



## **WELCOME TO THE RECRUITMENT PRIVACY POLICY**

KC Gaming Networks Ltd (Bet9ja) is a champion of data privacy and is highly committed to the protection of the privacy of a candidate's personal data. This notice provides information on how we collect, protect and process candidate data on our platforms during any recruitment process; ensuring we follow the Nigerian Data Protection Regulation (NDPR). This notice is not an offer of employment or a contractual agreement.

By accepting this Recruitment Privacy Policy, you agree that you understand and accept the use of your personal data and information as stated in this Privacy Policy. If you do not agree with the terms of this policy, please do not use the website or otherwise provide us with your personal information.

- **Information we collect**
- **How do we use this information**
- **How is the information shared**
- **Your data rights**
- **How to contact us**
- **How to contact the data regulator**

### **1. WHO IS THE DATA CONTROLLER?**

For the purposes of the Services, KC Gaming Networks Ltd TWORXS LTD (Bet9ja) a company registered under the laws of the Federal Republic of Nigeria is the data controller of your Personal Data and we are located at Tomi's House, No. 9 Funsho Williams Avenue, Ojuelegba, Surulere, Lagos State. You can contact us on 08099990939.

### **2. WHO IS THE DATA PROTECTION OFFICER**

Bet9ja has appointed a Data Protection Officer ('DPO'), who is duly supported by the Compliance Team in the office of the Legal and Compliance Department of KC Gaming Networks Ltd. The role of the DPO involves acting as the contact person for data subjects in relation to the processing of their data. You can contact our DPO using this email address 'dataprotection@bet9ja.com' or via phone on 01-5158885. If you wish to exercise any of your rights. Kindly see the 'Your Rights' section below.

### 3. INFORMATION WE COLLECT

All references to 'Personal Data' in this Recruitment Privacy Policy refers to any personal information about a natural person which enables that individual to be identified directly or indirectly by reference to the data provided.

The purpose of processing your personal information is to enable us to assess whether you are suitable for the position you applied for and to offer qualified candidates' employment. In relation to your application to work for Bet9ja, we collect, store, process and use the following categories of personal information about our applicants:

- The data you provide to us in your curriculum vitae and covering letter or via the email you send to us.
- Contact Details
- Educational Qualifications
- Previous Employment Details
- Skills and Experience
- Information you provide at the Interview

**Other Sources:** As part of our recruitment process, i.e. for the purposes of pre-employment or employment checks, we may receive information about you from other sources (such as from the payment providers, social media channels, professional bodies or third-party identity verification service provider) and add it to your profile on our database according to this Recruitment Privacy Policy.

You also have the right to request your personal data at any time in order to make alterations to any personal information that may have changed or become obsolete. Should you believe that any personal information we hold for you is incorrect, please contact our data protection team here - [dataprotection@bet9ja.com](mailto:dataprotection@bet9ja.com)

#### 4. HOW DO WE USE THIS INFORMATION

We process your personal information solely for the purpose of the Bet9ja vacancies and recruitment process. We contact our candidates via email, telephone or in writing as part of the application process. We also process your data to enter into a contract of employment with the successful candidate. These purposes include:

- **Comply with legal and contractual requirements:** We are required to process, utilize and retain personal information for legal and compliance purposes, including but not restricted to prevention, detection, or investigation of a crime; or fraudulent acts. In relation to internal and external audit obligations, immigration, information security purposes, and as required to provide such information under applicable law.
- **Legitimate interest:** In processing your personal data, during a recruitment process we have a legitimate interest in keeping records of such processing. This is to enable us to manage the recruitment process, assess whether you are suitable for the role and confirm who is qualified to be offered the job. Personal information provides functionality, analyses performance, fix errors, and improves the ability and effectiveness of the recruitment services. This processing is required for the purpose of our legitimate interests.

**How long we keep your information:** We will keep your information on our database for as long as it is strictly necessary. The purpose of which the information is collected is in line with data protection and other applicable laws.

Bet9ja does not sell, lease or rent out personal information to anyone.

#### 5. HOW IS THE INFORMATION SHARED

As part of this policy, your personal information will be shared within the recruitment process which stems from the Human Resources Department, the Recruiting Manager and the IT staff if there is a need to access data for the roles advertised.



We will not share your data with third parties, unless your application for employment is deemed successful by Bet9ja and a formal offer for employment is made to the successful candidate. We can share your information to conduct background checks from relevant background check provider. All third-party service providers are also mandated to take appropriate security measures to protect personal data in line with data protection regulations in applicable jurisdictions.

## 6. YOUR DATA RIGHTS

You have various rights in relation to your data:

**Right of access to personal data:** You have a right to request a copy of the personal information in our records. If you require such information, you can make a request to [hr@bet9ja.com](mailto:hr@bet9ja.com) or [dataprotection@bet9ja.com](mailto:dataprotection@bet9ja.com).

Kindly provide adequate information to identify yourself, and any other relevant information that would assist in processing your request. Such a request will be processed and made available to you in the shortest period.

**Right of rectification of personal data:** You have a right to request that we should rectify and correct any personal information that we are processing concerning you which is incorrect.

**Right of Erasure:** You have a right to request the erasure of your personal information where there is no compelling reason to continue processing the information. If you want to exercise this right, please email [dataprotection@bet9ja.com](mailto:dataprotection@bet9ja.com).

**Right to withdraw consent:** In a situation where we have relied upon your consent to process your personal information, you have the right to withdraw such consent, without limiting the lawfulness of your information in our custody and processed by us in line with any legal obligation or prior to the withdrawal of the consent.

**Right to restrict the processing of personal data:** In some certain instances, you have the right to request that we suspend the processing of your personal information. When the processing of your personal information is restricted, we can opt to store your information, but we may not process it further, subject to processing on compelling legitimate grounds and in connection to legal obligations.

**Right to data portability:** You have a right in certain situations to receive your personal information which you made available to us in a structured, commonly used and machine-readable format. You can also request that we transfer your information to another party, or organization subject to technical availability.

## 7. HOW TO CONTACT US

If you have any questions or inquiries about this notice or require further information about your data rights, please contact us using the following email address [dataprotection@bet9ja.com](mailto:dataprotection@bet9ja.com). Our data protection officer can also be reached by sending an email to [dataprotectionofficer@bet9ja.com](mailto:dataprotectionofficer@bet9ja.com).

## 8. FILE A COMPLAINT

In the event that you are not satisfied in the way we manage your personal data or information, you also have a right to make a complaint to the Head of Compliance of KC Gaming Networks Ltd (Bet9ja) at [legal@bet9ja.com](mailto:legal@bet9ja.com) or contact the Nigerian Data Protection Commission at this link [info@ndpc.gov.ng](mailto:info@ndpc.gov.ng)

## 9. SECURITY

We design our systems with your security and privacy in mind.

- We work to protect the security of your information you provide to our web sites by using a host of security applications and anti-hack measures inclusive of Secure Sockets Layer (SSL), Akamai IP/Geo Firewall and RESTFUL API to encrypt that information during transmission.
- We maintain physical, electronic and procedural safeguards in connection with the collection, storage, and disclosure of personal customer information. Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to you.
- It is important for you to take steps to protect against unauthorized access to your account and your password. You should keep your password and any security questions confidential. The security of your Account relies on your protection of your password and security questions. **DO NOT SHARE YOUR PASSWORD.** If you do share your password with a third party for any reason, the third party may have access to your account and your personal



information, and you may be responsible for actions taken using your password. If you believe someone else has obtained access to your password, please change it immediately and also contact us right away.

#### **10. PERSONAL DATA RETENTION**

If the event that your application for employment is unsuccessful, we will hold your data on file for 12 months after the end of the relevant recruitment process. Upon the expiration of the 12 months, we will securely destroy your personal information in accordance with our internal data policy.

If we want to retain your personal information on our database, on the basis that a further opening may arise in future and we may wish to consider your application for that role, we will write to you separately, requiring your explicit consent to retain your personal data for a fixed period on that basis.

If your application for employment is successful, the personal data that is collated during the recruitment process will be transferred to your employee file.

#### **11. CHANGES TO THIS NOTICE**

We reserve the right to change this notice at any time in our sole discretion. We will publish such changes by posting them on our website and with the date it was last updated.