



**Recruitment Privacy Policy**

Sollers Consulting LLC

Sollers Consulting

29.04.2022

## Sollers Consulting LLC - 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
- occupational qualifications
- employment record.

**ATTENTION!** If you wish to provide us with a CV that contains additional personal data, you may do so. **We will treat your clicking of the “apply” button as your explicit consent to process all personal data you have provided, for the same purposes and by the same entities as in relation to the personal data mentioned 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.

Legal grounds for processing your personal data are:

- Your explicit consent
- Our legitimate interest in attracting, identifying, and sourcing talent
- Our legitimate interest to process and manage your application for roles at Sollers, including the screening and selection
- Our legitimate interest to hire and onboard candidates by making an offer to successful candidates, and carrying out pre-employment screening checks
- Our legitimate interest to manage 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).

### **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.

In case you have given us a separate, specific consent, we will use your data to send you recruitment-related newsletters and job offers that match your profile.

### **Source of data**

Your personal data is being or is to be collected from the application form, your referees, CV, former employers, recruitment agencies, 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.

### **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.

### **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.

Your Data may also be processed by:

Sub-contractors (including head-hunters 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.



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.

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 regards 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**

In general, we do not process data based on consent. This is because, usually, we can rely on another legal basis. In cases where we do rely on consent, you have the right to withdraw it 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).

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.

## Other rights

We process your data according to CCPA, DOPPA and other laws regarding data protection in the USA. You have right to know about the personal data a business collects about them and how it is used and shared, right to delete your personal data, the right to opt-out of the sale of their personal information, right to non-discrimination for exercising their CCPA rights, right to correct inaccurate personal data, right to request disclosure, right to access your personal data and other rights guaranteed by applicable law. If you are Californian resident please see our CALIFORNIA CONSUMER PRIVACY STATEMENT –SUPPLEMENT linked below.

We do not sell your personal data and we do not process your sensitive personal data.

## 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.

## 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 LLC, based in Richmond, VA and address: 1806 Summit Ave, Suite 300 #1072, Richmond, VA 23230, registered by The Secretary of State of Delaware with Corporation Number –6602341 and Authentication number –202723053.

## Changes to this privacy statement

This privacy statement was last updated on 3<sup>rd</sup> October 2023.

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