
Candidate Privacy Notice - Data protection information (Art. 13 and 14 GDPR)

Record Asset Management GmbH

May 2025



In this Privacy Notice, "RAM", "we", "us" and "our", refer to Record Asset Management GmbH, registered in Germany with registered office at Bockenheimer Anlage 46, 60322 Frankfurt am Main, Germany. Record Asset Management GmbH is registered with the commercial register at the local court (*Amtsgericht*) of Frankfurt am Main under registration no. HRB 133865.

RAM is committed to safeguarding any information relating to an identified or identifiable natural person ("**you**") in the sense of Article 4 (1) of the General Data Protection Regulation (EU) 2016/679 ("**GDPR**"), such as names, contact details and ID data ("**Personal Information**"). To the extent that any Personal Information is collected, it will be held in confidence in accordance with the Data Protection Legislation (as defined below).

Please read the following Privacy Notice which explains how we process and protect Personal Information of any person applying for work with us (including potential employees or contractors) and which contains the information pursuant to Article 13 and 14 GDPR regarding processing of your personal data by RAM.

We will only use Personal Information which is provided to us by you, or otherwise obtained by us (i.e. from third parties), as set out in this Privacy Notice. We will ensure that your Personal Information is handled in accordance with the "**Data Protection Legislation**" (meaning any law applicable from time to time relating to the processing of Personal Information and/or privacy as the same may be re-enacted, applied, amended, superseded, repealed or consolidated, including without limitation the GDPR and the German Federal Data Protection Act (*Bundesdatenschutzgesetz – BDSG*), in each case including any legally binding regulations, directions and orders issued from time to time under or in connection with any such law).

By contacting or otherwise engaging with us, you acknowledge that we may process your Personal Information as set out in this Privacy Notice. RAM reserves the right to change this Privacy Notice from time to time.

If you contacting us as a client or investor, you acknowledge that we may also process your Personal Information as set out in our **RAM Client Privacy Notice**. This makes you aware of how and why your personal data will be used, namely for the purposes of the performance of our investment services, and how long it will usually be retained for.

If you are visiting the website www.recordfg.com ("**Website**"), you acknowledge that the operator of the Website, Record Currency Management Ltd., United Kingdom, registered with the Companies House under number 01710736, may process your Personal Information as set out in the **Privacy and Cookies Policy** of the operator, which is available through the Website.

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1. Our contact Information / Data controller / Data Protection Officer

The so-called "controller" for the processing of your Personal Information when engaging with us within the meaning of the GDPR is:

Record Asset Management GmbH

Bockenheimer Anlage 46

60322 Frankfurt am Main

Germany

e-mail: ramgdprqueries@recordfg.com

For all employment-related data enquiries please contact:

Kevin Ayles – Chief of Staff

e-mail: kayles@recordfg.com

phone: +44 203 892 1300

For all questions regarding data protection in relation to our services, you can contact either us via the above postal and e-mail address or our Data Protection Officer at any time. The Data Protection Officer can also be reached at the postal address and at the e-mail address given above (keyword: "**Data Protection Officer**"). We expressly point out that if you use this e-mail address, the contents will not be exclusively noted by our Data Protection Officer. If you wish to exchange confidential information, please therefore first contact us directly via this e-mail address.

2. Personal Information that we collect from you / Data categories

In connection with your application for work with us, we will collect, store and use the following categories of Personal Information about you from you:

- The Information you have provided to us in your curriculum vitae, covering Letter, and/or any information written in your application email.
- The information you have provided on our online application forms, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications.
- Any information you provide to us during an interview.
- Any information you provide to us to support your application during the recruitment process, including the results from any tasks undertaken or tests administered.
- The Personal Information you have provided about yourself, including your name and work contact details (e.g. work address, email address and telephone number).

The provision of this Personal Information is entirely voluntary, however, we may be unable to carry out some activities necessary to process your application or other requests without the provision of such information. For example, we may be unable to assess, if you meet the requirements of a certain job and establish a working relationship with you.

3. Personal Information that we receive from other data sources

We may receive information from third parties who collect Personal Information from you and pass it on to us including the following data sources:

- Recruitment agencies.
- [Certn UK Ltd., 160 London Road, Sevenoaks, TN13 1BT, England], who provides our employment screening process, from which we collect the following categories of data: Education history, Employment history, Professional Qualifications and Memberships, Media Searches, Regulatory

data from authorities, Directorships, Sanctions, Enforcements and other Regulatory records as well as Politically Exposed Persons (PEP) Lists, Identity check, Financial Probity Check, Address verification, Passport verification and any other information required to make an appointment.

- Bundeszentralregister / Disclosure and Barring Service in respect of criminal convictions.
- Your named referees.

4. What we do with your Personal Information / Purposes of data processing

Some of the above Personal Information is collected and processed to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks (which might include your financial soundness), where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

Having received some or all of the information listed above, we will process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then carry out the relevant employment screening process before confirming your appointment.

If you change your mind about us using your Personal Information in the ways described in this Privacy Notice or if you have any questions about this Privacy Notice or how we handle your Personal Information, please let us know by contacting the Record Financial Group's Chief of Staff (for contact details see item 1 above) who is responsible for overseeing compliance with this Privacy Notice.

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we may not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

5. Legal basis for processing your Personal Information

The law requires us to have a legal basis for collecting and using your Personal Information. Depending on the role you are applying for and the respective stage of the application process described below, we will rely on one or more of the following legal bases:

- Performance of a contract with you (Art. 6 (1) b) GDPR: Where we need to decide whether to enter into a contract with you and / or where we need to perform the contract we are about to enter into or have entered into with you.
- Legitimate interests (Art. 6 (1) f) GDPR: We may use your Personal Information where it is necessary to decide whether to appoint you to the role since it would be beneficial to our business to appoint someone to that role. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your Personal Information for our legitimate interests. We do not use your Personal Information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- Legal obligation (Art. 6 (1) c) GDPR: We may use your Personal Information where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- Consent (Art. 6 (1) a) GDPR: We rely on consent only where we have obtained your active agreement to use your Personal Information for a specified purpose.

6. Sensitive Personal Information

There are special categories of personal data in the sense of Article 9 (1) GDPR meaning any Personal Information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation ("**Sensitive Personal Information**").

When processing Sensitive Personal Information, we require further justification for collecting, storing and using this type of Personal Information. We have in place appropriate safeguards which we are required by law to maintain when processing such data.

When processing your Sensitive Personal Information, we usually rely on the following legal bases:

- Explicit consent (Art. 9 (2) a) GDPR: We rely on your consent only where we have obtained your explicit consent to the processing of those Sensitive Personal Information for one or more specified purpose.
- Legal obligation (Art. 9 (2) b) GDPR: We may use your Sensitive Personal Information where processing is necessary for the purposes of carrying out the obligations and exercising our specific rights or yours in the field of employment and social security and social protection law.
- Public interest (Art. 9 (2) g) GDPR: We may use your Sensitive Personal Information where processing is necessary for reasons of substantial public interest.

Less commonly, we may process your Sensitive Personal Information based on the following legal bases:

- Protection of interests (Art. 9 (2) c) GDPR: We may use your Sensitive Personal Information where processing is necessary to protect your vital interests or vital interests of another natural person where you are physically or legally incapable of giving consent.
- Public data (Art. 9 (2) e) GDPR: We may use your Sensitive Personal Information where processing relates to Sensitive Personal Information which are manifestly made public by you.
- Legal claims (Art. 9 (2) f) GDPR: We may use your Sensitive Personal Information where processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.

Based on the above legal bases we will use your Sensitive Personal Information in the following ways:

- We may process such Sensitive Personal Information in the form of data concerning your health in cases where we need information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.
- Any other Sensitive Personal Information that is collected through the employment screening process will be processed in accordance with Article 9 GDPR and as detailed in this Privacy Notice.

7. Personal Information relating to Criminal Convictions and Offences

We may also process Personal Information relating to criminal convictions and offences in accordance with Article 10 GDPR only either under the control of official authority or when the processing is authorised by Union or German national law providing for appropriate safeguards for your rights and freedoms. This will usually happen when we are legally obligated to conduct background checks to determine your suitability for a certain role within RAM and thus processing of such data in accordance with Article 6 (1) b) GDPR is necessary for the establishment or performance of your employment relationship with RAM. This includes regulatory roles performed by RAM employees which require approval from the German authorities, especially but not limited

to the German Federal Financial Supervisory Authority (*Bundesanstalt für Finanzaufsicht – BaFin*) and Deutsche Bundesbank or any other regulator relevant to the Record Financial Group.

As a regulated and supervised investment firm, and given that all staff of RAM are directly involved in the provision of investment services, we process information about criminal convictions and offences in respect of all roles. Following a successful recruitment process and at the stage of offering the role to you, we will collect information about your criminal convictions' history and financial soundness as a part of our pre-employment screening process.

We will use Personal Information about criminal convictions and offences only insofar it is necessary to consider your suitability for employment or continued employment. Less commonly, we may use such Personal Information where it is necessary in relation to legal claims. We have in place appropriate internal policies and safeguards which we are required by law to maintain when processing such data.

8. Disclosure of your Personal Information / Recipients

We will only share your Personal Information with the following third parties for the purposes of processing your application:

- **Certn UK Ltd.**, 160 London Road, Sevenoaks, TN13 1BT, England,
- who conduct our background checks as part of the pre-employment screening process;
- **SHL Group Ltd.**, The Pavilion 1 Atwell Place, Thames Ditton, Surrey, KT7 ONE, UK,
- **Global Office Lumina Learning Ltd.**, The Columbia Centre Station Road, Bracknell, RG12 1LP, UK and
- **Thomas International Ltd.**, First Floor, 18 Oxford Road, Marlow, Buckinghamshire, SL7 2NL, UK,

who each administer our application tasks and test and / or provide us with personal management solutions.

All our third-party service providers are required to take 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 Information for their own purposes. We only permit them to process your Personal Information for specified purposes and in accordance with our instructions.

In addition, part of the data processing may be carried out by group companies processing your Personal Information on behalf of us ("**Processor**"). If we pass on data to any of our Processors, they may only use the data to perform their tasks. The Processors have been carefully selected and contracted by us. They are contractually bound by our instructions, have appropriate technical and organizational measures in place to protect the rights of the data subjects and are regularly monitored by us.

9. Our security measures

We have put in place appropriate security measures to prevent your Personal Information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Information to those employees, agents and other third parties who have a business need-to-know (e. g. HR and your future team lead as well as management). They will only process your Personal Information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

10. Data retention

We will retain your Personal Information for a period of six months after the recruitment process that you have applied for has been completed and you have been notified about our decision. We

retain your Personal Information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your Personal Information in accordance with our data retention policies, unless we still require the data until the expiry of the statutory limitation period for evidentiary purposes for claims under civil law, due to statutory retention obligations or any other legal basis under data protection laws for the continued processing of your data in a specific individual case.

If we wish to retain your Personal Information on file, on the basis that a further opportunity may arise in future for which we may wish to consider you, we will write to you separately, seeking your explicit consent to retain your Personal Information for a fixed period.

11. Transferring Personal Information outside of Germany or EEA

In processing your Personal Information, it may be necessary for us to transfer your Personal Information outside Germany or the European Economic Area ("**EEA**") as we might also use the services of providers who are partly located outside Germany or the EEA or who process personal data outside Germany or the EEA (i.e. any Personal Information provided to RAM will be transferred to and stored on servers used by our Processor **Record Group Services Limited**, United Kingdom, registered with the Companies House under number 01927639.

Your Personal Information may also be accessed by staff operating outside Germany or the EEA who work for us or for one of our third-party service providers or Processors. This includes people engaged in, among other things, the provision of support services to us as explained under item 8. above.

Insofar as this is the case and the European Commission has not issued an adequacy decision pursuant to Art. 45 (3) GDPR ("**Adequacy Decision**") for these countries, we have taken appropriate safeguards as referred to in Article 46 (1) GDPR to ensure an adequate level of data protection for any data transfers, including, among others, the Standard Contractual Clauses of the European Union or binding internal data protection regulations ("**Appropriate Safeguards**").

In the absence of an Adequacy Decision and where none of the Appropriate Safeguards have been provided, we base the data transfer on derogations of Art. 49 GDPR, in particular your explicit consent or the necessity of the transfer for the performance of the employment contract or for the implementation of pre-contractual measures.

If a third country transfer is intended and no Adequacy Decision or Appropriate Safeguards are in place, there is a risk that authorities in the respective third country (e.g. intelligence services) may obtain access to the transferred data in order to collect and analyze the data and that under such circumstances your data subject rights cannot be guaranteed. When obtaining your consent, you will also be informed of this fact.

By submitting your Personal Information to us, you acknowledge the transfer, storing and/or processing of your Personal Information.

12. Your legal rights, especially objection and withdrawal

You shall have the rights of data subjects pursuant to Art. 7 (3), Art. 15 to 21, Art. 77 GDPR at any time, provided that the respective legal requirements are fulfilled:

- Right to withdraw your consent (Art. 7 (3) GDPR);
- Right to object to the processing of your personal data (Art. 21 GDPR);
- Right to access your personal data processed by us (Art. 15 GDPR);
- Right to rectification of your personal data stored by us that is incorrect (Art. 16 GDPR);
- Right to erasure of your personal data (Art. 17 GDPR);
- Right to restriction of the processing of your personal data (Art. 18 GDPR);
- Right to data portability of your personal data (Art. 20 GDPR);
- Right to lodge a complaint with a supervisory authority (Art. 77 GDPR).

To exercise your rights described above, you can contact us at any time using the contact details under item 1 above. This also applies insofar as you wish to receive copies of safeguards demonstrating an adequate level of data protection. Provided that the respective legal requirements are fulfilled, we will comply with your data protection request.

Your request to exercise data protection rights and our responses to them will be stored for documentation purposes for a period of up to three years and, in individual cases, for longer if there are grounds for asserting, exercising or defending legal claims. The legal basis is Art. 6 (1)(f) GDPR, based on our interest in defending against any civil claims under Art. 82 GDPR, avoiding fines under Art. 83 GDPR, and fulfilling our accountability obligations under Art. 5 (2) GDPR.

You have the right to withdraw your consent at any time. This request has the consequence that we will no longer proceed with the data processing based on the legal basis of this consent in the future. The withdrawal of consent does not affect the lawfulness of the processing based on the consent provided before the withdrawal.

Insofar as we process your data on the basis of legitimate interests, you have the right to object to the processing of your data at any time on grounds relating to your particular situation. If it is a matter of objecting to data processing for direct marketing purposes, you have a general right of objection, which will be fulfilled by us without giving reasons.

If you wish to exercise your right of withdrawal or objection, it is sufficient to send an email to contact details mentioned under item 1 above.

13. Complaints

Finally, you have the right to lodge a complaint with a data protection supervisory authority of your choice. You have the right to lodge a complaint with a data protection supervisory authority of your choice. For example, you can exercise this right at a supervisory authority in the member state of your habitual residence, your place of work or the place of the alleged infringement. This also includes the data protection supervisory authority responsible for the controller which is: The Hessian Commissioner for Data Protection and Freedom of Information, P.O. Box 3163, 65021 Wiesbaden, Germany, 0611/1408-0, poststelle@datenschutz.hessen.de.

We would, however, appreciate the opportunity to address with your concerns before you approach any supervisory authorities, so please contact us in the first instance.

14. Changes to this Privacy Notice

RAM may amend this Privacy Notice at any time without notice. By continuing the application process, you acknowledge that we shall process your Personal Information in accordance with the updated Privacy Notice. If you are not happy with any changes that we make, you should not continue the application process. Any changes to this Privacy Notice will be posted on this webpage.



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