

SIDIAN BANK RECRUITMENT PRIVACY NOTICE

Effective April 2023

1.0. Purpose and Scope

Sidian Bank Limited (“**Sidian**”, “**Bank**”) which seeks to fill a position for which you have applied, and which would be the employing entity in case you were offered employment, will, as a rule, be the controller (within the meaning of Data Protection Act, 2019), responsible for the processing of your personal data described in this Recruitment Privacy Notice (“**Notice**”).

We are committed to protecting the privacy of anyone who applies for employment with us.

We have set out information regarding our collection, analysis, disclosure, and other processing of your personal data during the recruitment process with us. If you are offered and accept employment with us, we will collect more information about you and make other uses of your information – this will be explained to you as part of the onboarding process and be addressed by a separate notice, the General Data Protection Notice to Employees if the case arises, and you will then also be provided with further data protection notices setting out additional information on individual processing activities, such as processing of your personal data in the employment context.

Nothing in this Notice shall be construed as an offer of employment or other contract with any entity of Sidian Bank Group. It is for information purposes under the Data Protection Act.

We collect and process your personal data in accordance with our main Privacy Notice, this Privacy Notice describes our privacy practices that are specific to recruitment. Please click the link to read the full notice before you proceed with your application – [Link is found here](#).

Please read and understand this Notice and our main Privacy Notice as we want to be sure that you are fully aware of how and why we are using your data.

2.0. Information we collect

We collect a range of information about you, including:

- **Identification data** – your name, government identifiers (national ID/passport/Huduma Namba), date of birth, and gender;
- **Contact data** – address, telephone, email addresses, and phone number;
- **Employment data** – your resume / CV, qualifications, skills, employment history (such as start and end dates of previous employment, job titles, and responsibilities, your current level of pay and employment benefits, notice period), preferred work location; and
- **Demographic information** – whether or not you have a disability or a health condition for which the Bank needs to make reasonable adjustments during the recruitment process.

If you fail to provide us with this information, or you object to us processing such information (see the below for more information about your rights in relation to your information) the consequences are that we may be prevented from progressing your application.

We may collect this information in a variety of ways:

- data might be contained in application forms, CVs / resumes, obtained from your identity documents, or collected through interviews or other forms of assessment;
- from third parties, such as references supplied by former employers, information from Sidian team members who have referred you for a job, information from employment background check providers, information from criminal record checks, educational institutions; and credit reference bureaus; and
- from publicly available sources including LinkedIn, Facebook, and Twitter.

If you give us information about other individuals, e.g., referees, you must first make sure that the individual knows that you might disclose information about them (either specifically to us or, at least, to potential employers).

3.0. Use of your personal data

We process your information for a variety of reasons that are necessary prior to entering into an employment with you. We rely on one or more of the following lawful grounds:

- we have a legitimate interest in processing personal data during the recruitment process and for record keeping of the process – this allows us to manage the recruitment process, assess and confirm your suitability for employment and make decisions on hiring of candidates.
- the processing is necessary for compliance with a legal obligation we have;
- the processing is necessary to perform an agreement we already have with you, or to take steps to enter into an agreement with you (e.g., contract of employment);
- you have explicitly agreed to us processing your information for a specific reason.

In relation to special categories of personal data, we will generally rely on your specific consent in order to process such information (including data relating to health or disability).

The information we collect and process will be used in order to:

- process your job application to identify and contact you, evaluate your qualifications and suitability for the position applied for, and verify the personal data provided if an offer is made; and
- support and manage the recruitment process, provide information about other job vacancies (if requested), and for statistical and analytical purposes.

4.0. Sharing your personal data

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the human resources team, interviewers involved in the recruitment process.

We share your data with third parties in order to obtain pre-employment references from other employers, employment background checks from third-party providers, and where necessary criminal records checks and credit reference checks.

5.0. Automated decision making

We do not carry out automated decision making or profiling in relation to recruitment.

6.0. Retention of your personal data

If your application for employment is unsuccessful, we will hold your data on file for 12 months after the end of the relevant recruitment process. At the end of this period, your data will be deleted or destroyed – although we may continue to hold purely statistical information which does not identify you.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your employee file and retained during your employment. The periods for which your data will be held will be provided to you in a separate privacy notice at the point at which you are offered employment with us.

7.0. Right to lodge complaint

Your rights are outlined in our Privacy Notice indicated above.

If you wish to fulfil your rights, have any complaints or queries about anything relating to the privacy of your personal data, or any other data protection issues, please contact us through:

Address: Sidian Bank Limited, K-Rep Centre, Wood Avenue, Kilimani, P.O. Box 25363-00603, Nairobi, Kenya | +254 711 058 994

Email: Sidian Bank Limited: dpo@sidianbank.co.ke

However, you also have the right to make a complaint at any time to the ODPC, which is the supervisory authority for data protection issues in the Republic of Kenya. You may lodge a complaint with the ODPC through: <https://www.odpc.go.ke/file-a-complaint/>.

For more information about our security practices, please see the main [Privacy Notice](#).