

Candidate Privacy Notice



This Candidate Privacy Notice (“Privacy Notice”) sets out how those members of the ZEDRA Group of companies (the “ZEDRA Group” or each a “ZEDRA Company”) who are subject to the applicable data protection laws in their respective local jurisdictions collect, use and disclose your personal data when you apply to work for a ZEDRA Company. This Privacy Notice also confirms your rights as a data subject.

The main body of this Privacy Notice is supplemented with specific information for each jurisdiction in which we operate. Please see the relevant jurisdiction-specific provisions included in the Annex to this notice for more information.

ZEDRA Group’s processing of personal data is always subject to the law, and our written policies and procedures. If this Privacy Notice conflicts with local law in your jurisdiction, the local law supersedes this notice. If the information in the main body of this Privacy Notice conflicts with relevant jurisdiction –specific information in this Privacy Notice, the jurisdiction –specific information overrides this notice.

In this Privacy Notice, “ZEDRA”, “us”, “we” and “our” refers to the ZEDRA Company to which you have applied to work. “You” refers to the job applicant. “Processing” means any operation performed on your personal data.

ZEDRA is the controller of your personal data and determines the purposes and means by which your personal data is processed and is ultimately responsible for the processing of that personal data.

We may amend this Privacy Notice from time to time to reflect any changes in the way that we process your personal data and the current Privacy Notice will always be available on the ZEDRA Group website.

1. What personal data do we process and for what purposes?

We collect your personal data in a variety of ways such as:

- In most cases, from the information and documentation that you provide including application forms, CVs, from forms completed by you, from correspondence and communication with you, or through interviews, meetings, online tests or other assessments;
- From third parties, such as via references supplied by a former employer, information from employment background check providers, information from credit reference agencies and information from criminal records checks where we are permitted by law to carry these out;
- From other ZEDRA Companies or employees (for example, where you are in internal applicant or where you have been referred for a role by a member of ZEDRA staff);
- From your agents or advisers; or
- From publicly available sources such as professional networking sites.

We’ve set out the specific categories of personal data we collect, use and process and the reasons why we collect, use and process that data below. We do not carry out all of these data processing activities in all jurisdictions in which we operate. For example, we don’t carry out such processing if it is unlawful or unnecessary in a jurisdiction.

Personal Data we process	Why do we process it?
• Contact details (Name, company name, job title, telephone numbers, email addresses, postal address.	• To communicate with you during the recruitment process.
• Contact details; and • Employment information (CV, professional qualifications and experience, employment history, skills experience); and • Recruitment information (Records of your progress through our hiring process, interview notes, psychometric or other assessment test results).	• To assess your suitability for a role. • Decide to whom to offer the role.

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| <ul style="list-style-type: none">• Contact details;• Employment information; and• Recruitment information. | <ul style="list-style-type: none">• To respond to and defend against legal claims. |
| <ul style="list-style-type: none">• Information about any physical or mental disabilities we are made aware of. | <ul style="list-style-type: none">• To make reasonable adjustments during the interview process. |
| <ul style="list-style-type: none">• Contact details;• Employment information; and• Recruitment information. | <ul style="list-style-type: none">• To inform you of other employment opportunities that might arise. |

If you are offered a role, we will continue to process your personal data in accordance with our Employee Privacy Notice, which we will provide to you.

In some jurisdictions, we are also required to have, and to inform you of, the legal basis (or “ground”) we rely upon for each use of your personal data listed above. “Legal bases” are the legal reasons for our use of your personal data – these are set out in applicable data protection laws. If a jurisdiction requires us to have a legal basis, we cannot use your personal data without one. Please see the relevant jurisdiction-specific section for more information about the legal bases we rely on in the jurisdictions in which we operate.

2. Automated decision-making

ZEDRA's recruitment processes are not based solely on automated decision-making.

3. Who has access to your personal data?

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff.

ZEDRA will not share your data with third parties, unless your application for employment is successful and an offer of employment is made. ZEDRA will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks. At this point, ZEDRA's Employee Privacy Notice will apply.

In sharing your personal data for the reasons set out elsewhere in this Privacy Notice, we may need to transfer it to other ZEDRA Companies, some of which are based in jurisdictions not considered under applicable data protection law to provide an adequate level of protection for your personal data.

4. International data transfers

In sharing your personal data for the reasons set out in this Privacy Notice, we may need to transfer it to jurisdictions outside the jurisdiction in which you reside. In particular, ZEDRA Group's servers are located in the UK, Jersey, Luxembourg and Switzerland, which means your personal data may be transferred to any one of these locations when being shared within the ZEDRA Group.

Any such transfers will be carried out in accordance with applicable data protection law and we will ensure that appropriate safeguards are in place to protect your personal data.

Where we are required by the law in the jurisdictions in which we operate to provide you with further details about international data transfers from that jurisdiction, you will find these details in the jurisdiction-specific provisions included in the Annex to this notice.

5. Retention of your data

If your application for employment is unsuccessful, ZEDRA may hold your data on file for a short period of time after the end of the relevant recruitment process. However, if you agree to allow ZEDRA to keep your personal data on file, we will hold your data on file for a further 12 months for the purposes of considering you for future employment opportunities. At the end of that period or once you withdraw your consent, your data is deleted or destroyed.

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

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6. Your rights as a data subject

You may have certain rights and choices (with certain limitations and exceptions) regarding our processing of your personal data. These rights vary depending on the ZEDRA Company with which you engage so please see the relevant jurisdiction section below for more information about the rights you have over your personal data.

If you would like to exercise your data subject rights, please use the contact information below.

7. Is it necessary for you to provide personal data to apply for a role?

You are under no statutory or contractual obligation to provide data to ZEDRA during the recruitment process. However, if you do not provide the information, we will not be able to process your application.

8. Contact details

If you have any questions about the processing of your personal data, or you wish to exercise any of your rights, please contact our Data Protection Lead at:

By email – dataprotection@zedra.com

If you are not satisfied with our processing of your personal data, or how we respond to, or deal with, the exercise of any of your data protection rights, you can make a complaint to the local regulator. See the jurisdiction -specific sections for these details.

Annex: Jurisdiction-Specific Sections



Additional information for individuals whose personal data is subject to the data protection legislation of the Bahamas, British Virgin Islands (BVI), Cayman Islands, Curaçao, European Economic Area (EEA), United Kingdom (UK), Gurnsey, Isle of Man, Jersey, Liechtenstein and Monaco.

1. Legal grounds for processing your personal data

In addition to the information provided above regarding the types of personal data we process and the reasons for processing, data protection legislation in the jurisdictions listed in this Additional Information require us to specify the legal basis for each processing activity. The table below sets out the relevant lawful bases that apply to the processing of your personal data in these jurisdictions, in line with applicable data protection legislation:

Personal Data we process	Why do we process it?	Legal basis for processing
• Contact details (Name, company name, job title, telephone numbers, email addresses, postal address).	• To communicate with you during the recruitment process.	• Legitimate interests For our legitimate interest in recruiting staff for our business.
• Contact details; and • Employment information (CV, professional qualifications and experience, employment history, skills experience); and • Recruitment information (Records of your progress through our hiring process, interview notes, psychometric or other assessment test results).	• To assess your suitability for the role and decide whether to offer you the role.	• Legitimate interests For our legitimate interest in recruiting staff for our business.
• Contact details; • Employment information; and • Recruitment information.	• To respond to and defend against legal claims.	• Legitimate interests For our legitimate interest in exercising, establishing or defending a legal claim.
• Information about any physical or mental disabilities we are made aware of.	• To make reasonable adjustments during the interview process.	• Legal obligation To comply with our legal obligation under labour or equalities law.
• Contact details; • Employment information; and • Recruitment information.	• To inform you of other employment opportunities that might arise.	• Your consent.

2. International data transfers

In the event we transfer your personal data around the ZEDRA Group, we do so on the basis of an International Data Transfer Agreement, which includes the European Commission's Standard Contractual Clauses, as set out in the Annex to Commission Implementing Decision 2021/914 of 4 June 2021 ("EU SCCs") and the following Addendums as legally required:

- In the BVI, the British Virgin Islands Data Protection Act 2021 Addendum to the EU SCC's;
- In Cayman Islands, the Cayman Islands Data Protection Act (as revised) Addendum to the EU SCC's;
- In Guernsey, the office of the Data Protection Authority's Addendum to the EU SCC's;
- In Jersey, the Data Protection Authority's Jersey Addendum to the EU SCC's;
- In Monaco, the APDP's International Data Transfer Addendum to the EU SCC's;
- In the UK, ICO's International Data Transfer Addendum to the EU SCCs.

Where we transfer your personal data to service providers, we ensure that the jurisdiction in which they receive your personal data is the subject to an adequacy decision by the European Commission or UK Government. If this is not the case, we will use the appropriate legal instruments, which may include entering into appropriate EU SCC's and/or Addendums above.

If you wish to obtain more information on how we transfer your personal data or wish to obtain a copy of the legal instruments implemented, contact the Data Protection Lead using the details provided above.

Annex: Jurisdiction-Specific Sections



3. Your rights as a data subject

You have certain legal rights (the “Rights”) under applicable data protection law such as the right:

- To request confirmation as to whether we are processing personal data about you and, if so, to make a subject access request (a “SAR”) for a copy of and information about the processing of that personal data;
- To request rectification of inaccurate or incomplete personal data concerning you;
- To require us to erase or restrict the processing of your personal data in certain circumstances;
- To request copies of any personal data which is being processed by automated means with your consent or under contract in a machine-readable format to be transferred to a third party;
- To object to the processing of personal data which is being processed to pursue the legitimate interests of the controller;
- Withdraw your consent at any time.
- To provide instructions regarding the handling of your personal data after your death (only in France), including whether it should be retained, deleted, or shared. These instructions can be general or specific, and you may update or revoke them at any time. Specific instructions can be submitted to the Data Protection Lead using the details provided above.

Please note that the Rights are not absolute, and ZEDRA may be legally entitled to refuse requests in certain circumstances.

4. Complaints

If you want to make a complaint about how we have handled your personal data, please contact the Data Protection Lead using the details provided above, who may investigate the matter and report back to you.

If you are still not satisfied after our response or believe we are not using your personal data in line with the law, you also have the right to complain to the regulator:

- In the Bahamas, the relevant regulator is the Office of the Data Protection Commissioner, and you can make your complaint via the website [here](#).
- In the BVI, the relevant regulator will be BVI Information Commissioner, when appointed.
- In the Cayman Islands, the relevant regulator is the Cayman Islands Ombudsman, and you can make your complaint via the website [here](#).
- In Curaçao, the relevant regulator is the the Data Protection Authority Curaçao, and you can make your complaint via the following email address: info@cbpcuracao.org.
- Where you are in the EU, you may contact your local Supervisory Authority – a full list of Supervisory Authorities in the EU can be found [here](#).
- In Guernsey, the relevant regulator is the Office of the Data protection Authority (ODPA), and you can make your complaint via the ODPA website [here](#).
- In the Isle of Man, the relevant regulator is the Isle of Man ICO, and you can make a complaint via the Isle of Man ICO’s website [here](#).
- In Jersey, the relevant regulator is the Jersey Office of the Information Commissioner (JOIC), and you can make your complaint via the JOIC website [here](#).
- In Liechtenstein, the relevant regulator is the Data Protection Office Liechtenstein, and you can make your complaint via the website [here](#).
- In Monaco, the relevant regulator is the APDP, and you can make a complaint via the APDP’s website [here](#).
- In the UK, the relevant regulator is the ICO and you can make your complaint via the ICO’s website [here](#).

Annex: Jurisdiction-Specific Sections



Additional information for individuals whose personal data is subject to the Hong Kong Personal Data (Privacy) Ordinance (Cap. 486 of the laws of Hong Kong).

1. Your rights as a data subject

Under applicable data protection laws, you have a number of rights available, namely the right to:

- **Access** your personal data through a data access request;
- **Correct** incomplete/ inaccurate data through a data correction request; and
- **Ascertain** our policies and practices in relation to personal data.

In order to enable us to process any data access or data correction request, the person making such request will have to provide information to verify his/her identity and his/her right to access or correct the personal data. We may charge a fee for processing a data access or data correction request which must not be excessive.

To exercise these rights, please contact the Data Protection Lead using the details provided above.

Additional information for individuals whose personal data is subject to the data protection legislation of India.

1. Your rights as a data subject

Under applicable data protection law, you have a number of rights available namely the right to:

- **Access** a summary of your personal data, processing activities being undertaken by us with respect to such personal data, and the recipients with whom we have shared your personal data, along with a description of the personal data we shared;
- **Correct** incomplete/ inaccurate/ outdated data;
- **Erase** the personal data we hold about you;
- **Nominate** an individual to exercise your rights under this notice on your behalf in the event of your death or incapacity; and
- **Withdraw** your consent at any time.

Please note that the rights are not absolute, and ZEDRA may be legally entitled to refuse requests in certain circumstances. If you wish to withdraw your consent, please contact the Data Protection Lead using the details provided above.

2. Complaints

If you want to make a complaint about how we have handled your personal data, please contact the Data Protection Lead using the details provided above, who may investigate the matter and report back to you. If you are still not satisfied after our response or believe we are not using your personal data in line with the law, you may escalate your complaint to the competent supervisory authority i.e., Data Protection Board in the manner prescribed by law.

Additional information for individuals whose personal data is subject to the data protection laws of Singapore.

For individuals whose personal data is subject to Singapore law, the information set out in the UK/EEA section of this Annex generally applies, except as modified or supplemented by the additional provisions set out below.

1. Legal grounds for processing your personal data

Under the Personal Data Protection Act 2012 of Singapore ("PDPA"), ZEDRA may collect, use, or disclose your personal data only with your consent (which may be express or deemed), or as otherwise permitted or required by law.

The PDPA also provides for exceptions where consent is not required, including but not limited to:

- Where necessary to respond to an emergency that threatens your life, health, or safety.
- Where required or authorised by law.
- For legitimate interests (subject to a balancing test and notification requirements).

Annex: Jurisdiction-Specific Sections



- For business improvement or asset transactions (subject to statutory conditions).
- Where the data is publicly available.

ZEDRA applies additional safeguards to sensitive data (such as medical, financial, or children's data) as recommended by the Personal Data Protection Commission of Singapore ("PDPC").

2. International data transfers

ZEDRA may transfer your personal data outside Singapore only if the recipient is bound by legally enforceable obligations (such as contract, binding corporate rules, or law) or specified certifications (such as Asia Pacific Economic Cooperation (APEC) Cross Border Privacy Rules (CBPR) or Privacy Recognition for Processors (PRP)) to provide a standard of protection comparable to that under the PDPA.

Other permitted transfer scenarios include:

- With your consent (after being informed of the risks).
- Where necessary for the performance of a contract with you.
- For your vital interests or national interest.
- Where the data is in transit through Singapore.
- Where the data is publicly available.

If you wish to obtain more information on how we transfer your personal data or wish to obtain a copy of the legal instruments implemented, please contact the Data Protection Lead using the details provided above.

3. Your rights as a data subject

Under the PDPA, you have the following rights:

- **Access:** You may request access to your personal data in our possession or control, and information about how your data has been used or disclosed in the past year.
- **Correction:** You may request correction of errors or omissions in your personal data.
- **Withdrawal of Consent:** You may withdraw your consent to our processing of your personal data at any time, subject to legal or contractual restrictions.
- **Direct Marketing:** You may object to the use of your personal data for direct marketing purposes.

Please note:

- ZEDRA may charge a reasonable fee for access requests, but not for correction requests. You will be notified of any fee in advance.
- ZEDRA will respond to access or correction requests as soon as reasonably possible, and generally within 30 days. If more time is needed, you will be informed of the reason and expected timeframe.
- Some rights may not always apply due to statutory exemptions or overriding legal obligations.
- To exercise your rights, please contact the Data Protection Lead using the details provided above.

3. Complaints

If you wish to make a complaint about how we have handled your personal data, please contact the Data Protection Lead in the first instance, who will investigate and respond to you. If you are not satisfied with our response or believe we are not using your personal data in line with the law, you have the right to lodge a complaint with the PDPC: <https://www.pdpc.gov.sg/complaints-and-reviews>.

Annex: Jurisdiction-Specific Sections



Additional information for individuals whose personal data is subject to the data protection laws of Switzerland.

1. International Transfer

In the event we transfer your personal data around the ZEDRA Group, we do so on the basis of an International Data Transfer Agreement, which includes the European Commission's Standard Contractual Clauses, as set out in the Annex to Commission Decision 2010/87/EU ("EU SCCs") and Swiss Federal Act on Data Protection's Addendum to the EU SCC's ("Swiss Addendum")

Where we transfer your personal data to service providers, we ensure that the jurisdiction in which they receive your personal data is the subject to an adequacy decision by the Federal Council and in accordance with Annex 1 of the Swiss Ordinance on Data Protection. If this is not the case, we will use the appropriate legal instruments, which may include entering into appropriate EU SCCs and/or Swiss Addendum, unless the recipient is subject to a legally accepted set of rules to ensure data protection and unless we cannot rely on a derogation. A derogation may apply for example in the event of legal proceedings abroad, but also in cases of overriding public interest or if the performance of a contract requires disclosure, if you have consented or if the data has been made generally available by you and you have not objected to the processing.

2. Complaints

If you want to make a complaint about how we have handled your personal data, please contact the Data Protection Lead using the details provided above, who may investigate the matter and report back to you.

If you are still not satisfied after our response or believe we are not using your personal data in line with the law, you also have the right to complain to the regulator. In Switzerland, you can contact the Federal Data Protection and Information Commissioner [here](#).

Additional information for individuals whose personal data is subject to the laws of the Republic of South Africa ("South Africa").

1. General

The additional information in this annexure applies to you if you are applying for a position with ZEDRA South Africa Proprietary Limited ("ZEDRA South Africa"). The contents of the first 'Annex: Country-Specific Section' for the EU and other countries (the "EU et al Annexure") applies to such processing, subject to the modifications set out in this annexure.

2. Responsible party and information officer

For the purposes of South Africa's data protection law, the Protection of Personal Information Act 4 of 2013 ("POPIA"), the responsible party for the processing of your personal data is ZEDRA South African Proprietary Limited, located at the following address: 33 Kingfisher Drive, Fourways, Sandton, Guateng, 2191.

3. International data transfers

In the event that we transfer your personal data out of South Africa, we conduct a transfer impact assessment (if legally required) and enter into a data transfer agreement that ensures that your personal data is adequately protected.

4. Particular laws authorising processing

In addition to POPIA, the following South African legislation requires or authorises the processing of employee candidate personal information:

- The Labour Relations Act 66 of 1995 (including processing of candidate data in relation to recruitment, disputes, or unfair labour practices);
- The Immigration Act 13 of 2002 (including processing of immigration and work permit data for non-South African candidates); and
- The Promotion of Access to Information Act 2 of 2000 (including access to records held by private bodies, including candidate personal data).

Annex: Jurisdiction-Specific Sections



5. Complaints

In South Africa, the relevant regulator is the Information Regulator. You can make a complaint via its website [here](#). would however appreciate if you contact our Information Officer before doing so.