

GDPR Candidate Privacy Notice

The "data controller" for the purposes of this GDPR Candidate Privacy Notice is Innocent Limited and all of its European subsidiary companies (including, but not limited to, Innocent Ltd (Ireland Branch), Innocent ApS, Innocent AB, Innocent Alps GmbH, Innocent SAS, Innocent B.V., Innocent Deutschland GmbH, Innocent Italia S.r.L, and Innocent Spain) (collectively referred to as "innocent"). As innocent is an international organisation, from time to time it is necessary for us to share data with our subsidiary companies for the purposes of the recruitment process and in relation to the hosting of data. As the data controller, we are responsible for deciding how we hold and use personal data (information that identifies a person) about you. This privacy notice is applicable to you because you are applying to 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 process, and how long we will retain that data. It provides you with the information which we are required to give you under the General Data Protection Regulation ((EU) 2016/679).

We have appointed a data protection officer who will oversee compliance of this candidate privacy notice. If you have any questions regarding the content, please contact them at dpo@innocentdrinks.com.

WHAT PERSONAL DATA IS BEING COLLECTED?

This includes:

- The information in your curriculum vitae and/or covering letter and/or any other document uploaded by you.
- The information in our application form, including name, title, address, telephone number, email address, date of birth, gender, employment history, and qualifications.
- Any information provided to us during an interview or assessment.
- Any information provided to us in other forms, including but not limited to our feedback questionnaire, which we may ask you to complete.

We may also collect, store and use the following "special categories" of more sensitive personal data about you:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition or disability.
- Information about any criminal convictions and offences.

We collect personal data about you throughout the application and recruitment process, through:

- Yourself;
- Recruitment agencies, from which we collect: curriculum vitae, and/or covering letter and/or any other document uploaded.

- Your named referees, from which we collect: name, company name, email address and telephone number, personal reference/or professional reference, start and end dates of employment and last job title.
- The following data, which is from a publicly accessible source, e.g. LinkedIn.

PURPOSES OF PROCESSING PERSONAL DATA

We will use the personal data we collect about you to assess your skills, qualifications and suitability for the role or future roles, carry out background and reference checks if applicable, communicate with you about the recruitment process, keep records related to our hiring processes, including but not limited to a feedback questionnaire which we may ask candidates to complete in order for us to review/improve our recruitment process, and comply with our legal or regulatory obligations.

It is in our legitimate interests to assess and consider whether to appoint you to the role or other future roles since it is beneficial to our business to fill such vacancies with suitable candidates.

We also need to process your personal data to decide whether to enter into a contract of employment with you.

Special Categories of Personal Data

We will use your special category personal data in the following ways:

- We will use information about any disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test, interview or other meeting.
- 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.

Criminal Convictions

We may hold information about any criminal convictions that you may have.

We may collect information about your criminal convictions history if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). We are entitled to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular, where the role requires a high degree of trust and integrity and so we would like to ask you to seek a basic disclosure of your criminal records history.

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

AUTOMATED DECISION-MAKING

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if the position changes.

DATA SHARING

Your personal data will be shared internally, including with relevant departments such as People if such sharing is necessary for them to perform their duties.

We may also share your personal data with third parties, including third-party service providers that assist us with the processing of applications received through our website, and other entities. We always require third parties to respect the security of any personal data we send to them and to take and implement appropriate security measures to protect the personal data in line with our policies and the data protection legislation. Third parties will only be permitted to process personal data for specified purposes and in accordance with our instructions.

DATA SECURITY

We have put in place appropriate security measures, internal policies and controls, to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to access such personal data. Such parties will only process your personal data on our instructions and they will be subject to a duty of confidentiality. Additionally, third parties are obliged to ensure they have in place appropriate technical and organisational measures to ensure the security of such personal data.

DATA RETENTION

If your application is successful we will retain your personal data pursuant to our privacy notice for employees, workers and contractors. If you are unsuccessful we will retain your personal data for a period of 24 months after we have communicated to you our decision. We retain your personal data for that period so that we can show that, for example, in the event of a legal claim, we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way or in order to consider you for any future roles that may become available. After this period, we will securely destroy your personal data in accordance with our applicable data retention policy, applicable laws and regulations.

PERSONAL DATA PROVIDED BY YOU

If you fail to provide information when requested which we consider necessary for us to consider your application (such as evidence of qualifications or work history to assess your suitability for the role), we will not be able to process your application.

YOUR RIGHTS AS A DATA SUBJECT

As a data subject, you have a number of rights in certain situations to:

- Request correction of the personal data that we hold about you.
- Request erasure of your personal data.
- Object to the processing of your personal data where we are relying on a legitimate interest (or the legitimate interest of a third party) and there is something about your particular situation which makes you want to object to us processing on this basis. You also have the right to object where we are processing your personal data for direct marketing purposes which is not the case at present.
- Request the restriction of processing of your personal data. You have the right to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for us processing it.
- Request access to your personal data (commonly known as a "data subject access request").
- Request the transfer of your personal data to another party.
- Make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact the data protection officer in writing.

YOUR RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for the avoidance of doubt we are not seeking, and you are not giving any consent under this notice), you have the right to withdraw your consent for that specific processing at any time. To withdraw any such consent, please contact the data protection officer.