

JOB APPLICANT PRIVACY NOTICE

Introduction

In this privacy notice references to "Signet", "we", "us" and "our" means Signet Trading Limited.

At Signet we are committed to protecting the privacy and security of your personal information. This privacy notice describes what personal information we collect from or about our job applicants, how we use it and to whom we disclose that information.

We are a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This privacy notice applies to the personal information of all individuals who apply to be employed by us (an "applicant"), unless the personal information is collected, used or disclosed as a customer of our H Samuel or Ernest Jones websites in which case the terms of the relevant consumer privacy notice will apply.

It is important that you read this notice before making your application. Please note that should your application be successful, we will provide you with a privacy notice for employees, contractors and other workers (Team Members), which you should read, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data Protection registration details

We are registered in the UK with the Information Commissioner's Office under the following registration number:

Z7503579

There is no obligation for us to register with the Office of the Data Commissioner in the Republic of Ireland.

What is personal information?

For the purposes of this privacy notice, personal information is any information relating to a living individual who can be identified directly or indirectly from that information. Personal data can be factual (e.g. name, address, date of birth) or it can be an opinion about that person, their action or behaviours.

There are "special categories" of more sensitive personal information which require a higher level of protection. These include information about a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic and biometric data, physical or mental health or condition or sexual life.

What personal information do we collect and hold?

We may collect, store and use the following categories of personal information about you:

Category of Personal Information	Examples
Personal details	Name Home address Gender National Insurance number
Personal contact details	Personal email address Home telephone number and/or personal mobile number
Salary and benefit information	Current salary and benefits or salary expectation

Recruitment	Application forms CVs Selection assessment records Interview notes Details and verification of education and qualifications Employment history incl. start and end dates References Background checks (for certain roles) Nationality and entitlement to work in the UK
Medical information	Information about any disabilities where reasonable adjustments may be required during the application process
Equal opportunities monitoring data	Gender Ethnic origin Religion or belief Health
CCTV images	CCTV footage

How is your personal information collected?

We typically collect personal information about job applicants through the application and recruitment process, either directly from candidates or sometimes from an agency. We may sometimes collect additional information from third parties including former employers and a background checking company (HireRight).

How we will use information about you

We will use your personal information to decide whether to appoint you into the role and to decide whether to enter into a contract of employment with you.

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

If we decide to offer you the role, we will then take up references from the referees you have provided and, in some cases, carry out a background check through HireRight.

Description of purpose	Examples
Assess your skills, qualifications, and suitability for the role you are applying for	Interview notes and assessment results Education and qualifications Employment history
Carry out background checks in some cases	Details of county court judgments or bankruptcy
Verifying your right to work in the UK	Right to work check including reviewing copies of passport and/or visa and/or other details
Communicate with you about the recruitment process	Personal contact details
Keep records relating to the recruitment process	Application forms CVs Interview notes Details and verification of education and qualifications Employment history incl. start and end dates References
Keeping your details on our Talent Bank if you request this	CV

What is the legal justification for our use of personal information?

Data protection legislation seeks to ensure that the way personal information is used is fair.

To comply with data protection legislation, we need to tell you the legal justification(s) we rely on in using your personal information for our purposes.

While the law provides several legal justifications, the summary and table below describes the main legal justifications that apply to our purposes for using your personal information. Depending on the circumstances, more than one condition may apply. For further information about which specific legal basis applies to each use of your personal information please contact dataprivacyuk@signetjewelers.com

Main legal justifications

- Compliance with a legal obligation (for example verifying your right to work in the UK)
- To take steps at your request prior to entering into a contract (to enable us to consider your application for employment)
- Necessary for our legitimate interests, namely to decide whether to appoint you into the role
- Consent (only for specific purposes)

Purpose	Legal justification for processing			
	Compliance with a legal obligation	Performance of a contract with you or to take steps at your request prior to entering into a contract	Necessary for our legitimate interests or those of a third party	Consent
Selecting the best candidate for the role	✓	✓	✓	✓ (only in specific circumstances)
Determining suitability for initial employment		✓	✓	
Communicating with you about the recruitment process		✓		
Dealing with legal claims	✓	✓	✓	
Complying with legal requirements	✓		✓	
Retaining your information for future recruitment				✓

Where we rely on our (or a third party's) legitimate business interests to justify the purposes for which we process your personal information, those legitimate interests will typically be:

- To decide whether to appoint you into the role.

- Protection of our employees, workers and contractors, and of our business, information and assets or those a third party (for example ensuring information security and preventing or detecting fraud or other crime)

Special categories of Personal information

For more sensitive special categories of Personal Information, we will rely on one or more of the legal justifications set out in the table above and typically one of the following additional justifications (however other legal justifications may be available):

- the use is necessary for performing or exercising obligations or rights of the employer or employee under employment laws, for example not to discriminate against a job applicant or treat them unfairly; or
- the use is necessary for establishing, exercising or defending legal claims; or
- the use is necessary for the purposes of making reasonable adjustments to our recruitment procedures
- the use is necessary for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment in accordance with applicable law (this applies in the UK only); or
- your explicit consent (in specific circumstances).

Automated decision making

We sometimes use automated decision making tools in the course of recruitment for store roles. These decisions do not involve human input and the software tools apply pre-defined criteria to make the decision and assess how we continue to deal with you.

If the role you are applying for is store based, whether Apprentice, Sales Associate, Supervisor, Assistant Manager or Store Manager, you will as part of the recruitment process be asked to undertake an online situational judgment assessment. This test is currently carried out for us by an external company known as a&dc (Assessment & Development Consultants Ltd), part of the PSI group. If you do not pass this assessment, your application will not proceed any further on this occasion, nor will you be able to apply for the same role again.

You have the right in certain circumstances not to be subject to a decision which is based solely on automated processing without human intervention. You are entitled to express your point of view on such a decision, to contest it, and ask us to intervene in the decision making process.

Please see the section "Rights of the individual" below for further details of this right.

Retaining personal information

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, accounting or reporting requirements

If your application is unsuccessful, we will retain your information for 12 months.

If you have asked to join the Talent Bank, we will retain your information for 12 months from when you asked to be added to it.

If your application is successful, you will be provided with our Team Member Privacy Notice, which explains that retention periods for different aspects of your personal information are established by our Data

Retention Policy. We will retain and securely destroy your personal information in accordance with our data retention periods.

To determine the appropriate retention period for personal data we consider the amount, nature and sensitivity of the personal information, and the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information, so it can no longer be associated with you, in which case we may use such information without further notice to you.

Who is personal information shared with?

Apart from the recruiting manager(s) and HR support having access to your personal information, we will only share the personal information collected in connection with your application with the following:

- Professional advisors including accountants, auditors, lawyers, insurers, human resources consultancies, and other outside professional advisors;
- Government, public and regulatory authorities including law enforcement, public bodies and government bodies;
- The referees you have provided, if we make an offer of employment to you.

Signet may also disclose your personal information to the extent that it is required to do so by law, relating to any legal proceedings or prospective legal proceedings and to establish, exercise or defend its legal rights.

How do we protect job applicant data?

Signet will take appropriate technical and organisational security measures to keep your information secure, such as restricting system access, encryption and password protection.

When we provide personal information to a third-party provider processing personal information on our behalf, the third party will be selected carefully and subject to a documented contract that includes specific information and terms which require them to use appropriate security measures to protect the confidentiality and security of the personal information.

Transferring your personal information outside of the European Economic Area (EEA)

As we are part of a global business, we may transfer personal information to countries outside the EEA which are not deemed to provide adequate protection for personal information

We will transfer information outside the EEA to other Signet group companies, service providers and governmental and regulatory authorities.

When making such transfers, we will take steps to ensure that your personal information is adequately protected and transferred in accordance with the requirements of data protection law.

This typically involves the use of data transfer agreements in the form permitted under data protection law (for example the European Commission's Standard Model Clauses). If there is no data transfer agreement in place, we may use other mechanisms recognised by data protection law as ensuring an adequate level of protection for personal information transfer outside the EEA (for example the US privacy Shield framework or any framework that replaces it).

For further information about these transfers and to request details and obtain a copy of the safeguards in place, please contact us using the details below (see Further Information section below)

Rights of the individual

All employees, contractors or workers have rights set out in the table below. These rights only apply in certain circumstances and are subject to certain legal exemptions.

If you wish to exercise your rights, please contact us using the details in the Further information section below.

Right	When is this right applicable?
<p>Right of access to Personal Information</p> <p>You have the right to receive a copy of the Personal Information we hold about you and information about how we use it.</p>	<p>This right is applicable at all times when we hold your Personal Information (subject to certain exemptions).</p>
<p>Right to rectification of Personal Information</p> <p>You have the right to ask us to correct Personal Information we hold about you where it is incorrect or incomplete.</p>	<p>This right is applicable at all times when we hold your Personal Information (subject to certain exemptions).</p>
<p>Right to erasure of Personal Information</p> <p>This right is also referred to as 'the right to be forgotten'. This right entitles you to request that your Personal Information be deleted or removed from our systems and records. This right only applies in certain circumstances.</p>	<p>Examples of when this right applies to Personal Information we hold include (subject to certain exemptions):</p> <ul style="list-style-type: none"> • when we no longer need the Personal Information for the purpose we collected it; • if you withdraw consent to our use of your information and no other legal justification supports our continued use of your information; • if you object to the way we use your information and we have no overriding grounds to continue using it; • if we have used your Personal Information unlawfully; and • if the Personal Information needs to be erased for compliance with applicable law.
<p>Right to restrict processing of Personal Information</p> <p>You have the right to request that we suspend our use of your Personal Information. This right only applies in certain circumstances.</p>	<p>You can exercise this right if:</p> <ul style="list-style-type: none"> • you think that the Personal Information we hold about you is not accurate, but this only applies for a period of time that

<p>Where we suspend our use of your Personal Information we will still be permitted to store your Personal Information, but any other use of this information while our use is suspended will require your consent, subject to certain exemptions.</p>	<p>allows us to consider if your Personal Information is in fact inaccurate;</p> <ul style="list-style-type: none"> • the processing is unlawful and you oppose the erasure of your Personal Information and request the restriction of its use instead; • we no longer need the Personal Information for the purposes we have used it to date, but the Personal Information is required by you in connection with legal claims; or • you have objected to our processing of the Personal Information and we are considering whether our reasons for processing override your objection.
<p>Right to data portability</p> <p>This right allows you to obtain your Personal Information in a format which enables you to transfer that Personal Information to another organisation. However, this right only applies in certain circumstances.</p> <p>You may have the right to have your Personal Information transferred by us directly to the other organisation, if this is technically feasible.</p>	<p>This right will only apply:</p> <ul style="list-style-type: none"> • to Personal Information you provided to us; • where we have justified our use of your Personal Information based on: <ul style="list-style-type: none"> ○ your consent; or ○ the fulfilment by us of a contract with you; and • if our use of your Personal Information is by electronic means.
<p>Right to object to processing of Personal Information</p> <p>You have the right to object to our use of your Personal Information in certain circumstances.</p>	<p>You can object to our use of your Personal Information where you have grounds relating to your particular situation <u>and</u> the legal justification we rely on for using your Personal Information is our (or a third party's) legitimate interests.</p> <p>However, we may continue to use your Personal Information, despite your objection, where there are compelling legitimate grounds to do so or we need to use your Personal Information in connection with any legal claims.</p>
<p>Rights relating to automated decision making and profiling</p> <p>You have the right not to be subject to a decision which is based solely on automated processing (without human involvement) where that decision produces a legal effect or otherwise significantly</p>	<p>This right is not applicable if:</p> <ul style="list-style-type: none"> • we need to make the automated decision in order to enter into or fulfil a contract with you; • we are authorised by law to take the automated decision; or

affects you. However, this right only applies in certain circumstances.	<ul style="list-style-type: none"> • you have provided your explicit consent to the decision being taken in this way using your Personal Information.
<p>Right to withdraw consent to processing of Personal Information</p> <p>Where we have relied upon your consent to process your Personal Information, you have the right to withdraw that consent.</p>	This right only applies where we process Personal Information based upon your consent.
<p>Right to complain to the relevant data protection authority</p> <p>If you think that we have processed your Personal Information in a manner that is not in accordance with data protection law, you can make a complaint to the data protection regulator, the Information Commissioner's Office.</p>	This right applies at any time.

When exercising your personal information rights, please note that we may request specific information from you to enable us to confirm your identity.

Further Information

Signet tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of personal information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

We cannot provide exhaustive detail of all aspects of Signet's collection and use of personal information. However, we are happy to provide any additional information or explanation needed.

If you have any questions about this privacy policy or Signet's treatment of your personal information, or if you wish to exercise any of your data protection rights please contact dataprivacyuk@signetjewelers.com or Data Privacy at Signet Trading Limited, 3 Imperial Place, Borehamwood, WD6 1JN.

Changes to this privacy notice

This privacy notice was last updated in May 2018.

We reserve the right to update this privacy notice at any time; and where appropriate we will give reasonable notice of any changes. We may also notify you in other ways from time to time about the processing of your personal information.