

Pret's Candidate Privacy Notice

What is the purpose of this document?

Pret a Manger (Europe) Limited ("Pret") is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. This privacy notice is relevant if you are applying for work with us (whether as an employee, worker, or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation (GDPR).

Who is the data controller?

If you are applying for a role with Pret, **Pret a Manger (Europe) Limited** is the controller of your personal data. We respect your data and your privacy is important to us.

This notice explains how Pret processes your personal data and describes your data protection rights, including a right to object to some of the processing which Pret carries out.

More information about your rights, and how to exercise them, is set out in the "Your rights" section.

If you have any queries about data protection or your rights under this notice, please contact us using the contact details provided at the end of this notice.

The kind of information we hold about you

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

- The information you have provided to us in your curriculum vitae and covering letter and any other supporting documents.
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications.
- Biometric data such as photographs, including those on passports and driving licences.
- Your preferences for location, type, and hours of work with us.
- Information about your current level of pay, including entitlement to any benefits connected to your employment.
- Any information you provide to us during an interview.

We may also collect, store, and use the following types of more sensitive personal information:

- Your nationality and entitlement to work in the UK.

- Details about your health, including any medical condition including whether you have a disability for which we need to make reasonable adjustments during the recruitment process (special category data)
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief (special category data).

Information about criminal convictions and offences.

Pret regularly require candidates to provide information relating to criminal convictions, for some roles there may be a need to provide this information. This may be required where you are, for example but not limited to:

- Supporting vulnerable people
- Accountable for cash and stock

We will only collect such information if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect it as part of the recruitment process and during the course of your employment. We will, if appropriate, use information about criminal convictions and offences to review and consider your employment in light of any such information disclosed to us.

We use your personal data in this way in order to carry out our obligations in respect of promoting the legitimate interests of our business.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the candidate.
- Your named referees if we offer you a role and request these from your referees.
- Data from a publicly accessible source including LinkedIn.

How we will use information about you

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

- Assess your skills, qualifications, and suitability for the role or any other roles that you may be suitable for.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

We need to process data to take steps at your request prior to entering into an employment contract with you. We also need to process your data to then enter into an employment contract with you if your

application is successful. For example, we need to process your data to provide you with an employment contract which contains your correct details.

In some cases, we need to process data to ensure that we are complying with our legal obligations.

For example, we are required by law to check an applicant's eligibility to work in the UK before we are able to employ them.

We may also process your data to respond to and defend legal claims make disclosures to law enforcement agencies or in relation to health and safety compliance and/or for auditing and regulatory purposes.

In other cases, we have a legitimate interest in processing personal data during the recruitment process and for keeping records about the process. Processing data from applicants allows us to properly and consistently manage the recruitment process, assess and confirm an applicant's suitability for employment and decide whether an applicant should be offered employment.

In relation to special categories of personal data, we may process information about your health if we need to make reasonable adjustments to the recruitment process for candidates who have a disability. This is in order to comply with our employment law obligations and exercise specific rights in relation to employment.

Where we process other special categories of personal data, such as information about ethnic origin, sexual orientation or religion or belief, this is done for the purposes of equal opportunities monitoring. This is in order that we can promote and maintain equality of opportunity, and also in order that we can carry out monitoring which is for reasons of substantial public interest for the purpose of keeping such equality of opportunity under review.

Information about Criminal Convictions

We will collect information about your criminal convictions history given the nature of our business and in compliance with our obligations in connection with employment, we ask candidates to disclose information relating to their criminal record history as part of the application process.

Such information is treated as confidential and for unsuccessful candidates, it will be anonymised in line with Pret's retention policy for job applicants' data. It will only be shared internally where there is a specific requirement for it, and it will be stored securely. For successful candidates, it may be included as part of your employee file.

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 this role and you fail to provide us with relevant details, we will not be able to take your application further.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Data sharing

Who has access to my data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, relevant managers in the business and IT staff if access to the data is necessary for the performance of their roles. We will also share information about your application with your recruitment agency, if applicable.

We share your data with third parties which provide IT hosting services to us under contract in connection with the operation of the application system. If your application for employment is successful then your data will be shared further for the purposes of managing both the business and the employment relationship, and a further privacy notice will be issued to you explaining how and why we will use your personal data as an employee.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

If your application for employment is unsuccessful, we will hold your data on file for 6 months after the end of the relevant recruitment process. If you provide consent to allow us to keep your personal data on file, we will hold your data for a further 6 months for consideration for future employment opportunities that may become available after the time that you originally made your application. At the end of the relevant period, or if you withdraw your consent (if applicable), your data will be deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to further internal systems and retained during your employment. As mentioned above, a new privacy notice will be issued to you explaining how and why your data will be processed and retained if you enter into employment with us.

Rights of access, correction, erasure, and restriction

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).
- **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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **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.

If you want to review, verify, correct or request 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 us in writing.

Right to withdraw consent

When you applied for this role, you provided consent to us processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact us. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

If you would like to exercise any of these rights, the contact details are as follows:

Email: dataprotection@pret.com

Post: Pret's Data Protection Officer,

Pret A Manger, 75B, Verde, 10 Bressenden Place, London, SW1E 5DH

If you have any queries about data protection, the contact details are as follows:

E-mail: dataprotection@pret.com

Post: Pret's Data Protection Officer,

Pret A Manger, 75B, Verde, 10 Bressenden Place, London, SW1E 5DH

If you believe that we have not complied with your data protection rights, please contact dataprotection@pret.com and we will investigate your concerns and take action if appropriate.

You also have the right to contact the Information Commissioner. You can contact them by calling 0303 123 1113 or online at www.ico.org.uk/concerns