JOB APPLICANTS' PRIVACY NOTICE

Debswana Pension Fund ("DPF","we","us","our") is the data controller responsible for deciding why and how your personal data is processed during the recruitment process. You can contact us at Private Bag 00512, Gaborone, by telephone at +267 361 4288, or our Data Protection Officer at dpfdataprotection@debswana.bw.

This privacy notice explains how we collect, use, and share your personal data during the recruitment process. It applies specifically to personal data collected and processed for recruitment. If you are offered and accept employment, further processing of your personal data will be governed by the Employee Privacy Notice.

SOURCES OF PERSONAL DATA

We collect personal data from the following sources:

i. directly from you through your CV, application form, cover letter, interviews, or communications with our Human Resources team; and
ii. from third parties including referees you have identified, previous employers, and publicly available sources such as LinkedIn.

Where personal data is not obtained directly from you, we will inform you of the source and the categories of data collected, as required by the Data Protection Act.

PURPOSE AND LEGAL BASIS FOR PROCESSING

We collect and process your personal data for the purposes below:

PURPOSE OF PROCESSING	EXAMPLES OF PERSONAL DATA PROCESSED	LEGAL BASIS
Assessing suitability for the position	Application form, CV, cover letter, qualifications, interview notes	Legitimate interest (to recruit qualified and suitable candidates)
Communicating with you	Email address, phone number	Legitimate interest (to facilitate communication about your application)
Verifying qualifications and background	References, employment history, transcripts, copy of Identity Document	Legitimate interest (to confirm accuracy of information provided)
Conducting background checks (where applicable)	Identification, criminal, or financial history (if relevant)	Consent (conducted only with your explicit written consent and where relevant to the role)
Internal recruitment record-keeping	All application-related data	Legitimate interest (for audit, compliance, and legal defence)

Where we rely on legitimate interests, we ensure that the processing is necessary, proportionate, and does not unfairly impact your rights. Where required, we will obtain your explicit consent for specific processing activities, such as criminal background checks.

MANDATORY PROVISION OF PERSONAL DATA

Certain personal data requested during the recruitment process is required to assess your application, verify your qualifications, and meet pre-contractual requirements. If you do not provide this information, we may be unable to process your application or offer you employment.

RECIPIENTS OF PERSONAL DATA

We may share your personal data with:

i. referees or previous employers, to verify your employment history, qualifications, and suitability for the role;
ii. professional advisors (e.g., legal advisors) in the event of a recruitment-related dispute or compliance requirement; and
iii. other parties lawfully entitled to receive the data under applicable laws.

INTERNATIONAL DATA TRANSFERS

In some cases, your personal data may be transferred to countries outside Botswana as part of the recruitment process. Where this occurs, we rely on adequacy decisions (where the destination country's laws are recognised as providing a level of protection equivalent to Botswana's). If no adequacy decision applies, we will implement appropriate safeguards or rely on specific derogations permitted under the Data Protection Act.

RETENTION OF PERSONAL DATA

Personal data of unsuccessful applicants will be retained for up to 6 months after the conclusion of the recruitment process. This is to allow us to respond to any legal claims, maintain recruitment records for audit purposes, and if you have consented, consider you for future opportunities. We may retain it longer if required by law.

Personal data of successful applicants will form part of their employee file and be processed in line with the Employee Privacy Notice.

YOUR DATA PROTECTION RIGHTS

You have the following rights under the Data Protection Act:

i. Right of access – request confirmation and a copy of your personal data
ii. Right to rectification – correct incomplete or inaccurate data
iii. Right to erasure – request deletion of your data in certain cases
iv. Right to restriction – limit how we process your data in defined circumstances.
v. Right to data portability – receive and transfer your data in structured format.
vi. Right to object – you have the right to object to processing based on our legitimate interests.
vii. Right to withdraw consent – where processing is based on consent, you may withdraw it at any time without affecting prior lawful processing.

These rights may be limited depending on the legal basis and processing context, or the rights of others. To exercise them, please contact us. You also have the right to lodge a complaint with the Information and Data Protection Commission.

AUTOMATED DECISION-MAKING

We do not use automated decision-making or profiling in our recruitment process.

UPDATES TO THIS NOTICE

We may update this Privacy Notice from time to time to reflect legal or operational changes. The latest version will be available on our website under recruitments or on request from our HR office.