

Candidate Privacy Notice (Recruitment)

1 Introduction

This Notice is intended to provide information regarding the use of personal data about candidates for positions with any of the companies within the Pets at Home Vet Group, which, depending on the position which the candidate is applying or being considered for, could involve personal data being shared with or processed by one or more of the following entities within our group of companies:

- Pets at Home Plc
- Pets at Home Vet Group Limited;
- Pets at Home Veterinary Specialist Group Limited;
- Companion Care (Services) Limited;
- Anderson Moores Veterinary Specialists Limited
- Dick White Referrals Limited;
- Northwest Veterinary Specialists Limited;
- Eye-Vet Limited;
- Pets at Home Limited; and/or
- one of our affiliated joint venture first opinion veterinary practices branded either “Vets4Pets” or “Companion Care”,
(together “**Vets4Pets**”, “**Company**”, “**we**” or “**us**”).

This Notice applies to all candidate personal data related to recruitment that is processed by Vets4Pets, regardless of whether it is maintained in electronic format or in a structured filing system.

2 Identity of the Data Controller

The Vets4Pets entity to which you are applying for or being considered for a role with is the data controller responsible for processing your personal data.

Any questions about this Notice may be sent to the Data Protection Officer by emailing data.protection@vets4pets.com.

3 Lawful Basis and Purposes for Processing Personal Data

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

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- 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. In addition, when you visit our car parks or premises we usually have CCTV systems operated for the security of both clients and colleagues and for the prevention of crime. These systems may record your image during your visit;
 - b) **consent**, including obtaining your consent to contact referees, to conduct background checks, to verify information, to consider you for other employment positions with Vets4Pets; and
 - c) **legal obligation**, including checking your eligibility to work in the UK.
- 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 by updating this Privacy Notice from time to time.

4 Categories and Sources of Personal Data that We Process

This Privacy Notice covers any of the personal data that candidates submit to Vets4Pets for the recruitment process. This may include but is not limited to the following information:

- a) Your name, contact details and candidate status;
- b) Details of your qualifications, 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, questionnaire results;
- d) Job preferences and type of employment sought, 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 with personal information about them;
- f) Current and historic salary details together with salary expectations;
- g) Details of your current benefit entitlements; and
- h) Information and proof (for example, a copy of a passport, visa or work permit) about your entitlement to work in the UK.

Vets4Pets may collect this information in a variety of ways, including directly from candidates, via hard copy and web-based application forms, from recruiters and recruitment agencies, through individual referrals and from test results where relevant to the position. We may also review social medial profiles (generally professional networks) and consider information that is publicly available.

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We may also collect personal data about candidates from other third parties, subject to your consent or required by law, including academic history and references supplied by former employers.

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 **Data Sharing: Intra-Group and Third Parties**

A candidate's personal data may be shared internally within the Vets4Pets as part of the recruitment process. This includes interviewers involved in the recruitment process, managers in the business area where there is a vacancy, senior management in the case of senior posts, and IT staff if access to the data is necessary for the performance of their roles.

Depending on the position sought, a candidate's personal data will be stored on secure servers at the particular Vets4Pets company that you are applying to and may be shared with other Vets4Pets companies involved in the recruitment process.

We may need to share some of your personal information with other parties, including in-house and external recruiters and recruitment agencies, hiring managers and service providers. When we do so, we ensure that contractual measures are in place where necessary to protect candidates' personal data.

6 **International Transfers**

Your personal data will not be transferred outside of the UK/EEA. We will notify you if this changes by updating this Privacy Notice from time to time.

We will not use your personal data for any purpose other than recruitment.

7 **Your Rights**

The General Data Protection Regulations provide you with certain rights in relation to the processing of your personal data, including to:

- a) **Request access to personal data about you** (commonly known as a “**data subject access request**”). This enables you to receive a copy of the personal data we hold about you.
- b) **Request rectification, correction, or updating to any of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- c) **Request erasure of personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove personal

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data where you have exercised your right to object to processing (see below).

- d) **Request the restriction of processing of your personal data.** This enables you to ask us to suspend the processing of personal data about you (e.g. if you want us to establish its accuracy or the reason for processing it).
- e) **Object to specific types of processing in some circumstances,** including direct marketing, processing based on legitimate interests, processing for research or statistical purposes, and decisions based solely on the basis of automated decision-making, including profiling.

These rights are not absolute and are subject to various conditions under:

- i) applicable data protection and privacy legislation; and
- ii) the laws and regulations to which we are subject.

Where processing is based on consent, you have the right to **withdraw your consent** at any time. This will not affect the lawfulness of any processing carried out before you withdrew your consent.

You also have the right to file a complaint with the UK Information Commissioner's Office ("**ICO**") if you are not happy with the way Vets4Pets processes your personal data and our response to your request.

To exercise any of these rights, please contact our Data Protection Officer by emailing data.protection@vets4pets.com.

8 **Data Retention**

Your details will not be kept for longer than is necessary for the recruitment process, unless you are offered employment, in which case all relevant data will be transferred to our People Team in accordance with our Colleague Privacy Notice. If your application is unsuccessful your details will be deleted within six (**6**) months of the decision unless you consent to us retaining your details so that we can consider you for other potential job openings.

24.5.2018

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