



PRIVACY NOTICE (JOB CANDIDATE)

Version 1

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1. About this Notice

Digicel respects privacy and is committed to protecting your personal data. As part of any recruitment process, Digicel collects and processes personal data relating to job applicants. Digicel is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

This privacy notice will inform you as to how we look after your personal data when you apply for a job or other role with us and the rights you have in connection with that information. It is important that you read all of this Notice carefully. The term "Candidate" is used in this Notice to refer to anyone who applies for a job role, who applies for the relevant talent pool, who is considered for a role or for a relevant talent pool or who otherwise seeks to work with or for us (whether on a permanent or non-permanent basis).

2. Who are We?

The Digicel Group¹ is the data controller, and is therefore responsible for your personal data (collectively referred to as "Digicel" "we", "us" or "our" in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact our Group Privacy Team using the details set out below.

Contact details:

The Digicel Group

Email address: privacy@digicelgroup.com

Postal address: 14 Ocean Boulevard, Kingston, Jamaica

Attn: Legal & Regulatory Department (Privacy)

Please address any questions or requests relating to this Notice to privacy@digicelgroup.com.

3. The Kind Of Information We Hold About You

When you submit an application for a job role (or seek otherwise to work with us), we will collect, store, and use the following categories of personal information about you:

- Identity data such as first name, maiden name, last name, alias or any similar identifier;
- Additional personal information such as title, gender, date and place of birth;
- Contact information, such as address, telephone number, and e-mail address;
- Past employment history (including previous employers, job titles, or positions) and references to facilitate proper evaluation of potential employees for employment;
- Academic, professional, and training information, such as academic degrees and professional qualifications;

¹ The Data Controller may change from territory to territory. This is a placeholder. HR Digicel Group is presumably Digicel Caribbean Limited

- Your CV/résumé and any information you volunteer therein (which may include photos and details of any memberships or interests constituting sensitive personal information)
- National identifiers such as nationality/ies, national IDs/passport, social security / insurance numbers, immigration information, and visa status
- Information relating to previous applications you have made to Digicel and/or any previous employment history with Digicel;
- Information concerning your application and our assessment of it;
- CCTV images, where you visit our premises; and
- Any other information you voluntarily provide throughout the process, including online, through interviews or other forms of assessment.

We may also collect, store and use the following types of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

4. How Is Your Personal Information Collected?

We collect personal information about candidates from the following sources:

- You, the candidate;
- References provided by referees;
- Recruitment or executive search agencies;
- Criminal data records as provided by your police record or through any criminal records checks;
- Background information as may be provided by security agencies, background checking agencies and credit reference agencies;
- Other background information provided or confirmed by academic institutions and training or certification providers; and
- Information collected from publicly available sources, including any social media platforms you use or other information available online.

5. How We Will Use Information About You

We will collect and use the personal information we collect about you primarily for the recruiting and assessment process but in particular to:

- Assess your skills and qualifications, and determine your suitability for the role;

- Carry out background and reference checks, where applicable;
- Communicate with you about the recruitment process;
- Keep records related to our hiring processes; and
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you to any available role within our organization.

We also need to process your personal information to decide whether to enter into a contract with you.

Having received your CV, cover letter and/or your application form and, where applicable, the results from the test that you may have taken, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do meet those requirements, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role we reserve the right to take up references, carry out a criminal record and carry out ANY background checks following your confirmation or appointment.

If you are accepted for a role at Digicel, the information collected during the recruiting process will be processed in accordance with applicable law, including our Personnel Privacy Notice, a copy of which will be provided when you are on-boarded as an employee, if applicable.

If you are not successful, we may still keep your application to allow us to consider you for other suitable openings within Digicel in the future.

6. If You Fail To Provide Personal Information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a police record or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

7. How We Use Particularly Sensitive Personal Information

We will use your particularly sensitive personal information in the following ways:

- We may use information about your disability status to consider whether we need to provide appropriate adjustments or accommodations during the recruitment process, for example whether adjustments need to be made during a test or interview.
- We may use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity.
- We may use your health information to help ensure that the company adheres to occupational health standards and continues to prioritize the safety and health of our current staff.

8. Information About Criminal Convictions

We may process information about criminal convictions. We reserve the right to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular where the role requires a high degree of trust and integrity.

We have in place an appropriate policy document and safeguards to maintain higher standards of processing when handling such data.

9. Automated Decision-Making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

10. Data Sharing

To carry out the purposes outlined above, your personal information may be shared internally with managers, HR and recruitment teams, systems administrators, and other members of Digicel group for our recruitment processes.

We will only disclose your personal information outside the group if disclosure is consistent with a ground for processing on which we rely and doing so is lawful and fair to you.

11. Why Might We Share Your Personal Information With Third Parties?

We will only share your personal information with the following third parties for the purposes of processing your application:

1. **SuccessFactors (SAP)** – a recruitment and talent management software that assists Digicel to streamline application and recruitment process with centrally-managed and comprehensive tools. This assists Digicel to secure the right talent through results-oriented recruiting practices and embedded engagement and automation.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

In accordance with applicable law, we may disclose your personal information if it is necessary for our legitimate interests as an organization or the interests of a third-party (but we will not do this if these interests are overridden by your interests and rights in particular to privacy). We may also disclose your personal information if you consent, where we are required to do so by law and in connection with criminal or regulatory investigations. Specific circumstances include:

- i. where we consider disclosure is necessary or required by law, to exercise, establish, or defend our legal rights, or to protect your vital interests or those of any other person;

- ii. where we engage third-party vendors to perform services on our behalf and these third parties must process personal information to provide their services. Examples include:
 - a. recruiting or executive search agencies involved in your recruiting;
 - b. background checking or other screening providers and relevant local criminal records checking agencies;
 - c. data storage, shared services and recruiting platform providers, IT developers and support providers and providers of hosting services in relation to our careers website or SuccessFactors integration; and
 - d. third parties who provide support and advice including in relation to legal, financial / audit, management consultancy, insurance, health and safety, security and intel and whistleblowing/reporting issues; and in connection with a proposed sale, reorganization, or disposal of Digicel or any Digicel business unit.

12. Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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

13. Data Retention

How long will you use my information for?

We will retain your personal information for a period of twelve (12) months after we have communicated to you our decision about whether to appoint you to role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

14. Rights Of Access, Correction, Erasure, And Restriction

Your Rights In Connection With Personal Information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, please contact privacy@digicelgroup.com in writing.

15. Right To Withdraw Consent

By applying for any role, you agree and understand that you have provided consent to us to process your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact privacy@digicelgroup.com. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.