



CHIVAS BROTHERS LIMITED & CHIVAS BROTHERS INTERNATIONAL LIMITED
CANDIDATE PRIVACY NOTICE

What is the purpose of this document?

Chivas Brothers Limited and Chivas Brothers International Limited are "data controllers". This means that we are individually and jointly responsible for deciding how we hold and use personal information about you. You are receiving a copy of this privacy notice because you are applying for a position with either of us (whether as an employee, worker, contractor, director or office holder or in any other capacity including on a voluntary unpaid basis). It applies to individuals who are applying for a vacancy that we are actively recruiting for, and also those who speculatively contact us to apply for roles. It makes you aware of how and why your personal data may be used, namely for the purposes of any recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the UK General Data Protection Regulation (GDPR).

If you are successful with your application we will hold your information in accordance with our Personnel Privacy Notice a copy of which will be provided or made available to you at the relevant time.

The most up-to-date version of this document is available on our corporate website at www.chivasbrothers.com

Data protection principles

In accordance with data protection law the personal information we hold about you will be:

1. Used lawfully, fairly and in a transparent way.
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.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.

6. Kept securely.

The kind of information we hold about you

In connection with your application for work with us, we may collect, store, and use the following categories of personal information about you:

- The information you have provided to us in the application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications, experience.
- Any CV or covering letter submitted.
- Any information you provide to us during an interview or at any stage of the application process.
- Any results from tests taken as part of the recruitment exercise.
- Our assessment of your application at all stages of the recruitment process (including for example interviewer notes and feedback).
- Records relating to any previous jobs applied for within the Pernod Ricard group.
- Any other information provided to us or a third party on our behalf (such as an agency) as part of the recruitment exercise.
- CCTV footage and records of access to our premises.

We may also collect, store and use the following "special categories" of more sensitive personal information about:

- Your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Your health, including any medical condition, health and sickness records.
- Criminal convictions and offences.

How is your personal information collected?

We will collect personal information from you and in some cases also from the following sources:

- Your named referees, from whom we request various information about your previous employment/experience and your suitability for the role applied for. This may include information on your character, ability, trustworthiness and confirmation of any statements you have made as part of the application process including dates of previous employment, roles,

responsibilities and performance. During the reference process we may also request further information, or the referee may volunteer such information.

- Recruitment agencies (if applicable), from which we may collect information about you and your application.
- Disclosure and Barring Service or Disclosure Scotland in respect of criminal convictions if applicable and any relevant background check provider.

How will we use personal information?

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

- Assess your skills, qualifications, and suitability for the work/role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.
- Determine whether to offer you a position.

It is in our legitimate interests to consider this information in the recruitment process to enable us to identify the best candidate for vacancies.

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully.

How will we use sensitive personal information?

We will use your sensitive personal information in the following ways:

- We will use information about your health and 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 or to the role applied for.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Information about criminal convictions

We may collect information about your criminal convictions history if we would like to offer you a role (conditional on checks and any other conditions, such as references, being satisfactory). We are entitled to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- If we are legally required to carry out criminal record checks for those carrying out the role that you have applied for.
- Certain roles require a high degree of trust and integrity (for example if it involves dealing with money/valuable products/security) and so we may ask for a basic disclosure of your criminal records history.

We will process information about criminal convictions in accordance with the appropriate policies and safeguards as required by law.

Automated decision-making

As part of our recruitment process we may use automated decision making (when an electronic system makes a decision without human intervention). This does not involve using any sensitive personal data. For some roles, we use “Ace” questions which means that your response to a particular question could result in an automated decision being made not to progress your application further. If a decision is made not to progress your application as a result of automated decision making, you will be notified of this and you may, within a period of one month of receiving such notification, contact us to ask us to reconsider the result of that decision.

Data sharing

We will only share your personal information with other members of our group and third parties for the purposes of processing your application. For example, we may share information with the following third parties: recruitment agencies, legal services, background and criminal record check providers, document storage providers, IT/software providers, IT security (including Zscaler), external test providers, CCTV providers and outsourced security providers (including G4S). 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.

Data security

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 (or instructions from a member of our group) and they are subject to a duty of confidentiality.

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.

Data retention

For internal and/or successful candidates we will retain your application information on your personnel file in accordance with our Personnel Privacy Notice and Document Retention Policy.

For unsuccessful candidates we will retain your personal information for a period of six months after we have communicated to you our decision that your application has not been successful. We retain your personal information for that period:

1. 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; and
2. on the basis that a further opportunity may arise in future and we may wish to consider you for that (we may retain the information for this purpose for longer with your express consent).

After this period, we will securely destroy your personal information in accordance with our Document Retention Policy, a copy of which is available upon request.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates that affect you.

Rights of access, correction, erasure, and restriction

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

- Request access to your personal information (a "data subject access request").
- Request correction of the personal information that we hold about you.
- Request the erasure of your personal information where there is no good reason for us continuing to process it.
- Request the restriction of processing of your personal information or that we stop processing. 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 or for us to stop processing in certain circumstances.
- Request the transfer of your personal information to another party.
- You can contest the result of an automated decision.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you wish to exercise any of your rights in relation to your data, please contact our Privacy Champion who has been appointed to oversee compliance with this privacy notice; **chivasbrothersdataprotection@pernod-ricard.com**

We hope that we can resolve any query or concern you may raise. You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

If you have any questions about this privacy notice, or how we handle your personal data please email chivasbrothersdataprotection@pernod-ricard.com

