

Debenhams Applicant Privacy Policy (UK & ROI)

This Privacy Policy explains how we use any **personal information** you provide to Debenhams because you are applying for work with us (whether as an employee, worker, agency worker, concession worker, consultant, or work placement). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise as well as for providing information about vacancies, and how long it will usually be retained for, in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679) and the Data Protection Act 2018 (UK) or Data Protections Acts 1988-2018 (ROI) (together referred to as the "GDPR") as updated or amended.

"Debenhams/We" means Debenhams Retail Limited and Debenhams Retail (Ireland) Limited (as applicable), which are subsidiaries of Debenhams Limited group of companies.

We respect your right to privacy and are committed to maintaining it. We only collect, store and process your personal information in accordance with the relevant legislation and the principles set out in the GDPR. Debenhams is a "data controller" and this means we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained within this privacy policy.

This policy does not form part of any offer of employment or engagement and we may amend it at any time to reflect any changes in the way in which we process your personal data. If changes are made during the application process, we will bring any such changes to your attention as soon as is practicable. We may also notify you in other ways from time to time about the processing of your personal data. Our Data Protection Policy sets out the principles of the data protection legislation and you should ensure that you read this as well, it is available at <http://phx.corporate-ir.net/phoenix.zhtml?c=196805&p=debehans-and-privacy>

1. What information we collect about you

"Personal information" is any information about a living individual from which they can be identified such as name, ID number, location data, any online identifier, or any factor specific to the physical, physiological, genetic, mental, economic or social identity of that person. It does not include data where any potential identifiers have been removed (anonymous data) or data held in an unstructured file.

There are **"special categories"** of more sensitive personal information which are more private in nature and therefore require a higher level of protection, such as genetic data, biometric data, sexual orientation, race or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and health. When we refer to **"processing"**, this means anything from collecting, using, storing, transferring, disclosing, altering or destroying personal data. For comprehensive definitions of the above, please refer to our Data Protection Policy.

In connection with your application for work with us, we will process the following categories of personal information about you:

- Information you have provided to us in your curriculum vitae/covering letter/application including: name, title, address, telephone numbers and email addresses, gender, date of birth, employment history, qualifications, education, professional memberships, training record, marital status, languages, and salary expectations.
- Psychometric data.
- Details of the role(s) you are applying for.
- Interview arrangements including travel.
- Details of offers of employment or engagement made including terms and conditions, benefits, wage/salary, job title, grade, start date, location, hours/days of work, holiday, pension.
- National Insurance/PRSI number.
- Eligibility to work checks such as passport or biometric residence permit.
- Formal ID relating to you, such as a driving licence, to verify your identity.
- Any information you provide to us during an interview including interview notes.
- CCTV footage, network and information security data.
- Social media details.
- Legal claims made by/against you.
- Voicemails, emails, correspondence and other communications regarding your application process.
- References.

We may also process the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records, GP/specialist details including reasonable adjustments required to assist with the workplace/application process.
- Information about criminal convictions and offences.

We obtain personal information about you through the application and recruitment process, either directly from you, our employees, or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, specified referees, credit reference agencies, other background check agencies such as the Disclosure and Barring Service. We may also access publicly available data such as social media information.

Where we receive information from third parties, we will only use it in accordance with this policy and in line with our Data Protection Policy. In some cases, the third party will be acting as a controller of your personal data and therefore we advise you to read their privacy notice and/or data protection policy.

Where we receive information from third parties, we will only use it in accordance with this policy and in line with our Data Protection Policy. In some cases, the third party will be acting as a controller of your personal data and therefore we advise you to read their privacy notice and/or data protection policy.

2. How we will use the information about you

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the work.
- Carry out background and reference checks, where applicable.
- Assess eligibility to work as required by immigration laws.
- Communicate with you about the recruitment process.
- Communicate with you about other vacancies (where you have consented).
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.
- CCTV footage of you for security reasons, for the protection of our property and for health/safety.
- To establish, defend or exercise legal claims in a tribunal or court of law.

It is in our legitimate interests to decide whether to appoint you to work since it would be beneficial to our business to appoint someone to that work.

We also need to process your personal information to decide whether to enter into a contract of employment/services/engagement with you.

Having received your application (including any CV or cover letter) and the results from the test which you may be required to take during the application process, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the work. Further interviews may be required and in some instances this would include psychometric testing. If we decide to offer you the work, we will then take up references, carry out a criminal record and other background checks (where required) before confirming your appointment.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a

credit check or references for the role and you fail to provide us with relevant details, we will not be able to take your application further.

How we use special categories data

We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process or to the role which you are applying for, for example whether adjustments need to be made during a test or interview or to provide additional equipment for your role.

We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Please note that we may process your personal information without your knowledge or consent, where this is required or permitted by law.

Criminal Conviction Data

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our Criminal Record Checks policy, you will be advised during the application process if the role you are applying for requires such a check and a copy of the policy will be made available to you prior to any such data being processed.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary 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.

We envisage that we will hold information about criminal convictions. We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us.

We will use information about criminal convictions and offences to assess suitability for a role and to make decisions about your continued employment or engagement. We are allowed to use your data in this way to comply with legal obligations (such as safeguarding, driving licence rules and anti-bribery/fraud) and for regulatory purposes (such as financial or legal). Further details regarding the basis for processing for specific roles is set out in the Criminal Record Checks policy.

Personal information shared with Third Parties

We may share your personal data and special category personal data internally. In particular, it may be shared with: HR employees involved in the recruitment process,

employee relations, line managers; consultants; advisers; or other appropriate persons who we shall make you aware of from time to time. We will share your personal information with third parties where required by law, where it is necessary to administer our relationship with you or where we have another legitimate interest in doing so.

“Third parties” includes third-party service providers (including contractors and designated agents) and other entities within our group. The following activities are carried out by third-party service providers:

- Recruitment companies to assist with recruitment processes.
- Occupational health providers and medical specialists for example to assess working capacity.
- Legal and other professional advisors to provide us with advice in relation to our business, including our legal, financial and other obligations and claims.
- Credit reference agencies, criminal record agencies and background check providers where such checks are required for your role.
- Numerical and psychometric testing providers to assess suitability for a role.
- IT service providers (service providers) to support, maintain and host our information systems, including the software and hardware infrastructure required for it to operate/be accessible online and to keep a backup of your personal information.

Debenhams only transfers your personal information to those third parties where we can be sure that we can protect your privacy and your rights. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

To comply with our legal obligations we may share your data with the following (all of whom are obliged to have adequate policies/procedures in place in relation to data security): HMRC or Irish Tax and Customs for tax purposes; Home Office or Irish Naturalisation and Immigration Service for immigration purposes; FCA for regulatory purposes.

3. How long we will store your information

We will retain your personal information for a period of 12 months after we have communicated to you our decision about whether to appoint you to a role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy. Where you are successful, your data will be processed

in accordance with the Colleague Privacy Policy (which will be provided as part of your confirmation).

Eligibility to work data will be retained for the period during which your application is being considered. If you are successful this will be processed in accordance with the Colleague Privacy Policy (which will be provided as part of your confirmation). If you are unsuccessful this data will be securely destroyed once the decision has been confirmed.

You will be asked if you also wish to consent to us retaining 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, if you consent to this, we will retain your information for a period of 12 months, after which we will securely destroy your personal information in accordance with our data retention policy unless you confirm your consent to this data being retained for a further period.

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.

4. Your rights over your information

You have many rights over your personal information and how it is used. The below table sets out the rights which may be available to you (depending on how we collected your personal data) and how to make use of those rights.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Your rights	How to make use of those rights
Right to be informed about what we do with your information	This Privacy Policy and details provided when we capture your personal information will keep you informed about how we will use this information.
Right to access your information	You can request access to the personal information we hold about you and check we are processing it lawfully by writing to us at DebenhamsGDPR@Debenhams.com – there are limited circumstances when we can refuse a request and we will provide an explanation if this applies to your request.

<p>Right to correct your information</p>	<p>If you believe that the personal information we hold about you may be incorrect, then the easiest way to correct this is through updating your details with HR/ER. If you don't want to do it this way, you can ask for us to update your information by writing to us at DebenhamsGDPR@Debenhams.com</p>
<p>Right to object to, or restrict, Debenhams using your information (in some circumstances)</p>	<p>Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground, you can ask us to stop processing your information or ask for us to limit the ways in which we process this information. You can request this by writing to us at DebenhamsGDPR@Debenhams.com, however we can refuse a request in certain circumstances – we will provide you with information explaining why we have refused your request if we do this.</p>
<p>Right to delete your personal information</p>	<p>Some people call this the “right to be forgotten”. Unless we have a reason for keeping your personal information (for example, where we need this to employ you or deal with ongoing litigation), you can request for us to stop holding your personal information by writing to us at DebenhamsGDPR@Debenhams.com and we will explain if this is or is not possible.</p>
<p>Right to portability of your information</p>	<p>You can ask us to move, transfer or copy your information to another party. To the extent we are able to do so, we will make this information available to you in a commonly used format so that you can transfer this to another service. You can request for us to do this by writing to us at DebenhamsGDPR@Debenhams.com</p>

RIGHT TO WITHDRAW CONSENT

As part of the application process you provide consent to us processing your personal information for the purposes of the recruitment exercise. You may also wish to consent to us processing your information for the purposes of providing information about other suitable vacancies. You have the right to withdraw your consent for processing for these purposes at any time. To withdraw your consent, please contact DebenhamsGDPR@Debenhams.com once we have received notification that you have withdrawn your consent, we will no longer process your

application and/or send you vacancy information, subject to our retention policy, we will dispose of your personal data securely.

Complain to the Regulator

You have the right to lodge a complaint with your relevant regulatory authority. In the UK this is the Information Commissioners Office (ICO) and in the ROI this is the Office of the Data Protection Commissioner.

5. Automated Decision Making

Debenhams might make some decisions based on profiling and without our intervention (known as automated decision making). As part of the application process you may be asked to complete some questions regarding core behaviours, a benchmark pass mark is set depending on the role, and this information will be used to assess initial suitability for the role on an automated basis.

6. Transferring data internationally

We may transfer your personal information to a third party data processors located in countries outside of the European Economic Area ('EEA'). Debenhams only transfers your personal information to those third parties where we can be sure that we can protect your privacy and your rights, for example the third party is located in a country which the EU has deemed to have adequate data protection laws in place, where that third party is certified on the EU-US Privacy Shield (see <https://www.privacyshield.gov>) or where we have a contract in place with that third party which includes the European Commission's standard data protection clauses.

7. How to contact us

Please feel free to contact us if you have any questions about our Privacy Policy or the personal information we hold about you. You can email:

DebenhamsGDPR@Debenhams.com

Or if you prefer you can contact our Data Protection Officer at:

Debenhams Data Protection Officer DPO@Debenhams.com

Debenhams Limited
10 Brock St,
Regents Place,
London
NW1 3FG