

Recruitment Privacy Notice

This Recruitment Privacy Notice explains how Antes Insurance Brokers Limited (“Antes”/“the Company”), acting as a data controller, collects, processes, and protects candidate personal data for recruitment purposes, in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 (“GDPR”) and the Data Protection Act (Cap. 586 of the Laws of Malta) (“Act”). The Company processes personal data on the basis of its legitimate interests in hiring qualified candidates and fulfilling its contractual and legal obligations. Antes is a wholly owned subsidiary of Argus Group Holdings (Europe) Limited, a company incorporated in Gibraltar, whom is ultimately owned by parent company Allshores Limited, a company incorporated in Bermuda forming part of the Allshores Group.

PURPOSES OF PROCESSING

Any personal data requested from candidates will be used for recruitment purposes only and will be treated in strict confidence, in accordance with applicable legal requirements, particularly, the GDPR and Act. Antes will process relevant personal data, including identification details, CV information, academic and professional qualifications, employment history, and any additional information provided by candidates, solely for the purpose of managing the recruitment process. Where necessary, Antes may process publicly available professional data (e.g. from LinkedIn, professional registries, or other job-related sources) to assess a candidate’s qualifications. Antes does not collect special categories of personal data unless required for a specific role or by law. If required, Antes will request the candidate’s explicit consent before processing sensitive data, such as health information, criminal records (if legally required), or diversity-related data.

SHARING OF PERSONAL DATA

Antes restricts access to the candidates’ personal data to designated personnel within Antes and the Allshores Group, and interviewing panel who will be involved in the recruitment process. Candidate personal data will be shared with HR personnel, hiring managers, and relevant internal stakeholders within Antes and Allshores Group, as necessary for the recruitment process. If a recruitment agency is used, Antes will ensure appropriate data protection agreements are in place. If candidate data is transferred outside Malta or the European Economic Area (e.g., to Antes parent company in Bermuda), Antes will take steps to ensure the transfer complies with the GDPR, including the use of standard contractual clauses, where applicable.

RETENTION OF RECRUITMENT RECORDS

Antes has a legitimate interest in processing and retaining candidate personal data during the whole recruitment process in order to manage and facilitate the selection process. Records shall include personal details, CVs, reference letters, and correspondence between Antes and the candidates. Antes will generally retain candidate records for six (6) months from the completion of the recruitment process to comply with legal obligations and to defend against any potential claims. If a

candidate wishes to have their data deleted earlier, they may submit a request to the Data Protection Officer. If a candidate is hired, their data will be retained as part of their employment records.

RIGHTS OF CANDIDATES

Candidates have the right to:

- Access their personal data.
- Request rectification of inaccurate or incomplete data.
- Request erasure of their data (where applicable).
- Restrict processing in certain cases.
- Request data portability (where processing is based on legitimate interests).
- Object to processing (where processing is based on consent or a contract).
- Lodge a complaint with the Office of the Information and Data Protection Commissioner (IDPC) of Malta if they believe their data has been misused.

CONTACT

If you have any questions regarding this Privacy Notice or how Antes process personal data, please contact the Data Protection Officer at:

- Email: dpo@antes.mt copying in privacy@bfm.bm
- Mailing Address: Trident Park, No. 8A Level 5, Notabile Gardens, Mdina Road, Central Business District Zone 2, Birkirkara, Malta, CBD 2010.

Candidates may also lodge a complaint with the Office of the IDPC of Malta at <https://idpc.org.mt/>.