

VOLKSWAGEN GROUP UK APPLICANT PRIVACY STATEMENT

Volkswagen Group United Kingdom Limited (“we”/“us”) are committed to protecting and respecting any personal information you share with us.

This Privacy Statement applies to the information we collect and use when you apply for a job (including an apprenticeship) with us, whether by email, post or online, including through portals we operate such as www.vwgjobs.co.uk or third party websites or Apps (collectively, “Jobs Portals”).

This statement describes the types of information we collect from you (as the applicant of the job vacancy) how it is used by us, how we share data with others, how you can manage the information we hold and how you can contact us.

For the purposes of data protection laws, we are a controller of the information relating to you described in this statement. A controller is a person that decides why and how the information held about you is used and otherwise processed. When we refer to information we “process”, this means anything from collecting, using, storing, transferring, disclosing, altering or destroying personal data.

Please note that, if applying through a Jobs Portal, a separate privacy policy made available to you by the operator of that portal will apply to its use of your personal information. If you are applying for a job with us through our own Jobs Portal, our privacy policy on that website will also apply to the processing of the personal information we obtain from you through that website.

Supplementary privacy statements may apply for applications for specific types of roles such as senior management positions. Please see the relevant job vacancy or application information for further details.

The contents of this statement do not form part of any offer of employment and we may change it from time to time to reflect any changes in the way in which we process your personal data. If you are in the application process when any substantial changes or updates are made to this statement, we will bring any such changes to your attention as soon as is practicable.

This version of our Privacy Statement is live from 13th October 2020.

What information do we collect?

We collect information about you when you apply for job vacancies with us and during the recruitment process. We only collect information which is necessary, relevant and adequate for the purpose you are providing it for.

We collect information about you when you apply for a job vacancy or during the recruitment process.

We may collect, store and use personal information about you which includes some, or all, of the following:

- Name, home address, work address and contact information including telephone numbers and email addresses.
- Date and place of birth.
- Driving licence number.
- A list of any relevant training and qualifications pertinent to the role you are applying for.
- An upload of your CV and covering letter.
- An indication that you are permitted to work in UK.

- Your salary and working hour expectations.
- Your current package and benefits.
- In some circumstances we may ask you to answer some competency questions in relation to the role you are applying for.
- Details of why you have applied for the role.
- Any details about your health which you provide regarding adjustments or accessibility assistance needs you may have so you can be supported through the application process.
- Video interview recordings.
- Telephone interview recordings.
- Application documentation (interview, assessment centre notes etc.).
- Employment references.
- Passport, driving licence and other identity information and visa documentation.
- Results of verification checks we perform including those relating to your work history, qualifications and right to work.
- Equality monitoring information (optional voluntary submission) including gender, ethnicity, religion and sexual orientation.

How do we use this information?

We will only process information that is necessary for the purpose for which it has been collected.

There are various ways in which we may use or process your personal information. We list these below:

Consent

Where you have provided your consent, we may use and process your information to:

1. Hold your details for use in future applications. 'See further How long do we keep your information for?' below.

You can withdraw your consent at any time by contacting us at recruitment@vwg.co.uk or by using the edit settings in 'your profile' where you can manage or delete your account.

Contractual performance

We use and process your personal information where this is necessary to perform a contract with you and to fulfil the recruitment processes entered into with us

1. To decide whether to enter into a contract of employment with you.
2. To fulfil activities to progress the application to its conclusion which could include initial candidate screening, telephone interviews, video interviews, interview scheduling, face to face interviews and Assessment Centres.

Legitimate Interests

We may use and process your personal information where it is necessary for us to carry out activities for which it is in our legitimate interests as a business to do so. We process your personal information on this basis for the following legitimate interests and purposes:

Processing necessary for us to operate the recruitment process efficiently and effectively

1. To communicate with you in relation to the recruitment process;
2. To analyse, evaluate and report on vacancy recruitment to enable the distribution and organisation of requests such as pre-employment checks and management of job offers;
3. To progress the application through the recruitment process;
4. To consider your suitability for a job vacancy you are applying for;
5. To help determine whether a job offer may be made to you;

Processing necessary for us to protect our staff, property and business

6. CCTV footage to ensure business efficiencies, for security reasons, for the protection of our property and for health and safety reasons;
7. To verify the information you provide to us in your application.

Legal obligations

We may use and process your personal information where it is necessary for us to comply with our legal obligations, including:

1. To formally identify you by processing formal identification documentation relating to you, such as a passport or driving licence, to verify your identity (including your date of birth);
2. To check your eligibility to work in the UK, as required by immigration laws, by processing passport, visa and other relevant documentation;
3. To comply with court processes and court orders by processing information in relation to legal claims made by you or against you;
4. For purposes relating to the occurrence, investigation or prevention of fraud; and
5. To perform DVLA checks to validate driving licence information if the job role you apply for involves you driving company vehicles.

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 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.

Use of Special Category data

There are “special categories” of more sensitive personal data 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. In limited circumstances, where you have provided it, we will also collect, store and use your special category data on the basis set out below:

1. To enable us to perform our legal obligations in respect of employment law. This may include health information to assess and/or to comply with our obligations under the Equality Act 2010 (for example a requirement to make reasonable adjustments to your working conditions);
2. Where processing is necessary for reasons of substantial public interest, in accordance with any legislation that we are subject to, proportionate to the aim pursued and respectful of your rights to data protection and with suitable measures in place to safeguard your rights and freedoms. This includes processing to identify or monitor equality of opportunity or treatment between different groups of applicant, where those groups are based on special categories of data; or
3. Where processing is necessary for the assessing your working capability, subject to appropriate confidentiality safeguards. This may include information about your physical or mental health, or disability status, to assess whether any reasonable adjustments are required for you during the recruitment process and, where you are successful in your role application, carrying out any medical assessment required for your role, pension and any insurance benefits.

Information about Criminal Convictions

We do not routinely process information about criminal convictions. Please see the applicable supplementary privacy statement for details in relation to specific types of roles where the processing of such information may apply.

Automated Decisions

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making except where set out in a supplementary privacy statement.

How do we share information?

We do not sell your information to third parties, but we do work closely with third party suppliers who fulfil business activities for us.

We do not sell your information to third parties. However, we may from time to time disclose your information to the following categories of companies or organisations to which we pass the responsibility to handle services on our behalf, such as:

- Suppliers who handle recruitment processes, verify application information or conduct candidate assessments on our behalf.
- Cloud service providers that provide our Jobs Portals and IT service providers that help us to maintain those platforms.
- Our legal and other professional advisors.

Due to the international nature of our business, there may be some instances where your information is processed or stored outside of the UK and the EU. In those instances, we will ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law.

We take steps to ensure that any third party partners who handle your information comply with data protection legislation and protect your information just as we do. We only disclose personal information that is necessary for them to provide the service that they are undertaking on our behalf.

We will aim to anonymise your information or use aggregated non-specific data sets where ever possible.

How long do we keep your information for?

We will not hold your personal information on this platform in an identifiable format for any longer than is necessary.

We do not retain personal information on this platform in an identifiable format for longer than is necessary.

After 6 months of collecting your details will be deleted unless you indicate you would like your details kept longer, in which case it will continue to be held for a fixed period once we have sought and obtained your explicit consent.

The only exceptions to the periods mentioned above are where:

- the law requires us to hold your personal information for a longer period, or delete it sooner;
- where you have raised a legal claim, complaint or concern about the recruitment process us, in which case we will retain your information for a period of 6 years following the date of that legal claim, complaint or query, whichever is the later, in order for us to manage, deal with and/or defend any such legal claim, complaint or query;
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see further How can I manage the information we hold about you?);
- you are employed by us following your application, in which case we will retain this information for 4 years and 6 months from the date of collection; or
- we have stated a different period for a particular type of role in a supplementary privacy statement.

How can I manage the information we hold about you?

You have the right as an individual to access your personal information we hold about you and make corrections if necessary. You also have the right to withdraw any consent you have previously given us and ask us to erase information we hold about you. You can also object to us using your personal information (where we rely on our business interests to process and use your personal information).

You have a number of rights in relation to your personal information under data protection law. In relation to most rights, we will ask you for information to confirm your identity and, where applicable, to help us search for your personal information. Except in rare cases, we will respond to you within 1 month of receipt of any request (including any identification documents requested).

You have the right to:

- 1) Ask for a copy of the information that we hold about you;
- 2) Correct and update your information;
- 3) Withdraw your consent (where we rely on it). Please see further How do we use this information;
- 4) Object to our use of your information (where we rely on our legitimate interests to use your personal information) provided we do not have any continuing lawful reason to continue to use and process the information. When we do rely on our legitimate interests

to use your personal information for direct marketing, we will always comply with your right to object;

- 5) Erase your information (or restrict the use of it), provided we do not have any continuing lawful reason to continue to use and process that information;
- 6) Transfer your information in a structured data file (in a commonly used and machine readable format), where we rely on your consent to use and process your personal information or need to process it in connection with your contract; and
- 7) Not to be subject to a purely automated decision (including profiling) which has a significant effect on you.

You can exercise the above rights and/or manage your information by contacting us using the details below:

HRS Recruitment, Volkswagen Group United Kingdom Limited, Yeomans Drive, Blakelands, Milton Keynes, MK14 5AN.

E-mail: recruitment@vwg.co.uk

You can also manage your personal details or delete your profile in the edit settings of 'your profile'.

If you have any specific data protection concerns or a complaint, you can address it to our Data Protection Team at dataprotection@vwg.co.uk.

If you are unhappy, you have the right to lodge a complaint with a data protection regulator in Europe, in particular in a country you work or live or where your legal rights have been infringed. The contact details for the Information Commissioner's Office, the data protection regulator in the UK, are below:

Post: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Call: 0303 123 1113

Email: casework@ico.org.uk.