

Data Confidentiality Declaration for Job Applicants

Introduction

By applying for a position at Gazprombank (Switzerland) Ltd. ("GPBS"), please be aware that we as data controller register and collect personal information about you.

The following describes how we process your application and what information we collect, including what practices we usually follow.

GPBS is committed to being transparent about how it collects and uses your personal data and to meeting its data protection obligations.

INFORMATION CONCERNING THE COLLECTION OF PERSONAL DATA DURING THE RECRUITMENT PROCESS

The following privacy notice provides you with an overview of the collection and processing of your personal data during the recruitment process.

1. Receipt of application

Upon submission of your application via our website, you will receive an automatically generated response email asking you to read this document and to give your consent of processing your personal data for the recruitment process, should you be in agreement with this declaration.

Upon receipt of your written consent, we will review your application. As a result of the application review, you may be invited for a personal interview. This choice is based on your qualifications in relation to the position or positions.

Invitation for a personal interview will take place via e-mail or telephone and confirmed via e-mail. Applicants who have been invited for a personal interview will receive an answer either per e-mail or by telephone. Once we have filled the position, we will send a written rejection to all rejected applicants.

Applications can be also received from recruitment agencies and head-hunters that are mandated by GPBS in line with local legal obligations and our internal policies.

2. Who is responsible for data processing and to who can be addressed?

2.1 Responsible body:

Gazprombank (Switzerland) Ltd
Human Resources

2.2 Contact details of the Data Protection Officer of GPBS:

Gazprombank (Switzerland) Ltd
Daniel Urban / Compliance
Zollikerstrasse 183
8008 Zurich
Switzerland

dataprotection@gazprombank.ch

3. What sources and data does GPBS use?

GPBS processes personal data that we receive from applicants or recruitment agencies in the course of our search for new employees with the aim of establishing an employment relationship. Personal data in this context are data which allow the identification of a person.

In the context of the recruitment process "KYC" stands for know your candidate. This means that during the recruiting process and before getting to the offering stage, the Bank must be in possession of the full set of the candidate's application documents comprising CV, passport copy, working permit, educational records and written employment confirmation from previous employers. Depending on the situation, passport and permit information from the candidate's relatives may need to be submitted as well to the Bank.

If the application process is continued after the review of the data initially submitted, additional personal data will be collected from suitable applicants or data from third parties will be consulted as required. Relevant personal data are, e.g. data on creditworthiness, data in the context of wage garnishments, etc. References will only be obtained with the consent of the applicant.

4. For what purpose does GPBS process your data (purpose of processing) and on what legal basis?

We process personal data in accordance with the relevant data protection regulations:

- (a) With regard to the establishment of an employment relationship processing of personal data takes place for the purpose of recruitment.
- (b) In the context of legitimate interests personal data of the applicants are processed beyond the actual performance of the recruitment in order to safeguard legitimate interests of us or third parties. Non-exclusive list of examples:
 - Assessment of legal claims and defense in legal actions and disputes
 - Improvement of HR services
 - Personal security check for defined functions and tasks
 - Video surveillance for protection (entrance control, physical surveillance, building access)
 - Anti-nepotism / avoidance of conflict of interest

- (c) If you have given us your explicit consent to process personal data for specific purposes, the legal basis for processing is derived on the basis of your permission. A given consent can be revoked at any time. The revocation of the consent does not affect the legitimacy of the data processed until the revocation. The processing procedures of applicants with consent include, for example:
- Creation of an application profile
 - Inclusion in the talent pool

GPBS has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job.

5. Who receives your data?

Within GPBS, those departments will have access that need your data during the recruitment process. Relevant recipients of personal data of applicants within our company are for example employees of the human resources department and entrusted GPBS employees involved in the recruiting process such as hiring line managers.

We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

6. Is data transferred to a third country?

If required within the recruitment process (e.g. for personal background checks) data can be transmitted to offices in countries outside Switzerland (so-called third countries) to the extent necessary. Therefore data could for instance be transferred to an affiliated company of the Bank or the Group outside Switzerland e.g. Russia, Luxemburg, United Arab Emirates.

7. How long will your data be stored?

We process and store your personal data as long as it is necessary for the application process. The application process either leads to the conclusion of an employment contract or is terminated without result. If your application for employment is successful, the data will be processed further as part of the establishment and administration of the employment relationship. If your application for employment is unsuccessful, the data will be deleted after about three months after completion of the application process. If your data is recorded in our talent pool, it will be deleted after about six months.

8. What privacy rights do you have?

Each data subject has the right of access, rectification, erasure (right to be forgotten), restriction and objection of processes concerning him or her. You can revoke your consent to

the processing of personal data at any time. Please note that the revocation only works for the future. Processing that took place before the revocation is not affected by this right.

9. Is there an obligation for you to provide data?

You are under no statutory or contractual obligation to provide us with personal data during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.

For the purpose of carrying out the recruitment process, you only need to provide us with the personal data required for this procedure. If statutory obligations or special duties of care, for example in connection with the staffing of a job, make it necessary, we may request further personal data from you (e.g. references).

10. To what extent is there an automated decision-making process?

GPBS does not use automated decision making as part of the recruitment process.

11. Is profiling taking place?

GPBS does not use profiling as part of the recruitment process.

Thank you for your attention

Gazprombank (Switzerland) Ltd