

## Carlsberg Applicant Privacy Notice

We, **Carlsberg UK Limited and Carlsberg Supply Company UK Limited** ("**Carlsberg**") have prepared this Applicant Privacy Notice ("**Notice**"), for applicants to roles with Carlsberg. The purpose of this Notice is to give you information on how Carlsberg collects, processes, stores and otherwise uses information about you, and on your rights in relation to that information.

Carlsberg needs to process your personal data in order to process your application for employment. There are also statutory requirements we have to comply with in relation to your application.

We need to ask for your specific and/or explicit consent to process your personal data in a particular way in certain circumstances such as to retain your information on file to contact you about roles we think might be relevant to you. Where we want to rely on your consent, we will ask you to sign a consent form. In most cases we will process your personal data for the reasons set out in this Notice and it will not be appropriate or necessary for you to provide consent.

In this document "**Carlsberg**", "**we**" or "**us**" refers to the Carlsberg entity that you're applying to work for. In addition, you will see a number of references to the "**Carlsberg Group**", which includes all other Carlsberg entities globally. Details of these can be obtained by contacting us using the details provided below.

We may update this document from time to time, for example if we implement new systems or processes that involve the use of personal data.

"**GDPR**" refers to the General Data Protection Regulation, which is a European law governing your rights in relation to your personal data, and how organisations must protect it.

### What categories of personal data does Carlsberg collect about me?

"**Personal data**" means any information relating to you. Carlsberg will collect, process and use the following types of personal data (together understood as "**applicant data**"):

- **Identification data**, such as your name, nationality, passport details and driving licence details ;
- **Personal information**, such as your date and place of birth, emergency contact details and gender;
- **Contact details**, such as your home address, telephone number and email address;
- **Education and work experience**, such as contact details for your current/former employer, and information about your educational background, your work experience and other experience;
- **Other application data**, such as the information included in your application form/CV;
- **Information collected as part of the interview process**, such as notes taken from your interview or information provided from recruitment agencies, and photo and video data from your visits to our sites;
- **Information about any offer of employment that we make to you**, such as your position, title, salary, status (full or part time), weekly working hours, work location, department, position level, contract start date, basic salary, bonuses, salary increases, allowances, and benefits;
- **Information collected as part of the on-boarding process**, such as your bank account details and national insurance number;
- **Background check information**, such as information obtained through reference checks, confirmation about your work/educational background and right to work, and criminal record checks;
- **Health and medical data** such as information on any disabilities you might have.

Under the GDPR, certain categories of applicant data are considered particularly sensitive ("**sensitive applicant data**") and therefore as needing additional protection. These categories include information about health, racial or ethnic origin, political opinions, religious beliefs, trade union membership or your sexual orientation, and genetic and biometric data. Information concerning criminal convictions and offences is also viewed as sensitive under the applicable data protection legislation.

We handle applicant data and sensitive applicant data in compliance with applicable data protection laws, including as described in the "How does Carlsberg use my data?" section below.

## How does Carlsberg use my data?

Carlsberg needs applicant data and sensitive applicant data for a variety of reasons linked to your application for a role with us (“**processing purposes**”).

We are required to explain to you the legal bases for our collection, processing and use of your applicant data and sensitive applicant data. For each use listed below we note the purpose for which we use and disclose it, and the ground we rely on as the basis for our use. For an explanation of each of the grounds set out in this Notice, please contact us using the contact details set out at the end of this Notice.

- **Administering and processing your application**, including processing a job offer should you be successful and accommodating your application and interview, which may involve the processing of identification data, contact details, information about your qualifications and employment history, information obtained during your interview, information contained in your CV, information about any offer of employment that we make to you, and health and medical data;

*Legal bases: contract performance; legitimate interests (assessing your suitability for employment with us), employment rights and obligations*

- **Determining your eligibility for the role you applied for**, which may involve the processing of identification data, contact details, information about your work and education experience, information obtained during your interview and information contained in your CV;

*Legal bases: contract performance, legitimate interests (assessing your suitability for employment with us)*

- **Conducting background checks as part of your application**, which may involve the processing of identification data, contact details, information about your qualification and employment history, and criminal records data;

*Legal bases: contract performance, legitimate interests (assessing your suitability for employment with us), employment rights and obligations*

- **Complying with applicable laws and employment-related requirements**, along with the administration of those requirements, such as employment and immigration laws, which may involve the processing of identification data, contact details and other application data;

*Legal bases: contract performance, legal obligations, employment rights and obligations*

- **Monitoring and ensuring compliance with applicable policies, and procedures and laws**, including operating a CCTV system to make sure our sites are secure and our employees and visitors are safe, which may involve the processing of your identification data and contact details;

*Legal bases: contract performance, legitimate interests (managing compliance with our policies)*

- **Communicating with you, other Carlsberg employees and third parties**, (e.g. business partners, suppliers, customers or government officials), including communicating future employment opportunities, which may involve the processing of identification data, your contact details and other application data;

*Legal bases: contract performance, consent, legitimate interest (managing our business operations and operation of our organisations structure)*

- **Responding to and complying with requests and legal demands from regulators or other authorities** within or outside your home country which may involve the processing of identification data, contact details and other application data;

*Legal bases: legal obligations, legitimate interests (to enable us to cooperate with regulatory authorities), legal claims*

- **Fulfilling corporate financial responsibilities and changing our business structure**, including audit requirements and cost/budgeting analysis and control, which may involve the processing of identification data, contact details, information about the role you have applied for, including the role's salary and benefits.

*Legal bases: contract performance, legal obligations, legitimate interests (to enable us to cooperate with regulatory authorities and to allow us to change our business)*

If you have any questions about the legal bases on which we rely, please contact us using the details set out in the "Who can I contact" section below.

### **Who does Carlsberg share my data with?**

To ensure that the processing purposes can be achieved, your information may be shared with any of the entities within the Carlsberg network. Where we share data in this way, it is our policy to limit the categories of individual who have access to that personal information.

Carlsberg may transfer personal data to third parties, including entities within and outside the Carlsberg Group in any jurisdictions where the Carlsberg Group entities are located, for the following processing purposes:

- **Within the Carlsberg Group.** As the Carlsberg entity that you're applying to work for is part of a wider group with headquarters in Denmark, and entities located across several regions, Carlsberg may transfer the applicant data and sensitive applicant data to, or otherwise allow access to such data by, other entities within the Carlsberg Group and the Directors of the Carlsberg Group, which may use, transfer and process the data for the following purposes: to communicate information about the Carlsberg Group; to monitor and assure compliance with applicable policies and procedures, and applicable laws; and to respond to requests and legal demands from regulators and other authorities.
- **Regulators, authorities, and other third parties.** Where necessary for the processing purposes described above, personal information may be transferred to regulators, courts and other authorities (e.g. tax and law-enforcement authorities), independent external advisors (e.g. auditors), Carlsberg insurance providers, pensions and benefits providers, and internal compliance and investigation teams (including external advisers appointed to conduct internal investigations).
- **Data processors.** Where necessary for the processing purposes described above, personal data may be shared with one or more third parties, whether affiliated or unaffiliated, to process personal information under appropriate instructions ("**data processors**"). The data processors may carry out instructions related to recruitment, workforce administration, IT system support and maintenance, payroll and compensation, training, compliance, and other activities, and will be subject to contractual obligations to implement appropriate technical and organisational security measures to safeguard the personal information, and to process the personal information only as instructed.

For a full list of the Carlsberg Group entities and third parties with whom we may share your data, please contact us as set out below.

Some of the recipients with whom we may share applicant data and sensitive applicant data may be located in countries outside of Europe. In some cases, this may include countries located outside the European Union and/or European Economic Area ("**EEA**").

Some countries where recipients are located already provide an adequate level of protection for this data, while transfers to other countries such as the USA may be protected under arrangements such as the EU-US Privacy Shield. Nevertheless, in the case of transfers to Carlsberg entities outside of EEA, Carlsberg will be bound by the EU Standard Data Protection Clauses (pursuant to Article 46(2)(c) GDPR), which the

European Commission has assessed as providing an adequate level of protection for personal data, to ensure that your data is protected adequately.

If recipients are located in other countries without adequate protections for personal data, Carlsberg will take all necessary measures to ensure that transfers out of the EEA are adequately protected as required by applicable data protection law. This will include using appropriate safeguards such as the EU Standard Data Protection Clauses. You can ask for a copy of the appropriate safeguards by contacting us as set out below.

#### **How long will Carlsberg keep personal information?**

It is our policy not to keep personal information for longer than is necessary. We may, for example, keep your personal information for a reasonable time after your application process is completed, in case we have future job opportunities that we consider you are suitable for. Where personal information is kept, that period will be determined based on the applicable local law. For further information, please contact us as advised below.

#### **What rights do I have in respect of my personal information?**

You have a number of rights in relation to your applicant data and sensitive applicant data. These can differ by country, but can be summarised in broad terms as follows:

##### **Right of access**

You have the right to confirm with us whether your personal data is processed, and if it is, to request access to that personal data and to be informed of the types of personal data processed, the purpose of the processing and the recipients or categories of recipients. However, we do have to take into account the interests of others, so this is not an absolute right.

##### **Right to rectification**

You may have the right to rectify inaccurate or incomplete personal data concerning you.

##### **Right to erasure (right to be forgotten)**

You may have the right to ask us to erase personal data concerning you.

##### **Right to restriction of processing**

In certain circumstances, you may have the right to request that we restrict processing of your personal data.

##### **Right to data portability**

You may have the right to receive, in a structured, commonly used and machine-readable format, personal data concerning you that you have provided to us, and you may have the right to transmit that data to another entity.

##### **Right to object and rights relating to automated decision-making**

In certain circumstances, you may have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data, including profiling, by us, and we may be required to no longer process your personal data.

#### **Who can I contact?**

If you have any concerns or questions about this Notice you can get hold of the right person here:

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Legal Department, Carlsberg UK Limited / Carlsberg Supply Company UK Limited, 140 Bridge Street, Northampton, NN1 1PZ, or by email to [uk.hr.admin@carlsberg.co.uk](mailto:uk.hr.admin@carlsberg.co.uk).

You also have the right to lodge a complaint with the competent data protection supervisory authority, which in **United Kingdom** is the **Information Commissioner's Office**