

Candidate Privacy Notice

International Procurement and Logistics Limited whose head office is 1 Foxbridge Way, Normanton, England, WF6 1TN, together with our affiliates Forza Foods Limited of 62 Devilliers Way, Normanton, England, WF6 1GX and Kober Limited of 4 Hanging Wood Way, Cleckheaton, England, BD19 4TS ("**We**", "**Us**", "**IPL Group**") is committed to protecting the privacy and security of your personal information. Please read the following carefully to understand Our views and practices regarding your personal data and how We will treat it.

This privacy notice describes how We collect and use personal information about candidates during the recruitment process, in accordance with the General Information Protection Regulation ("**GDPR**") and the version of the GDPR retained in UK law (the "**UK GDPR**").

For the purpose of the GDPR and UK GDPR, the Data Controller is International Procurement and Logistics Limited whose head office is 1 Foxbridge Way, Normanton, England, WF6 1TN.

This Privacy Notice is for information only; it is not a contractual agreement.

1. Our recruitment process

Where you apply for a job opening posted by Us, these Privacy Notice provisions will apply to Our processing of your personal information.

Where you apply for a job opening via the application function on a job site or similar online service provider ("**Partner**"), you should note that the relevant Partner may retain your personal data. Any use by the Partner of your data will be in accordance with the Partner's Privacy Notice.

2. Your personal information

We use Eploy, an online application system provided by ITS Software Systems Ltd, a company registered in England & Wales (Company No. 4583888), to assist with our recruitment within the UK. Eploy process personal information as a data processor on our behalf. Eploy is only entitled to process candidate personal data in accordance with our instructions. We do not use Eploy for our recruitment outside of the UK.

Information We collect from You

We will collect, store, and use some or all of the following categories of your personal information:

- Information that you provide when you apply for a role. This includes information provided through an online job site, via email, in person at interviews and/or by any other method.
- In particular, We process personal details such as name, email address, address, telephone number, date of birth, qualifications, information relating to your employment history, skills, experience and similar information that you provide to Us, as well as your video if we conduct your interview using the video interview feature.
- If you contact Us, We may keep a record of that correspondence.

- A record of your progress through any hiring process that We may conduct.
- Details of your visits to Eploy’s website including, but not limited to, traffic data, location data, weblogs and other communication data, the site that referred you to Eploy’s website and the resources that you access.
- Information you provide in relation to your right to work documentation.

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your race or ethnicity, religion or belief, sexual orientation and gender identity.
- Information about any disability or health condition.
- Details of the effect or impact of your disability or health condition on your work (including details of any ‘reasonable adjustments’ that you believe you need).
- Information about any criminal convictions which are not yet spent (i.e. unspent) under the terms of the Rehabilitation of Offenders Act 1974 (as amended).

Information We Collect From Other Sources

We also may collect personal information from the following sources:

- Recruitment agencies.
- Job boards, such as Indeed.
- Our employment background check provider.
- Your named referees.
- Eploy provides Us with the facility to link the data you provide to Us, with other publicly available information about you that you have published on the internet – this may include sources such as LinkedIn and other social media profiles.
- Eploy’s technology allows Us to search various databases – some publicly available and others not, which may include your personal data (including your CV or Résumé), to find possible candidates to fill Our job openings. Where We find you in this way, we will obtain your personal data from these sources.
- We may receive your personal data from a third party who recommends you as a candidate for a specific job opening or for Our business more generally.

3. Uses Made Of Your Information

Lawful basis for processing

We rely on legitimate interest as the lawful basis on which We collect and use your personal data. Our legitimate interests are the recruitment of staff for Our business.

We will not use your information for any purpose other than this.

Purposes of processing

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers

in the business area with a vacancy and IT staff if access to the information is necessary for the performance of their roles.

We use information held about you in the following ways:

- To consider your application in respect of a role for which you have applied.
- To consider your application in respect of other roles.
- To communicate with you in respect of the recruitment process.
- To enhance any information that We receive from you with information obtained from third party data providers.
- To find appropriate candidates to fill Our job openings.
- To ensure that We are complying with Our legal obligations. For example, We are required to check your eligibility to work in the UK before employment starts.
- To respond to and defend against legal claims, or to protect your interests (or someone else's interests) and you are not capable of giving consent, or have already made the information public.
- To maintain adequate records in relation to recruitment.

Purpose of processing certain types of sensitive personal information

We use sensitive information held about you in the following ways:

- We process health information that may be relevant in respect of the role for which you have applied or are being considered for and / or that we need to make reasonable adjustments to the recruitment process for you.
- Where We process other special categories of information, such as information about ethnic origin, sexual orientation, gender identity, or religion or belief, this is for equal opportunities monitoring purposes.
- We are entitled to carry out a criminal records check in order to satisfy Ourselves that there is nothing in your criminal convictions history, which makes you unsuitable for the role. We use a third party to do this on Our behalf and may receive a copy of their report if you have consented for Us to do so.

Automated decision-making

We use Eploy's information analytics and algorithm technology in the following ways:

- When you apply for a role, We will ask you if you have the right to work in the UK. If you answer that you do not have this right, the Eploy system will automatically reject your application. Were We to employ someone that did not have the right to work in the UK or omit to carry out a correct right to work check, We could face a civil penalty.
- Certain roles may require specific prerequisites or skills (for example, fluency in a certain language, particular professional qualifications or certifications, or number of years in a similar role). Applications that do not meet any such requirements will be automatically rejected.

You have the right to contact Us (see 'Contact', below) within 21 days of any unsuccessful application to challenge any decision from any automated decision-making and/or to ask us to reconsider and to review your application without the use of automated decision-making (through human intervention).

4. Disclosure of Your Information

As set out above, Eploy will process your information in accordance with Our instructions and as otherwise required by law.

If your application for employment is successful and We make you an offer of employment, We may share your information with former employers to obtain references for you or Our employment background check, pre-employment screening or testing providers to obtain necessary background checks, including a criminal record check.

Where you have applied to a job opening through a service provider such as employment agency or similar, We will share information about you and your application with them as We progress through the recruitment exercise. The service provider shall be the data controller of this data and shall therefore be responsible for complying with all applicable law in respect of the use of that data following its transfer by Us. Where you use a service provider like this, you should note that the relevant organisation may retain your personal data, including the data it collects from Us in respect of the progress of your application. Any use by them of your data will be in accordance with their Privacy Notice.

5. How We store your Personal Data

Security

We take appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where We are legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure. Although We will do Our best to protect your personal data, We cannot guarantee the security of your data transmitted through any online means; therefore, any transmission remains at your own risk.

Where We store your Personal Data

The data that We collect from you and process using Eploy's website is stored solely in the UK, however some of Our computer systems are operated by our parent company ASDA Stores Limited or by other companies contracted to provide services to Us that operate in countries outside the UK or the European Economic Area ("EEA"). Because the law in some of these countries does not provide the same level of protection as UK and EEA law, We put in place data processing agreements with each company that processes Personal Information outside of the UK. These data processor agreements are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data. If you would like further information, please contact Us (see 'Contact' below). By submitting your personal data, you agree to this transfer, storing or processing.

How long We keep your Personal Data

Registrations with Our careers website

In order to manage the website effectively, accounts that have been inactive for a period of 12 months and all personal data associated with them, will be deleted. 'Inactive' means that the user has not logged on to the account. In such cases, We will e-mail the user's registered email address to notify them that We will be deleting their data within 30 days of this email. The email will explain that if the

user wishes to retain their account, then they may log on to our careers website to opt back in to ensure their data is retained, by updating their contact preferences. If the user does not do so, their account and all personal data will be automatically removed from Eploy's database and deleted. If a user wants to re-register, they are free to do so at any time. If you are unsure about any of this or what it means regarding your data, please feel free to get in touch with Us (see 'Contact', below).

Candidate applications for a role with Us

If your application for employment is unsuccessful:

- We will hold your information on file for 6 months after you have been notified that you have been unsuccessful. After this period, We will securely delete your personal information in accordance with Our information retention policy. In some circumstances, We may anonymise your personal information so that it can no longer be associated with you, in which case We may use such information without further notice to you.
- If We wish to retain your personal information on file, on the basis that a further opportunity may arise in future and We may wish to consider you for that, We will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

If your application for employment is successful:

- Personal information gathered during the recruitment process will be transferred to your personnel file within 30 days of your first day of work with Us. The periods for which your information will be held will be confirmed to you in a new privacy notice and our information retention policy.
- Once you are no longer an employee, worker or contractor of the IPL Group, We will retain and securely destroy your personal information in accordance with Our information retention policy.

6. Your rights

Under the GDPR and the UK GDPR, you have a number of important rights free of charge. In summary, those include:

- Access to your personal data and to certain other supplementary information that this Privacy Notice is already designed to address.
- Require Us to correct any mistakes in your information that We hold.
- Require the erasure of personal data concerning you in certain situations.
- Receive the personal data concerning you that you have provided to Us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations.
- Object at any time to processing of personal data concerning you for direct marketing.
- Object to decisions being taken by automated means that produce legal effects concerning you or similarly significantly affect you.
- Object in certain other situations to our continued processing of your personal data.
- Otherwise, restrict Our processing of your personal data in certain circumstances.
- Claim compensation for damages caused by Our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the UK GDPR.

If you would like to exercise any of those rights, please:

- Contact Us using Our Contact details below.
- Let Us have enough information to identify you.
- Let Us have proof of your identity and address.
- Let Us know the information to which your request relates.

7. How to complain

We hope that We can resolve any query or concern you raise about Our use of your information.

The General Data Protection Regulation and the UK GDPR also gives you right to lodge a complaint with a supervisory authority, in particular (under the GDPR) in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/make-a-complaint> or telephone: 0303 123 1113.

8. Contact

All questions, comments and requests regarding this Privacy Notice should be addressed to Our Legal & Compliance team by e-mailing dataprotection@ipl-ltd.com. Should you have any continuing concerns after this, we will provide you with the contact details for Our appointed Data Protection Officer.