

Recruitment Privacy Notice	
Created By:	Data Protection Officer
Creation Date:	1 August 2018
Last Updated:	September 2023
Review Date:	September 2024
This Policy Covers:	The privacy notice explains how candidate data is collected, used, transferred and disclosed by boohoo Group.

1. Scope

Here at the boohoo Group we are committed to protecting and respecting the privacy of your personal data. This privacy notice explains how, as a resident of the United Kingdom, the EEA, or California, your data is collected, used, transferred and disclosed by us when you apply for a position with us. This notice covers:

- The personal data we collect
- How we collect your data
- How we store 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 data related query

boohoo

POLICY DOCUMENT

If you are a California resident then please also refer to the CCPA Personnel Privacy Notice (CCPA Notice) on pages 7 and 8 below.

If you are a resident of the United Kingdom or the EEA, Boohoo.com UK Ltd, of 49-51 Dale Street, Manchester M1 2HF is the controller of and is responsible for your personal data collected through the <https://careers.boohoogroup.com/> website (the "website"). Boohoo.com UK Ltd may share your personal data with other boohoo Group brands.

If you are a resident of California, boohoo.com USA, Inc. is the business which determines the purposes and means of processing your personal data collected through the website. boohoo.com USA, Inc. may share your personal data with other boohoo Group brands.

2. 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.

3. 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.

4. 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 permanently removed. Special category data is sensitive data that needs more protection and includes: race, ethnic origin, politics, religion, trade union membership, genetics, biometrics, health, sex life, sexual orientation.

If you apply for a job at the boohoo Group, we may collect the following data:

- Identity data: 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 relevant country (for example a passport, or birth certificate);
- Contact data: your personal email address, home address, personal telephone number(s) and social media id (if you contact us via social media)
- Employment data: this includes information about your previous work such as job history, experience, salary and details of your referees from previous employers.
- Education and skills data: information about your education, qualifications and training and skills;
- Curriculum Vitae: this will cover any additional information you provide to us on your CV uploaded as part of your application;
- Health data: this includes information relating to any disabilities you may have that you have disclosed to us;
- Criminal record data: this includes information such as any previous criminal convictions declared by you during the application process.

5. 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

6. How we use your data See below for information on how we use your personal data.

As a 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 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• Health• Curriculum Vitae	<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
<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 organization;• Necessary for social security and social protection purposes (Data Protection Act 2018); or• Consent

boohoo

POLICY DOCUMENT

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 organization and for employment, social security and social protection purposes (Data Protection Act 2018):

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

For all other roles, criminal records checks are undertaken on the basis of 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 use any of your personal data, please contact our Data Protection Officer at dpo@boohoo.com.

How long we keep your data for

Unsuccessful candidate data is retained for 12 months, as other suitable job opportunities with boohoo 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
 - 1) third party service providers that we engage to provide IT and HR administration systems and software, and to host our careers website; and
 - 2) third party criminal record check service providers.

boohoo

POLICY DOCUMENT

- 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; and
- to our professional advisers including lawyers, auditors and insurers who provide consultancy, legal, and insurance services.

Your data and countries outside of the UK

The personal data we collect from you may be transferred to, and stored at, destinations outside the UK using legally-provided mechanisms to lawfully transfer data across borders. It may also be processed by staff operating outside the UK who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and 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 UK, we will ensure a similar degree of protection is afforded to it by ensuring appropriate safeguards, as required by law, are in place. We will be able to transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data. More information can be found here: <https://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 UK.

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 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.

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

The logo for boohoo, featuring the brand name in a bold, lowercase, sans-serif font.

POLICY DOCUMENT

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.

This Privacy Notice was last updated on 20 September 2023.

Boohoo.com UK Limited

Registered Company Number: 05723154

UK VAT Number: 185 4874 61.

boohoo

POLICY DOCUMENT

FOR CALIFORNIA RESIDENT APPLICANTS ONLY

CCPA Personnel Privacy Notice (“CCPA Notice”)

If you are a California resident applying for a role, then this section will also apply to you.

Boohoo Group and its affiliates and subsidiaries (collectively the “Company,” “our,” “we”) collects and uses your personal information (including sensitive personal information) for human resources, employment, benefits administration, health and safety, and business-related purposes and to be in legal compliance/the business purposes listed below.

We are committed to protecting the privacy of personal information. This CCPA Notice informs you of the Company’s practices concerning the collection, use, and disclosure of personal information collected from you in connection with your job application with the Company.

CATEGORIES OF PERSONAL INFORMATION THAT WE MAY COLLECT AND POSSIBLE PURPOSES OF USE

- **Identifiers.** Such as real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, social security number/ social insurance number, driver’s license number, passport number, photograph (for your work pass!) or other similar identifiers.
- **Information protected by California Civil Code section 1798.80(e) (as applicable).** Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information.
- **Commercial Information.** This includes records of real property, business transactions, financial and physical assets, investments, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- **Characteristics of protected classes under California or US Federal law (as applicable).** Such as age, race, disability, national origin, medical information and health insurance information.
- **Internet Activity.** Electronic network activity information respecting the use of Company provided networks, systems, platforms and devices; including, but not limited to, browsing history, search history, and information regarding interaction with an Internet Website, application, or advertisement. Note that employees should have no reasonable expectation of privacy with respect to their use of such Company-provided facilities.
- **Geolocation Data.** Such as specific location when using web services.

boohoo

POLICY DOCUMENT

- **Sensory information (e.g., audio, electronic, visual, thermal, olfactory or similar information).** Such as photographs or security camera footage in the public areas of Company's facilities. Note that security cameras do not record audio.
- **Professional or employment-related information.** Such as resumes, interview notes, human resources, records, payroll, board of directors appointments, and communications.
- **Inferences.** Inferences drawn from any of the above information to create a profile about an employee, job applicant, or contractor reflecting their preferences, characteristics, psychological trends, predispositions, behaviour, attitudes, intelligence, abilities and aptitudes.

HOW WE MAY USE PERSONAL INFORMATION

- **Auditing.** Auditing related to current interactions with employees and concurrent transactions.
- **Legal and Compliance Purposes.** Legal compliance requirements, compliance training, investigating and responding to claims against the Company and its customers and employees, due diligence purposes (like in connection with a corporate transaction), and other such purposes.
- **Security.** Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity, environmental, health and safety, including monitoring and maintaining the security of the working environment with security cameras, maintenance of medical and sickness records and occupational health programs, keeping emergency contacts, behavioural safety, and statutory reporting obligations.
- **Debugging.** Debugging to identify and repair system, network and equipment errors that impair existing intended functionality of Company's systems, networks, and devices.
- **Performing Services.** Performing services on behalf of Company, or in relation to the administration of our relationship with you. This will include activities such as human resources administration, payroll and benefits, workforce management and administration, logistics, corporate travel and other reimbursable expenses, development and training, absence monitoring, timekeeping, performance appraisal, disciplinary and grievance processes, administration of termination of employment, reporting, career planning, talent management, relocation; workforce management and administration; real estate management; IT administration of our technologies, network, and intranet, and IT security management and tasks.
- **Research.** Undertaking internal research for technological development and demonstration, such as quality of products, logistics, enterprise resource planning and analytics, testing quality of products, technologies and services.
- **Quality Assurance.** Undertaking activities to verify or maintain the quality or safety of, and to improve, upgrade, or enhance, our services, products, and premises. This may include certain recordkeeping, such as accounting, commercial, procurement, document management and other similar activities. This may also include certain reporting functions like financial information and financial background checks, and consultancy and advisory services.
- **External Marketing.** We may use your information to externally market our goods and services, such as on social media or through public relations materials and communications, reputation and business-development efforts, branding, and event organization.

We will not sell or share the personal information, including any sensitive personal information, we collect about our employees or applicants for employment or share it with third parties for cross-context behavioral advertising.

The logo for boohoo, featuring the brand name in a bold, lowercase, sans-serif font.

POLICY DOCUMENT

Changes to this privacy notice

This Privacy Notice was last updated on 20 September 2023.

Boohoo.com UK Limited

Registered Company Number: 05723154

UK VAT number: 185 4874 61.