

I. PURPOSE OF THE DOCUMENT

1. UADB "INVL Life" (hereinafter - the Company) job applicants register description in the Baltics (hereinafter - the Rules) establish the procedure of processing of personal data of candidates and provide information on what candidate data and on what basis the Company collects and processes, for which processes it is used, what is the retention time, as well as other relevant information.
2. The personal data of candidates are processed in accordance with the General Data Protection Regulation (EU) 2016/679, the Law on Legal Protection of Personal Data in Lithuania, Personal Data Processing Law in Latvia and Personal Data Protection act in Estonia, as well as other legal acts regulating this field.

II. DEFINITIONS AND GENERAL PROVISIONS

3. The Company – UADB “INVL Life” with branches in Latvia and Estonia.
4. Candidate - a natural person who applies for a vacant job position in the Company or for the position of the Company's management body, regardless of whether the candidate to the Company's management body shall be employee of the Company or independent management body member, or for the position as a person performing key functions, without regard to whether the candidate performing key functions shall be an employee or he / she shall perform outsourced key function.
5. Personal data is any information about an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, surname, date of birth, an personal identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Candidates' personal data is processed only in the territory of the European Union.
6. Personal data processing - any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
7. Consent - any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
8. Other terms used in the Rules shall be understood as they are defined in the General Data Protection Regulation and other legal acts.
9. The Rules may be amended, supplemented and / or updated. The latest and relevant version of the Rules is published on the website <https://assets.invl.com/privacy-policy/INVL-Group-Privacy-Policy.pdf> in Lithuania; <https://www.invl.ee/en/invl-life-privacy-policy/> in Estonia; https://invl.lv/wp-content/uploads/2022/05/Privatuma_politika_27042022_02052022.pdf in Latvia.
10. In all matters of data processing, including requests for the exercise of data subjects' rights, the Company, as the controller of the personal data of the candidates, may be contacted in the following ways:
 - 10.1. E-mail address: cv@invl.com;
 - 10.2. contact the Company's Data protection officer (e-mail address: dap@invl.com);
 - 10.3. postal correspondence address:

- 10.3.1. Lithuania - Gynėjų st. 14, 01109, Vilnius, Lithuania.
- 10.3.2. Latvia - Kronvalda bulvāris 3-3, LV-1010 Rīga, Latvija, +371 675 03333.
- 10.3.3. Estonia - Löötsa 12, 11415 Tallinn, Estonia, +372 681 2300.

11. Contact details of the Data controller

UADB „INVL Life“
Legal entity code: 305859887
Registered office address: Gynėjų st. 14, 01109, Vilnius
Tel.: 8 700 55 959
E-mail address: dap@invl.com

III. IMPLEMENTATION OF CANDIDATE SELECTION FOR THE POSITION AND EVALUATION OF CANDIDATES

12. When performing selections for vacant positions in the Company and evaluating the candidate, the Company manages the following candidate data:
- 12.1. general information about the candidate: name, surname, date of birth, address of residence, e-mail of the candidate, postal address and / or telephone number, information on the candidate's work experience (place of work, period of work, position, responsibilities and / or achievements), information on the candidate's education (educational institution, period of training, education and / or qualifications), information on in-service training (training received, certificates obtained), information on language skills, information technology, driving license (if required for work functions), other competencies, personal qualities;
 - 12.2. documents certifying the state of health (i.e. data on disability) in order to assess the candidate's ability to work, in accordance with the requirements of occupational safety and health legislation;
 - 12.3. information on the impeccable reputation of the candidate for the purpose of proper performance of the Company's obligations as a licensed financial market participant provided for in legal acts;
 - 12.4. information on relations with other companies, economic and commercial activities in order to avoid and manage the situation of possible conflicts of interest;
 - 12.5. previously listed and other information provided by the candidate in his / her curriculum vitae, cover letter, fit and proper questionnaire or other application documents and information in a public space (e.g. online portals);
 - 12.6. recommendations, employer feedback: the person recommending or providing the candidate, his or her contact, the content of the recommendation or feedback;
 - 12.7. candidate evaluation information: summary of the interview with the candidate, insights and opinions of the selection person (s), test results of the candidate.
13. The data referred to in points 12.2 to 12.4 shall be collected and processed only at the final stage of selection.
14. The Company collects and processes the candidate's personal data only to the extent necessary for the selection for a specific job position and to the extent permitted by applicable law.
15. If the candidate provides the Company with the data of other persons related to him, candidate must inform these persons about it and acquaint them with the provisions of the Rules.
16. The legal basis for processing the data specified in point 12 (hereinafter - the Data) may be the Data subject's intention to enter into an agreement with the Company, the Data subject's consent

to process his/her personal data for a specific purpose, as well as the fulfillment of legal obligations. The Company may also process personal data in accordance with the concept of legitimate interest (for example, to ensure operational risk management) after it has implemented the requirements set out in the GDPR. One or more of the above legal substantiations may apply to the processing of personal data of the same candidate under the conditions provided for by the applicable legislation.

17. The Company will collect the candidate's personal data from other sources only with the separate consent of the candidate. For example, the Company will review the candidate's recommendations or seek feedback from the candidate's employer only if the candidate agrees for the Company to contact the named employer and / or another person.
18. If at the end of the selection for the respective position, the Company does not select the candidate and does not conclude an employment contract with the candidate, the Company will destroy all personal data collected for selection purposes unless the candidate's consents to his/her data being included in the Company's candidate database.
19. If the candidate agrees to be included in the Company's candidate database and to receive information on future searches and selections of employees by the Company or INVL investment management and life insurance group's companies, the Company will continue to process the candidate data specified in point 12 in the candidate database. The data will be processed for a maximum of 12 months after the end of the selection.
20. The candidate is free to object to the inclusion and further processing of his / her data in the candidate database after the selection, and the candidate may at any time withdraw his / her consent and request the removal of his / her data from the candidate database.
21. The storage of personal data of a candidate for a longer period than specified in these Rules may be carried out only on the grounds provided by law.

IV. SOURCES OF DATA RECEIPT

22. Usually, the Company receives the candidate's data directly from the candidate when the latter responds to the Company's job advertisement and / or submits his / her CV, candidate's questionnaire and / or other application documents (CV, cover letter, etc.).
23. Information about the candidate's candidacy, his / her curriculum vitae and / or other application documents may also be obtained by the Company from entities providing job search, selection and / or mediation services, e.g. employment agencies, job search portals, specialized career social networks (i.e. "Linkedin").
24. The Company may also obtain certain information about the candidate from third parties, e.g. persons recommending the candidate, current or former employers or information from public sources. However, the Company will collect information from third parties only if the candidate consents to the Company agreeing to contact the employer and / or other person named by the candidate and receive a recommendation or feedback on the candidate.

V. DISCLOSURE TO THIRD PARTIES

25. The Company may transfer the candidate data for processing to third parties who assist the Company in the selection of candidates or who provide services related to the selection, evaluation of candidates and the Company's internal administration. Such persons may include personnel selection and / or evaluation service providers, database software providers, database

administration service providers, and so on. In each case, we provide data the data processor only to the extent necessary for the execution of a specific order or for the provision of a specific service. The data processors used by us may process the candidate's personal data only in accordance with the Company's instructions and may not use them for other purposes or transfer them to other persons without the Company's consent. In addition, they must ensure the security of the candidate's data in accordance with applicable laws and agreements signed with the Company.

26. The Company may also provide personal data processed in the candidate database to INVL investment management and life insurance group's companies if the Company considers that the candidate may be suitable for a job in the said companies and the candidate has expressed consent.
27. The data may also be provided to the competent authorities or law enforcement authorities or supervisory authorities, but only upon their request and only when required by applicable law or in cases provided for by law, where the approval of or notification to the supervisory authority is required for the candidate's intended position.

VI. RIGHTS OF THE CANDIDATE

28. The candidate has the right to receive confirmation from the Company whether the Company processes the candidate's personal data, as well as the right to access the candidate's personal data and information on the purposes of data processing, categories of processed data, categories of data recipients, data processing period and data receipt sources.
29. If the data provided to us in the candidate's application documents has changed or the candidate considers that the information about the candidate processed by the Company is inaccurate or incorrect, the candidate has the right to request that this information be changed, clarified and / or corrected.
30. The Candidate has the right to withdraw his / her consent at any time and demand the termination of further processing of personal data, which is carried out on the basis of consent, and (or) disagree with the processing of personal data when personal data are processed in the legitimate interests of the Company.
31. In certain circumstances specified in the data processing legislation (when personal data is processed illegally, the basis for data processing has disappeared, etc.), the candidate has the right to request that the Company delete the candidate's personal data.
32. The candidate has the right to restrict the processing of his / her personal data until the lawfulness of the processing has been verified at the candidate's request.
33. The candidate has the right to require the Company to provide in writing or in a commonly used electronic form the personal data provided by the candidate to the Company, which is processed by automated means, on the basis of his / her consent or performance of the contract and, if possible, to transmit those data to another service provider (right to data portability).
34. The candidate has the right to lodge a complaint with the corresponding state's data protection authority (LT: State Data Protection Inspectorate (address L. Sapiegos st. 17, Vilnius, website address - <https://vdai.lrv.lt>; LV: Data State Inspectorate (address Elijas Street 17, Riga, LV-1050, website address - <https://www.dvi.gov.lv>; EE: Tatari 39, 10134 Tallinn, Estija, webside address - <https://www.aki.ee/en>).

35. If the candidate considers that his / her data is processed by the Company in violation of the requirements of data protection legislation, the candidate is always first asked to apply directly to the Company.
36. Upon receipt of a candidate's request for the exercise of any of his / her rights and ascertaining the candidate's identity, the Company undertakes to provide the candidate with information on the action taken on the candidate's request without undue delay, but in any case no later than one month after receipt. Depending on the complexity and number of applications, the Company has the right to extend the one-month period for another two months, informing the candidate before the end of the first month and stating the reasons for such extension.
37. The candidate does not have to pay any fee to obtain information about his / her personal data the Company processes (or to exercise any other rights). However, the Company may charge a reasonable fee if the candidate's request is manifestly unfounded, repeated or disproportionate.