

Data Privacy Statement For Candidates

Last updated 22 April 2025

1. Introduction

- 1.1. The Altify entities listed at Schedule 1 (*Altify Employers*) (“**Altify**”, “**we**”, “**our**” or “**us**”) provide this notice to you because you are applying to work with us as an employee, worker, or contractor.
- 1.2. This notice explains how we will process information that we gather about you in connection with your application for a role at Altify (referred to as “personal data” in this notice). Please read it carefully to understand our practices regarding your personal data and how we will use it.

2. Introduction

- 2.1. Altify Group Ltd., as well as the specific Altify entity you are applying for a role with (if different from Altify Group Ltd.), are each independent controllers of the personal data of prospective employees, workers and contractors who apply for roles at Altify.
- 2.2. If you have any questions about this notice or your personal data, or wish to exercise any of your rights as described in this notice or under applicable data protection laws, you can contact Altify’s Data Protection Officer through support@altify.app.

3. What Personal Data We Collect

Personal data you give us

- 3.1. You may give us personal data about you by filling in forms online, corresponding with us by phone, email, in person, or otherwise, or through a recruitment agency or other third party.

Personal data we collect from you

- 3.2. The personal data that we collect about you includes, but is not limited to, the following:
 - Your name.
 - Home address.
 - Contact details (such as telephone number and email address).
 - Date of birth.
 - Gender.

- Marital status.
- Your image or a recording of you.
- Copies of your passport, driving licence and similar documents.
- Education history (including copies of relevant degrees, diplomas or certificates if required), training and professional experience.
- Current and past employment details.
- Immigration status and work permits.
- Languages spoken and level of proficiency.
- Test results and scores (including the results of any aptitude or psychometric tests we ask you to undergo).
- Criminal record information (where required or permitted by local laws).
- Information required to prepare the employment contract.
- Other information given in your CV.
- Interview notes and recordings.
- Diversity information (such as information about your race or ethnicity if you choose to provide this).
- Information about your health, such as any disability you might have.
- Depending on your location, biometric data.

4. Personal Data Provided by Third Parties

Personal data you give us

- 4.1. We collect most of the personal data described in Section 3 from you directly.
- 4.2. However, we may also collect personal data about you from third parties, including:
 - Existing Altify employees who refer or nominate you for roles with us.
 - Governmental authorities (such as local tax authorities).
 - Your named referees who you've asked to provide us with references.
 - Any third party recruitment testing partners we work with.
 - Where allowed by law, third-party background screening providers, credit reference agencies, fraud prevention agencies, sanction screening and criminal convictions screening agencies.
 - Where allowed by law, other publicly available sources, such as social media networking sites (such as LinkedIn, Instagram and X).

5. Data Relating to Criminal Convictions & Offences

- 5.1. Where required and allowed by law, we also collect and store personal data relating to criminal convictions and offences as part of our background screening checks during the

onboarding process. In cases where we need to identify a lawful basis for such processing, then, depending on local laws, such processing is carried out with your consent, to comply with our legal obligations or on the basis of our legitimate interests (to ensure we hire suitable candidates). This data is only processed where it is necessary for the purposes of:

- Complying with or assisting other persons to comply with a regulatory requirement which involves Altify taking steps to establish whether you have committed an unlawful act or been involved in dishonesty, malpractice or other seriously improper conduct.
- Preventing or detecting unlawful acts (including fraud).
- Obtaining legal advice.
- Establishing, exercising or defending legal rights or claims.

6. What We Do With Your Personal Data & Our Legal Basis

6.1. We process your personal data for the reasons listed below. In some countries we require a lawful basis to process your personal data and therefore we have also identified this below for the countries where this is required.

Purpose of Processing	Lawful Basis
Assessing your skills, qualifications, and suitability for the role, including taking up references and conducting appropriate background checks.	Legitimate interests (to ensure we hire suitable candidates) Performance of a contract
Recruitment processes (including negotiation and communicating with you in relation to your application).	Legitimate interests (to run a fair and efficient recruitment process).

Purpose of Processing	Lawful Basis
<p>Complying with our legal and regulatory obligations, including for the purposes of:</p> <ul style="list-style-type: none"> • Preventing illegal working, • Complying with health and safety obligations, • Responding to government statistical monitoring, • Assessing fitness and propriety of individuals for the purpose of relevant regulatory schemes to which we must adhere, • Considering whether adjustments may need to be made to accommodate an individual with a disability, • Liaising with relevant tax authorities and other government entities or agencies in relation to attachments of earnings and similar deductions, and • Communications with public or regulatory bodies. 	<p>Compliance with legal obligations.</p>
<p>Recording interviews for quality control purposes and to train our interviewers.</p>	<p>Depending on local laws, either legitimate interests (to monitor the quality of our interviewers) or your consent.</p>
<p>Carrying out equal opportunities monitoring.</p>	<p>Consent.</p>
<p>Carrying out analytics in relation to Altify's recruitment practices.</p>	<p>Legitimate interests (to ensure we can improve our recruitment practices where necessary).</p>
<p>Dealing with any legal disputes involving you or other prospective, current or former employees, workers or contractors.</p>	<p>Legitimate interests (to establish, exercise or defend ourselves against legal claims).</p>

Purpose of Processing	Lawful Basis
Quality assurance, monitoring and staff training purposes.	Legitimate interests (to ensure our recruitment practices are carried out properly).
Promoting the safety and security of our personnel (including by detecting and stopping threats to our personnel and property).	Legitimate interests (to ensure the wellbeing and safety of our staff).
Keeping your application data on file so that we can consider you for future roles and opportunities at Altify which we think you'd be suited to.	Depending on local laws, either legitimate interests (to ensure our recruitment process is as efficient as possible) or your consent.
Depending on where you are located, we may take steps to verify your identity during the recruitment process to detect and prevent interview fraud.	Depending on local laws, either legitimate interests (to prevent fraud) or your consent.

‘Special categories of personal data’ or ‘sensitive personal data’

- 6.2. We process your personal data for the reasons listed below. In some countries we require a lawful basis to process your personal data and therefore we have also identified this below for the countries where this is required. 6.2. We process ‘special categories of personal data’ or ‘sensitive personal data’ (which may include information about your racial or ethnic origin, sexual orientation, political opinion and health, genetic or biometric data) for the purposes of:
- Carrying out obligations and / or exercising specific rights which are imposed or conferred on us by employment laws;
 - Establishing, bringing or defending legal claims; and
 - In the case of personal data about your physical or mental health, to enable Altify to assess your working capacity and make decisions for occupational health purposes.
- 6.3. We will request your explicit consent to collect this information where necessary under applicable laws.
- 6.4. In the case of “equal opportunities monitoring”, please note that participation is voluntary and providing this information is optional. Any information you provide will not be

accessible or used in the hiring process, and has no effect on your opportunity for employment.

7. Disclosure of Your Personal Data to Third Parties

- 7.1. For the purposes set out in Section 6 above, we may share your personal data with:
- Our group companies, where it's necessary to process your application.
 - Professional advisors (including lawyers, accountants and auditors) where necessary to receive their services.
 - Legal and regulatory authorities (such as tax authorities) where necessary to comply with our legal obligations.
 - Our third party service providers, including our data hosting service provider, background screening check provider, fraud prevention agencies and online recruitment testing service providers.
 - Artificial intelligence providers as far as we use their technology to assist us during the recruiting process.
- 7.2. We also disclose your personal data to third parties where it is in our legitimate interest to do so, including for the following reasons:
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
 - If all or substantially all of our assets are acquired by a third party, in which case personal data held about our applicants will be one of the transferred assets, and
 - If we are under a duty to disclose or share your personal data in order to comply with any legal obligation.
- 7.3. For UK candidates only, the personal data we have collected from you may be shared with Cifas who will use it to prevent fraud, other unlawful or dishonest conduct, malpractice, and other seriously improper conduct. If any of these are detected you could be refused certain services or employment. Your personal data will also be used to verify your identity. Further details of how your information will be used by us and Cifas, and your data protection rights, can be found by <https://www.cifas.org.uk/fpn>.
- 7.4. Except as set out in this notice, or as required by law, we do not sell your personal data or disclose it to any third parties without your consent.

8. Security of Your Personal Data

- 8.1. We are committed to ensuring that your personal data is safe and take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this notice.

- 8.2. Unfortunately, the transmission of personal data through the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to or stored on our IT system, and any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.
- 8.3. If we share your personal data with any third party, we will take all necessary steps to make sure that your personal data is handled lawfully and securely by that third party.

9. How Long We Keep Your Personal Data

- 9.1. We will keep your personal data for as long as necessary to fulfil the purposes described in this notice or the terms of any contract that we enter into, or for a longer period as may be required by law. After this, where allowed by laws and this notice, we will erase or anonymise your personal data. If you need any additional information about this, please contact our Data Protection Officer at compliance@altify.app.

10. Automated Decision-Making

- 10.1. We may use automated decision-making in the form of online assessments to help streamline our recruitment processes. These online assessments are mainly designed to assess your competency for the role you have applied for, your working style and / or whether or not you would be suitable for a role with Altify. These online assessments will produce a score based on the responses you provide, which we then use to determine whether or not to progress your application.
- 10.2. In addition, we may use a tool to screen your CV for suitability against the role you've applied for. This is necessary because we typically receive a large number of applications for job vacancies and this helps ensure all applications can be reviewed. The score produced by the tool will be based on your CV and how closely this matches the key attributes we have set for the role. Our recruiters may take this score into account when assessing your application. This tool is supported by artificial intelligence.
- 10.3. If you are not happy with the outcome of any automated decision we have made, you have the right to challenge this. See the "Exercising Your Rights" section below for more information about how you can do this.

11. Your Rights

- 11.1. Subject to applicable laws in your location, you may have certain rights in relation to your personal data, including the right to:

- Access a copy of the personal data which we hold about you.
- Ask us to correct your personal data if you think it's wrong.
- Ask us to delete your personal data in certain circumstances.
- Object to us processing your personal data on the basis of our legitimate interests or another lawful basis in certain circumstances.
- Ask us to restrict how we use your personal data in certain circumstances;
- Ask us to transfer personal data to you or another company in a structured, commonly used, machine-readable format in certain circumstances.
- Withdraw your consent (where you have previously given us this), and
- Ask us to carry out a human review of an automated decision we make about you.

11.2. Please note that not all of these rights are absolute and we may not be required to comply with your request where exemptions apply under applicable data protection laws.

12. Exercising Your Rights

- 12.1. You can exercise any of your rights as described in this notice and under data protection laws by contacting Altify's Data Protection Officer through compliance@altify.app.
- 12.2. Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm your identity.

13. International Transfers

- 13.1. As an international organisation, we may need to transfer your personal data outside the country or region where you reside to process your application. This may involve transferring your personal data to countries which do not have equivalent data protection or privacy laws to those which apply in your own country. We may also need to transfer your personal data to third party service providers located in other countries.
- 13.2. Regardless of where your personal data is transferred, we shall put in place appropriate safeguards to ensure that your personal data is treated securely and in accordance with applicable law. For individuals in the EEA, UK and South Africa, this usually means entering into Standard Contractual Clauses with recipients of your data who are located in countries which are not recognised as having adequate data protection laws. More details regarding these safeguards can be obtained from the Data Protection Officer whose details are given above.
- 13.3. If you live in a country where consent is needed to transfer your personal data internationally, then you agree to your personal data being transferred by applying for a role at Altify and/or accepting this privacy notice (if applicable).

14. Complaints

- 14.1. Please direct any complaints about how Altify processes your personal data to our Data Protection Officer at compliance@altify.app.
- 14.2. You also have the right to complain to your local data protection authority:
- A list of European Union data protection authorities can be found [here](#).
 - The United Kingdom's data protection authority's contact details can be found [here](#).
 - The South African data protection authority's contact details can be found [here](#).

15. Changes

- 15.1. This notice may be amended by Altify at any time. You can always find the latest version of this notice on our website.

Schedule 1 - Altify Employers

Location	Altify Entity	Registration Number
United Kingdom	Altify Group Limited	11713189
Europe	Smartbytes GmbH	CHE-173.590.561
South Africa	Altify SA Solutions (Pty) Ltd	2022/368750/07