**MADISON GROUP RECRUITMENT DATA PRIVACY NOTICE**

Madison Group Limited is a financial services group offering life assurance, retirement benefits, general and healthcare insurance and investment management services. The services are offered through the subsidiaries Madison Life Assurance Kenya Limited, Madison General Insurance Kenya Limited and Madison Investment Managers Limited. Throughout this document, “**The Group/We**” refers to Madison Group Limited and or the respective subsidiary to which you are applying for a role.

The Group respects the privacy of all job applicants and is committed to protecting your Personal Data. This Recruitment Data Privacy Notice is a summary of our Privacy Notice available at <https://www.madison.co.ke/privacy-notice/>. It explains how we collect, use, disclose or otherwise process your personal data in connection with our recruitment processes.

This Recruitment Data Privacy Notice only applies to the personal data of job applicants, potential candidates and or all individuals who take part in a recruitment activity and interns/attaches.

By submitting your personal data to us, you acknowledge that you have read and understood this Recruitment Data Privacy Notice and agree to the use of your personal data as set out herein.

**What type of personal data do we process?** We may process your Personal Data during the recruitment process including but not limited to; Basic personal information such as name, and date of birth; Identification details such as national identification number, and passport number; Contact information such as phone number, email address and postal address; Location data such as physical/residential address; Educational background including the level of your education, grades and school attended; Occupation background including details of previous work experience; Professional details such as; professional memberships, background/reference check details; compensation details such as salary information; interview details such as; interview notes, test results, the progress of the hiring process, other assessment materials; multimedia data such as passport photo; sensitive data such as marital status, disability, health condition, sex.

This personal data is received directly from you (through job applications/resumes and when you attend a job interview) or indirectly (through your duly authorised representative (your referee), our third-party service providers (e.g. the recruitment agency and background/reference checks service providers) or public sources (e.g. LinkedIn or other social media profiles)

In cases where you submit personal data about another person, kindly ensure that you capture the correct information and that you have notified them that you are submitting their information to us. It is also crucial that you show them this Recruitment Data Privacy Notice, and our Privacy Notice and or direct them to us if they have any questions or concerns about the use of their personal data.Please note that we may not be able to effectively process your job application if you fail to provide us with the personal data that we have requested. This may lead to you not being considered for the role you have applied for or any other role.

**What is the legal basis for processing your personal data?** We process your personal data for various purposes at different stages (“**the purposes**’) including but not limited to; In order to take precontractual steps relating to the potential employment relationship with you including; considering your application in respect of the role you have applied, considering your application in respect of other roles within the Group, communicating with you or responding to your request/application, facilitating and conducting an interview, performing background/reference checks (where you are successful); responding to complaints, answering queries and concerns; To comply with any legal, regulatory, tax, accounting or reporting obligations; To conduct statistical/ analysis/market research/ surveys to improve our recruitment and hiring process; To safeguard our legitimate interests in recruiting the most suitable candidates, evaluating and improving our recruitment process, maintain recruits details in relation to recruiting and hiring, public interests and your vital interest including health (to provide reasonable accommodations to facilitate the interview process), safety or security purposes, exercise and defence of a legal claim.

We will limit the processing of your personal data for these purposes.

**How long do we retain your personal data?** We will retain your personal data for only as long as is necessary to fulfil the purposes for which it was collected. Generally, we retain your information for the entire period of the recruitment plus as long as we are legally obligated to do so. The specific retention period is informed by legal and regulatory requirements as well as our internal Records Management and Retention Policy but will not exceed four (4) years, if you are not successful.

**Who do we share your personal data with?** We share your personal data with certain third parties like suppliers or service providers with whom we have engaged for and in connection with the purposes. This may include; technology service providers; background/reference check service providers; recruitment agencies credit reference agencies; government agencies and public authorities (as and when we are required under the law); our professional advisers such as auditors, and other companies within the Madison Group where necessary.

Some of these third parties may be located outside Kenya. We will take reasonable steps to ensure that the data we share is accurate, up-to-date, complete and relevant to the purpose of the use or disclosure. All third parties are also required to ensure the security of your data and shall strictly utilise it in connection with the purpose it is shared with them.

**How can you access your data subject rights?** You have the right to; be informed on the purpose for which we are processing your personal data, to access the personal data that we process, request that we correct your personal data if it is inaccurate, false or misleading, erase your personal data(this is subject to any legal obligation that we may have), object to the processing of your personal data, data portability, restrict the processing of your personal data. and the right to lodge a complaint with the Office of the Data Protection Commissioner. You may exercise any of your data subject rights by downloading the appropriate data subject action form which may be downloaded from our website at [www.madison.co.ke](http://www.madison.co.ke) and sending the filled form to [dpo@madison.co.ke](mailto:dpo@madison.co.ke) **OR** by sending an email to [dpo@madison.co.ke](mailto:dpo@madison.co.ke)

**Data security.** We will employ adequate organisational and technical measures to safeguard your data at all stages of processing.

**Changes to this Recruitment Data Privacy Notice.** We may occasionally update this Recruitment Privacy Notice to reflect changes in our data processing activities or legal developments. Any updates will be posted on our Privacy Notice posted on our website and the date of the last revision will be indicated at the top of the Privacy Notice.

Please see Madison Groups’ Privacy Notice on our website at [www.madison.co.ke](http://www.madison.co.ke) for further information on our privacy practices.  If you have any questions regarding this Privacy Notice or any concerns regarding the processing of your personal data, please write an email to [dpo@madison.co.ke](mailto:dpo@madison.co.ke) or visit our offices at Madison House, Upper Hill Close, Upper Hill, Nairobi.