

Smollan Recruitment Privacy Notice

Effective Date: 5 June 2025

Purpose of this Notice

This Recruitment Privacy Notice explains how Smollan and its affiliated entities (“Smollan”, “we”, “our”, or “us”) collect, use, disclose, and protect personal data of individuals who apply for employment with us or who are otherwise considered for employment opportunities (“you”).

Scope

This notice applies to all individuals who:

- Submit applications via our careers page, LinkedIn, job boards, recruitment agencies, or email;
- Engage with us during the recruitment, interview, or onboarding process;
- Are referred to us as potential candidates.

Data Controller

Smollan is the data controller of your personal data. If you have any questions about this Privacy Notice, please contact our Information Officer via this [LINK](#).

Personal Data We Collect

We may collect the following categories of personal data:

- *Identity Data*: Full name, date of birth, nationality, ID/passport details.
- *Contact Data*: Email address, phone number, physical address.
- *Application Data*: CV, cover letter, employment history, education, skills, qualifications, references, portfolios.
- *Assessment Data*: Interview notes, test results, psychometric assessments, coding samples (if applicable).
- *Background Screening Data*: Criminal record checks, credit history, right-to-work status, previous employer checks (where permitted by law and applicable to the role).
- *Special Categories of Data*: Only where necessary and permitted—e.g., disability status for accommodation needs, or race/ethnicity for employment equity reporting.

How We Collect Your Data

We collect personal data:

- Directly from you during application or interviews;
- From recruitment agencies, job boards, or referrals;
- From public professional platforms (e.g., LinkedIn);
- From background check providers, with your consent;
- From your references or previous employers.

Why We Process Your Data (Legal Bases)

We process your personal data for the following purposes:

| Purpose | Legal Basis |
|-----------------------------------------------------------|---------------------------------------------|
| Assess your suitability for employment | Legitimate Interest / Consent |
| Conduct interviews and assessments | Legitimate Interest |
| Verify qualifications, experience, and references | Legitimate Interest / Legal Obligation |
| Perform background and eligibility checks | Consent / Legal Obligation |
| Communicate with you about your application | Contractual Necessity / Legitimate Interest |
| Maintain records of recruitment activity | Legal Obligation / Legitimate Interest |
| Comply with applicable labor, tax, and immigration laws | Legal Obligation |
| Monitor equality and diversity metrics (where applicable) | Consent / Legal Obligation |

Data Sharing

We may share your data with:

- Internal HR, line managers, and decision-makers within Smollan Group companies;
- Third-party recruitment partners and platforms (e.g., LinkedIn Talent, recruitment agencies);
- Background check service providers;
- Government bodies or regulators where required by law;
- IT and cloud service providers (e.g., Google Workspace, Microsoft 365).

Where international transfers occur, we implement safeguards such as Standard Contractual Clauses (SCCs) to protect your data.

Data Retention

Unsuccessful candidate data is retained for up to 12 months (or longer if required by local law) to address future opportunities, audit queries, or legal obligations.

Successful candidate data is retained as part of your employment record, subject to the company's employee data retention policy.

You may request earlier deletion by contacting us using the form linked below.

Your Rights

- *Access*: Request a copy of the personal data we hold about you.
- *Rectification*: Request correction of inaccurate or incomplete data.
- *Erasure*: Request deletion of your personal data.
- *Restriction*: Request limitation of data processing.
- *Objection*: Object to data processing based on legitimate interests.
- *Data Portability*: Request transfer of your personal data to another entity.
- *Withdraw Consent*: Where processing is based on consent, withdraw it at any time.
- *Lodge a Complaint*: File a complaint with a relevant data protection authority.

If you wish to exercise any of these rights please select this [LINK](#) and complete the online form. We may also need to ask you for further information to verify your identity before we can respond to any request.

If you are dissatisfied with how we have handled your personal data or a data rights request, you have the right to lodge a complaint with a data protection supervisory authority.

You may contact the authority in the country where you live, work, or where the alleged infringement occurred.

If you are located in the European Union or United Kingdom, you may wish to contact:

EU:

Data Protection Commission (DPC)
21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland
www.dataprotection.ie
Tel: +353 (0)761 104 800 | Email: info@dataprotection.ie

UK:

Information Commissioner's Office (ICO)
Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, United Kingdom
www.ico.org.uk
Tel: +44 (0)303 123 1113

For all other jurisdictions, please contact our central privacy team using [this link/form/email], and we will advise you of the appropriate authority in your region if required.

Data Security

We apply appropriate technical and organizational measures to secure your data. If you suspect a breach, contact us immediately.

Children's Privacy

We do not knowingly collect recruitment data from individuals under the age of 18. If we learn that data was collected inappropriately, it will be deleted promptly.

Changes to this Privacy Notice

We may amend this Recruitment Privacy Notice periodically. Changes will be posted with a revised effective date.

Contact Us

Questions, comments or requests regarding this Privacy Notice should be made by completing the form available via this [LINK](#) or by post to: FAO Data Protection, Smollan, P.O. Box 51537, Raedene, Johannesburg, South Africa, 2124.