

# EXPERIAN AFRICA

---

## RECRUITMENT PRIVACY NOTICE

### Introduction and scope

At Experian, we respect your right to **privacy** and are committed to being transparent about how we collect, use and protect your Personal Information in order to meet our obligations under the applicable data privacy laws. This privacy notice will provide you with details of the processing activities you can expect from us during our recruitment, selection and onboarding processes. You will also find information relating to your privacy rights and how you can exercise these.

This notice applies to candidates who apply for career opportunities at Experian and explains how we collect, use and process your personal information during the recruitment process. This notice does not form part of any employment contract or offer, although Experian may refer to this privacy notice in recruitment-related communications. We may update this notice at any time, and if we do so, we will make a copy of the amended notice available to you as soon as reasonably practical. We may also notify you in other ways from time to time about the processing of your personal information to ensure continuous transparency of the processing activities you can expect from us.

For any questions about this Notice or your privacy rights, contact our Data Protection Office at: [informationofficerafrica@experian.com](mailto:informationofficerafrica@experian.com).

### Who is responsible for Processing your Personal Information?

The Responsible Party is Experian South Africa, we have a Dual Head office:

- Ballyoaks Office Park, 35 Ballyclare Drive, Bryanston, Sandton and Experian House
- 3 Neutron Avenue, Techno Park, Stellenbosch

### Our Privacy Principles

Experian strives to comply with all applicable Data Privacy legislation. To ensure we respect your right to Privacy, we endeavour to adhere to the following principles when processing Personal Information.

Personal Information that we hold about you must be:

- used in a lawful, fair, and transparent manner;



- collected for lawful purposes that we have explained to you and not used in a manner that is not compatible with these lawful purposes;
- limited to what is necessary for achieving the lawful purposes that we have explained to you, and not used for another purpose;
- accurate and up to date;
- only retained for the period necessary to achieve our purposes for collection and meet any applicable legal obligations; and
- protected from unauthorised access, use or disclosure

## Key Data Privacy Terms to Interpret This Notice

**“Responsible Party”**, also known as a “data controller”, determines how to collect, store, and use your Personal Information. Experian is usually the responsible party when processing Personal Information to manage the recruitment process and for other purposes detailed in this privacy notice.

**“Personal Information”**, also known as “personal data”, refers to information about an identifiable person (including natural and juristic persons, such as companies and trusts). Information which identifies or relates directly to you is referred as your Personal Information.

**“Processing”**, Experian may collect, receive, record, organise, collate, store, update, change, retrieve, read, process, analyse, use and/or share your Personal Information in the ways set out in this privacy notice. When we do one or more of these actions with your Personal Information, we are **“Processing”** your Personal Information.

**“Special Personal Information”** refers to categories of particularly sensitive Personal Information, such as information about your health or sex life, racial or ethnic origin, religious or philosophical beliefs, sexual orientation, criminal behaviour, trade union membership and/or biometric information, if applicable, require higher levels of protection. We will only process Special Personal Information, when necessary, with a clear legal justification for processing this type of Personal Information. Experian has implemented appropriate policies and safeguards to ensure we apply the strictest privacy standards when we process Special Personal Information.

## Which categories of Personal Information do we collect, and why?

We will only use your Personal Information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that purpose is compatible with the original purpose for collection. If we need to use your Personal Information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. See below table that sets out the Personal Information we process as well as the purpose we process it:

| Personal Information   | Purpose for processing   |
|--|--|
| Your name, address and contact details.  | To facilitate the recruitment process.   |
| Details of your qualifications, skills, experiences, employment history and remuneration.  | We use this information to manage the recruitment process including assessing your suitability for the role applied for and to facilitate the onboarding of successful candidates. |
| References from previous employers and educational establishments, results from fraud prevention databases, credit bureaus and records of criminal activity. | This information is processed to meet the requirements of the applicable labour law as transposed into our employment equity and recruitment policy.                               |
| Employment equity monitoring including your gender, race, disability.  | To comply with our obligations in terms of the employment equity Act and transformation laws. To maintain and promote equality in the workplace if you are successful.             |
| Assessment responses, scores, and video recordings   | To evaluate candidate suitability for roles through cognitive, personality, and situational assessments.   |
| Inferred psychological traits (SPI)  | May be inferred from assessment responses and used for advisory purposes only, subject to explicit consent.  |
| Video interview recordings   | Used for pre-screening purposes by authorized HR personnel, subject to candidate consent.  |



## **What is our legal basis for processing Personal Information?**

We will process your Personal Information in order to review your job application and decide whether to conclude an employment contract with you following our recruitment process. Should you be the successful applicant, we will process your information in line with our obligations therein.

## **Automated Decision-Making and Human Oversight**

Experian does not make recruitment decisions based solely on automated processing. While assessments may include scoring mechanisms, these are used to support decision-making and are always reviewed by qualified HR personnel. No candidate is rejected based solely on automated scoring.

## **Am I obliged to provide this Personal Information?**

You are not obliged to provide the information, but failure to do so will negatively affect your recruitment process and may result in your application not being considered.

When processing is based on consent, you are not obliged to provide the information or provide consent. Any possible consequences of a failure to provide your consent will be explained together with our request for consent.

## **The security of your Personal Information**

We take reasonable technical and organisational measures to secure the integrity of information we are responsible for, using accepted technological standards to prevent unauthorised access to or disclosure of your Personal Information. We take all reasonable measures to protect your Personal Information from misuse, loss, alteration or destruction.

We have put in place appropriate security measures to protect your Personal Information from accidental loss, unauthorised use, alteration, access or disclosure. In addition, we limit access to your Personal Information to those employees, agents, contractors and other third parties who have a business need to access the Information. They will only process your Personal Information on our instructions and are subject to a duty of confidentiality.

From time to time, we review our information collection, storage and processing practices, including physical security measures, to keep up to date with good practice.

Experian has implemented procedures to address any suspected data breaches and will notify you and any applicable regulator of a breach where Experian is legally required to do so within the period in which Experian is required to issue such a notification.

## **Who has access to your Personal Information?**

Access to your Personal Information will only be granted to individuals who will participate in the recruitment process. This includes members of the Human Resources Team, interview panellists, and other colleagues



if necessary.

If you are successful, we may share your Information with third parties in order to conduct pre-employment checks which includes fraud prevention, employment background checks and the necessary criminal records checks as required under our recruitment policy.

We may also make use of third-party service providers to assist with candidate assessments, including video interviews. These providers act on behalf of Experian and are contractually bound to process your personal information only for the purposes defined by Experian). These contracts include obligations to implement appropriate technical and organisational measures to safeguard personal information.

### **Transborder flow of your Personal Information**

We primarily store your Personal Information in South Africa. However, in limited circumstances, your information may be transferred to and stored in databases located outside South Africa to support centralised functions within the Experian Group.

Additionally, we may engage trusted third-party service providers, to assist with recruitment-related activities, including candidate assessments and video interviews. These providers may operate or store data in jurisdictions outside South Africa.

Where your Personal Information is transferred to a country that does not offer substantially similar data protection laws, we will implement appropriate safeguards to ensure your information remains protected. This includes contractual measures and adherence to applicable data protection laws, such as the Protection of Personal Information Act (POPIA).

All cross-border transfers will ensure your Personal Information receives a level of protection consistent with this Notice. Access to your data will be limited to authorised personnel within Experian and its service providers, strictly for recruitment purposes.

### **Retention of your Personal Information**

We will only retain your information for as long as necessary to achieve the abovementioned purposes, and any related legal obligation.

We may keep and process some or all of your Personal Information if, and for as long as:

- we are required or permitted by law or a contract with you to keep it;
- we reasonably need it for lawful purposes related to our functions and activities;
- we reasonably need it for evidentiary purposes; or
- you agree to us keeping it for a specified further period.

To determine the appropriate retention period for Personal Information, Experian will consider, among other things, the quantity, nature and sensitivity of the Personal Information, the potential risk of harm from



unauthorised use or disclosure of your Personal Information, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means. Experian will always comply with applicable legal, regulatory or other requirements as they pertain to the retention of Personal Information.

## Your Rights

You may have rights under applicable Data Privacy Legislation in relation to your Personal Information, which you may exercise under certain circumstance. To exercise any of these rights, kindly contact the Experian Information Officer via [informationofficerafrica@experian.com](mailto:informationofficerafrica@experian.com).

You may have the right to:

- **Request access to your Personal Information** (commonly known as a “**data subject access request**”). This enables you to receive a copy of the Personal Information that Experian has about you.
- **Request correction of the Personal Information that we hold about you.** This enables you to ensure that any incomplete or inaccurate data that the Experian holds about is corrected.
- **Object to the Processing of your Personal Information.** Where you do not believe Experian has a lawful basis to process your information, you may have the right to object.
- **Request erasure of your Personal Information.** This enables you to request that Experian delete or remove Personal Information where there is no lawful basis for us continuing to process it. You also have the right to ask us to delete or remove your Personal Information where you have successfully exercised your right to object to processing (described below), or where we are required to erase or anonymise your Personal Information to comply with applicable law. Experian may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Withdraw consent at any time where we are relying on consent to process your Personal Information.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent. Please note that we may continue to process your Personal Information in certain instances where we are not relying on your consent.

You will not have to pay a fee to access your Personal Information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive.



We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it.

### **Do you have queries or complaints?**

If you have questions about our privacy notice or wish to contact us, please contact our Information Officer at [informationofficerafrica@experian.com](mailto:informationofficerafrica@experian.com). Our dedicated Data Protection Office is available to attend to any query you may have.

Where the above channels have not addressed your query or complaint appropriately, you have the right to make a complaint at any time to the government body / regulator responsible for enforcement of Privacy laws (e.g. the information regulator in South Africa). Details of the relevant regulator may be access online or requested via [informationofficerafrica@experian.com](mailto:informationofficerafrica@experian.com).