

Recruitment Privacy Policy

Sollers Consulting Sdn Bhd

Sollers Consulting

07.09.2023



# Sollers Consulting Sdn Bhd Recruitment Privacy Policy

### 1. Introduction

At Sollers Consulting, we are strongly committed to protecting personal data and keeping everyone informed, in an open, transparent way. By reading this Privacy Policy you will learn the details on the collection and use of your personal data as well as what your individual rights are. For the purpose of this Privacy Policy, the terms "personal data", "data user" and "processing" shall have the same meaning as prescribed in the Personal Data Protection Act 2010 ("PDPA").

This Privacy Policy serves to inform you that your personal data is being processed by us or on our behalf and you agree to the processing of your personal data in accordance with this Privacy Policy.

What personal data will we collect:

Sollers Consulting may collect a variety of personal data from you from time to time, including but not limited to your:

- 1. name (names) and surname
- 2. date of birth
- 3. contact details including contact number and e-mail address
- 4. education
- 5. occupational qualifications
- 6. employment record
- 7. NRIC No
- 8. details contained in your CV
- 9. CCTV images and footages
- 10. results of background checks (if any)
- 11. other personal data which is submitted or made available by you to us from time to time.

# 2. Obligatory personal data

It is obligatory that you supply us with your personal data as specified as compulsory in our forms (collectively, "compulsory personal data"). The consequence of refusing to supply us your personal data will result in your application for potential employment to be rejected or us being unable to offer you an employment.

Save for the compulsory personal data mentioned above, you are not obligated to provide us with any additional personal data and your consent is voluntary. If you do not wish to grant consent in relation to your



additional personal data, please do not include it in the CV you upload.

# 3. Purposes of processing

The personal data you provide in the application form, your CV and any other documents that you choose to share with us will be used to assess your candidate profile, skills and whether you are suitable for the position you are applying for, for us to send you recruitment-related newsletters and job offers that match your profile, for communicating with you, dealing with your inquiries and enforcing our rights, to obtain professional advice, for compliance with applicable laws, for conducting pre-employment screening checks and background checks, for managing our career websites (including conducting statistical analyses), for administrative purposes and other purposes in connection with the recruitment procedure and your job application.

#### 4. Source of data

Your personal data is being or is to be collected from the application form, your referees, CV, former employers, recruitment agencies, closed circuit television (CCTV) recording, from oral or written communications, information obtained during your job interview with us, all other employment related forms and all other information that you may provide us from time to time.

#### 5. Data retention

If you accept an employment offer made by us, any relevant personal data collected during your recruitment period will become part of your personnel records and will be retained in accordance with the binding law.

If we do not become your employer, we will only store your data for the period that we, in good faith, believe we are required by law to preserve it. (for example, in connection with any anticipated litigation).

If you choose to join a recruiting program, or one of our recruitment-related events we may store your personal data to consider you for future employment opportunities if you give us, a specific, separate consent for that.

We conduct regular data-cleansing and updating exercises to make sure the information we have is relevant, accurate and we do not store your data without having a valid reason for doing so.

## 6. Security and Sharing Personal Data

We may disclose the personal data that you choose to share with us, to the following (who may be located within or outside Malaysia):

- 1. Recruitment Teams of companies belonging to Sollers Holding Capital Group (please see Appendix Nr 1 thereto),
- 2. HR Managers of companies belonging to Sollers Holding Capital Group (please see Appendix Nr 1 thereto),



- 3. Recruiters being employees or contractors of companies belonging to Sollers Holding Capital Group (please see Appendix Nr 1 thereto),
- 4. People and Payroll Teams of companies belonging to Sollers Holding Capital Group (please see Appendix Nr 1 thereto),
- 5. IT Systems Administrators Teams of companies belonging to Sollers Holding Capital Group (please see Appendix Nr 1 thereto),
- 6. Sub-contractors (including headhunters and recruitment agencies) of companies belonging to Sollers Holding Capital Group (please see Appendix Nr 1 thereto) that we collaborate with,
- 7. Business partners, service providers including but not limited to data center service providers and cloud service providers of companies belonging to Sollers Holding Capital Group (please see Appendix Nr 1 thereto) that we collaborate with,
- 8. Professional advisors on a need-to-know basis of companies belonging to Sollers Holding Capital Group (please see Appendix Nr 1 thereto),
- 9. Third parties as required by law. It may happen that we will need to share personal data with e.g. law enforcement bodies or governmental agencies in order to be compliant with the applicable law.
- 10. Coderbyte Enterprise Inc, 434 Washington Street, Carlstadt, NJ 07072, USA if you're applying for an IT-related position, you will be required to take a test. Your results will be processed by Coderbyte.
- 11. Such third party as requested or authorised by you.

We have a framework of procedures and trainings aimed at keeping your personal data safe and ensuring security and confidentiality. These are regularly reviewed to assess the appropriateness of the measures we have in place to keep the data we hold secure.

We only share personal data with others when we are legally permitted to do so, putting in place security mechanisms and contracts to comply with our security, confidentiality and data protection standards and policies.

# 7. Exercising individual rights

Please find below a list of rights that you have regarding your personal data.

Access to personal data

You have the right to request access to your personal data held by us as a data user, subject to the provisions of the PDPA. If you want to exercise it and ask us what personal data we are processing, send us an e-mail to <a href="mailto:data.protection@sollers.eu.">data.protection@sollers.eu.</a>. We will respond to your request as promptly as possible, within the legally required time limits.

Correction of personal data

You have the right to request correction of your personal data, subject to the provisions of the PDPA. If you want to exercise this right to update the personal data that we process, please send us an e-mail to data.protection@sollers.eu..



You may decide not to provide us with your personal data, but in this case your application will have to be excluded from the recruitment process. The same applies in case you decide to rectify or delete your data during the recruitment process.

Limiting the processing of personal data and withdrawal of consent

You have the right to limit the processing of your personal data and/or withdraw your consent previously given to us (in full or in part) to the processing of your personal data, at any time subject to any applicable legal restrictions. To limit the processing of your personal data and/or withdraw the consent to our processing of your personal data which you have previously given, send us an e-mail at <a href="mailto:data.protection@sollers.eu.">data.protection@sollers.eu.</a> or, to stop receiving emails from a Sollers marketing list, please click on the unsubscribe link in the email received from us.

If you limit the processing or withdraw your consent to any or all use of your personal data, we may not be in a position to continue to administer any arrangement or contractual relationship in place, which in turn may result in us being unable to (continue to) process your personal data for any of the purposes stipulated in this Privacy Policy.

# 8. Inquiries or Complaints

If you want to contact us with any inquiries or complaints about our use of your personal data, please contact us via the method below:

Contact Person: Kamil Paziewski

Designation: Compliance Person, the Department of Personal Data Protection supporting companies

belonging to Sollers Capital Group Phone number: +60 11 1534 0399 E-mail: data.protection@sollers.eu.

We will reply to you as soon as possible.

You also have the right to lodge a complaint with the Department of Personal Data Protection, please note that this is the body appropriate for all companies within Sollers Holding Capital Group (communication via email address as above).

## 9. Transfer of personal data to places outside Malaysia

We may transfer your personal data to a place outside of Malaysia and you hereby agree to the transfer.

# 10. Language

This Privacy Policy is prepared in English and Bahasa Malaysia languages. In the event of any inconsistency between the English version and the Bahasa Malaysia version of this Privacy Policy, the English version shall prevail over the Bahasa Malaysia version.

This privacy statement was last updated on 7<sup>th</sup> September 2023.