

Recruitment Privacy Policy

1 DOES THIS POLICY APPLY TO YOU?

Data Protection Privacy Notice for all applicants that are not currently staff members of Paddy Power Betfair. If you are applying for a promotion or another job in the organisation and are already employed by Paddy Power Betfair, please refer to the Employee Privacy Policy.

2 WHAT IS THE PURPOSE OF THIS DOCUMENT?

Paddy Power Betfair is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during the application process with us, in accordance with the General Data Protection Regulation (GDPR) and any national laws, regulations and secondary legislation, as amended or updated from time to time, in the United Kingdom, Ireland and any other territory which implements the GDPR.

We are required under data protection legislation to notify you of the information contained in this privacy notice. The "data controller" will be determined by your location and the entity that you are employed by/contracted with. The applicable data controller within the Paddy Power Betfair Group is responsible for deciding how we hold and use personal information about you. To determine your data controller, please see the table below:

Location	Data Controller
UK	Betfair Limited (UK HO) Power Leisure Bookmaker UK (Retail UK)
Ireland	Power Leisure Bookmakers Limited Ireland (HO Ireland) PPB Developments and Insights Limited (HO Ireland) Paddy Power Betfair PLC (Retail Ireland)
Northern Ireland	D McGranaghans
Malta	Betfair Malta Holding Limited
Romania	Betfair Romania Development
Porto	TSED Unipessoal LDA
Italy	Betfair Italia SRL
Spain	Betfair Limited
Denmark	TSE Global Ltd

Paddy Power Betfair plc may act as joint data controller to carry out the purposes outlined in this policy.

It is important that you read this notice, 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.

3 DATA PROTECTION PRINCIPLES

We will comply with data protection law. This says that the personal information we hold about you must 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.

4 THE KIND OF INFORMATION WE HOLD ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

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

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Right to work documentation, such as Passports, Visas or National Identity Cards.
- Date of birth.
- Gender.
- Family including marital status and dependants.
- National Insurance number.
- Copy of driving licence.
- References for candidates that are shortlisted.
- Information included in a CV or cover letter or as part of the application process.
- Previous employment records (including job titles, work history including details of past salary, and professional memberships).

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

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions which we would use for monitoring purposes.
- Information about your health, including any medical condition, health and sickness

records.

- Information about criminal convictions and offences.

5 HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect personal information about all applicants from the application process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies (such as Experian and Sterling Talent Solutions).

6 HOW WE WILL USE INFORMATION ABOUT YOU

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to comply with a legal or regulatory obligation, such as responding to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include authorities outside of your country of residence.
2. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

Situations in which we will use your personal information:

We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations.

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the work location in which you are based
- Assessing qualification for a particular job or task
- Education, training and development requirements
- Dealing with legal disputes involving you, or employees, workers and contractors.
- Ascertaining your fitness to work or otherwise complying with health and safety obligations.
- To prevent fraud.
- Equal opportunities monitoring.
- Creating talent pools in case you are suitable for other positions with us.



Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The legitimate interests that we have identified which require us to process your data are to recruit an effective workforce to meet our customer requirements and ensure those prospective employees are suitable and honest.

If you fail to provide personal information:

If you fail to provide certain information when requested, we may not be able to continue with the application process (such as not being able to confirm your right to work, or obtaining references), or we may be prevented from complying with our legal obligations if you were to become employed by us (such as to ensure the health and safety of our workers).

Change of purpose:

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7 HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

“Special categories” of particularly sensitive personal information require higher levels of protection. This information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation and disability status, to ensure meaningful equal opportunity monitoring and reporting and to comply with employment and other laws, We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances (and we will always ensure that we follow our Data Protection Policy):

1. With your explicit written consent. If we need your consent we will contact you separately about this.
2. Where we need to process this data to carry out our legal obligations
3. Where it is needed for equal opportunities monitoring
4. Where it is needed to assess adjustments to our recruitment process or interview arrangements to assess if we can safely offer you employment.

Less commonly, we may process this type of information where it is needed in relation to legal claims (for example if you raise concerns which relate to a protected characteristic) or where you have already made the information public.

8 INFORMATION ABOUT CRIMINAL CONVICTIONS

We do not envisage that we will hold information about criminal convictions at the recruitment stage but an offer of employment may be conditional on you providing us with relevant information.

9 AUTOMATED DECISION-MAKING

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

10 DATA SHARING

We may have to share your data with third parties, including third-party service providers and other entities in the group. We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

“Third parties” includes other entities within our group. The following activities are carried out by third-party service providers [credit checks etc]

How secure is my information with third-party service providers and other entities in our group?

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.

When might you share my personal information with other entities in the group?

We will share your personal information with other entities in our group as part of our regular reporting activities on company performance for system maintenance support and hosting of data. We will share your personal information with our other European entities in our group in accordance with any of the purposes described in Section 6 above.

What about other third parties?

We may share your personal information with a regulator or to otherwise comply with the law.

As part of our selection process we may share your data with third parties, where prior consent from you is given to do so. These include:

- Psychometric assessment tools e.g Talentq
- Video interviewing e.g. Sonru

The organisation will not transfer your data outside the European Economic Area as part of the recruitment process.

11 DATA SECURITY

We have put in place measures to protect the security of your information. Details of these measures are available on request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

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.

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

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for. We keep information about applicants for 18 months from an application being made.

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

13 RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your duty to inform us of changes:

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the application process with us.

Your rights in connection with personal information:

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

- 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.
- 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.
- 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).

- 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- 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.

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 the Data Protection team, dataprotection@paddypowerbetfair.com in writing.

No fee is usually required:

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.

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). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

14 RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Protection team. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

15 DATA PROTECTION OFFICER

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO. You have the right to make a complaint at any time to your local supervisory authority for data protection issues.

16 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. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact the Data Protection team, dataprotection@paddypowerbetfair.com