

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

2. Data Controller

- 2.1. In accordance with the provisions of the Nigeria Data Protection Act 2023 (DPA), 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. The lawful bases Shago relies on for the processing of your Personal Data include:

4.2.1. **Your Consent:** Where you have given consent for the processing of your Personal Data.

4.2.2. **Vital or Legitimate Interest:** Processing may be done further to your vital interest in seeking employment and/or processing is needed further to the legitimate interest of Shago 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 data protection authority 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 1 (one) year after the recruitment process for the relevant job opening is closed, 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;
- 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. In any case, you are always entitled to lodge a complaint with the competent data protection 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.

9. Notification of a Personal Data Breach

9.1. In the event that a personal data breach has occurred impacting your Personal Data held with Shago that is likely to result in a high risk to your rights and freedoms, we shall immediately notify you of the breach in plain and clear language. We shall also notify the data protection authority of such personal data breach within 72 (seventy-two) hours of becoming aware of the breach.

10. Updates to our Privacy Policy

10.1. This Policy will be reviewed, when necessary, but at least annually. If we make any material changes, we'll add a note to this page.

11. Contact Us

If you have questions or concerns about this Policy or how we process your personal data, you can contact us:

- Sending a message via the chat functions on our website
- Emailing us at legalteam@shagopayments.com
- Writing to us at No.6, Olakunle Selesi Crescent, Ajao Estate, Anthony, Lagos State

Last updated on the 5th March 2024.