VOLKSWAGEN GROUP UK CAREERS WEBSITE

Privacy Statement

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

This statement describes what types of information we collect from you when you access the www.vwgjobs.co.uk website ("Website") and apply for job vacancies using the Website, how that information is used by us, how we share it 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 is used and otherwise processed.

We advertise job available with us (Volkswagen Group United Kingdom Limited) on the Website and also with third parties such as retailers in our authorised network or Trade Part Specialist (TPS) Centres. Our Website allows you to apply for jobs with these third parties, and when you do so, we pass on the application information you supply to us to the relevant third party. As this party is the employer that has decided to list the vacancy on our Website and decides how to use the information it receives, they are a separate and independent **controller** of any personal information contained in your job application that they receive. Once this information is shared with such employers, we do not make any decisions over their copy of the information. For example, such information is retained for the duration specified by the applicable employer. Please refer to the separate privacy statement for the relevant employer for details regarding its handling of that information. If you apply for a job with us, the Volkswagen Group UK Applicant Privacy Statement will apply.

We may sometimes provide your application information to an assessment centre or training services provider who may be working on our behalf (for jobs with us) or on behalf of a third party employer (for jobs with them).

The contents of this statement may change from time to time so you may wish to check this page occasionally to ensure you are still happy to share your information with us. Where possible, we will also contact you directly to notify you of any substantial changes.

This version of our Privacy Statement is live from 20/02/20.

What information do we collect?

We collect information about you when you apply for vacancies via this Website 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 use this Website site and during the recruitment process.

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

- 1. Name, address and contact information including telephone numbers and email addresses.
- 2. Login details (i.e. your username and password)
- 3. A list of any relevant training and qualifications pertinent to the role you are applying for.
- 4. An upload of your CV and covering letter.
- 5. An indication that you are permitted to work in UK (via a check box selection).

- 6. Criminal convictions provided on a voluntary basis depending on the role applied for and the type of conviction this may have a bearing on whether your application is progressed).
- 7. Your salary and working hour expectations.
- 8. Your current package and benefits.
- 9. In some circumstances we may ask you to answer some competency questions in relation to the role you are applying for.
- 10. Details of why you have applied for the role.
- 11. Any details you provide regarding adjustments or accessibility assistance needs you may have to so you can be supported through the application process.
- 12. Video interview recordings.
- 13. Telephone interview recordings.
- 14. Application documentation (interview, assessment centre notes etc.)
- 15. Date of birth.
- 16. Equality monitoring information (optional voluntary submission) gender, ethnicity, religion, sexual orientation.
- 17. The date and time you used our Website;
- 18. The pages you visited on our Website and how long you visited us for;
- 19. Your IP address;
- 20. The internet browser and devices you are using;
- 21. The website address from which you accessed our Website;
- 22. Any information within correspondence you send to us.

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

- 1. To hold your profile details, namely your salary expectations, full/part time working preferences and your training and qualifications (but not your name, contact details and other account registration information for which we rely on contractual performance see below) so that you can retrieve these at your convenience and use in future applications.
- 2. To use limited special category personal information about you and details of your criminal convictions (if you decide to provide this information and where we have obtained your explicit consent). See further <u>Use of Special Category data</u> and <u>Information about Criminal Convictions</u> 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. Our use of your personal information before you withdraw your consent will remain lawful.

Contractual performance

We may use and process your personal information in the following ways where this is necessary to perform a contract with you and to fulfil the recruitment processes entered into with us or our authorised retailers or TPS Centres.

- 1. To provide a registration process to allow the creation of a profile for you to manage your application(s).
- 2. To provide a service for the submission of the applications against published job vacancies.
- To fulfil and/or facilitate 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 referral to assessment centres.

Legal Obligation

We may process your personal information to comply with our legal or regulatory requirements including:

- 1. To assist, or respond to a request for information from, an authorised authority, regulatory body or court, or to respond to a court order).
- 2. Where it is needed to make reasonable accessibility adjustments to support your recruitment application based on your individual needs.

Legitimate Interests

We may use and process your personal information as set out below where it is necessary for us to carry out activities for which it is in our legitimate interests as a business to do so.

<u>Processing necessary for us to operate the administrative and technical aspects of our business</u> efficiently and effectively

- 1. To analyse, evaluate and report on vacancy recruitment.
- 2. To contact you by email from time to time to remind you that your profile is still active.
- 3. To verify the accuracy of information that we hold about you or your identity.
- 4. For network and information security purposes i.e. in order for us to take steps to protect your information against loss, damage, theft or unauthorised access.
- 5. To comply with a request from you in connection with the exercise of your rights.
- 6. To inform you of updates to our terms and conditions and policies.

Processing necessary for us to assess and respond to complaints, claims and regulators

- 7. To respond to queries, complaints or claims and to manage legal and regulatory requests and requirements.
- 8. To enforce or protect our legal rights or to establish, bring or defend legal claims.

Use of Special Category data

We may process "special categories" of personal information 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, the processing of your special category personal information is carried out based on the following lawful basis:

- 1. It is necessary for the establishment, exercise or defence of legal claims; or
- 2. It is done with your explicit consent, including to share your special category personal information with the third party to whom you are applying for a job.

Information about Criminal Convictions

If you volunteer any criminal conviction information about you and provide your explicit consent, this

may be used by any employer to whom you apply to assess your suitability for the advertised role.

Automated Decision-Making

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

How do we share information?

We do not sell your information to third parties, but we do work closely with our retailer network and TPS Centres, our group companies and 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 categories of companies or organisations mentioned below.

We share your personal information to the retailer, TPS Centre or other employer to whom you submit a job application using the Website so that they can manage the recruitment process and process your application.

We share your personal information with companies or organisations to which we pass the responsibility to handle services on our behalf, such as:

- Suppliers who are responsible for the technology and support of the platform through which the Website operates;
- Suppliers who handle recruitment processes and conduct candidate assessments on our, or the retailer's/TPS Centres' behalf.
- Our legal and other professional advisors.

We also share your personal information with companies in our group for the administrative, reporting and audit purposes.

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 12 months from the date of our receipt, your details will be deleted unless you indicate you would like your details kept longer, in which case they will continue to be held for a further 12 months until you tell us to stop.

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;
- we bring or defend a legal claim or other proceedings during the period we retain your personal information, in which case we will retain your personal information until those proceedings have concluded and no further appeals are possible;
- you exercise your right to require us to retain your personal information for a period longer than the retention period stated above (see further <u>How can I manage the information we</u> <u>hold about you?</u>); or
- 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?);

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 <u>How do we use this</u> 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;
- 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.

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

HRS Recruitment, Volkswagen Group United Kingdom Limited, Yoemans 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.