. We may also need to share Your personal information with a regulator to comply with the law.

We share Your personal data with third-party service providers processing data on behalf of HACA. In such cases Your personal data is safeguarded by Data Processing Agreements, committing outsourced service providers to process Your personal data for specified purposes and in accordance with Our instructions, to comply with the GDPR and to apply appropriate security measures to protect Your personal information in line with Our policies. We do not allow our third-party service providers to use Your personal data for their own purposes.

We may share Your personal information with other third parties, e.g. service providers, suppliers, customers and business partners to fulfil Our contractual obligations. In such cases We limit personal data shared to absolute minimum required.

We may share some personal information (work contact details, title, position description, working history and records, picture, etc.) to clients and prospects for business development purposes, including sharing Your LinkedIn Profile on Our website.

HACA does not routinely transfer staff personal data outside the European Economic Area but when this is necessary, We ensure that We have appropriate safeguards in place.

9. Data security

We have put in place appropriate physical, technical and procedural security measures to prevent Your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We limit access to Your personal data to those employees, contractors and other third parties on a need-to-know basis, i.e. who need the access in order to fulfil the tasks and duties relating to service provision.

All service providers are permitted to process Your personal data based on Our instructions, they are subject to a duty of confidentiality, and they are required to be compliant and demonstrate the compliance with Personal Data Protection.

Our IT systems are protected against unauthorised access with various level of controlled and password protected access rights.

When transferring or disclosing Your personal data the safety measures vary based on the sensitivity of the data and may include e.g. strong identification of the recipient and encryption of the transferred information.

10. Data retention

We only retain Your personal information for as long as necessary to fulfil the purposes We collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, We consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of Your personal data, the purposes for which We process Your personal data and whether We can achieve those purposes through other means, and the applicable legal requirements.

Once You are no longer an employee of the Company We will retain and securely destroy Your personal information in accordance with applicable laws and regulations.

11. Your rights

Under certain circumstances, You have the right to:

- Request access to Your personal information. This enables You to receive a copy of the personal information We hold about You and to check that We are collecting and using it lawfully.
- Request correction of the personal information that We hold about You. This enables You to have any incomplete or inaccurate information We hold about You corrected.
- Request erasure of Your personal information. This enables You to ask Us to delete or remove personal information where there is no good reason for Us continuing to use it. You also have the right to ask Us to delete or remove Your personal information where You have exercised Your right to object to processing (see below).
- Request erasure of Your picture and links on HACA PARTNERS website to Your LinkedIn Profile.
- Object to processing of Your personal information where We are relying on a legitimate interest (or those of a third party) and there is something about Your particular situation which makes You want to object to processing on this ground.
- Request the restriction of collecting and using Your personal information. This enables You to ask Us to suspend the usage of personal information about You, for example if You want Us to establish its accuracy or the reason for processing it.
- Request the data portability of Your personal information to another party.
- Right to lodge a complaint to the Commission Nationale pour la Protection des Données (referred to as the "CNPD").
- Right to withdraw the consent. In circumstances where You have provided Your consent to the collection, processing and transfer of Your personal information for a specific purpose, You have the right to withdraw Your consent for that specific processing at any time.
- Right to object – stopping the processing of an individual data for direct marketing, profiling and where there are no compelling legitimate grounds

- Rights in relation to automated decision making and profiling - not to be subjected to a decision based solely on automated processing, including profiling of an individual.

If You would like to exercise any of these rights, please contact Your Line Manager or send a mail to dpo@hacapartners.lu.

If You believe that the Company has not complied with Your data protection rights, You can complain to the CNPD.

In order to meet Your request, We may need to request specific information from You to help Us confirm Your identity and ensure Your right to access the information (or to exercise any of Your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Exercising Your rights is free of charge. We are also entitled to decline requests on statutory grounds in which cases We will inform You of such decline including the grounds for the decline.

12. Changes to this Notice

We reserve the right to update this Notice at any time and will provide You with a new Notice when We make any updates.

13. How to contact Us

If You have any questions about how We process Your personal data, please feel free to contact Your Line Manager or to send a mail to dataprotection@hacapartners.lu.

Should You wish to report a complaint or if You feel that Our Company has not addressed Your concern in a satisfactory manner, You may contact the CNPD

CNPD

15, Boulevard du Jazz

L-4370 Luxembourg

Tél. : (+352) 26 10 60 -1

www.cnpd.lu

Nom – Prénom

Date

Signature