

Job Applicant Privacy Notice

This Privacy Notice concerns data collections and data processing in accordance with the UK GDPR. As part of any recruitment process, NORTH FOOD Ltd collects and processes personal data relating to job applicants. This notice applies to job applicants and potential candidates for employment with us, either submitted as part of the online application and (or) through alternative channels.

Any references to "us", "we", "our", "organisation", "company", "business" means NORTH FOOD LTD. As used in this Privacy Notice, "personal data" means information that identifies a candidate or job applicant.

The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations. If you have any requests about your personal data or queries with regard to how we handle your data you can contact us, via email: contact.uk@northfood.co.uk or write to us: NORTH FOOD LTD, CENTRALPOINT, 45 BEECH STREET LONDON EC2Y 8AD, UNITED KINGDOM.

General Data protection principles.

In collecting and processing the personal information, we will comply with the data protection law in force at the time. This requires that the data we hold about you must be:

1. Used lawfully, fairly and in a transparent manner.
2. Collected only for valid purposes that we have stated and explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about or as long as the law requires us to.
6. Kept securely and protected against unlawful processing and accidental loss.

Information we collect.

NORTH FOOD Ltd collects a range of information about you. The below list is not an exhaustive list, there may be other records that we may retain:

- your name, address and contact details, including email address and telephone number
- details of your qualifications, skills, experience and employment history
- information about your current level of remuneration, including benefit entitlements
- information about your entitlement to work in the UK

Sensitive personal data

It is not our policy to seek sensitive personal data unless required for further employment purposes, equality monitoring, legally required or reasonably necessary for an ongoing relationship with you. For example, we may collect information about disabilities to make reasonable adjustments in the workplace. This data may be retained for as long as may be necessary for the original purpose. 'Sensitive personal data', that is data that consists of information about your (for example):

- racial or ethnic origins
- political opinions
- religious beliefs



- trade union membership (or non-membership)
- physical or mental health or condition
- sexual orientation
- information about your criminal convictions or offences (whether spent or not).

How We Collect Your Data

NORTH FOOD Ltd may collect this information in a variety of ways, data might be contained in application forms, CVs/resumes, obtained from your passport or other identity documents, collected through interviews and other forms of assessment.

We may also collect personal data about you from third parties, such as references supplied by former employers. We will seek information from third parties only once a job offer to you has been made and will inform you that we are doing so. Personal data will be stored in a range of different places, for example on your application records, in HR files and on IT systems, including email.

How We Use Personal Data

We will only use your personal information when the law allows us to. In order to pursue the legitimate interests of the business, we will only do so provided your interests and fundamental rights do not override those interests. NORTH FOOD Ltd will not use your data for any purpose other than the recruitment exercise for which you have applied for or for matters such as equality monitoring.

Recruitment processes are not based solely on automated decision-making.

Processing of sensitive personal information.

"Special categories" of particularly sensitive personal information, such as information about your health, racial or ethnic origin, sexual orientation or trade union membership, require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations or exercise rights in connection with employment.
- Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

In general, we will not process particularly sensitive personal information about you unless it is necessary for performing or exercising obligations or rights in equality monitoring, making reasonable adjustments to the workplace or complying with our regulatory and other obligations. On rare occasions, there may be other reasons for processing, such as it is in the public interest to do so. The situations in which we will process your particularly sensitive personal information are listed below.

- We will use information about your physical health or disability status, to provide appropriate workplace adjustments. This will not form part of the recruitment decision making.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting. This will not form part of the recruitment decision making.

- We will use information about criminal convictions and offences to assess your suitability for the position you have applied for and our compliance and regulatory obligations.

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. Subject to information about criminal convictions for some positions, you should be aware that provision of this sensitive personal information is not a condition for employment with us.

Why does NORTH FOOD Ltd process personal data?

We need to process data to take steps at your request prior to entering into a contract with you. NORTH FOOD Ltd has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. In some cases we need to process information to carry out its legal obligations and exercise specific rights in relation to employment. For example, the eligibility to work in the UK before employment starts.

For how long does NORTH FOOD Ltd keep data?

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during and after your employment. Details of retention periods for different aspects of your personal information are set out in the Record Retention Schedule as set out in our Privacy Standard. This Record Retention Schedule is available on demand.

If you are unsuccessful, NORTH FOOD Ltd may keep your application for six months period (after the end of the recruitment process) in case there are future employment opportunities for which you may be suited. We will ask for your consent to store your data and you are free to withdraw your consent at any time.

Who has access to data?

Your information will be shared internally for the purposes of the recruitment process. This includes members of our HR team, interviewers, business managers and IT staff if access to the data is necessary for the performance of their roles. We will not share your data with third parties, unless your application for employment is successful. NORTH FOOD Ltd may then share your data with former employers to obtain references for you and, where appropriate, employment background check providers to obtain necessary background checks.

Under certain circumstances, we might share your personal information with public authorities, where required by law.

NORTH FOOD Ltd will not transfer your data outside the United Kingdom without first ensuring that appropriate safeguards exist so as to ensure that your data is protected to at least the same level as set out in our policies.

How does NORTH FOOD Ltd protect data?

We have put in place appropriate data collection, storage and processing practices and security measures to protect your personal information from being accidentally lost, used or accessed in an unauthorised way,

altered or disclosed. In addition, we limit access to your personal information to those employees who have a business need to know and they are subject to a duty of confidentiality.

Although we will do our best to protect your personal data, you should be aware that the transmission of information via the internet is not completely secure and we cannot guarantee the security of your personal information, for this reason any transmission is at your own risk.

Your rights.

Your rights in connection with personal information are as follows:

- **The right to be informed:**
We are obligated to provide clear and transparent information about our data processing activities. This is provided by this privacy policy.
- **The right of access:**
Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you within one calendar month of receiving a written request. A copy of the personal data we hold about you is free of charge. However, we are allowed under the law to charge a reasonable fee if your request for access is clearly excessive or we can refuse to comply with the request in such circumstances. We may extend the time to respond by a further two calendar months if the request is complex or we have received a number of requests from the same person.
- **The right to correction:**
If you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.
- **The right to erasure:**
You may request us to delete your personal data. This includes personal data that may have been unlawfully processed or is no longer required. Please note that we may not be able to comply with your request whereby we believe there is a legitimate reason for us to keep the data. We will inform you should this be the case.
- **Object to processing:**
You may object to processing of your personal information in relation to your particular situation, in this case we will stop processing the personal data unless we can demonstrate compelling legitimate reason for the processing, which override your interests and rights.
- **The right to restrict processing;**
This enables you to ask us to suspend the processing of personal information about you, for example if you want to establish its accuracy or the reason for processing it.
- **Request the transfer of your personal information to another party.**
- **Right to withdraw consent:**
In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Please note, that under certain circumstances, your rights may be limited and subject to restrictions in some situations. You will be informed should we be unable to comply with your request where we believe there is a legitimate reason to do so.

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If you have any questions about this privacy notice, how we handles your data or want to update your personal information, please contact us: contact.uk@northfood.co.uk

If you believe that NORTH FOOD Ltd has not complied with your data protection rights, you have the right to lodge a complaint with the Information Commissioner's Office, the UK supervisory authority for data protection issues.

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to NORTH FOOD Ltd during the recruitment process. However, if you do not provide the information (other than sensitive personal information), we may not be able to process your application properly or at all.

Changes to this privacy notice.

We reserve the right to update this privacy notice at any time, when require. We may also notify you in other ways from time to time about the processing of your personal information.

