



Job Applicants Privacy Policy

Ver. 2.0 – 22/06/2023

Soldo understands that your privacy is important to you and that you care about how your personal data is used.

This privacy policy aims to give you information on how Soldo collects and processes your personal data when applying for a job with us.

This privacy policy applies to personal information of job candidates and potential candidates collected and processed during the recruitment and selection process.. It does not apply to any personal information of employees or independent contractors or customers of Soldo.

About Soldo

Soldo is made up of different legal entities. When you apply for a vacancy at Soldo, you will be employed directly by the Soldo company with the vacancy.

This privacy policy is issued on behalf of the Soldo companies, so when we mention “Soldo”, “we”, “us” or “our” in this privacy policy, we are referring to the relevant Soldo legal entity responsible for processing your personal information.

For the purposes of the European and UK data protection law, Soldo Software Ltd is the controller of your personal information, for further details of which, please see the “Contact details” section below. This means that we are responsible for deciding what data is collecting, how this data is going to be used e and how this data is protected.

We are required under the data protections laws to notify you of the information contained in this privacy policy. It is important that you read this policy, together with any other privacy policy we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Contact details

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the Data Protection Officer at privacy@soldo.com

You can contact Soldo Software Ltd as follows:

Address: 119 Marylebone Road, London NW1

Email: privacy@soldo.com



You have the right to make a complain to the Data Protection Authority of the state of your usual place residence, place of work or place of the alleged infringement. We would, however, appreciate the chance to deal with your concerns before you approach the Data Protection Authority, so please contact us in the first instance.

What is personal data?

Personal data is defined as any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier.

This personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

What personal data do we collect?

We collect your information through the application and recruitment process, either directly from you or from third parties.

Data might be contained in application forms (submitted by post or by completing the register form on our website), CV or resumes obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

We may sometimes collect data about you from third parties such as recruitment consultants and agencies, former employers or other recruitment solutions including online services, e.g. LinkedIn.

Some of the information we collect about you is required to make an assessment on your application and contact you about your progress through the recruitment process (for example, your telephone number, email address, CV). If you do not provide this information then we will be unable to assess your application or contact you to invite you to interview, or make you an offer.

The information we collect may include:

- your name, postal address, email address, phone number, contact details;
- age range;
- gender;
- nationality;
- current salary, annual leave, pension and benefits information;
- desired start date with Soldo;
- details of your educational history, qualifications, skills, experience and employment history;
- cover letter and references from previous employer;
- copy of passport and other identification;
- photographs;
- information about your entitlement to work in the country (where applicable).



In principle, we do not collect or use any special categories of personal data such as health data or other sensitive types of data, unless you provide this to us voluntarily as part of your application documentation or during an interview. We will only process this kind of information where you have given your explicit consent or where it is necessary to comply with our obligation under applicable legislation (for example, health-related information about reasonable adjustment you require).

For some roles, we may be obliged to seek information about criminal convictions and offences. Where we seek this information, we do so because it is necessary for us to carry out our obligations and exercise specific rights in relation to employment.

Why do we collect and use your data?

Our purpose for collecting your personal data is so we can:

- review and process any job application you submit to us. This includes assessing your suitability for the relevant role;
- manage the recruitment process. This includes research into the experience of applicants and talents, analysing referral sources, conducting interviews and assessments, monitoring the effectiveness of the recruitment process;
- ensure we comply with our legal obligations (for example, it is required to check a successful applicant's eligibility to work in the country before employment starts, including any criminal records or other background checks);
- respond to and defend against legal claims.

We will not use your data for any purpose other than the recruitment process of which you are a part.

The lawful basis for processing your data

The lawful basis we rely on for processing your personal data in relation to information we collect as part of the application and selection process, is to take steps at your request prior to entering into a contract for employment.

The lawful basis we rely on for processing your personal data in relation to information we need to recruit and employ you, is that it is necessary for the performance of a contract to which you are a party (an employment contract).

We may also process your personal information where it is necessary to pursue our legitimate interests (or those of a third party), provided that your interests or your fundamental rights and freedoms do not override our interests. Our legitimate interests include: processing personal data during the recruitment process and keeping records of the process that allows us to manage the recruitment process, responding to and defending against legal claims.

In some case, we may use your information to comply with a legal obligation placed on us as the data controller.



How long do we keep your data for?

We will keep your personal data for as long as is necessary for the purposes it was collected.

If you apply for a vacancy and you are unsuccessful, your personal data will be kept for a period of twelve months after application closing date, so that we can consider you for future employment opportunities. We may keep your personal data for longer because of an ongoing court claim or another legal reason.

If you are successful, your personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new employee privacy notice.

Data security

We take the security of your personal data seriously. All personal data you provide to us will be stored securely in accordance with our policies.

We put in place security measures to minimise the possibility of the loss or unauthorised access of your personal data. We restrict access of your personal data to those persons who have a business reason for knowing such information. We continuously educate and train our staff about the importance of confidentiality and privacy of customer data.

We maintain physical, electronic and procedural safeguards that comply with the relevant applicable laws and regulations, to protect your personal data from unauthorised access. We set up systems and processes to prevent unauthorised access or disclosure.

All our suppliers who process personal data for us are required to keep that data secure.

Data store

Data will be stored in a range of different places, including on your application record, in HR management systems and other IT systems, including email.

Personal data is held in data centres within the European Economic Area (EEA).

Data sharing



Your information may be shared internally within the Soldo company for the purpose of the recruitment process. This includes members of the HR team and interviewers involved in the recruitment process.

We may also share your personal data within our related companies with a vacancy, so they can make you an offer. This will involve transferring your personal data inside the EEA and the UK.

The data we collect may be shared with technology suppliers (for example our hosting provider), communication service providers to help us provide our services to you and send you emails as well as recruitment agencies.

All the recipients of your personal data are required to take appropriate security measures to protect your personal data. They must only process your personal data for specified permitted purposes and in accordance with data protection law.

We, or processors acting on our behalf, will only process personal data in countries outside the EEA and the UK, when we are assured those countries provide an adequate level of data protection. In absence of an adequacy decision, transfer will be made on condition that individual's enforceable rights and effective remedies are available, and appropriate safeguards are in place.

Your rights

We ensure you can exercise your rights in relation to the personal data you provide to us.

Where we are relying on your explicit consent to use your personal data, you can withdraw that consent at any time by contacting the Data Protection Officer whose contact details are found at the top of this policy.

You can request access to the personal data we hold about you.

You can also ask us to update your personal data if it changes or it is incomplete. In certain circumstances, you can request we erase the personal data we hold or ask us to stop or restrict processing if you have an objection.

You have a right to object to us processing your personal information unless we can demonstrate compelling and legitimate grounds for the processing, which may override your own interests. or where we need to process your information to investigate and protect us or others from legal claims.

In some circumstances, you may be entitled to obtain your personal data from us in a format that makes it easier to reuse your information in another context and transmit this data to another data controller of your choosing without hindrance. This is referred to as the right to data portability. The right will only apply to the information you have provided and where it is held electronically, and where you have either consented to processing, or where processing is conducted on the basis of a contract you have with us.



If you have any privacy-related questions or unresolved problems relating to the use of your personal data, you can contact the Data Protection Officer.

You have the right to make a complaint at any time to the relevant data protection authority. We would appreciate the chance to deal with your concerns before you approach the data protection authority, so please contact us in the first instance

Changes to this policy

We may update this privacy policy from time to time. In that case the last updated date at the bottom of this page will also change. Any changes to this privacy policy will apply to you and your data immediately.

Last updated 22 June 2023