

## Data Privacy Statement

The Value Retail recruitment portal (“**Portal**”) is dedicated to recruitment opportunities within Value Retail PLC and its **associated companies**.

You should read through this Data Privacy Statement (the “**Statement**”) carefully to fully understand the basis upon which we will use your information, including what information we collect about you, how we use the information, where we store the information and to whom the information is disclosed. Any information that we collect about you that is personal to you, and from which it is possible to identify you, is known as personal data for the purposes of data protection laws.

### Commitment to Privacy

**We are committed to protecting your personal data and privacy. We will use your personal data for recruitment, onboarding and hiring (if applicable) purposes and as set out in this Statement. We will always keep your personal data safe and comply with applicable data protection law as amended and updated from time to time.**

### Other privacy policies that may apply

This Statement only applies to information we collect via the Portal and is in addition to our individual privacy policies which relate to our use of information about you other than in connection with the Portal (for example our employee privacy statement which applies to information we collect about you if you commence employment with us). If you are not willing to accept this Statement or if you do not agree with how we will handle your personal data, please do not sign up to the Portal or provide us with your personal data.

If your personal data has been provided to us by a third party (for example a friend or an agency) but you no longer wish us to have or use your personal data please contact us using the detail in *Contacting Us* below to ask us to anonymise your personal data. For more information on how long we retain your information for please see *How long we keep your information for* below.

In order to provide the Portal, we work with a number of partner providers, some of whom have their own privacy policies. You can find out more about our partner providers below (*Who we share your information with*) and in the list [here](#).

### Application of this Statement

This Statement applies to the way we collect and process your personal data from the time you provide personal data in a candidate profile, up to the point at which we anonymise the data we hold on you, so that we are unable to tell any data relates to you. Please see section *How long we keep your information for* below for information on how long we keep your data.

Once you commence employment, the way we process your personal data will also be governed by our employee privacy statement (which will be made available to you when you commence employment). Your employee profile will be automatically created using information from your candidate profile (including any updates you make to your candidate profile). When you make updates to one of your profiles, the other profile will also be updated (if such information is also collected in that profile). For example if you have both a candidate profile and an employee profile and your employee profile is updated with the time you spent in a job role at Value Retail this will automatically be included in your candidate profile. This ensures the data we keep on you is kept up to date.

### Giving us personal data about another person

When you use the Portal to give us a friend’s details because you think they should be considered for a role you must ensure that you have spoken to your friend beforehand and that they have agreed that we may contact them. Similarly, if you upload your friend’s CV to the Portal you must make sure that you have your friend’s permission to do this and that they agree to us being sent a copy of their CV before you upload it. You need to give your friend enough information about how we will use their information and what their information will be used for when asking

them whether we may contact them. You are also responsible for making sure that you give us accurate information about your friend.

### Who we are

Please [click here](#) to see who we are. The entities listed are the owners and operators of retail outlet villages (“Villages”) indicated against their name. References in this Statement to “we” or “us” are to the entities listed. Each of the entities listed are committed to protecting your privacy and are joint data controllers within the meaning of data protection laws applicable in the European Union (“EU”) and European Economic Area (“EEA”). The entities listed are joint controllers of personal data in order to achieve a universal job application system, supplying job opportunities across the Villages. Where you apply to a job in a country listed in the link above, the corresponding entity will be the data controller responsible for collecting your personal data.

In some countries, we may have a data protection officer. [Click here](#) to find out where, and what the officer’s contact details are.

### What information do we collect about you?

As part of the recruitment process, we collect the personal data that you submit to the Portal to create your profile or submit an application, which may include the following (subject to the local legal requirements in the country you apply for a job in):

- a) Personal details such as your name, gender, residential address, email address, contact telephone numbers, nationality, or previous criminal convictions;
- b) Details about your previous employment such as your curriculum vitae, work history (including whether you have been employed by us before) and any further personal data about you contained therein;
- c) Details about your qualifications such as your skills, education, the languages you speak and your proficiency, your eligibility to work in a particular country (e.g. your citizenship or visa details), your experience in particular areas (including management and managing international teams) and industries; and
- d) Details about your preferences such as positions you may be interested in, information about when you may be available to interview, start work (i.e. your current notice period) or work on an ongoing basis (e.g. full or part time or on weekends), whether you are open to relocation or working remotely, whether you are willing to travel for work and whether you have your own transport.

Please note that our application process allows you to include any other information you think relevant to your application, including cover letters, references from your previous employment, and other documents. Please be aware that although we may not require you to provide such documents, they may contain personal data, and we will hold and process any information, including any personal data, that you provide in such documents.

If you click to apply for a position through LinkedIn, we may use the information you have previously provided to LinkedIn to populate your profile on the Portal (including information regarding your experience, employment, education, skills and recommendations). We will ask you to authorise LinkedIn to share your personal data with us for this purpose. The data you provide to LinkedIn will only be used to update your profile when you apply to a vacancy using the “apply with LinkedIn” button, it will not automatically update your profile information in between job applications you submit or if you apply for a vacancy without using the “apply with LinkedIn” button. Please note that when you apply for a job using the “apply with LinkedIn” button it is still your responsibility to review the job application before you submit, to ensure all the fields included are correct.

If you apply for a position through an external recruiter or agency, we may collect your information directly from them and contact you directly (if you have given permission to such recruiter or agency to share your information with us).

### *Mandatory information*

Some information we request is mandatory and must be provided before you can submit an application through the Portal. Any mandatory information will be marked with a red asterisk. If you do not provide any information marked as mandatory, you will not be able to submit an application through the Portal.

### Automated decision making

Some of our job vacancies may have certain pre-requisites relating to lifestyle, working preferences, language abilities, right to work or prior experience. Please note that if the job vacancy you apply for has such a pre-requisite, the Portal is configured to automatically reject your application if you do not meet that certain pre-requisite.

### How we use your information

We use your personal information in the following ways:

Primarily, we use your information in order to consider you for employment opportunities with us and to contact you in relation to these, and to progress your application.

If your application is successful, we will retain your personal data and process it:

- a) For the purposes of onboarding you to your new role; and
- b) In the course of your ongoing employment (as further set out in our employee privacy policy to which you will have access once you commence employment).

If your application is successful, the information from your profile will be duplicated in our employee records.

If your application is unsuccessful, we will notify you using the personal data you have provided us.

If you have requested that we send you job alerts, we will also use your personal data in order to inform you about other employment opportunities for which you have requested a job alert. You can influence the types of opportunities we send you by managing your preferences on your profile page.

We will make your candidate profile visible to our internal company recruiters (whether worldwide, in your country of residence or who manage jobs you have applied for, according to the preferences you set) and we will share your personal data internally to make your profile visible. Someone representing the option you have chosen may contact you about your profile, including if we have a role you may be interested in. If you do not agree to this, you will need to revoke your consent to this Statement, which means information in your profile will be anonymised.

### How long we keep your information for

Whether your application is successful or not we will retain your personal data on our system for 12 months from the later of (a) the last time you access the Portal, (b) the last time you update your profile in the Portal or (c) the last time you apply for a job in the Portal. Shortly before the 12 month period expires, we will contact you to ask you to update your profile, and to check whether you would like us to retain your personal data or not. If we do not hear from you or you indicate that you no longer want us to retain the personal data in your profile, we will anonymise all personal data we hold on you, so that we are unable to tell any data relates to you. You are also able to ask us to anonymise your own profile at any time by contacting us using the details [here](#).

However, in some countries we are legally required to retain certain data for longer than this period for legal reasons. Where we are required to retain your details for longer than the period mentioned above (due to local legal reasons) we will anonymise the data as soon as we are no longer required to retain it for such local legal reasons.

### Who we share your information with

We share your information between ourselves (see *Who We Are*) for the purposes set out above (see *How We Use Your Information*)

For the purposes set out above, we may also provide your information to our suppliers and processors who perform certain business services for us. We share your information with third parties for the purposes of:

- a) Administering and providing the Portal including communicating with you regarding other employment opportunities;
- b) Conducting assessments as part of the recruitment process; and
- c) Administering delivery of documents for signature and electronic signatures.

In some cases the information we collect from you may also be processed outside the EEA and such destinations may not have laws which protect your information to the same extent as in the EEA. We have obligations to ensure that your personal data processed by us or by our suppliers or processors operating outside the EEA is treated securely and is protected against unauthorised access, loss or destruction, unlawful processing and any processing which is inconsistent with the purposes set out in this Statement.

You can click [here](#) for a list of the suppliers and processors we currently use, and other parties to whom we disclose your information. The link also has information about how these parties use your information, any processing they perform outside the EEA, and the safeguards that are used to protect your information if this happens. This information may be updated from time to time. Please ask us if you would like more information about the safeguards that are used to protect your information when it is processed outside the EEA (see *Contacting Us* below).

In addition, we may disclose your personal data:

- a) If we are under a duty to disclose or share your information in order to comply with any legal obligation, or in order to protect the rights, property or safety of our business, our customers or others. This includes, in specific cases, exchanging information with other companies and organisations for the purposes of fraud protection; and
- b) To successors in title or replacement operators of all or part of our respective businesses.

#### The legal basis for us using your information

We collect and process the personal data referred to above (see *What Information Do We Collect About You?*) so that we can:

- a) Process employment applications in an efficient, secure and centralised manner;
- b) Maximise the number of potential candidates who are informed about job opportunities and able to access the application process; and
- c) Better understand the way we conduct our recruitment and onboarding practises.

We have assessed the impact of processing your information for the reasons listed above and have balanced your interests, rights and freedoms against our interests in processing your data in this way. This assessment has been used to implement the way we process your data to ensure your rights are adequately protected.

In some cases, we process your personal data in connection with our legal obligations. For example, we may be prohibited by law from employing you if you do not have the right to work in a particular country. We may also be required to make reports to comply with equal opportunities law, which requires us to collect certain information from you (although we make sure that no-one involved in making a decision about your application can see this information).

In certain circumstances, we process your personal data after obtaining your consent to do so for the purposes of contacting you about other employment opportunities you may be interested in. Where you have provided consent to us processing your data you have a right to withdraw this (see *Your rights*).

#### Your rights

By law, you have a number of rights when it comes to your personal data. Further information and advice about your rights can be obtained from the data protection regulator in your country.

Rights	What does this mean?
1. The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Statement.
2. The right of access	<p>You have the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this Statement).</p> <p>This is so you're aware and can check that we're using your information in accordance with data protection law.</p>
3. The right to rectification	You are entitled to have your information corrected if it's inaccurate or incomplete.
4. The right to erasure	This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
5. The right to restrict processing	You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.
6. The right to data portability	You may have the right to obtain your personal data and send it to a third party.
7. The right to object to processing	You have the right to object to certain types of processing, including processing for direct marketing (which we do only with your consent).
8. The right to lodge a complaint	You have the right to lodge a complaint about the way we handle or process your personal data with your national data protection regulator.
9. The right to withdraw consent	If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for marketing purposes.

We usually act on requests and provide information free of charge, but we may charge a reasonable fee to cover our administrative costs of providing the information for:

- a) baseless or excessive/repeated requests, or
- b) further copies of the same information.

Alternatively, we may be entitled to refuse to act on the request. Please consider your request responsibly before submitting it. We will respond as soon as we can and in the event that we decide to charge you a reasonable fee, we will notify you. Generally we will respond to you within one month from when we receive your request but, if the request is going to take longer to deal with, we'll come back to you and let you know.

#### Contacting us

If you need to contact us for any reason (including to exercise any of your rights in relation to data protection as set out above) please send us your request using the details [here](#). If you need to contact us for reasons related to your application itself please contact us at [Recruitment@ValueRetail.com](mailto:Recruitment@ValueRetail.com)