

## **Information Notice — Processing of Candidate Personal Data**

### **1. Introduction**

- 1.1. Shago Payments Limited (including its affiliates, collectively referred to as “Shago”, “our”, “we” or the “Company”) is strongly committed to your privacy.
- 1.2. This Information Notice has been prepared to provide some insight into our privacy practices regarding the collection and use of your personal data as part of our job application and recruitment process, as well as to provide you with mandatory information as a data subject.
- 1.3. If you have any further questions about any sections of this Information Notice, you may send an email to [legalteam@shagopayments.com](mailto:legalteam@shagopayments.com)

### **2. Data Controller**

- 2.1. In accordance with the provisions of the Nigeria Data Protection Regulation (NDPR), Shago is a data controller, who collects your Personal Data for recruitment purposes, which includes accessing your application for a job opening in Shago.

### **3. Types of Personal Data Processed**

- 3.1. During the recruitment and selection process, we may collect your Personal Data from the following sources:
  - a. You, as the candidate;
  - b. Recruitment agencies working with us (if applicable);
  - c. Publicly available information (for example on LinkedIn or other similar social media); and
  - d. Your referees.
- 3.2. Further, we will collect the following Personal Data directly from you:
  - a. Your Curriculum Vitae (CV) and/or cover letter;
  - b. Your completed job application form, which includes but is not limited to full name, education, work experiences, skills and qualifications, email address, phone number and other contact details, etc.;
  - c. Interviews notes and / or recordings (whether physical or virtual interviews); and
  - d. Your references.
- 3.3. All of this information, and other personal information which may be collected and processed by Shago as part of the recruitment process, will be referred to collectively, in this Information Notice, as “Personal Data”.

### **4. Lawful Basis for Processing of Candidate’s Personal Data**

- 4.1. Shago will process your Personal Data for the following purposes:
  - a. Processing your job application, to analyze your skills, qualifications, educational background and fitness for the position, and to contact you with information concerning the recruitment process;
  - b. Managing your application within our Human Resources Department, and managing the screening, recruitment and selection process; and
  - c. Suggesting other job openings within Shago we think you may be interested in.

4.2. As Shago needs to process your Personal Data as part of the recruitment process, it may do so without your specific consent, in accordance with Article 2.2 (a) and (d) of the NDPR<sup>1</sup>, which provides the instances where you have given consent for the processing of your Personal Data, protecting your vital interest of a natural person in seeking employment and where processing is needed to protect Shago's legitimate interests in engaging skilled and qualified employees.

## 5. Recipients and Transfers of Personal Data

5.1. Your Personal Data may be shared with:

- a. Persons (e.g., including system administrators and relevant Shago employees, including your potential Line Manager and those within the Human Resources departments), who are bound by confidentiality obligations and authorised by Shago to process your Personal Data, as they may have access to your Personal Data during the performance of their duties;
- b. Public authorities, bodies or entities to which Personal Data must be disclosed to under any applicable law or binding orders from regulatory authorities;
- c. Recruitment partners (if applicable) that we outsource some recruitment activities (e.g. screening activities) for the purposes described in this Agreement. Shago will ensure appropriate data protection provisions are in place with such third party; and
- d. Other related companies of Shago, for administrative purposes.

5.2. Your Personal Data may be transferred to recipients located in several different countries. Shago implements appropriate safeguards to ensure the lawfulness and security of these Personal Data transfers, such as reliance on adequacy decisions from the Nigerian Data Protection Bureau (NDPB) and other safeguards or conditions considered adequate to the transfer at hand.

## 6. Retention of Personal Data

6.1. We will only keep your personal data for as long as is reasonably necessary:

- a. to fulfill the purposes for which it was collected, taking into consideration the recruitment and selection process;
- b. to comply with legal requirements under applicable law(s), including responding to queries from law enforcement; or
- c. for any other purpose outlined above

At a minimum, Shago will retain your data for the duration of the recruitment process for the relevant job opening, unless you request for your Personal Data to be deleted.

## 7. Your Rights

7.1. As a data subject, you are entitled to exercise the following rights, at any time:

- a. Access your Personal Data being processed by Shago (and / or obtain a copy of the Personal Data), as well as information on the processing of your Personal Data;

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<sup>1</sup> You have given consent for the processing of your personal information.

- b. Request for the correction or an update to your Personal Data being processed by Shago, where it may be inaccurate or incomplete;
  - c. Request the erasure of your Personal Data being processed by Shago, where you feel that the processing is unnecessary, in contravention with the provisions of this Information Notice or otherwise unlawful;
  - d. Request the restriction of the processing of your Personal Data, where you feel that the Personal Data processed is inaccurate, or that the processing is unnecessary or unlawful, as well as where you have objected to the processing;
  - e. Portability – the right to obtain a copy of the Personal Data you provided to Shago in a structured, commonly used and machine-readable format, as well as to request the transmission of those Personal Data to another data controller;
  - f. Object to the processing of your Personal Data, based on relevant grounds related to your particular situation, which you believe must prevent Shago from processing your Personal Data for a given purpose; and
  - g. Withdraw your consent to processing, where your consent serves as the legal basis for processing – this will not affect the lawfulness of processing carried out prior to your withdrawal.
- 7.2. Requests to exercise any of the above rights must be sent via email to [legalteam@shagopayments.com](mailto:legalteam@shagopayments.com). In any case, you are always entitled to lodge a complaint with the competent supervisory authority, if you believe that Shago's processing of your Personal Data is in violation of any applicable law.

## 8. Security

- 8.1. Shago has implemented technical, physical and organizational safeguards with a view to protecting the security of your Personal Data from loss, damage or unauthorized use, disclosure, alteration or access, having regard to the nature of the data.