## CENTER PARCS LIMITED CENTER PARCS (OPERATING COMPANY) LIMITED CP WOBURN (OPERATING COMPANY) LIMITED CENTER PARCS (UK) GROUP LIMITED

# CENTER PARCS IRELAND LIMITED

# **RECRUITMENT PRIVACY NOTICE**

This privacy notices applies to all individuals who apply to work for :

- Center Parcs Limited, Company number: 01908230, Registered address: One Edison Rise, New Ollerton, Newark, Nottinghamshire, NG22 9DP
- Center Parcs (Operating Company) Limited, Company number:04379585, Registered address: One Edison Rise, New Ollerton, Newark, Nottinghamshire, NG22 9DP
- CP Woburn (Operating Company) Limited, Company number:07656412, Registered address: One Edison Rise, New Ollerton, Newark, Nottinghamshire, NG22 9DP
- Center Parcs Ireland Limited, Company number: 554787, Registered address: 10 Earlsfort Terrace, Dublin 2, D02 T380, Ireland

For the purposes of Data Protection Laws (as defined below), the relevant company that you apply to work for (from the list above) will be the data controller in respect of any personal data you provide to them as part of the recruitment process. In this privacy notice, "we", "us" or "Center Parcs", means whichever company you apply to work for.

If you have any questions about this notice please contact <u>Employee.Dataprotection@centerparcs.co.uk</u>

#### How do we use your personal data?

The General Data Protection Regulation (EU) 2016/679 and the UK and Irish Data Protection Acts 2018 ("**Data Protection Laws**") imposes legal obligations on the way in which we obtain, record and process personal information about individuals as part of our recruitment process. This notice explains:

- what personal information we collect and for what purposes; and
- your rights in respect of our use of your personal data.

This notice covers the following topics:

Useful Words and Phrases

What kinds of personal data do we process?

How do we collect your personal data?

What do we use your personal data for?

Who may have access to your personal data?

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## Useful Words and Phrases

Please familiarise yourself with the following words and phrases as they have particular meanings in the Data Protection Laws and are used throughout this privacy notice:

Personal Data

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	identified.
	This will include information such as telephone numbers, names, addresses and e-mail addresses. It will also include expressions of opinion and indications of intentions about <u>data subjects</u> (and their own expressions of opinion/intentions).
	It will also cover information which on its own does not identify someone but which would identify them if put together with other information which we have or are likely to have in the future.
Special Categories of Personal Data	means any information relating to:
	Racial or ethnic origin;
	Political opinions;
	• Religious beliefs or beliefs of a similar nature;
	• Trade union membership;
	Physical or mental health or condition;
	• Sexual life;
	• Genetic data or biometric data for the purpose of uniquely identifying you; or
Processing / Process	This covers a wide range of activities that can be done with personal data, including:
	• obtaining, recording, retrieving, consulting or holding it;
	• organising, adapting or altering it;
	• disclosing, disseminating or otherwise making it available; and
	• aligning, blocking, erasing or destroying it.
Data Subject	The person whom the personal data is about.
Information Commissioner (ICO)	The supervisory authority for data protection issues, responsible for implementing, overseeing and enforcing data protection laws in the UK.
Data Protection Commission	The supervisory authority for data protection issues, responsible for implementing, overseeing and enforcing data protection laws in the Ireland.

# What kinds of personal data do we process?

We will make sure that we only collect the minimum information we need from you at each stage of the recruitment process. Please do not provide us with personal data that is irrelevant or excessive. If you or any third party (such as a recruitment agent) do so we will dispose of it securely and will not keep a copy.

At application stage, we will collect, store, and use the following categories of personal data about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- Date of birth.
- Your application/CV including information about your skills (education, professional qualifications and training), employment history and referees, previous salary and start date;

- confirmation of whether or not you are eligible to work in the UK or Ireland; and
- How you heard about this vacancy.
- Details of un-spent Criminal Convictions
- Information in relation to Safeguarding Practices and Working with Children

In addition to the above, if you are invited to interview stage, we will collect, store and process the following categories of personal data:

• Notes about your interview and appraising your performance.

#### How do we collect your personal data?

The vast majority of personal data is either obtained from you directly or, if you have engaged with us through a third party recruitment agent, your chosen recruitment agent. However, we obtain some personal data from other sources such as previous employers, criminal records checks from the Disclosure and Barring Services in the UK and the Garda Vetting Bureau in Ireland and Experian, and credit-checking sources should the role you applying for require us to do so.

#### What do we use your personal data for?

We will process <u>personal data</u> about you for the following purposes, which are all necessary in our legitimate interests, to take steps at your request prior to entering into an employment contract with you (if your application is successful) and to comply with law:

- process and assess your application;
- consider you for the position you have applied for and any future vacancies if appropriate
- for research and analysis and to help us improve our recruitment process;
- make up your personnel file if you are successful (however only to the extent relevant to your employment;
- to approach your nominated referees for the purposes of obtaining references; and
- to carry out equal opportunities monitoring.

We also need to process your personal data where necessary

- to comply with a legal obligation; or
- for our legitimate interests (or those of a third party) in circumstances where your own interests and rights do not override those interests.

This processing does not adversely affect your rights and freedoms. If we did not process most of the personal data we collect about you, then we would not be able to consider you for the position. We will only use your personal data 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 persona data for an unrelated purpose, we will notify you and we will explain the legal basis that allows us to do so.

Please note that we may process your personal information in limited circumstances without your knowledge or consent where this is required or permitted by law.

# Who will have access to your personal data?

Sometimes we will disclose some of your personal data to other organisations.

This will happen where we use another organisation to provide services, such as IT service providers and professional advisers (including lawyers and recruitment service providers). Where such third parties process your personal data on behalf of Center Parcs we will ensure that a written data processing agreement or clauses are in place. We will disclose your personal data to other companies within the Center Parcs group where we use centralised resources to administer our systems.

We may also have to disclose some <u>personal data</u> to professional bodies, Courts, the Police and other UK authorities on request.

From time to time, we will transfer your personal data outside of the EEA, for example, some of our third party IT service providers have operations based outside of the EEA. Where this is the case, we ensure that those providers comply with strict obligations of confidentiality and security. We also ensure that, in line with requirements set out in the Data Protection Laws, any transfer of your personal data outside the EEA is subject to adequate protection either because it is being transferred to a country which has equivalent data protection laws in place, it is being transferred to an organisation that is a member of an approved certification (e.g Privacy Shield in the US) or by entering into an appropriate contract to govern the transfer itself. If you want more information about countries to which your information is transferred and the protections that we put in place, please contact the Legal Department.

#### How long do we keep your data?

We will maintain retention policies and procedures so that your personal data is destroyed after a period of 12 months from the date of your application - given the purposes for which the data is used - except where another law requires us to keep the data for a certain length of time. When we do delete your personal data, we will make sure we do it in a secure and confidential way.

#### Your rights in relation to your personal data

As a <u>data subject</u>, you have the following rights under Data Protection Laws:

- the right of access to personal data relating to you
- the right to restrict or prevent processing of your personal data
- rights in relation to automated decision taking
- the right to have inaccurate personal data corrected or erased
- the right to object to processing of your personal data in certain circumstances
- the right to have your <u>personal data</u> ported to another data controller (e.g. if you change jobs)
- the right to complain to the <u>Information Commissioner</u> or the Data Protection Commissioner, respectively, if you believe we have not handled your <u>personal data</u> in accordance with the Data Protection Laws.

These rights are explained in more detail below, but if you have any comments, concerns or complaints about our use of your <u>personal data</u>, please contact the Legal Department. We will respond to any rights that you exercise within a month of receiving your request, unless the request is particularly complex, in which case we will explain the position to you within a month, and respond within three months.

## Requests for Access to your personal data

You may ask to see what personal data we hold about you and be provided with:

- a copy;
- details of why it is being or is to be processed;
- details of the recipients or classes of recipients to whom it is or may be disclosed, whether they
  are overseas and what protections are used for those oversea transfers;
- details of how long we hold it for (or how we decide that);
- any information available about the source of that data; and
- whether we carry out any automated decision-making or profiling and, where we do, information about the logic involved and the envisaged outcome or consequences of that decision or profiling.

To request a copy of your personal data you should

contact:Employee.Dataprotection@centerparcs.co.uk via email and a copy will be retained on your personnel file.

To help us find the personal data you are looking for easily, please give us as much information as possible about the type of personal data you would like to see.

If, to comply with your request, we would have to disclose personal data relating to or identifying another person, we may need to obtain the consent of that person if possible. If we cannot obtain consent, we may need to withhold that information or edit the data to remove the identity of that person if possible.

There are some types of personal data which we do not have to disclose to you, such as:

- confidential references we give;
- <u>personal data</u> processed for the purposes of management forecasting or management / succession planning where disclosure would cause harm;
- <u>personal data</u> which records our intentions in relation to any negotiations with you where disclosure would be likely to prejudice those negotiations.

#### Right to restrict processing of personal data

You are entitled to request that we restrict the processing your personal data temporarily if:

- (a) you do not think that your data is accurate, and you want us to establish its accuracy or our reason(s) for processing it.
- (b) the processing is unlawful but you do not want us to erase it;
- (c) we no longer need the personal data for our processing, but you ask us to keep it to enable you to establish, exercise or defend legal claims; or

you object to us processing your personal data, for such period as it takes us to determine whether we have a legitimate grounds to continue processing it..

#### Rights in relation to automated decision taking

You may ask us to ensure that:

- when we are evaluating you (for example conducting psychometric testing), we don't base any decisions solely on an automated process where such decision would have a legal or similarly significant effect on you; and
- to have any decision reviewed by a member of staff.

These rights will not apply in all circumstances: for example, where the decision is authorised or required by law and steps have been taken to safeguard your interests, for example where there is a human element in the relevant decision-making process.

#### Right to erasure

You can\_ask us to erase your personal data where:

- (a) you do not believe that we need it for the purposes set out in this privacy notice;
- (b) if, having given us consent to process your data, you withdraw that consent and we cannot otherwise legally process your it;
- (c) you object to our processing and we do not have any overriding legitimate grounds to continue to process it; or
- (d) your personal data has been processed unlawfully or has not been erased when it should have been.

In some circumstances, we may need to continue processing your data.

### Right to object

You also have the right to object to Center Parcs' processing of your personal data where such processing is based on Center Parcs' or a third parties legitimate interests. Such objection may be

based on your particular situation and Center Parcs will consider any such objection to assess on a case by case basis whether Center Parcs has compelling legitimate interests to continue processing such data in light of your objection.

#### Inaccurate data

You may challenge the accuracy of <u>personal data</u> which we process about you and, if it is found to be inaccurate or incomplete, you are entitled to have the inaccurate data removed and incomplete personal data, completed.

## Data portability

You may ask us to provide you or a third party with an electronic copy of any personal data you provided to us and which we process by automated means. This does not extend to personal data we generate or obtain from other sources and does not apply to hard copy files.

## Changes to this notice

We reserve the right to update this privacy notice at any time, and we will inform you and make available 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 data.

It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal data changes during the recruitment process.

#### Raising a complaint

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact the Legal Department in writing in the first instance.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) or the Data Protection Commissioner, respectively. Information about how to do this is available on the ICO's website at www.ico.org.uk or www.dataprotetion.ie.

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