

CANDIDATE PRIVACY POLICY
EUROPCAR MOBILITY GROUP UK

General

Welcome and thank you for your interest in Europcar Mobility Group UK (“Europcar”). This policy sets out the types of personal data we process as part of our recruitment procedures and the purposes for which we use the data. By personal data, we mean information that identifies you either directly or indirectly. This policy applies to applications made via the Careers section of our website (Europcar.co.uk), via a third party employment site and via an employment agency.

Europcar Group UK Limited (company registration number 1089053) whose registered office is at 1 Great Central Square, Leicester LE1 4JS is the data controller and is responsible for the processing of your data collected in relation to its recruitment procedures.

Categories of personal data

You do not need to supply us with any personal data to simply browse the Careers section of our website. You should be aware that we may use cookies whilst you are viewing our website. Cookies serve to make the website more user-friendly, more effective and safer overall. For more information on how we use cookies on the website, please click [here](#) to view our Cookie Policy.

On the Careers section of the website, we offer you the opportunity to apply for one of our vacancies quickly and easily by uploading your CV onto the website in response to a job advert. When you apply for a position via a third party website or agency, that third party organisation will forward any personal data you supply to them, which will usually be in the form of a CV.

Regardless of the way in which you apply for a position with us, we will process some or all of the following categories of personal data as part of your application:

- a. Identification Data, including, surname, first name, postal or home address, date of birth, national insurance number.
- b. Communication Data, including, e-mail address, home telephone number, mobile telephone number, communication preferences (e.g. e-mails, letters, text message).
- c. Education and Training Data, including where relevant, information about your school and university education, including results obtained, as well as further training, both academic and vocational.
- d. Professional and employment information, including your CV, details of past positions held, experience, qualifications gained in the workplace, details of referees, etc.
- e. Details of the type of employment you are looking for (current and/or desired position, salary and other job preferences).
- f. Other information collected during interviews and from referees, if your application proceeds. We would advise you to seek consent from any individual whom you would like to act as a referee before providing their details to us as part of your application. You should also inform them that we may contact them at any point in the application process.
- g. Voluntary information that you provide to us on a voluntary basis without us expressly asking for it.
- h. Special categories of data such as your nationality.

- i. Our IT systems also record the IP address (a numerical label assigned to each device connected to a computer network that uses the Internet Protocol for communication) accessing our website.

Purposes of data processing and legal basis for processing data at Europcar

We collect and process your Personal Data for the following purposes and on the following legal bases:

<u>Purposes of the processing</u>	<u>Legal basis for the processing</u>
Assess your skills, qualifications and experience in line with the position for which you have applied	This processing is based on contract. In other words, because you have asked us to review your job application prior to potentially entering into a contract of employment with you.
Communicate with you about the recruitment process and your application	
Check information provided by you and verifying your qualifications and references	This processing is based on our legitimate interest in checking the information provided by you and to check your references
Contacting one or more individuals whose details you have provided as your referees	This processing is based on your consent
Keep you updated on other potential career opportunities at Europcar	This processing is based on your consent for your CV to be retained by us and to be and to be contacted for future opportunities at Europcar

International Sanctions checks

In addition to the processing activities above, we also use your data to check that you are not recorded on a Sanctions List (namely any list of designated individuals against whom financial, economic or immigration sanctions or other restrictions have been imposed, as issued and amended from time to time by any of the following bodies:

- a. the U.S. government, including OFAC’s list of Specially Designated Nationals (or “SDNs”) and Blocked Persons and lists maintained by the U.S. Department of State;
- b. the United Nations Security Council;
- c. the European Union and any Member State (including the EU’s consolidated list of persons subject to EU financial sanctions); and
- d. the United Kingdom (including the consolidated list of financial sanctions targets issued by the UK’s Office of Financial Sanctions Implementation (“OFSI”).

This processing is necessary to meet our legal obligations and in the “legitimate interest” of Europcar in ensuring that it is compliant with the International Sanctions regime.

Transmission of data by Europcar

I. Categories of recipients

Your personal data may be communicated to:

- a. our employees. The data you have provided is only accessed by Europcar employees involved in the recruitment process, including our HR teams and the relevant people within the business involved in recruitment of the specific role.

- b. our subcontractors, in particular our applicant management system, which is provided and maintained by Broadbean (based in the European Union) and our IT service providers, for hosting, maintenance or development purposes.
- c. other group companies if your application relates to a job offer within a different company in the Europcar Mobility Group.

Except as set out above, we do not share your personal data with any external third parties, unless we are required to do so, under any legal or regulatory obligation.

We want to make you aware that automated decision-making, in particular a decision about your application or profiling, does not take place. This processing is based on the execution of pre-contractual measures adopted at your request and is necessary to enable us to process your application.

II. Transmission of data

All information that you provide in the context of an application to Europcar is transmitted, stored and secured in our applicant management system in encrypted form. Europcar uses technical and organizational security measures to protect your stored data against accidental or intentional manipulation, loss, destruction or against access by unauthorised persons. The security measures are continuously improved in line with technological developments.

The application process does not involve transfers of personal data to countries outside the European Economic Area.

Duration of storage of personal data

Purposes of the processing	Data Retention Period
Assess your skills, qualifications and experience in line with the position for which you have applied	If you are offered a position at Europcar, we will retain your information provided during the application and recruitment process as part of your employee record. If the application process has been completed and a rejection decision has been made, we will store this information for a period of six months and then delete it.
Communicate with you about the recruitment process and your application	
Check information provided by you and verifying your qualifications and references	
Contacting one or more individuals whose details you have provided as your referees	
Check that you are not recorded on a sanctions list (namely any list of designated individuals)	5 years from the date of the sanctions list check
Keep you updated on other potential career opportunities at Europcar	Six months from the date of your consent to retain your details. After six months, all CVs and applications are routinely destroyed.

The only exceptions to the above storage periods are:

- a. If Europcar is legally obliged to store personal data, it will be stored for the duration of the legal obligation; and

- b. anonymized data (where data relating to specific individuals cannot be identified) which is created as part of the application process (e.g. duration of the application process, result of the application process).

Your rights and how to exercise them

You have the right to request information regarding the personal data we hold about you and how we use and process that data. You may also request that we correct, update, restrict, limit or delete your personal data, as well as withdrawing your consent to the processing of some or all of your data at any time. When making any request in relation to your personal data, please ensure that you include information to identify yourself, such as your full name, contact details, the position for which you applied for, the date you submitted your application and date of interview if applicable).

For more information regarding how to exercise these rights, as well as how to complain to the Information Commissioner's Office (which is the supervisory body for data protection in the UK) regarding our processing of your data, please see sections 6 and 7 of our general privacy policy which can be accessed by clicking [here](#).

Changes to this Privacy Policy

We reserve the right to change this policy at any time in order to reflect the changes in our practices and also to remain compliant with applicable data protection laws and regulations. The policy was last updated on 9 June 2022.

Further questions

If you would like to know more about the provisions of this privacy policy or to contact our Data Protection Officer, you can write to the Director of Legal Services, Europcar Group UK Limited, 1 Great Central Square, Leicester LE1 4JS or send an e-mail to dpo@europcar.com.