

European Union Recruitment Personal Data Privacy Notice

Effective Date: December 16, 2024

The purpose of this personal data privacy notice is to inform you about how your personal data (i.e., information which directly or indirectly identifies you) is processed by D. E. Shaw & Co. (Luxembourg), S.a r.l. (“**D. E. Shaw Luxembourg**”), D. E. Shaw & Co. (London), LLP, and D. E. Shaw & Co., L.P. (together, “**we**”, “**us**”, or “**our**”) when a candidate for employment applies for a role with D. E. Shaw Luxembourg (“**you**” or “**your**”). We act as the controller of your personal data.

1. What categories of personal data do we collect about you?

We may collect some or all of the following information about you directly from you:

- Your name, address, and contact details, including email address and telephone number;
- Education, professional, or employment-related information, including contact information of your professional references that you provide to us;
- Any sample work product such as software code or written work that you provide to us;
- National identification information such as your nationality, residency status, entitlement to work in Luxembourg (or other relevant jurisdiction);
- Compensation information such as your current or expected future compensation;
- Information required for background checks and screening such as education verification, credit and driver’s license checks, and criminal convictions or offences to the extent any are identified during a background check; and
- Any other sort of information that you voluntarily provide to us.

Sometimes we will collect these types of personal data about you from third parties and/or publicly available sources and registers. For example, we might:

- Receive certain of the above-described information from a recruiter;
- Obtain professional references from a former employer or other relevant referee that you identify to us; and
- Engage a background check provider to undertake an employment, education, credit and/or criminal background check to the extent allowed by applicable law.

2. What is your personal data used for?

We will only process personal data to the extent necessary to achieve the purpose for which it has been collected. The provision of personal data by you may be necessary in order for us to:

- (a) Fulfil D. E. Shaw Luxembourg's legal obligations such as verifying your eligibility to work, complying with legal and regulatory requirements, and taking actions in any legal proceedings;
- (b) Fulfil D. E. Shaw Luxembourg's contractual obligations or undertake the preparatory steps to enter into an employment agreement with you where your application is successful;
- (c) Meet D. E. Shaw Luxembourg's legitimate interests such as:
 - Process and assess your application for a role with us;
 - Administer, manage, and improve our recruitment operations;
 - Conduct reference and background checks about you (where specifically authorized by applicable law and/or required by a law from a jurisdiction outside the European Economic Area (“EEA”) applicable to the D. E. Shaw Group, further details will be provided to you if such background check is necessary in connection with your application for employment), including a criminal history check, credit history check, education, qualification and employment history verification, and professional license verification;
 - Meet our obligations with respect to recruiting agencies acting on your behalf;
 - Facilitate any merger, acquisition, or transaction for the sale of all or part of our business;
 - Maintain the security of the D. E. Shaw group, including the information technology system;
 - Inform you about prospective employment opportunities with us, unless you notify us that you do not wish to hear about any such opportunities by emailing us as described in the “**Contact us**” section; and
- (d) Any other purposes directly or indirectly related to the above.

Your Right to Object — please note that you have a right to object to the processing of your personal data where that processing is carried out for our legitimate interests.

Unless you give us your prior consent as may be required under applicable law, we will not use your personal data for purposes unrelated to the foregoing, such as to market third-party products to you.

Where we are required by law or contract to process certain personal data and you do not provide this to us when requested, we may not be able to process your application.

3. To whom do we disclose your personal data?

In connection with the purposes described above, we may disclose your personal data to:

- Our affiliates, agents, contractors, service providers, consultants and advisors;

- Fraud prevention agencies and law enforcement agencies;
- Individuals that refer you (e.g., an employee of the D. E. Shaw Group) to us;
- Courts, regulators, ombudsmen, and other bodies recognized in the relevant industry;
- Any third party that acquires, or is interested in acquiring or securitizing all or part of our business or that succeeds us in carrying all or part of our business;
- As required or permitted by law, including to comply with a subpoena or similar legal process or government request, or when we believe in good faith that disclosure is legally required or we have a legitimate interest in making a disclosure, such as where necessary to protect our rights and property; and
- Anyone else as may be necessary for the above purposes, subject to your authorization where necessary on a case-by-case basis.

We may transfer your personal data in accordance with a valid transfer mechanism under applicable law (e.g., the European Commission adequacy decision or EU standard contractual clauses) to the above-listed recipients located outside of the EEA, including the United States, India, and United Kingdom which may not have data protection laws equivalent to those in the EEA. We will make such transfers to the extent these are necessary for us to consider your application for employment and, if your application is successful, to undertake the steps necessary to enter into an employment agreement with you.

You can request further details in relation to international transfers, including a copy of any standard contractual clauses, by using the contact details provided below.

4. For how long do we keep your personal data?

We will retain your personal data for prospective recruiting activities, including sourcing candidates for employment opportunities and for organizing events with prospective candidates, in accordance with our internal data retention procedures. The criteria used to determine the retention periods include: (i) how long the personal data is needed in connection with our evaluation of your application and other recruitment activities; (ii) the type of personal data collected; and (iii) whether we are subject to a legal, contractual or similar obligation to retain the data (e.g., employment law, mandatory data retention laws, government orders to preserve data relevant to an investigation, or data that must be retained for the purposes of resolving potential litigation or disputes).

If you would like more information about applicable data retention policies, please email privacy@deshaw.com. If you have submitted a resume to us and do not wish to proceed with your application, please email cvwithdraw@deshaw.com.

If your application for employment is successful, your personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your personal data will be held will be provided to you in a new privacy notice.

5. Your rights

You have a right to:

- request access to and rectification or erasure of your personal data;
- obtain restriction of processing or to object to processing of your personal data; and
- ask for a copy of your personal data to be provided to you, or a third party, in a digital format.

We will respond to your request in writing, or orally if requested, as soon as practicable and in any event not more than within one month after receipt of your request. In exceptional cases, we may extend this period by up to two months and we will tell you why. You may exercise your rights by emailing us as described in the “**Contact us**” section.

You also have a right to lodge a complaint about the processing of your personal data with your local data protection authority. You may find contact information for each of the European Union data protection authorities [here](#).

6. Changes to this privacy notice

The effective date on this notice indicates the date on which this notice was last updated. We periodically will review and may modify this privacy notice. We will notify you of any material changes.

7. Contact us

All questions, requests, or concerns regarding this privacy notice or relating to the processing of your personal data, including all requests as detailed in the "Your rights" section above, should be sent to privacy@deshaw.com.