

JEB LTD

RECRUITMENT PRIVACY NOTICE

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1 Introduction

- 1.1 Your privacy is important to us and we are committed to safeguarding the privacy of our job candidates.
- 1.2 This Recruitment Privacy Notice lets you know how we, JEB Ltd (hereafter “JEB”, “we”, “us”, “our” or “the company”) collect and use your personal data during our recruiting process in accordance with data protection laws, including the Data Protection Act 2017 (hereafter referred to as the “DPA”) and the European Union General Data Protection Regulation 2016 (hereafter referred to as the “GDPR”).
- 1.3 This notice describes the broadest potential use of personal data; we may make less use of your personal data than is described here.

2 Collecting your personal data

- 2.1 The type of personal data we collect and process will depend on the purpose for which it is collected. We will only collect and process data that we need for that purpose.
- 2.2 We may collect your personal data in connection with your recruitment in the following way:
 - Your personal data is provided to us directly by you for e.g. when you send us your CV via email, or collected through face to face interviews.
 - Your personal data is provided to us by a third party, for e.g. referenced and testimonials supplied by your previous employers
- 2.3 We are likely to collect, process and maintain your personal data including:

Categories of personal data	Details
Contact details	First name, surname, physical address, email address, telephone number
Individual details	Sex (male/female), date of birth, age
Educational and professional background	CV/ resumé, academic and professional qualifications, employment history, reference letters and interview notes
National identification details	Identity card number
Financial information	Information about your current level of remuneration
Special Categories	Certificate of character (not yet applicable)
Other	Information you choose to share with us such as your hobbies and social preferences

- 2.4 Sensitive data that are collected by JEB qualify as special categories of personal data. This information, when collected, is generally done so on a voluntary, consensual basis, and job candidates are not required to provide this information, unless it is necessary for us to collect such information to comply with our legal obligations or exercising our specific rights in relation to the recruitment process. For instance, in the event you choose to provide us with information on whether you have a disability, we shall consider any accommodation.
- 2.5 To the extent data you provide contains details of your racial or ethnic origin, political opinions or beliefs, religious beliefs, membership in a trade union or political party, physical or mental health or condition, sexual orientation, commission or alleged commission of an offence or related proceedings, you expressly authorise JEB to handle such details as specified in this notice.

3 Using your personal data

- 3.1 JEB will only use your personal data for the purpose for which it was collected or agreed with you. If you are hired by JEB, we may collect other necessary personal data in connection with your employment as described in our Employee Privacy Notice.
- 3.2 We will not use your personal data for any automated individual decision making which will have a significant impact on you.
- 3.3 We have set out below the legal basis of processing for each purpose. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your personal data.

Purpose of processing	Legal basis of processing
As required for the recruitment process at JEB: <ul style="list-style-type: none"> - for communicating with you, - to assess candidate credibility and - to set out your job conditions. 	<ul style="list-style-type: none"> - The processing is necessary to perform a contract or to take steps at your request, before entering a contract, namely your contract of employment.
Storing your CV and contact details for the purpose of contacting you in the event there are future job opportunities	<ul style="list-style-type: none"> - Consent

- 3.4 Please contact the Data Protection Team at dataprotection@jeb.ltd if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been mentioned below.

4 Voluntary disclosure of your personal data

- 4.1 Your provision of personal data in connection with your job application and recruitment is voluntary, and you determine the extent of data you provide to us.

- 4.2 Please note that if you decide not to provide your personal data, it may affect our ability to consider you for employment.

5 Who has access to your personal data?

5.1 Access to your personal data within JEB

- 5.1.1 Only the Director of the company has access to your personal data and he is required to keep that data confidential.

5.2 Access to your personal data by third parties

- 5.2.1 Except as otherwise stated in this notice or as required for legal or regulatory purposes, we treat your personal data as confidential and will not disclose it to third parties without your consent. We do not share personal data you provide to us for recruitment purposes with any other service providers or other third parties, unless your application for employment is successful and JEB makes you an offer of employment.
- 5.2.2 We may however share your personal data with public and government authorities, as required by applicable laws and regulations, for national security and/or law enforcement purposes.
- 5.2.3 For more details, please contact our Data Protection Team at dataprotection@jeb.ltd.

6 Security of your personal data

- 6.1 We have put in place appropriate security measures to prevent your personal data from being subject to any accidental or unlawful destruction, loss, alteration, and any unauthorised disclosure or access.
- 6.2 We have also put in place procedures to deal with any suspected data security breach and will notify you and the Data Protection Office of a suspected breach where we are legally required to do so.

7 Your data protection rights

- 7.1 Under the GDPR and the DPA, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

7.1.1 Your right to erasure of your personal data

You have the right to ask us to delete your personal data in certain circumstances:

- When we no longer need your personal data;
- If you initially consented to the use of your personal data, but have now withdrawn your consent;
- If you have objected to us using your personal data, and your interests outweigh ours;
- If we have collected or used your personal data unlawfully; and

- If we have a legal obligation to erase your data.

Where we collect personal data for a specific purpose, we will not keep it for longer than is necessary to fulfil that purpose, unless we have to keep it for legitimate business or legal reasons. Upon the determined expiry date, we will securely destroy your personal data as per the retention periods as indicated in Section 8.

7.1.2 Your right of access to your personal data

You have the right to request a copy of the personal data we hold about you. To do this, simply contact the Director at brian.vs@jeb.ltd and specify what data you would like. We will take all reasonable steps to confirm your identity before providing details of your personal data.

You will not have to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

7.1.3 Your right to rectification of your personal data

You have the right to ask us to update or correct your personal data if you think it is inaccurate or incomplete. We will take all reasonable steps to confirm your identity before making changes to personal data we may hold about you. We would appreciate it if you would take the necessary steps to keep your personal data accurate and up-to-date by notifying us of any changes we need to be aware of. You may submit requests to correct your personal data, or any other requests concerning your personal data to the Director at brian.vs@jeb.ltd.

7.1.4 Your right to restriction of processing

You have the right to ask us to limit how we use your data. If necessary, you may also stop us from deleting your data. To exercise your right to restriction, simply contact the Director at brian.vs@jeb.ltd, say what data you want restricted and state your reasons. You may request us to restrict processing of your personal data in the following circumstances:

- If you have contested the accuracy of your personal data, for a period to enable us to verify the accuracy of the data;
- If you have made an objection to the use of your personal data;
- If we have processed your personal data unlawfully but you do want it deleted;
- If we no longer need your personal data but you want us to keep it in order to create, exercise or defend legal claims.

7.1.5 Your right to object to processing

You also have the right to object to us processing your personal data where your data is being used:

- For a task carried out in the public interest;
- For our legitimate interests;

- For scientific or historical research, or statistical purposes; or
- For direct marketing.

We currently process personal data for the purposes mentioned in section 3.3 only. You should contact the Director at brian.vs@jeb.ltd to inform that you are objecting to any more processing of your personal data and state in your objection why you believe we should stop using your data in this way. Unless we believe we have strong legitimate reasons to continue using your data in spite of your objections, we will stop processing your data as per the objection raised.

7.1.6 Your right to data portability

The right to data portability allows you to ask for transfer of your personal data from one organisation to another, or to you. The right only applies if we are processing information based on your consent or performance of a contract with you, and the processing is automated. You can exercise this right with respect to information you have given us by contacting the Director at brian.vs@jeb.ltd. We will ensure that your data is provided in a way that is accessible and machine-readable.

7.1.7 Your right to withdraw consent

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

If you wish to exercise any of the rights set out above, please contact our Director brian.vs@jeb.ltd.

8 Retention of your personal data

- 8.1 Where we collect and or process your personal data for a specific purpose, we will not keep it for longer than is necessary to fulfil that purpose, unless we have to keep it for legitimate business or legal reasons. To the extent permitted or required by law, we may delete your personal data at any time. Accordingly, you should retain your own copy of any data you submit to us.
- 8.2 If your application for employment is unsuccessful all personal data collected during the recruitment process will be deleted upon candidate rejection. JEB may, with your consent, retain only your CV on file for one year after the end of the relevant recruitment process in order to consider you for future job opportunities. At the end of that period, or once you withdraw your consent, your CV will be deleted or destroyed.
- 8.3 If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your personal data will be held will be provided to you in an Employee Privacy Notice.

- 8.4 During your recruitment process, you may submit requests to access or correct your personal data, or any other requests concerning your personal data to the Director at brian.vs@jeb.ltd.

9 Your responsibilities

- 9.1 You are responsible for the data you provide or make available to us, and you must ensure it is honest, truthful, accurate and not misleading in any way. You must ensure that the data provided does not contain material that is obscene, defamatory, or infringing on any rights of any third party, does not contain malicious code; and is not otherwise legally actionable.
- 9.2 Further, if you provide any data concerning any other person, such as individuals you provide as references, you are responsible for providing any notices and obtaining any consents necessary for us to collect and use that data as described in this notice.

10 Dispute resolution

- 10.1 If you have any complaints regarding our compliance with this notice, you should contact the Data Protection Team at dataprotection@jeb.ltd. We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of your personal data in accordance with this notice.
- 10.2 If you believe that we have not handled your request in an appropriate manner, then you have the right to lodge a complaint with the Data Protection Authority. The procedure on how to report a complaint with the Data Protection Office of Mauritius is available on <https://dataprotection.govmu.org/Pages/Home%20-%20Pages/Take%20Action/To-report-your-Complaint.aspx>.

11 General

- 11.1 We may update this notice from time to time. The latest version will be available on our Website. Please check this page regularly to keep up to date.
- 11.2 If you have any questions or concerns about this notice or its application, or if you believe your personal data has been used in a way that is not consistent with this notice or your specified preferences, please contact the Data Protection Officer.