

Recruitment Privacy Notice	
Created By:	Data Protection Officer
Creation Date:	28 th August 2018
Review Date:	27 th August 2019
This Policy Covers:	The privacy notice explains how candidate data is collected, used, transferred and disclosed by boohoo Group.

Passionate Agile Creative Team

boohoo

POLICY DOCUMENT

Here at boohoo, boohooMAN and Nasty Gal (collectively referred to as “boohoo Group”, “we”, “us” and “our” in this privacy notice) we are committed to protecting and respecting the privacy of your personal data. This privacy notice explains how your data is collected, used, transferred and disclosed by us when you apply for a position with us. It covers:

- The personal data we collect
- How we collect your data
- How we use your data
- How we share your data
- Your rights
- Changes to this privacy notice
- Who to contact if you have a query

Boohoo.com UK Ltd, of 49-51 Dale Street, Manchester M1 2EH is the controller and responsible for your personal data collected through the www.careers.boohoo.com website (the “website”).

Our commitment to you

We take the protection of your personal data seriously and will process your personal data fairly, lawfully and transparently. This privacy notice describes the personal data we are collecting about you and how it is used.

How we keep your data safe and secure

We have appropriate organisational safeguards and security measures in place to protect your data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also require any third party who is contracted to process your personal data on our behalf to have security measures in place to protect your data and to treat such data in accordance with the law. In the unfortunate event of a personal data breach, we will notify you and any applicable regulator when we are legally required to do so.

The personal data we collect

Personal data means any information about an individual from which that person can be identified. It does not include anonymised data, where the identity and identifying information has been removed.

If you apply for a job at boohoo Group the following groups of personal data may be collected:

- **Identity data:** This includes information such as first name, last name, title, date of birth, occupation, personal description, and gender. It also includes proof of your identity and right to work in the UK, for example a passport or birth certificate.
- **Contact data:** this includes information such as email address, address, telephone number and social media id.
- **Employment data:** this includes information about your previous work such as job history, experience and details of your referees from previous employers.

- **Education and skills data:** this includes information such as your education history, qualifications, training and skills.
- **Criminal record data:** this includes information such as any previous criminal convictions declared by you during the application process.

How we collect your data

We may collect personal data about you when you submit a job application via our careers website, job boards, LinkedIn or social media. We may receive personal data about you from various third parties, including recruitment agencies.

Once an offer has been made we may also receive personal data from previous employers and criminal record checking agencies.

How we use your data

See below for information on how we use your personal data. As a data controller, we will only collect and process your personal data where we have a legal basis to do so.

Purpose/Activity	Type of data	Lawful basis for processing
<p>Recruitment of staff via the boohoo Group careers site(s), agencies and internal referrals, including:</p> <ul style="list-style-type: none"> • to assess your suitability for work and to determine to whom to offer employment • to make reasonable adjustments in respect of disabilities or conditions • to assess your right to work in the UK and verify your identity • for HR and business administration • to comply with legislative and regulatory requirements, and meet our legal responsibilities • to seek references 	<ul style="list-style-type: none"> • Identity • Contact • Employment • Education and skills • Financial and tax 	<ul style="list-style-type: none"> • Necessary for the performance of a contract or to enter into a contract • Necessary for compliance with a legal obligation • Necessary for the legitimate interests of the organisation
<p>Undertaking of criminal records checks (to prevent fraud and unlawful acts).</p>	<ul style="list-style-type: none"> • Criminal records 	<ul style="list-style-type: none"> • Necessary for the legitimate interests of the organisation; and • Protecting the public against dishonesty (Data Protection Act 1998); or • Consent

Please be aware that we may process your personal data using more than one lawful basis, depending on the specific activity involved. Please contact us if you need details about the specific legal ground we are relying on to process your personal data.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we wish to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. We may process personal data without your consent, in compliance with the above rules, where this is required or permitted by law.

Criminal records checks

Once an offer of employment is made Disclosure and Barring Service (DBS) checks may be carried out on candidates to guard against the risk of fraud or other unlawful acts being inflicted upon our business, customers or staff. This data is processed for the following roles as it is necessary for the legitimate interests of the organisation (GDPR Article 6); and to protect the public against dishonesty (Data Protection Act 2018):

- Finance
- Legal
- HR
- Directors
- IT
- Customer services

For all other roles, criminal records checks are undertaken on the basis of legitimate interests and consent (Data Protection Act 2018). We would encourage staff and candidates to discuss any concerns they have regarding criminal records checks with us.

If you have any questions about how boohoo Group use any of your personal data, please contact our Data Protection Officer, Keri Devine at mydata@boohoo.com.

How long we keep your data for

Unsuccessful candidate data is retained for 12 months, as other suitable job opportunities with boohoo Group may arise, however, candidates can ask us to delete their data sooner than this if they wish.

Links to other websites and third parties

Our website may include links to and from the websites of our partner networks, advertisers and affiliates, or to social media platforms. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to their websites.

How we share your data

We may disclose and share your personal data with the parties set out below:

- to business partners, suppliers, sub-contractors and other third parties that we use in connection with the running of our business for the purposes above in the section 'How we use your data', such as:

- third party service providers that we engage to provide IT and HR administration systems and software, and to host our careers website.
- third party criminal record check service providers.
- to any third party to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- to our professional advisers including lawyers, auditors and insurers who provide consultancy, legal, and insurance services.

Your data and countries outside of Europe

The personal data we collect from you may be transferred to, and stored at, destinations outside the European Economic Area ("EEA") using legally-provided mechanisms to lawfully transfer data across borders. It may also be processed by employees operating outside the EEA who work for us or for one of our suppliers. Such employees may be engaged in, among other things, the provision of support services. We will take all steps necessary to ensure that your data is treated securely and in accordance with this Privacy Notice.

Whenever we transfer personal data outside the EEA, we will ensure a similar degree of protection is afforded to it by ensuring appropriate safeguards, as required by law, are in place. This may include using specific contractual clauses approved by the European Commission which give personal data the same protection as it has in Europe. More information about these is available here <http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:32010D0087>

Please contact us if you want further information on the countries to which we may transfer personal data and the specific mechanism used by us when transferring your personal data outside the EEA.

Your Rights

You have several rights under the data privacy legislation. This includes, under certain circumstances, the right to:

- request access to your personal data
- request correction of your personal data
- request erasure of your personal data
- request restriction of processing of your personal data
- request the transfer of your personal data
- object to processing of your personal data
- object to automated decision making

We will try to respond to all legitimate requests within one month. Occasionally, it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. We may need to request specific information from you to help us confirm your identity and ensure your right to exercise any of the above rights. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.



POLICY DOCUMENT

If you wish to exercise any of these rights, please email mydata@boohoo.com

Changes to this privacy notice

From time to time we may change this privacy notice. If there are any significant changes we will post updates on our careers website.

How to contact us

We welcome feedback and are happy to answer any questions you may have about your data. Please send any questions, comments or requests for more information to our Data Protection Officer, Keri Devine, who can be contacted at mydata@boohoo.com.

This Privacy Notice was last updated on 28th August 2018 (Version 2.0).

Boohoo.com UK Limited,

Registered Company Number: 05723154,

UK VAT Number: 185 4874 61.