



Job Applicant Privacy Notice

Who We Are

For the purposes of this Privacy Notice "We", "Us" and "Our" means Salt Pay Services Ltd, Borgun hf. or Pagaqui - Pagamentos e Carregamentos, S.A. (as the case may be).

We are committed to protecting and respecting your privacy. This Privacy Notice sets out the basis on which the personal data collected from you, or that you provide to Us, will be processed by Us in connection with Our recruitment processes. Please read the following carefully to understand Our views and practices regarding your personal data and how We will treat it.

For the purpose of the General Data Protection Regulation (EU) 2016/679 ("GDPR") the primary data controller responsible for the processing of your personal data is the Company to which you are applying for work.

If the company you are applying to is not mentioned above, please consider that the company to which you are applying is the primary data controller responsible for the processing of your personal data in relation to your job application.

Our Data Protection Officer is responsible for Our corporate group's data protection compliance and their contact details are available at the end of this Privacy Notice.

We use Workable, an online application provided by Workable Software Limited, to assist with Our recruitment process. We use Workable to process your personal data on Our behalf. Workable is only entitled to process your personal data in accordance with Our instructions.

Where you apply for a job opening via the application function on a job site or similar online service provider ("Partner"), you should note that the relevant Partner may retain your personal data and may also collect data from Us in respect of the progress of your application. Any use by the Partner of your data will be in accordance with the Partner's Privacy Notice.

How We Collect Information

We will hold the personal data you provide to us directly when you apply for a role. This includes information provided through online job sites (such as Workable), via email, social media, in person at interviews and/or by any other method. Your visits to Workable's website also generates information that's accessible to us and includes technical information such as traffic data, location data, weblogs and other communication data, the site that referred you to Workable's website and the resources that you access.

We may receive personal data about you from other sources. For example, Workable provides Us with the facility to link the data you provide to Us, with other publicly available information about you that you have published on the Internet – this may include sources such as LinkedIn and other social media profiles. Workable's technology allows Us to search various databases – some publicly available and others not, which may include your personal data (including your CV), to find possible candidates to fill Our job openings. Where We find you in this way, We will obtain your personal data from these sources.

We may also receive your personal data from a third party such as an independent recruiter who recommends you as a candidate for a specific job opening or for our business more generally.

What Information Collect and Why We Collect it

Shortlisting

The following list summarises the information We collect and hold up to and including the shortlisting stage of the recruitment process. Depending on the role for and the country in which you are applying We may require the following information:

- your name and contact details (eg address, home and mobile phone numbers, email address);
- details of your qualifications, experience, employment history and career interests (as contained in your CV or Covering Letter);
- your video-recorded responses to a set of questions (submitted via Workable);
- your responses to additional personality, aptitude and skill screening tests (submitted via third parties);
- details of your referees.

All this information is necessary for the purposes of Our legitimate interests as a business that are to:

- carry out a fair and efficient recruitment process;
- progress your application, arrange interviews and inform you of the outcome at all stages;

make an informed decision to shortlist for interview and (if relevant) to recruit.

Offering Employment

The following list summarises the additional information We would need before making a final decision to recruit and before offering an unconditional offer of employment. Depending on the role for and the country in which you are applying We may need to:

- require a copy or an original of an ID document and proof of your right to work;
- require a copy or an original of a criminal record check;
- require a proof of address;
- confirm your academic qualifications and professional experience with your referees, academic institutions and former employers.

All of the above would entail the processing of additional personal data about you that We need in order to either (i) comply with our legal obligations; or to (ii) take certain steps prior to enter into an employment contract with you; or to (iii) pursue our legitimate interests as a business that are to:

- make an informed decision to recruit;
- maintain employment records and to comply with legal, regulatory, contractual and corporate governance obligations and good employment practice (that includes Us ensuring you have the right to work in the relevant jurisdiction);
- to verify the qualifications information provided by you;

- to verify the criminal records information provided by you.

Data Retention

If your application is unsuccessful, we will keep your information for one year from the time you entered our database. If, within that timeframe, there is a legitimate interaction with your application, we will keep your information for a further six months from the date of this activity. For the purposes of this provision, a legitimate interaction is one for the purposes of:

- reaching out to good candidates that the we were unable to hire at the time of their application and where we may have suitable positions for them in the near future; and
- establishing, exercising and/or defending any legal claims, in accordance with our legitimate interests.

You can request the erasure of your personal data before the end of the period described above by clicking the “Withdraw this application” link at the bottom of the confirmation email sent by Workable after you submit your application.

The personal data of successful job applicants is handled in accordance with our staff privacy notice which shall be made available to you during your induction.

Automated decision making/profiling

We may use Workable’s technology to select appropriate candidates for Us to consider based on criteria expressly identified by us, or typical in relation to the role for which you have applied. The process of finding suitable candidates is automatic, however, any decision as to who We will engage to fill the job opening will be made by Us.

Storing and Sharing Information - Service Providers

We will not transfer your personal data outside of the United Kingdom or the EEA without an appropriate safeguard. If you would like further information please contact Us (see ‘Contact’ below).

Where We store your personal data on our own systems, it is stored on Microsoft SharePoint. However, personal data We collect in relation to job applications is primarily stored on Workable.

The data that We collect from you and process using Workable’s services may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for Us or for one of our suppliers. In particular, your data may be accessible to i) Workable’s staff in the USA or ii) may be stored by Workable’s hosting service provider on servers in the USA as well as in the EU. The USA does not have the same data protection laws as the United Kingdom and EEA. A data processing agreement has been signed between Workable Software Limited and its overseas group companies, and between Workable Software Limited and each of its data processors. These data processing agreements are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data.

Workable and any other service providers We engage in order to help manage and streamline our recruitment process may be able to access your personal data. However these service providers are contractually precluded from processing personal data other than in accordance with our instructions.

Storing and Sharing Information - Other Partners

Where you have applied for a job opening through the Indeed Apply functionality, and where you have consented to this disclosure, We will disclose to Indeed certain personal data that We hold, including but not limited to a unique identifier used by Indeed to identify you, and information about your progress through our hiring process for the applicable job opening, as well as tangible, intangible, visual, electronic, present, or future information that We hold about you, such as your name, contact details and other information involving analysis of data relating to you as an applicant for employment (collectively "Disposition Data"). Indeed's Privacy Notice in respect of Indeed's use of the Disposition Data is available on Indeed's website.

Where you have applied to a job opening through another service provider, We may disclose data similar to the Disposition Data defined above to such service provider. The service provider shall be the data controller of this data and shall therefore be responsible for complying with all applicable law in respect of the use of that data following its transfer by Us.

Storing and Sharing Information - Other Circumstances

In addition, we may also disclose your personal information to third parties in the following circumstances:

- If We sell or buy any business or assets, We may disclose your personal information to the prospective seller or buyer of such business or assets;
- if Our or substantially all of Our assets are acquired by a third party, personal information about our job applicants will be one of the transferred assets;
- If We are under a duty to disclose or share your personal data in order to comply with any legal obligation or to protect Our rights, property, or safety or that of Our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection;
- We may disclose your personal information to other third parties, the court service and/or regulators or law enforcement agencies in connection with (potential) proceedings or investigations anywhere in the world where compelled to do so. Where permitted, we will direct any such request to you or notify you before responding unless to do so would prejudice the prevention or detection of a crime.

Security

We take appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where We are legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure. Although We will do Our best to protect your personal data, We cannot guarantee the security of your data transmitted through any online means, therefore any transmission remains at your own risk.

Your rights

Under the [General Data Protection Regulation](#) you have a number of important rights free of charge. In summary, those include rights to:

- access to your personal data and to certain other supplementary information that this Privacy Notice is already designed to address;
- require Us to correct any mistakes in your information which We hold;
- require the erasure of personal data concerning you by deleting your candidate profile on Workable
- receive the personal data concerning you which you have provided to Us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations;
- object at any time to processing of personal data concerning you for direct marketing;
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- object in certain other situations to our continued processing of your personal data;
- otherwise restrict our processing of your personal data in certain circumstances;
- claim compensation for damages caused by our breach of any data protection laws.

Job applicants are not under a statutory or contractual obligation to provide any personal data to Us. However, if you do not provide the information we need to assess your job application then we may not be able to process your application. If you have any concerns regarding any of the categories of personal data we require job applicants to provide, please contact Us using our Contact details.

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

1. contact Us using our Contact details below;
2. let Us have enough information to establish your identity;
3. let Us know the information to which your request relates.

How to complain

We hope that We can resolve any query or concern you raise about Our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with your local supervisory authority in charge of data protection. This authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/make-a-complaint>.

You can find a list and contact details of all EEA supervisory authorities on the European Data Protection Board's website: https://edpb.europa.eu/about-edpb/board/members_en.

Contact

All questions, comments and requests regarding this Privacy Notice should be directed to our Data Protection Officer at privacy@saltpay.co or to Salt Pay Services Ltd, a company incorporated in England with registered number 12271069, at 3rd Floor, 20 Old Bailey, London EC4M 7AN.

Changes to This Policy

We reserve our right to amend this Privacy Notice in accordance with our future business needs and processing activities. We provide notice in relation to any amendments by publishing a new version of

this Privacy Notice on our website. Please consult our website regularly in order to read the latest version of this Privacy Notice.

The Privacy Notice that will be presented to you when you apply for a job with us will be the latest version.

Date of Last Amendment

17 November 2020