

SUMMARY OF APPLICANT PRIVACY NOTICE

This Summary Applicant Privacy Notice (“**Summary Notice**”) has been prepared to provide you with a summary of the detailed Applicant Privacy Notice (“**Full Notice**”), in respect of our data processing activities regarding individually identifiable information about applicants for positions at Enstar (“**Personal Data**”), i.e., the Enstar entity identified in the vacancy for which you are applying and which acts as data controller (“**Enstar**” or “**we**”).

Scope of applicability

This Summary Notice applies to you if you are applying for a position at Enstar.

Processing of your Personal Data (categories of Personal Data)

We process the following items of your Personal Data collected from you or authorized third parties (e.g. recruitment agencies) during the application and job interview process:

- Your account details;
- Your name, gender and contact details;
- Information related to your professional and educational experience;
- language skills;
- your eligibility to work in the country to which you are applying;
- information about the reason for your application to Enstar;
- information from your LinkedIn profile (if you decided to use your LinkedIn profile as a CV); and
- any other information you provide.

For more details see I. 1. of the Full Notice.

Processing purposes

We process Your Personal Data for the following purposes:

- To determine your suitability for the position you are applying for as part of the application process;
- To provide you with offers for potential other positions that may be of interest for you;
- Where required in respect of the legal interests of Enstar (e.g., as required to defend against legal claims); and
- To comply with legal or regulatory obligations under national laws applicable to Enstar.

For more details see I. 2. of the Full Notice.

Legal justifications for the Processing of your Personal Data

One of the key privacy law requirements is that any processing of Personal Data must have a legal justification. Our justification for processing your Personal Data is that the Processing is:

- i. necessary to determine whether an employment contract will be entered into;
- ii. necessary for compliance with a legal obligation;
- iii. necessary for realizing a legitimate interest; or
- iv. based on your consent.

For more details see I. 3. of the Full Notice.

Data transfers and recipients and legal justification for such transfers

We transfer your Personal Data to other Enstar group companies, our service providers, and, in accordance with applicable law, governmental authorities, courts, external advisors, and similar third parties. Some of these recipients may be located in jurisdictions outside the EU. For more details see II. of the Full Notice.

Retention periods for and deletion of your Personal Data

Your Personal Data will be deleted once it is no longer needed for the purposes for which it was originally collected or as required by applicable law. For more details see III. of the Full Notice.

Your statutory rights

You have a number of rights with regard to the Processing of your Personal Data, each as per the conditions defined in applicable law, such as the right to have access to your data, to have it corrected, erased or handed over. Please refer any of your questions to dataprotection@enstargroup.com.

For more details see IV. of the Full Notice.

Changes of this Summary and the Detailed Privacy Notice as well as further notices

Both this summary notice and the detailed privacy notice are subject to change. Changes will be updated on the Enstar website. Where appropriate, you will be notified adequately through further relevant privacy notices (e.g. for specific purposes, systems used by Enstar if this is not covered by this Summary Notice and the Full Notice).

How to contact us

If you wish to exercise your data subject rights or if you have any other questions concerning this Notice, please address your request to the data protection officer, who can be contacted at dataprotection@enstargroup.com.

FULL NOTICE

I. YOUR PERSONAL DATA / PURPOSES AND LEGAL BASIS OF THE PROCESSING

We will process Personal Data about you that we have collected from you or authorized third parties (e.g. recruitment agencies) during the application and job interview process.

1. Categories of Personal Data

We collect the following Personal Data categories when you apply at Enstar

- Full name, gender, contact Details (address, phone number, email address);
- Professional and educational experience;
- Language skills;
- Eligibility to work in the country you are applying;
- Information about the reason for your application at Enstar;
- Information from your LinkedIn profile (if you decided to use your LinkedIn profile as a CV); and
- Any other information you provide in your CV, cover letter and/or the documents you upload.

The provision of Personal Data is necessary to enable Enstar to make a decision as to whether an employment contract will be concluded with you (hiring decision). The provision of Personal Data by you is voluntary. However, if you do not provide your Personal Data, the application process may be delayed and/or we may reject your application.

2. Processing Purposes

We process your Personal Data to the extent permitted or required under applicable law, for the following purposes :

- To determine your suitability for the position you are applying for as part of the application process;
- To provide you with offers for potential other positions that may be of interest for you (if you provided consent);
- To protect the legal interests of Enstar (e.g., as required to defend against legal claims); and
- To comply with legal or regulatory obligations under national laws applicable to Enstar.

3. Legal Basis

The processing of your Personal Data is mainly necessary to determine whether an employment contract will be entered into. This is based on Art. 6 para. 1 lit. b) General Data Protection Regulation (Regulation (EU) 2016/679) (“**GDPR**”) and the corresponding provisions in local data protection law in other jurisdictions relating to the (pre-)employment relationship.

If you provide consent allowing Enstar to provide you with information regarding potential other positions that may be of interest for you, the processing of your Personal Data is based on this consent.

Your Personal Data may also be processed where Enstar reasonably considers it necessary to comply with legal or regulatory obligations or to protect the legal interests of Enstar (e.g., as required to defend against legal claims or to take precautions against liability).

DATA TRANSFERS AND RECIPIENTS

We may transfer a subset of your Personal Data to other parties, for the legitimate interests of Enstar (i.e. in light of our global structure to allow for global recruitment and to allow all relevant managers and recruiters who may be located at different Enstar Group entities to review the application).

The following recipients or categories of recipients will receive access to some of your Personal Data as required for business operations.

1. Enstar Group

Your Personal Data will be processed in systems across the Enstar Group to support us with Human Resources (“HR”) management, and hiring and workforce analytics to proactively identify and address issues. Enstar operates and maintains these tools as a processor. However, only HR managers and authorized managers located at another Enstar Group company, who have a need to know, will have access to the Personal Data (i.e. as required to evaluate your application in light of Enstar’s global structure). A list of such affiliates is available upon request.

If you provide consent allowing Enstar to provide you with offers for potential other positions that may be of interest for you, your Personal Data on a need-to-know basis will also be transferred to regional and global recruiters who are located at different Enstar Group companies and who will review your application and contact you in case your profile is suitable for an open vacancy.

2. Service Providers, Third Parties

In addition, we make certain Personal Data available to affiliated and unaffiliated service providers as processors on a “need-to-know” basis or other third parties as controllers, as permitted under applicable data privacy law.

Government agencies and entities receiving your Personal Data as required by law may process your Personal Data as controllers for their own purposes.

3. Cross-Border Data Transfer

In certain cases, we transfer your Personal Data outside of the country you are located. Some recipients of your Personal Data may be located in another country for which the European Commission has not issued a decision that this country ensures an adequate level of data protection, such as the U.S. and, other countries where Enstar has operations.

Some recipients located outside of the European Economic Area (“**EEA**”) are certified under the EU-U.S. Privacy Shield and others are located in countries for which the European Commission has issued adequacy decisions. In each case, the transfer is thereby recognized as providing an adequate level of data protection from a European data protection law perspective (Art. 45 GDPR).

By way of entering into appropriate data transfer agreements based on Standard Contractual Clauses, which are accessible upon request under the contact details provided above, we have established that all other recipients located outside the EEA will provide an adequate level of protection for the Personal Data and that appropriate technical and organizational security measures are in place to protect Personal Data against accidental or unlawful destruction, accidental loss or alteration, unauthorized disclosure or access, and against all other unlawful forms of processing. Any onward transfer (including our affiliates outside the EEA) is subject to appropriate onward transfer requirements as required by applicable law.

II. RETENTION PERIODS

Personal Data processed for the purposes hereunder will be stored only as long as necessary during the during application process and a subsequent reasonable period (taking into account statutory limitation periods) as required or permitted under applicable law (e.g. as necessary to defend against claims in relation to the application process, or to comply with Enstar’s obligations regarding data retention as established in the applicable laws). If a judicial or disciplinary action is initiated, the Personal Data may be stored until the end of such action, including any potential periods for appeal, and will then be deleted or archived as permitted by applicable law.

If you provide consent allowing Enstar to provide you with offers for potential other positions that may be of interest for you, your Personal Data will be stored as detailed in the retention policy or until you withdraw your consent.

Your Personal Data will not be kept in a form that allows you to be identified for any longer than is reasonably considered necessary by Enstar for achieving the purposes for which it was processed or as it is established in the applicable laws related to data retention periods. Enstar may keep anonymized data - i.e. data that does not allow you to be identified - for internal statistics purposes and for purposes to improve our recruitment process.

III. YOUR STATUTORY RIGHTS

You normally have the following rights (under the conditions set out under applicable law (e.g. GDPR)):

- (i) **Right of access:** You have the right to obtain from us confirmation as to whether or not Personal Data concerning you is being processed, and, where that is the case, to request access to the Personal Data. The access information includes – inter alia – the purposes of the processing, the categories of Personal Data concerned, and the recipients or categories of recipients to whom the Personal Data have been or will be disclosed.
You have the right to obtain a copy of the Personal Data undergoing processing. For additional copies requested by you, we may charge a reasonable fee based on administrative costs.
- (ii) **Right to rectification:** You have the right to require us to rectify any inaccurate Personal Data concerning you. Depending on the purposes of the processing, you have the right to have incomplete Personal Data completed, including by means of providing a supplementary notice.
- (iii) **Right to erasure (right to be forgotten):** You have the right to ask us to erase your Personal Data, in which case we have to comply.
- (iv) **Right to restriction of processing:** You have the right to request the restriction of processing your Personal Data. In this case, the respective data will be marked and may only be processed by us for certain purposes.
- (v) **Right to data portability:** You have the right to receive the Personal Data concerning you which you have provided to us in a structured, commonly used and machine-readable format and you have the right to transmit that Personal Data to another entity without hindrance from us.

(vi) **Right to object:**

You have the right to object, on grounds relating to your particular situation, at any time to the processing of your Personal Data by us and we can be required not to process your Personal Data any longer. If you have a right to object and you exercise this right, your Personal Data will no longer be processed for such purposes by us. Exercising this right will not incur any costs.

Such a right to object may not exist, in particular, if the processing of your Personal Data is necessary to take steps prior to entering into a contract or to perform a contract already concluded.

Please note that these rights may be limited under applicable national data protection law.

If you have declared your consent for any Personal Data processing activities, you can withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the withdrawal of consent.

If you wish to exercise your data subject rights or if you have any other questions concerning this Notice, please submit your request to dataprotection@enstargroup.com.

In case of complaints you also have the right to lodge a complaint with the competent supervisory authority. For individuals located in the UK or EEA, this would be to the Member State of your habitual residence or location of the alleged infringement of GDPR.