

## Applicant Privacy Notice

### 1 Introduction

Fortnum & Mason Plc (“**we**”, “**us**”, “**our**”) is committed to being transparent about how we collect and use your personal data and to meeting our data protection obligations. This Notice applies to all applicant personal data related to recruitment that is processed by us, regardless of whether it is maintained in electronic format or in a structured filing system.

### 2 Data Controller

We are the data controller in respect of your personal data and our registered office is at: 181 Piccadilly, London, W1A 1ER.

### 3 Lawful Basis and Purposes for Processing Personal Data

For recruitment purposes we collect, store, use and otherwise process personal data about job applicants in order to make hiring decisions. The lawful bases for processing include:

- (a) **for us to pursue our legitimate interests**, including but not limited to the purposes of the recruitment process, assessing and confirming your suitability for employment, facilitating the selection process, conducting reference checks, communicating with you, business process execution and internal management, safeguarding the security of our infrastructure, premises, assets and office equipment, including the prevention of criminal activity, defending legal claims;
- (b) **consent**, including obtaining your consent to contact referees, to conduct background checks, to verify information, to consider you for other employment positions with Company; and
- (c) **legal obligation**, including checking your eligibility to work in the UK and checking your criminal record (where applicable for the position to which you are applying).

We will notify you of any changes to information we collect or to the purposes for which we collect and process it in this context.

### 4 Categories and Sources of Personal Data that We Process

4.1 This Privacy Notice covers any of the personal data that applicants submit to Company for the recruitment process (either directly or through a job board (e.g. [www.indeed.com](http://www.indeed.com))). This may include but is not limited to the following information:

- (a) Your name, contact details and applicant status;
- (b) Details of your qualifications, salary expectations, skills, experience and employment history;

- (c) Information included in your CV or cover letter, such as job history, academic background, skills and competencies, personal interests, languages spoken, qualifications;
- (d) Job preference, type of employment sought or willingness to relocate;
- (e) Names and contact details for references. Please note that it is your responsibility to obtain consent from your references prior to providing us personal information about them;
- (f) Current and historic salary details together with salary expectations;
- (g) Details of your current benefit entitlements.

4.2 We may collect this information in a variety of ways, including directly from applicants, via hard copy and web-based application forms, from job-boards, from recruiters and recruitment agencies, through individual referrals. We may also review social media profiles (generally professional networks) and consider information that is publicly available.

4.3 We may also collect personal data about applicants from other third parties, subject to your consent or required by law, including academic history, references supplied by former employers, information from employment background check providers and information from criminal records checks where necessary or required by law. We will seek information from third parties only once a job offer to you has been made and once we have communicated to you that we will be doing so.

4.4 We process limited amounts of special categories of your personal data in order to comply with our legal obligations, when necessary for the purposes of carrying out obligations and to make reasonable adjustments for candidates with disabilities.

## 5 **Automated decision-making**

6 We may also use an automated decision-making process to make decisions around candidates who are not legally entitled to work within the UK. We do not envisage using automated systems to make any further decisions about your application; however we will notify you in writing if this changes.

## 7 **Information about criminal convictions**

We may collect and use information about criminal convictions. This will usually be where you are to be based at an Airport location and you have provided consent for us to do so at the outset. We will collect such information as part of the recruitment process or during the course of working for us. We will use information about criminal convictions in the following ways:

- (a) To assess a candidate's suitability for a vacancy, including their professional integrity and accountability; and
- (b) To satisfy the security measures put in place at all Airport locations in the UK.

## 8 **With whom might we share your information?**

8.1 We may share personal data about our candidates with the following:

- (a) Other group companies as part of the recruitment process;
- (b) Managers in the business area where there is a vacancy;
- (c) Senior management in the case of senior posts; and
- (d) in-house and external recruiters, recruitment agencies and service providers and applicant tracking systems e.g. our HR System/database (FUNL)

8.2 When we use third parties to process information on our behalf, we require them to commit to compliance with relevant data protection legislation. Where we provide information to other bodies, such as the government which they will use for their own purposes then they will owe obligations to you directly to deal with your data lawfully. Please contact us if you want further information about who we transfer your data to and in what capacity they may use it.

## 9 **What are your rights?**

9.1 You have the following rights:

- (a) to obtain access to your personal data - you may request information on how your personal data is handled by us and request a copy of such personal data;
- (b) to request us to correct or update your personal data if it is inaccurate or out of date;
- (c) to object to the processing of your personal data for the purposes of our legitimate interests, unless we:
  - (i) demonstrate compelling legitimate grounds which override your right to object; or
  - (ii) the processing is necessary for the establishment, exercise or defence of legal claims;
- (d) to erase your personal data held by us:
  - (i) which are no longer necessary in relation to the purposes for which they were collected;
  - (ii) to the processing of which you object; or
  - (iii) which may have been unlawfully processed by us;
- (e) to restrict processing by us, i.e. the processing will be limited to storage only:
  - (i) where you oppose to deletion of your personal data and prefer restriction of processing instead, or

- (ii) where you object to the processing by us on the basis of its legitimate interests (see (c) above); and
  - (f) to transmit personal data you submitted to us back to you or to another organisation in certain circumstances.
- 9.2 The right to erasure, to restrict processing and to transmit personal data listed above may not apply in cases where the processing is necessary for compliance with our legal obligation or the establishment, exercise or defence of legal claims.
- 9.3 Where processing of your personal data is based on your consent you have the right to withdraw your consent at any time, this will not affect the lawfulness of processing based on your consent prior to withdrawal.
- 9.4 These rights are not absolute and may be subject to certain conditions under the GDPR. Should you wish to exercise any of these rights, please contact us using the contact details set out in 12 below.

## 10 **Data Retention**

Applicant personal data will not be kept for longer than is necessary for the recruitment process, unless the data is relevant to a successful candidate's employment. In such cases, relevant data will be transferred to our HR information in accordance with our Employee Privacy Notice. Unsuccessful applicants' personal data held in our structured files will be deleted within six (6) months of the decision unless the applicant consents to our retaining the information for a defined period for the purpose of being considered for other potential job openings. You can find more information about how long we retain personal data for in our Records Retention Policy.

## 11 **Will your information be transferred outside the UK/EEA?**

Candidate's personal data will not be transferred outside of the UK/EEA. We will notify you in writing if this changes.

## 12 **Contacts**

- 12.1 If you have any questions about this privacy notice or information we hold about you, or should you wish to exercise the rights accorded by the GDPR set out at paragraph 9 above, please contact [thepeopleteam@fortnum&mason.co.uk](mailto:thepeopleteam@fortnum&mason.co.uk).
- 12.2 We may update this notice periodically. Where we do this, we will inform you of the changes. This notice is non-contractual, which means it does not confer any legal rights on any member of staff and we may amend it at any time in line with law or good practice.

## 13 **Complaints**

- 13.1 We strive to process your personal data in accordance with the applicable legal obligations but if you have any complaint(s) in that regard, please address your complaint(s) using the contact details set out in paragraph 12.

13.2 You also have the right to lodge a complaint with the UK data protection regulator, if you are not happy with how we handle your personal data and we could not provide you with a satisfactory resolution to your request. You can find their contact details at [www.ico.org.uk](http://www.ico.org.uk).