



THE GIFTED CONSULTANTS

Privacy & Data Protection Policy

EU GDPR · UK GDPR · US State Laws · POPIA Compliant

Effective Date: June 2026 | Version 1.2

About Our Role The Gifted Consultants (Pty) Ltd operates as an authorised sourcing partner and data processor on behalf of UAB Hire Abroad (www.hireabroad.com), a recruitment platform registered in Lithuania and regulated under EU GDPR. In connection with our European recruitment services, we collect only pre-screening eligibility data at the initial stage. Candidates who progress through our screening are directed to register their full profile directly on the Hire Abroad platform, at which point UAB Hire Abroad becomes the data controller for all further processing, including collection of identity documents, bank details, and employment records.

1. Data Controller

The Gifted Consultants (Pty) Ltd ('we', 'us', 'our') is the data controller responsible for personal data collected through this website and through our initial candidate screening activities. For candidates who proceed to register on the Hire Abroad platform, UAB Hire Abroad assumes the role of data controller for all further processing.

Registration No.: 2015 / 149497 / 07

Registered Office: 70 Buckingham Terrace, 1st Floor Pharos House, Westville, KwaZulu-Natal, 3629, South Africa

Telephone: +27 87 265 6714

General Email: info@thegiftedconsultants.com

Candidate Enquiries: tgceurocareers@hireabroad.email (acting on behalf of Hire Abroad)

Website: www.thegiftedconsultants.com

2. Legal Frameworks That Apply

As a South African company acting as an authorised sourcing partner for a Lithuanian EU-regulated recruitment platform, multiple data protection frameworks apply to our activities:

2.1 General Data Protection Regulation (GDPR) - European Union



The GDPR (Regulation (EU) 2016/679) applies when we process personal data of individuals located in the EEA. We act as a data processor on behalf of UAB Hire Abroad, who is the data controller under GDPR for European candidates.

2.2 UK GDPR & Data Protection Act 2018

The UK GDPR and DPA 2018 apply to our activities involving UK-based candidates. The same processor/controller arrangement applies as described above.

2.3 US State Privacy Laws (CCPA/CPRA and Equivalent)

We comply with applicable US state privacy legislation, including the CCPA as amended by the CPRA, for any US-based individuals who interact with our website or services.

2.4 Protection of Personal Information Act (POPIA) - South Africa

POPIA (Act 4 of 2013) governs all personal information processing in South Africa. As a South African registered entity, we comply with POPIA across all operations.

3. What Data We Collect and When

Key principle: *The Gifted Consultants collects only lightweight pre-screening eligibility data. Sensitive documents (passport, ID, criminal record, bank details) are collected exclusively by Hire Abroad on their secure platform — not by TGC.*

3.1 Pre-Screening Data (Collected by TGC via Tally form)

- Full name and contact details (email, WhatsApp/mobile number)
- Nationality and country of residence
- EU/EEA citizenship status
- Years of work experience and job roles of interest
- English proficiency level
- Availability to relocate

3.2 Communication Data (Collected by TGC)

- WhatsApp and email correspondence during the screening process
- Interview notes from Calendly scheduling and appointments

3.3 Technical / Usage Data (Collected by TGC website)

- IP address and browser type
- Pages visited and time on site
- Device type and operating system

3.4 Full Candidate Profile Data (Collected by Hire Abroad - NOT TGC)

Once a candidate is directed to the Hire Abroad platform (hireabroad.com) to register, the following data is collected and controlled exclusively by UAB Hire Abroad under their own privacy policy and GDPR obligations:

- Curriculum Vitae (CV) / Resume
- Passport or national identity document
- Driving licence



- BSN number (Dutch citizen service number)
- Bank account details (IBAN/SWIFT)
- Criminal record certificate (VOG)
- Travel documentation
- Full employment history and references

Hire Abroad's privacy policy is available at: www.hireabroad.com

4. How We Collect Your Data

- Online eligibility questionnaire (Tally.so, embedded on our website) - pre-screening only
 - WhatsApp communication initiated by or with candidates (via tgceurocareers@hireabroad.email)
 - Email correspondence (via tgceurocareers@hireabroad.email)
 - Calendly interview scheduling and appointment notes
 - Automatic technical data via website cookies and server logs
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5. Purpose and Legal Basis for Processing

TGC processes pre-screening data for the following purposes on behalf of UAB Hire Abroad:

- Eligibility screening - determining whether a candidate meets basic EU/EEA citizenship and experience requirements - Legitimate interests / Contractual necessity
- Initial candidate assessment - evaluating suitability via Calendly interview - Legitimate interests / Contractual necessity
- Directing eligible candidates to the Hire Abroad registration platform - Legitimate interests
- Communicating with candidates about their application status - Contractual necessity / Consent
- Complying with legal obligations - Legal obligation
- Website analytics and performance - Legitimate interests

TGC does not make placement decisions. All matching, vacancy allocation, employer introductions, and placement decisions are made by UAB Hire Abroad.

6. Who We Share Your Data With

6.1 UAB Hire Abroad (Controller)

Pre-screening information about eligible candidates is passed to UAB Hire Abroad as part of the normal sourcing workflow. TGC acts as processor under a Data Processing Agreement with Hire Abroad. Candidates are then directed to register directly on the Hire Abroad platform.

6.2 Third-Party Sub-processors (TGC Pre-screening Stage)

- Tally.so - eligibility questionnaire hosting
 - Google Workspace (Google LLC) - email communication
 - WhatsApp (Meta Platforms) - candidate communication
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- Calendly LLC - interview scheduling

6.3 Legal Disclosure

We may disclose personal data if required by applicable law, court order, or competent regulatory authority.

Important: *We do not sell, rent, or trade your personal data. We do not share your data with employers directly — that is done by Hire Abroad after you register on their platform.*

7. International Data Transfers

7.1 TGC Pre-screening Data (Lithuania/EU → South Africa)

Pre-screening data collected via our Tally form is processed in South Africa by TGC. South Africa is not recognised as adequate under GDPR. This transfer is governed by Standard Contractual Clauses (Module Two: Controller to Processor) under the Data Processing Agreement between UAB Hire Abroad and TGC.

7.2 Full Candidate Data (Hire Abroad Platform)

All full candidate profile data collected on the Hire Abroad platform is processed by UAB Hire Abroad in Lithuania (EU) and subject to GDPR. TGC has no access to or responsibility for this data.

8. Data Retention

TGC retains pre-screening data only for as long as necessary:

- Candidates who do not pass eligibility screening: deleted within 30 days
- Candidates screened but not referred to Hire Abroad: deleted within 60 days of last contact
- Candidates successfully registered on Hire Abroad: deleted from TGC systems within 30 days of confirmed registration
- Website technical data: up to 12 months

Once a candidate registers on the Hire Abroad platform, their ongoing data is retained according to Hire Abroad's own retention policy.

9. Your Rights

Your data rights depend on your jurisdiction. For pre-screening data held by TGC, the following rights apply:

9.1 Right of Access

Request a copy of pre-screening data TGC holds about you.

9.2 Right to Rectification



Request correction of any inaccurate or incomplete data.

9.3 Right to Erasure

Request deletion of your pre-screening data from TGC systems.

9.4 Right to Restrict Processing

Request that we limit processing in certain circumstances.

9.5 Right to Object

Object to processing based on legitimate interests.

9.6 Right to Withdraw Consent

Withdraw consent at any time without affecting prior processing.

9.7 Rights Over Hire Abroad Data

For data held on the Hire Abroad platform, please contact Hire Abroad directly at www.hireabroad.com. TGC cannot action rights requests relating to data held by Hire Abroad.

To exercise rights over TGC pre-screening data, contact: tgceurocareers@hireabroad.email

Subject line: Data Rights Request - [Your Name] - [Your Country]

We will respond within 30 days (GDPR/POPIA), one calendar month (UK GDPR), or 45 days (US).

10. Cookies & Website Tracking

- Strictly necessary cookies - required for the website to function
- Analytical cookies - to understand visitor interaction (Google Analytics, anonymised)

See our full Cookie Policy at www.thegiftedconsultants.com/cookie-policy for details on the cookies we use and how to manage your preferences.

11. Data Security

- Password-protected accounts (Google Workspace with 2-factor authentication)
- Encrypted data transmission (HTTPS)
- Access controls limiting data to authorised personnel only
- Data Processing Agreement with Hire Abroad governing all processing

In the event of a personal data breach, we will notify UAB Hire Abroad immediately (within 24 hours) so they can fulfil their GDPR Article 33 notification obligations to the relevant supervisory authority within 72 hours.

12. Children's Privacy



Our services are intended for adults aged 18 and over. We do not knowingly collect personal data from children. If we become aware of such data, we will delete it immediately.

13. Third-Party Links

Our website links to third-party sites including Tally.so, Calendly, and the Hire Abroad platform. We are not responsible for their privacy practices. Please review their policies before submitting personal data.

14. Changes to This Policy

We may update this policy to reflect changes in our practices, our relationship with Hire Abroad, or legal requirements. The current version is always available at www.thegiftedconsultants.com/privacy-policy.

15. Contact & Supervisory Authorities

Data Controller (pre-screening): The Gifted Consultants (Pty) Ltd

Candidate enquiries: tgceurocareers@hireabroad.email

General: info@thegiftedconsultants.com | +27 87 265 6714

70 Buckingham Terrace, 1st Floor Pharos House, Westville, KwaZulu-Natal, 3629, South Africa

Data Controller (full candidate profile): UAB Hire Abroad

www.hireabroad.com | Naručio g. 3, Vilnius, Lithuania

Supervisory Authorities

- South Africa - Information Regulator: www.justice.gov.za/infoereg
- Lithuania / EU - State Data Protection Inspectorate: www.vdai.lrv.lt
- Netherlands - Autoriteit Persoonsgegevens: www.autoriteitpersoonsgegevens.nl
- United Kingdom - ICO: www.ico.org.uk | 0303 123 1113
- California (USA) - CCPA: cpa.ca.gov