



Ocado Retail
Recruitment Privacy Notice

INTRODUCTION

This privacy notice explains what personal data (information) we will hold about you, how we collect it, how we will use and may share information about you during the application process and when you visit our recruitment website, and your rights in relation to your personal information. We are required to notify you of this information, under relevant data protection laws reflecting the requirements of the Data Protection Act (DPA) 2018 and the General Data Protection Regulation (GDPR) 2018. We are committed to being transparent about how we meet our data protection obligations.

This notice applies to the recruitment activities of all companies owned directly or indirectly by Ocado Retail Limited, including where relevant, internal recruitment activities. Currently, this includes Ocado Retail Limited only and references to 'we', 'us' and 'our' in this privacy notice are references to Ocado Retail Limited.

Please ensure that you read this privacy notice and any other similar notice or policy we may provide to you from time to time when we collect or process personal information about you.

Data Protection Officer

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information or you would like to contact us, please contact the DPO. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK Supervisory Authority for data protection issues or your local Supervisory Authority for data protection issues (contact details below).

Contact details of the DPO:

Email: privacy@ocado.com

Telephone number: +44 (0)1707 227 800

Address: Gladys Ombu, Data Protection Officer, Ocado Retail, Apollo Court, 2 Bishop Square, Hatfield Business Park, Hatfield, Herts, AL10 9EX.

Who collects the information

Ocado Retail Limited is the 'data controller' and gathers, shares and uses certain information about you in line with this recruitment privacy notice. A data controller is an entity which determines the purposes for which and the manner in which your personal data is processed.

Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.

- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

About the personal information we collect and process

The table set out in **Part A** of the Schedule below summarises the information we collect and hold up to and including the shortlisting stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared.

The table in **Part B** of the Schedule below summarises the additional information we collect before making a final decision to recruit and the onboarding process i.e. before making an offer of employment unconditional subject to pre-employment checks, how and why we do so, how we use it and with whom it may be shared.

We also use cookies and similar technologies in relation to our online recruitment activities and you should refer to our Privacy & Cookie Policy for further information which is available on our website, www.ocadoretail.com.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to the information we collect or to the purposes for which we collect and process it.

Where information may be held

Information may be held at our offices and those of third-party agencies, service providers, representatives and agents. Information may be transferred internationally to countries in the EU, the USA, Canada and other countries around the world, including countries that do not have data protection laws equivalent to those in the UK for the reasons described above. We have security measures in place to seek to ensure that there is appropriate security for information we transfer outside the European Economic Area (EEA). This involves us using one or more of the following transfer mechanisms:

- The use of European Commission-approved standard contractual clauses in contracts for the transfer of personal data to third countries.
- The transfer to organisations that are part of the EU-US Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA.
- Transfers to a non-EEA country with privacy laws that give the same protection as the EEA.

You can find out more about the above data protection safeguards on the [European Commission Justice website](#).

For more information on how we safeguard transfers of your personal information, please contact us at privacy@ocadoetail.com.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, save for the exemptions to this rule i.e. if automated decision-making is required or authorised by law or is necessary for entering into or performing the contract or is based on your individual explicit written consent.

If you fail to provide personal information

You are under no statutory or contractual obligation to provide your personal information during the recruitment process. However, 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 references for a role and you fail to provide us with relevant details, we will not be able to take your application further.

Why we process your personal data

We need to process your personal information to take steps at your request to review your application and/ or CV prior to entering into a contract with you. Where we may process other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes and your express consent will be requested.

In some cases, we need to process your personal information to ensure that we are complying with our legal obligations. For example, we are required to check a successful applicant's eligibility to work in the UK before employment starts.

We also have a legitimate interest to process your personal information and to keep records of this process. Processing your personal information during the recruitment process allows us to manage the process, assess and decide whom to offer a job. It also allows us to support your career aspirations to work for us in the future should you be unsuccessful with your initial job application by securely storing a database of your CV, shortlisting and interview notes to help us assess your suitability for other opportunities with us.

Where we rely on legitimate interests as a reason to process your personal information, including to respond to and defend against legal claims we have ensured that we have considered whether or not those interests override your rights and freedoms and are satisfied that they do not.

How long we keep your information

We will normally delete your personal information within six (6) months if you are not shortlisted for the role you have applied for with us. If your application is unsuccessful after the shortlisting and interviewing stages, we will hold your personal information on file in our HR management system Freshteam for twelve (12) months after the end of the relevant recruitment process. We reserve the right to retain records of unsuccessful applicants, for up to a period of two (2) years, with the view to considering you for future vacancies. At the end of that period your personal information will be securely deleted. You have the right to

exercise your right to request that your personal information is deleted by emailing privacy@ocadoretail.com.

If your application is successful your personal information collected will be transferred to your personnel file and retained throughout your employment and six (6) years following the end of your employment as per our retention policy.

Your rights in connection with personal information

Under certain circumstances, by law, you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure of your personal information**. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below). Please note that this is not an absolute right and that we will be able to retain certain information where we have a legitimate interest to do so.
- **Object to processing** of your personal information 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.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example, if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.
- **Withdraw your consent** for the processing of your personal information (where your consent is required) at any time. However, if you withdraw your consent, this will not affect the lawfulness of any processing of your personal information carried out prior to the withdrawal of your consent.

If you want to review, verify, correct or request the erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the DPO in writing. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is an appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information 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.

Sharing your personal information with third parties

We will only share your personal information with third parties for the purposes of:

- a) processing your application and to enable appropriate checks and aptitude tests to be carried out. For example, we work with:
 - a. Agenda Screening Services to help us carry out pre-employment background checks. This may include assessing your qualifications, skills for a particular role, verifying information on your application form, reference checks, credit reference checks (where applicable), right to work verifications and basic or enhanced disclosure criminal record checks (only where this is legally permitted). Any processing of your personal data for the purpose of pre-employment checks by [Agenda Screening](#) will be information that is collected or provided directly from you. For further details, you can review their pre-employment privacy notice by using the link above.
 - b. Third-party HR software providers like Freshteam for recruitment, applicant tracking, onboarding and for candidate information management ;
 - c. The Driving and Vehicle Licensing Authority (DVLA) to conduct driving licence checks.
 - d. We also used third-party service providers, such as IT system and technology application providers, to process and store your personal information and this may involve or include processing of your information by entities owned directly or indirectly by Ocado Group plc (a separate group of companies to Ocado Retail Limited and its subsidiaries); and
- b) inline with our Privacy & Cookie Policy (which is available on our website, www.ocadoretail.com), to help us monitor website performance, utilisation of features and services, traffic and demographic trends, and browser versions, to improve our website and services and tailor them to your interests.

Our third-party service providers 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 for recruitment purposes.

How to complain

We hope that our Data Protection Officer can resolve any query or concern you raise about our use of your personal information.

However, for further information about your rights and how to make a formal complaint, in the UK in the first instance, please contact the Information Commissioner's Office (as this is

Ocado Retail's Supervisory Authority) at <https://ico.org.uk/concerns/> or telephone: (+44) 0303 123 1113.

ABOUT THE INFORMATION WE COLLECT AND HOLD

Part A

Up to and including the shortlisting stage

The information we collect	How we collect the information	Why we collect the information (legal basis)	How we use and may share the information
Your name and contact details (i.e. address, home and mobile phone numbers, email address)	From you	To be able to contact you and progress your application and to make an informed recruitment decision (our legitimate interests) Necessary to enter into/perform a contract with you (the employment contract) and/or to take steps at your request prior to doing so	To enable HR personnel or the manager of the relevant department to contact you to progress your application, arrange interviews and inform you of the outcome To inform the relevant manager or department of your application
Details of your qualifications, experience, CV, employment history including job titles, salary, notice period, and working hours and interests (if you provide us with this information)	From you, in the completed application form, CV and interview notes (if relevant)	To make an informed recruitment decision (our legitimate interests) Necessary to enter into/perform a contract with you (the employment contract) and/or to take steps at your request prior to doing so	To enable HR personnel or hiring managers in the relevant department to undertake shortlisting and hiring decisions. Used to make an informed recruitment decision
Pre-screening comments based on telephone interviews, manager interview notes and aptitude testing results and notes	From you in your completed application form, telephone and in-person interview notes, and from relevant aptitude testing	To make an informed recruitment decision (our legitimate interests) Necessary to enter into/perform a contract with you (the employment contract) and/or to take steps at your request prior to doing so	To enable HR personnel or hiring managers in the relevant department to undertake shortlisting and hiring decisions. Used to make an informed recruitment decision
Information regarding your criminal record	From you, in your completed application form	To carry out statutory checks with your consent	Information shared with Agenda Screening

Note, that we only collect this information where local legal requirements permit.

For reasons of substantial public interest (preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the regulated sector and protecting the public against dishonesty)

Services, the DBS and other regulatory authorities as required

Used to make an informed recruitment decision

To comply with our legal obligations

Details of your referees

From your completed application form

Where required, with your consent

To carry out a fair recruitment process

To make an informed recruitment decision (our legitimate interests)

Used to make an informed recruitment decision

Necessary to enter into/perform a contract with you (the employment contract) and/or to take steps at your request prior to doing so

Information shared with Agenda Screening Services, the relevant managers, HR personnel and the referee

Details about your disability status and health

From your completed application form, medical questionnaire, interview, or from your directly

To comply with our legal obligations to make reasonable adjustments

To carry out a fair recruitment process

Note, that we only collect this information where local legal requirements permit.

Information shared with relevant managers, HR personnel and the referee

Part B

Before making a final decision to recruit and onboarding

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<p>Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers (if you provide us with them)</p>	<p>From your referees (details of whom you will have provided)</p>	<p>To make an informed recruitment decision (our legitimate interests)</p> <p>Necessary to enter into/perform a contract with you (the employment contract) and/or to take steps at your request prior to doing so</p>	<p>To obtain the relevant reference about you</p> <p>Information shared with Agenda Screening Services, the relevant managers and HR personnel</p> <p>Used to make an informed recruitment decision</p>
<p>Information regarding your academic and professional qualifications*</p>	<p>From you, or where permissible, from your education provider, from the relevant professional body</p>	<p>To make an informed recruitment decision (our legitimate interests)</p> <p>Necessary to enter into/perform a contract with you (the employment contract) and/or to take steps at your request prior to doing so</p>	<p>Information shared with Agenda Screening Services, the relevant managers and HR personnel</p> <p>To carry out a fair recruitment process</p> <p>Used to make an informed recruitment decision</p>
<p>Information regarding your criminal record, in criminal records certificates (CRCs, DBS checks and enhanced criminal records certificates (ECRCs)*</p>	<p>From you and from the Disclosure and Barring Service (DBS)</p>	<p>To carry out statutory checks with your consent</p> <p>For reasons of substantial public interest (preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the regulated sector and protecting the public against dishonesty)</p>	<p>Used to make an informed recruitment decision</p> <p>Information shared with Agenda Screening Services, the DBS and other regulatory authorities as required</p>
<p>Note, that we only collect this information where local legal requirements permit.</p>			

To make an informed recruitment decision (our legitimate interests)

Your nationality and immigration status and information from related documents, such as your passport, driving licence, VISA, national insurance number or other identification and immigration information – to the extent permitted by local law*

From you and, where necessary, the Home Office

To comply with our legal obligations

To carry out right to work checks
Information may be shared with the Home Office, Agenda Screening Services

A copy of your driving licence and relevant driving checks and driving assessment comments – if driving skills are required for the position you are applying*

From you

To comply with our legal obligations
Where applicable, to comply with the terms of our insurance (our legitimate interests)

Used to make an informed recruitment decision
To ensure that you have a clean driving licence
Information may be shared with our insurer, the Driving and Vehicle Licensing Authority (DVLA) and Agenda Screening Services

You are required (by law or in order to enter into your contract of employment) to provide the categories of information marked “*” above to us to enable us to verify your right to work and suitability for the position.