

Candidate Privacy Policy

Policy Scope

All job applicants applying for employment at Jade.

Note: Jade refers to Jade Software Corporation Limited (JSCL) and its subsidiaries.

Policy Purpose

This notice informs job applicants about how Jade protects and handles their personal information under the UK GDPR, the New Zealand Privacy Act 2020, and the Australian Privacy Act 1988 throughout the recruitment process and after it concludes.

It explains how we collect, use, store, disclose, and protect your personal information during our recruitment and selection processes. It applies to all job applicants, prospective workers, contractors, and volunteers.

We comply with:

UK: UK GDPR & Information Commissioner's Office (ICO) recruitment guidance.

NZ: Privacy Act 2020 & Office of the Privacy Commissioner (OPC) recruitment guidance.

AU: Privacy Act 1988 and the guidance of the Office of the Australian Information Commissioner (OAIC), including the application of the Australian Privacy Principles (APPs) where the employee-records exemption does not apply.

Policy

What Personal Information We Collect

We may collect:

- Contact & identity details
- CV, cover letter, application responses
- Employment history & qualifications
- Interview & assessment results
- Reference details (nominated only)
- Verification, right-to-work, or vetting checks (role-dependent)
- Criminal Record information where relevant and permitted
- Medical history and health information where relevant and permitted
- Optional diversity information

How We Collect Your Information (Directly and Indirectly)

- Directly from you through job applications
- Through interviews and assessments
- From referees you nominate
- From background-checking providers (with your consent)
- From publicly available sources where appropriate (e.g., LinkedIn)

This includes personal information collected directly from you and information collected indirectly from third parties, such as referees you nominate, background-checking providers (where permitted), and publicly available professional sources.

Why We Collect and Use Your Information

We use your information to:

- Assess suitability and qualifications
- Verify identity, work rights, or credentials
- Conduct interviews, assessments, references, and role-relevant criminal record checks
- Manage shortlisting and selection decisions
- Communicate with you
- Maintain recruitment records

If You Do Not Provide Requested Information

Some of the personal information we request is necessary to manage recruitment, assess suitability for a role, or meet legal or regulatory requirements. If you choose not to provide requested information, we may be unable to progress your application, verify your suitability, or offer you a role.

Legal Basis (UK, NZ, AU)

United Kingdom

We process candidate personal information under the lawful bases set out in the UK GDPR, including:

- Legitimate interests (for example, assessing suitability, managing recruitment activities, maintaining security, and ensuring fair and efficient hiring processes).
- Legal obligations (such as right-to-work checks, preventing unlawful discrimination, and complying with regulatory requirements).
- Contractual necessity (taking steps at the candidate's request before entering into a potential employment contract).

New Zealand

We process candidate personal information only for lawful purposes connected with our recruitment functions, in accordance with the Information Privacy Principles (IPPs) in the Privacy Act 2020. This includes:

- Purpose limitation (IPP1) – collecting information only where necessary for recruitment.
- Security (IPP5) – protecting personal information using reasonable safeguards.
- Access and correction (IPPs 6–7) – enabling candidates to access and request correction of their information.
- Use and disclosure (IPPs 10–11) – using and sharing information only for the purposes for which it was collected, or where another lawful ground applies.

Australia

The employee-records exemption does not apply to job applicants, so the Australian Privacy Principles (APPs) apply in full to candidate information. We process candidate data in accordance with:

- APP 3 – Collection: We only collect information that is reasonably necessary for our recruitment activities, and we do so by lawful and fair means.
- APP 5 – Notification: We take reasonable steps to inform candidates about the collection of their personal information, including how it will be used and disclosed.
- APP 6 – Use and Disclosure: We only use or disclose candidate information for the purpose it was collected, or where another lawful basis (e.g., consent or legal requirement) applies.
- APP 11 – Security: We take reasonable steps to protect personal information from misuse, interference, loss, and unauthorised access or disclosure, and to destroy or de-identify information when no longer required.

International Transfers

If we transfer recruitment information overseas, we use the safeguards required by each region's privacy laws:

- UK: Approved transfer tools (e.g., IDTA or SCCs + Addendum).
- NZ: IPP 12 (comparable safeguards or your authorisation).
This may include access to or storage of personal information in countries where Jade or its service providers operate, including the United Kingdom and Australia.
- AU: APP 8 (reasonable steps to ensure overseas protection).

Sharing Your Information

We may share your information with:

- Hiring managers and People & Capability team members
- Recruitment platforms and applicant-tracking systems
- Assessment and testing providers
- Background-check agencies (with your consent, where required)
- Referees you have nominated
- Regulators or authorities where required by law

We do not contact any referee you have not nominated, and we do not seek additional reference information without your consent.

Retention

We keep candidate information only for as long as needed to manage recruitment, make hiring decisions, meet legal or regulatory requirements, or resolve complaints. If you are not selected, we may retain your information for future opportunities. You may opt out of this at any time.

Your Rights

- United Kingdom: You may request access, correction, deletion (where applicable), and object to processing.
- New Zealand: You may request access to and correction of your personal information (IPPs 6–7)
- Australia: You may request access to, and correction of, your personal information under the APPs.

Contact Us

For privacy questions or rights requests contact our Privacy Officer / DPO
Email: privacyenquiries@jadeworld.com

Regulator contact details:

UK: Information Commissioner's Office (ICO): ico.org.uk
NZ: Office of the Privacy Commissioner (OPC): privacy.org.nz
AU: Office of the Australian Information Commissioner (OAIC): oaic.gov.au

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