



**Recruitment Privacy Policy**

Sollers Consulting K.K.

Sollers Consulting

04.05.2019

## Sollers Consulting – Recruitment Privacy Policy

### 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.

### What is personal data

Personal data is any information relating to an identified or identifiable living person.

### What personal data we will collect

For our recruitment activities, we will collect certain personal data such as your:

- name (names) and surname
- date of birth
- contact details indicated by such a person
- education
- employment record
- occupational qualification

If you wish to provide us with a CV that contains additional personal data, you may do so. By clicking of the “apply” button you shall be deemed to have consented to our privacy policy and to processing of additional personal data, for the same purposes and by the same entities as the personal data listed above. 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.

### Purposes of processing

**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.**

We process your data based on recruitment purposes such as:

- attracting, identifying and sourcing talent
- processing and managing your application for roles at Sollers, including the screening and selection

- hiring and onboarding candidates by making an offer to successful candidates
- carrying out pre-employment screening checks
- managing our career websites (including conducting statistical analyses)
- Compliance with a legal or regulatory obligation (when carrying out background checks to warrant a candidate is eligible to work). We will not collect personal information or other information that may cause social discrimination.
- Sending recruitment-related newsletters and job offers that match your profiles (Only when you wish to receive and have agreed on Sollers privacy policy)

### **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 certain period that we, in good faith, believe we ought to preserve it. (for example, in connection with any anticipated litigation). If you would like your data to be deleted immediately, please contact us.

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 that.

### **Security. Sharing Personal Data and processing locations**

The personal data that you choose to share with us, may be processed by:

- Recruitment teams of companies belonging to Sollers Holding Capital Group (please see Appendix Nr 1 thereto),
- HR Managers of companies belonging to Sollers Holding Capital Group (please see Appendix Nr 1 thereto),
- Recruiters being employees or contractors of companies belonging to Sollers Holding Capital Group (please see Appendix Nr 1 thereto),
- People and Payroll teams of companies belonging to Sollers Holding Capital Group (please see Appendix Nr 1 thereto),
- IT systems Administrators Teams of companies belonging to Sollers Holding Capital Group (please

see Appendix Nr 1 thereto).

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. In case we are obliged to share your personal data with the third party, we will obtain your consent except in the cases arising from applicable law.

Your Data may also be processed by:

- 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, if this proves to be needed during the recruitment process.
- Third parties as required by law It may happen that we will need to share personal information with e.g. law enforcement bodies or governmental agencies in order to be compliant with the applicable law.
- Codility Ltd., 107 Cheapside, London EC2V 6DN, Great Britain - if you're applying for an IT-related position, you will be required to take a test. Your results will be processed by Codility.
- 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,
- Professional advisors on a need-to-know basis of companies belonging to Sollers Holding Capital Group (please see Appendix Nr 1 thereto),
- Such third party as requested or authorized by you.

### **Exercising individual rights**

When their data is processed, individuals have certain rights. Data controllers and processors are responsible for guaranteeing these rights. Please find below a list of rights that you have and how to exercise them in regard to us, the Data Controller:

### **Access to personal data**

You have the right of access to your personal data held by us as a data controller. If you want to exercise it and ask us what personal data we are processing, send us an e-mail to [data.protection@sollers.eu](mailto:data.protection@sollers.eu) We will respond to your request as promptly as possible, within the legally required time limits.

### **Withdrawal of consent**

You have the right to withdraw your consent at any time. To withdraw consent to our processing of your personal data, send us an e-mail to [data.protection@sollers.eu](mailto:data.protection@sollers.eu) or, to stop receiving emails from a Sollers marketing list, please click on the unsubscribe link in the email received from us.

### **Amendment of personal data**

Whenever we become aware that the personal data, we process is no longer accurate, we will make the appropriate amendments ourselves. In case you want to update the personal data that we process, please send us an e-mail to [data.protection@sollers.eu](mailto:data.protection@sollers.eu).

### **Refusal to provide personal data**

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.

### **Complaints**

If you want to complain about our use of your personal data, please send an email with the details of your complaint to [data.protection@sollers.eu](mailto:data.protection@sollers.eu) We will investigate and reply to your complaint as soon as possible.

### **Personal data of Residents outside Japan**

Personal information of residents in overseas will be handled in accordance with the relevant laws and regulations.

When transferring personal information of residents from overseas to Japan, we will strictly manage the information and take sufficient measures to protect it.

If you are a resident of the European Economic Area (EEA), you may file a complaint about the handling of your personal information with the supervisory body of an EEA member state.



### **Data Controller: details and contact information**

When processing personal data, the entity that decides why and how the data is processed is a Data Controller. The Data Controller in our case is Sollers Consulting K.K., based in Imperial Tower 15F, 1-1-1 Uchisaiwai-cho, Chiyoda-city Tokyo, Japan, registered in Legal Affairs Bureau under company register number: 0100-01-192224

### **Changes to this privacy statement**

This privacy statement was last updated on 12<sup>th</sup> December 2023.

Provided our commitment to processing data and informing you about your rights in a transparent way, we will keep this privacy statement under regular review.