



APPLICANT PRIVACY NOTICE

At Startrader Limited, a company registered under the laws of Seychelles, with company registration number 8427362-1 and licenced by the Financial Services Authority (FSA) of Seychelles, with License No. SD049 ("we," "us," and "STARTRADER") refer to STARTRADER, the data controller and the entity responsible for processing your personal data. We respect and protect your privacy. This Privacy Notice explains how STARTRADER collects, uses, discloses, and safeguards your personal information during the recruitment process. We are committed to ensuring that your data is processed in compliance with applicable data protection laws, including the General Data Protection Regulation (GDPR), Seychelles' Data Protection Act, and other relevant local privacy laws.

By submitting your application to STARTRADER, you consent to the collection, processing, and storage of your personal data as outlined below.

1. WHAT INFORMATION WE COLLECT

During the recruitment process, we collect the following categories of personal data to assess your application, communicate with you, and facilitate the hiring process:

- Personal Identification Information: Full name, date of birth, gender, nationality, marital status, and contact information (email, phone number, address).
- Professional Information: CV/resume, cover letter, qualifications, certifications, work experience, professional references, and other relevant career documents.
- Assessment Information: Interview notes, feedback, results from pre-employment tests, skill assessments, or psychometric tests.
- Background Check Information: Data for verifying employment history, educational background, criminal records, and identity.
- Sensitive Personal Data: Health-related information, disabilities, or other sensitive data voluntarily provided for diversity initiatives, workplace accommodations, or special recruitment needs.
- Employment and Eligibility Data: Documents verifying eligibility to work (e.g., work permits, residence permits, or other relevant documents).



2. HOW WE USE YOUR INFORMATION

We process your personal data for the following purposes:

- **Recruitment and Selection:** To assess your qualifications, suitability, and experience for the position you are applying for, including reviewing your CV, conducting interviews, and testing skills or knowledge as necessary.
- **Communication:** To keep you informed about your application status, interview schedules, job offers, or rejection notifications.
- **Employment or Career Development:** If you are selected for the role, we use your data to facilitate employment contract establishment, onboarding, and career development at STARTRADER.
- **Legal and Regulatory Compliance:** To meet legal obligations, including verifying your eligibility to work and conducting background checks as required.
- **Statistical and Analytical Purposes:** Anonymized data may be used for internal audits, recruitment reporting, or improving our hiring process.

3. LEGAL BASIS FOR PROCESSING

We process your personal data based on the following legal grounds:

- **Consent:** Where you have given your explicit consent for processing, such as for the collection of sensitive personal data or specific recruitment-related purposes.
- **Contractual Necessity:** To take steps prior to entering an employment contract, such as evaluating your application, assessing your qualifications, and communicating with you regarding recruitment.
- **Legal Obligation:** To comply with laws that require us to verify your eligibility to work, conduct background checks, or meet other statutory obligations.
- **Legitimate Interests:** Where necessary for our legitimate interests, such as improving recruitment processes or preventing fraud, provided these interests do not override your rights.

4. SHARING YOUR INFORMATION

We may share your personal data within STARTRADER and with third parties as necessary to process your application:

- **Internal Sharing:** Your data may be shared between relevant STARTRADER entities (e.g., human resources, legal, hiring managers) for the purpose of recruitment and employment processes.



- **Service Providers:** We may share your data with third-party service providers such as recruitment agencies, background check providers, or job platforms, who assist us in evaluating your application.
- **Legal Compliance:** If required by law or legal process, we may disclose your data to regulatory authorities or law enforcement agencies.
- **Business Transfers:** In the event of a merger, acquisition, or sale of assets, your data may be transferred to the new entity, and you will be notified of this change.

5. RETENTION OF YOUR INFORMATION

We retain your personal data for as long as necessary to fulfil the purposes outlined in this Privacy Notice. Specific retention periods include:

- **Application Data:** Retained for up to 6 months to 1 year for potential future job opportunities, unless you request its deletion sooner.
- **Background Check Data:** Retained for the duration of the recruitment process, after which it will be securely deleted.
- **Employment Data:** If you are hired, your data will be retained according to employment law and contractual obligations.

Once your data is no longer required, we ensure it is securely disposed of or anonymised.

6. DATA SECURITY

We have implemented security measures to protect your personal data from unauthorised access, disclosure, alteration, or destruction. These include:

- **Encryption:** Protecting your personal data during transmission.
- **Access Control:** Limiting access to authorised personnel only, based on their need to process the data.
- **Regular Audits:** Conducting security assessments to monitor and evaluate the effectiveness of our security measures.

7. INTERNATIONAL TRANSFERS OF DATA

As STARTRADER operates in multiple regions, your data may be transferred to countries outside of Seychelles or the European Economic Area (EEA). In these cases, we ensure that appropriate safeguards are in place, such as:

- **Standard Contractual Clauses (SCCs):** For transfers to non-EEA countries.
- **Adequacy Decisions:** Transfers to countries recognised by the European Commission as having adequate data protection laws.

Suite 3, Global Village, Jivan's Complex, Mont Fleuri, Mahe, Seychelles



8. YOUR RIGHTS

Under applicable data protection laws, you have several rights regarding your personal data, including:

- **Right to Access:** You can request a copy of the personal data we hold about you.
- **Right to Rectification:** You can ask us to correct inaccurate or incomplete data.
- **Right to Erasure:** You can request that we delete your personal data when it is no longer necessary for the purposes for which it was collected.
- **Right to Restriction:** You can request that we limit the processing of your data in certain circumstances.
- **Right to Object:** You can object to certain types of data processing, such as for direct marketing.
- **Right to Data Portability:** You can request that we provide your data in a structured, commonly used format for transfer to another organization.
- **Right to Withdraw Consent:** If we rely on consent as the legal basis for processing, you can withdraw your consent at any time.

To exercise your rights, please contact us using the details provided below.

9. AUTOMATED DECISION-MAKING AND PROFILING

We do not use automated decision-making processes that produce legal effects concerning you or significantly affect you, including profiling, unless expressly stated in the future.

10. CHANGES TO THIS PRIVACY NOTICE

We may update this Privacy Notice to reflect changes in our recruitment practices or legal requirements. When we make material changes, we will notify you accordingly. We encourage you to review this notice periodically.

11. HOW TO CONTACT US

If you have any questions or concerns about how we process your personal data, or if you wish to exercise any of your rights, please contact us at:

STARTRADER LIMITED

Email: support@startrader.com

Address: Suite 3, Global Village, Jivan's Complex, Mont Fleuri, Mahe, Seychelles