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## lm Careers Privacy Policy

This Privacy Policy explains how the lm Group collects, uses, and protects your personal data during your job application process - whether through our Careers Website: <https://lmgrouplastminute.com/our-people/current-opportunities.aspx> or through other channels.

### 1. Who is responsible for your data?

The data controller is Bravonext SA, along with other lm Group companies depending on the job opportunity. These include:

Comvel GmbH, Blue SAS, Bravometa CH SA, Bravoventure India Private Limited, Bravoventure Spain SLU, Cruiseland Srl, LMnext (CH/DE/FR/UK/US/PT), PIGI Shipping & Consulting Srl, Red Universal de Marketing y Bookings Online SA, Bravoventure Poland Sp.z.o.o., LM Forward Ltd, Viaggiare Srl, Webnext Ltd, Bravolivia SI.

### 2. What personal data do we collect?

We may collect the following types of personal data:

#### Data you provide:

- Contact details
- Languages spoken
- Education and qualifications
- Information in your CV and cover letter
- Details shared during interviews

#### Data from recruiters or agencies:

- Contact and residence information
- Employment history and education
- Professional skills and qualifications
- Contract details and salary information
- Any images provided

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### Sensitive data:

We only collect special categories of data (such as health-related information) with your explicit consent, and only if required for recruitment purposes—such as applications under protected categories.

### **3. Why and how do we collect your data?**

We collect and process your personal data to:

- Evaluate your application
- Proceed with hiring decisions
- Establish potential employment relationships
- Comply with legal obligations
- Include you in our Talent Community, if you request it, a network of potential candidates we may contact for future opportunities that match your skills and interests, to receive updates on new job openings and company news.

### Legal basis:

Pre-contractual requirements (necessary to assess and enter into a potential contract)

Legal compliance

Providing personal data is voluntary, but missing essential information (like your name or education) may prevent us from properly assessing your application.

### **4. Who can access your data and where is it stored?**

Your data is securely stored and processed both electronically and, where needed, in paper format. It is only accessible to:

- Authorized staff in the People department
- Relevant hiring managers involved in your application
- We also use SmartRecruiters, a third-party platform, for managing the recruitment process.

SmartRecruiters acts as:

- A data processor on our behalf (processing your data securely), and
- An independent data controller for managing your user account.

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For more on how SmartRecruiters handles your data, visit:  
<https://www.smartrecruiters.com/legal/candidate-privacy-policy/>

Your data may be processed in:

- The European Union
- Switzerland (recognized as providing adequate data protection)
- Other relevant jurisdictions when required

## 5. How long do we retain your data?

We keep your personal data for up to 12 months after your application, unless:

- Longer retention is required by law, or
- You request continued storage (with your consent)

After this period, your data is deleted from both digital systems and physical records.

## 6. What are your rights and how can you exercise them?

Under applicable data protection laws, you have the right to:

- Access your data and request a copy
- Update or correct your personal information
- Delete or limit processing of your data
- Withdraw your consent at any time (without affecting prior processing)
- Request data portability, where applicable
- Object to processing for direct marketing or where we rely on a legitimate interest

### To exercise your rights

- Use your account settings on the recruitment platform, or
- Contact us via email at: [privacy.en@lastminute.com](mailto:privacy.en@lastminute.com)
- Or send a registered letter to:

Vicolo de' Calvi 2, 6830 Chiasso, Switzerland

You may also file a complaint with your local Data Protection Authority.

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## **7. Contact Details of the Data Controller**

Email: [privacy.en@lastminute.com](mailto:privacy.en@lastminute.com)

Mail: Vicolo de' Calvi 2, 6830 Chiasso, Switzerland

To comply with the General Data Protection Regulation (2016/679), we have appointed a European Representative. If you wish to contact them, their details are:

Bird & Bird GDPR Representative Services SRL

Avenue Louise 235

1050 Bruxelles

Belgium

## **8. Contact Details of the Data Protection Officer (DPO)**

You can reach our DPO at:

Email: [dpo@lastminute.com](mailto:dpo@lastminute.com)

Mail: Vicolo de' Calvi 2, 6830 Chiasso, Switzerland