



## **CANDIDATE PRIVACY NOTICE**

### **1. WHAT IS THE PURPOSE OF THIS DOCUMENT?**

- 1.1.** City Pantry Limited is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you.
- 1.2.** A copy of this privacy notice has been made available to you because you are applying for work with us (whether as an employee, worker (where applicable), independent contractor, consultant or non-executive board member). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

### **2. DATA PROTECTION PRINCIPLES**

- 2.1.** We will comply with data protection law and principles, which means that your data will be;
  - 2.1.1.** used lawfully, fairly and in a transparent way;
  - 2.1.2.** collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
  - 2.1.3.** relevant to the purposes we have told you about and limited only to those purposes;
  - 2.1.4.** accurate and kept up to date;
  - 2.1.5.** kept only as long as necessary for the purposes we have told you about; and
  - 2.1.6.** kept securely.

### **3. WHAT INFORMATION DO WE HOLD ABOUT YOU?**

- 3.1.** In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you;
  - 3.1.1.** the information you have provided to us in your CV and covering letter;
  - 3.1.2.** the information you have provided on a CV or application form, including name, title, address, telephone number, personal email
  - 3.1.3.** address, date of birth, gender, employment history, qualifications, photographs and recordings/videos;
  - 3.1.4.** any information you provide to us during an interview; and
  - 3.1.5.** your test scores (as appropriate).
- 3.2.** We may from time to time on a voluntary disclosure basis (typically only once an offer of employment has been made) also collect, store and use the following "special categories" of more sensitive personal information;
  - 3.2.1.** information about your race or ethnicity, religious beliefs, sexual orientation, disability and political opinions;
  - 3.2.2.** information about your health, including any medical condition, health and sickness records; and
  - 3.2.3.** information about criminal convictions and offences.



#### **4. HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

We may collect personal information about candidates from the sources including but not limited to those listed in the Appendix attached to this notice.

#### **5. HOW WILL USE INFORMATION ABOUT YOU?**

- 5.1. We will use the personal information we collect about you for the purposes set out below and on the legal basis that we have a legitimate interest to process your data to decide whether we want to enter into a contract of employment with you and so we need to;
  - 5.1.1. assess your skills, qualifications, and suitability for the role;
  - 5.1.2. carry out background and reference checks, where applicable;
  - 5.1.3. communicate with you about the recruitment process and (where you have expressly consented) about new opportunities/other suitable vacancies;
  - 5.1.4. determine the terms and conditions of a job offer; and
  - 5.1.5. comply with legal or regulatory requirements.
- 5.2. It is in our legitimate business interests to do so to decide whether to appoint you to the role and consequently keep records related to our hiring processes.
- 5.3. We also need to process your personal information in assessing your suitability for the role.
- 5.4. Having received your CV and covering letter or your application form and your test results (if applicable) we will then process that information to decide whether you meet the basic requirements to be longlisted / shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role.
- 5.5. If we decide to offer you the role, we will then take up references and may where applicable carry out other relevant background checks.

#### **6. 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 of qualifications, work history or your right to work), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

#### **7. HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION**

We will use information about your 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 or interview.

#### **8. INFORMATION ABOUT CRIMINAL CONVICTIONS**

We do not envisage that we will process information about criminal convictions.



## **9. AUTOMATED DECISION-MAKING**

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

## **10. DATA SHARING**

**10.1.** Why might you share my personal information with third parties?

**10.1.1.** We will only share your personal information with the following third parties for the purposes of processing your application: Talent Acquisition, Workable, McQuaig, Just Eat Holdings Limited, Grant Thornton or other third party providers in place from time to time.

**10.1.2.** All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **11. DATA SECURITY**

**11.1.** We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

**11.2.** We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **12. DATA RETENTION**

**12.1.** How long will you use my information for?

**12.1.1.** We will retain your personal information for a period of 12 months after we have communicated to you our decision about whether to appoint you to role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

**12.1.2.** If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

## **13. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

**13.1.** Under certain circumstances, by law you have the right to:



- 13.1.1.** Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- 13.1.2.** Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- 13.1.3.** Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- 13.1.4.** Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. Your objection may not have any impact on our processing of your personal information.
- 13.1.5.** Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- 13.1.6.** Request the transfer of your personal information to another party.
- 13.2.** If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact [data@citypantry.com](mailto:data@citypantry.com) in writing for your request to be considered.

#### **14. RIGHT TO WITHDRAW CONSENT**

When you applied for this role, you may have in limited circumstances provided consent to us processing your personal information for the purposes of the recruitment exercise you have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact [data@citypantry.com](mailto:data@citypantry.com). Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

#### **15. HOW TO CONTACT US**

If you have any questions about this privacy notice or how we handle your personal information, please contact us at [data@citypantry.com](mailto:data@citypantry.com)

#### **16. CHANGES TO THIS PRIVACY NOTICE**

We reserve the right to update this privacy notice at any time, and we will provide you with access to a new privacy notice where we make any substantial updates during the recruitment process. We may also notify you in other ways from time to time about the processing of your personal information.



## **Appendix – UK & Ireland**

We may collect personal information about candidates from the sources including but not limited to those listed in the below Appendix as per clause 4.

- You, the candidate;
- Talent Acquisition Team at City Pantry, Tempo, Pareto, Workable and our LinkedIn Recruiter, from which we collect the following categories of data: information you have provided in your curriculum vitae and covering letter or provided on our application form;
- McQuaig from which we collect information about your psychometric test scores;
- Your named referees; and
- The following data from third parties is from a publicly accessible source LinkedIn, Glassdoor, Google, hired.com, CoHire, Otta, StackOverflow and Indeed.