

## Steinhoff UK Beds Limited (A subsidiary of Steinhoff UK) - Data Protection Applicant Privacy Notice

Steinhoff UK Beds takes its obligations with regard to data protection seriously. As such, we are providing this notice (“**Privacy Notice**”) to you so that you are provided with information about how Steinhoff UK Beds collects and uses your Personal Data in accordance with applicable data protection law, including the General Data Protection Regulation 2016/679 (“**GDPR**”) and the Data Protection Act 2018. Please read this Privacy Notice, as it contains important information of which you should be aware.

For the purposes of this Privacy Notice, “**Steinhoff UK Beds Applicants**” (“**you**” or “**your**”) means applicants for employment with Steinhoff UK Beds (including applicants for permanent and temporary staff, consultants and agency workers, employed by us directly or by a third party on our behalf) and “**Steinhoff UK Beds**” (“**we**”, “**us**” or “**our**”) means Steinhoff UK Beds Ltd, a company incorporated in the UK with a registered office address to which you have applied or which receives your application and by which or in respect of which you may be employed.

Steinhoff UK Beds is the data controller with regard to the processing of your Personal Data (as defined below). The data controller is the entity that determines how and why Personal Data is processed.

### 1. What do we collect and process?

In order for Steinhoff UK Beds to manage its business and staff recruitment efficiently, it is necessary for us to collect, maintain and process Personal Data about Steinhoff UK Beds Applicants. “**Personal Data**” is information which (either on its own or in combination with other information Steinhoff UK Beds holds) allows Steinhoff UK Beds to identify you and thus enable us to manage our relationship with you. Details of how and for what purposes we process Personal Data are set out below.

Personal Data will primarily be collected from you directly. You provide us with Personal Data when you apply for a job with us, when you complete our application forms or correspond with us and in the course of any recruitment interview or test.

However, some Personal Data may, where lawful to do so, be collected by Steinhoff UK Beds from third parties (e.g. previous employers and/or your referees) or publically available information about you (e.g. from a social media account if this has been made publically available by you), to which Steinhoff UK Beds has access.

### 2. Why and for what purpose do we collect and use your Personal Data and Sensitive Personal Data and what is our lawful basis for doing so?

**Please note:** this list may be updated from time to time and we will provide notice as and when such updates are made.

The term “**processing**” means *any* action taken, also with the help of electronic means, in connection with Personal Data, including collection, handling, use, transfer and disclosure by transmission through to erasure, disposal or destruction.

Basis of Processing	Personal Information	Purposes of Processing
Processing that is necessary to perform a contract or when taking steps in connection with a contract with you.	<ul style="list-style-type: none"> <li>Name and address</li> <li>Contact information (including telephone number and email address)</li> <li>[Date of birth]</li> <li>[Next of kin details]</li> <li>[DVLA records[, where relevant to role]]</li> </ul>	<p>(a) To communicate with you and, where successful, making a job offer to you and entering into a contract of employment with you.</p> <p>(b) To set up and to administer the employment (or other) relationship with you.</p> <p>(c) To pay your expenses related to your travel and accommodation in respect of your attendance at interviews and other meetings with us.</p>
Where necessary, processing based on your freely given, specific, informed and unambiguous consent.	<ul style="list-style-type: none"> <li>Name and address</li> <li>Contact information (including telephone number and email address)</li> <li>Physical or mental health or condition</li> <li>Gender</li> <li>Nationality and citizenship</li> <li>Passport, visa and/or work permit details</li> </ul>	<p>(a) To record any medical conditions where necessary for making adjustments to your working environment prior to commencement of employment.</p> <p>(b) To conduct background checks,</p>

	<ul style="list-style-type: none"> <li>• Racial or ethnic origin</li> <li>• Criminal offences or allegations</li> <li>• Education, skills, training and qualifications obtained (and any other information recorded within your application and CV or provided at interview/in other communications with us)</li> <li>• Personal information provided voluntarily by you</li> </ul>	<p>verification and vetting which are not required by law but needed by us to assess your suitability for your role.</p> <p>(c) To retain your application and/or CV on file for the purposes of informing you of future job opportunities within Steinhoff UK Beds which may be of interest to you and for which you may be a suitable candidate.</p>
<p>Processing that is necessary <b>to comply with a legal obligation</b> to which we as the data controller are subject (other than a contractual obligation)</p>	<ul style="list-style-type: none"> <li>• Name and address</li> <li>• Contact information (including telephone number and email address)</li> <li>• Date of birth</li> <li>• Nationality and citizenship</li> <li>• Passport, visa and/or work permit details</li> <li>• Pre-employment screening (in line with current relevant legislation)</li> <li>• Reference information</li> <li>• Education, skills, training and qualifications obtained (and any other information recorded within your application or CV or provided at interview/in other communications with us)</li> <li>• Criminal offences or allegations</li> <li>• Physical or mental health or conditions</li> <li>• CCTV data</li> <li>• Photograph</li> <li>• [DVLA details [(where relevant to role)]]</li> </ul>	<p>(a) to review and confirm your right to work</p> <p>(b) to monitor equal opportunities and managing and administering equal opportunity reporting</p> <p>(c) to conduct verification and vetting, including background checks and credit checks where required by law</p> <p>(d) to process a request by you to exercise your rights under applicable data protection law or other laws</p> <p>(e) for compliance with legal and regulatory requirements (including but not limited to health and safety laws and employment laws) and good governance obligations</p> <p>(f) Determining whether any adjustments are necessary to process your application</p> <p>(g) for dealing with legal claims</p> <p>(h) responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities</p> <p>(i) complying with disclosure orders arising in civil proceedings</p>
<p>Processing that is necessary <b>for our own legitimate interests</b> or those of third parties provided these are not overridden by your interests and fundamental rights and freedoms</p>	<ul style="list-style-type: none"> <li>• Name and address</li> <li>• Photograph</li> <li>• Contact information (including telephone number and email address)</li> <li>• Date of birth</li> <li>• Nationality and citizenship</li> <li>• Details of previous employment, including previous salaries</li> <li>• Education, skills, training and qualifications obtained (and any other information recorded within your CV or provided at interview/in other communications with us)</li> <li>• DVLA Records (where relevant to role)</li> <li>• Pre-employment screening (in line</li> </ul>	<p>(a) to administer your application for a job with us and consider your suitability for the relevant role</p> <p>(b) to obtain, consider and verify your employment references and employment history</p> <p>(c) to analyse recruitment objectives</p> <p>(d) to develop, operate and collect feedback on recruitment activities and employee selection processes</p> <p>(e) to communicate with you and provide you with information in connection with your recruitment from time to time and for general candidate administration</p> <p>(f) responding to non-binding requests or</p>

	<p>with current relevant legislation)</p> <ul style="list-style-type: none"> <li>• Reference information</li> <li>• Personal information about you taken from social media including qualifications, work history and lifestyle and social circumstances</li> <li>• Personal information provided voluntarily by you</li> </ul>	<p>search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities</p> <p>(g) Supporting the sale, transfer or merging of part or all of our business or assets, or in connection with the acquisition of another business</p> <p>(h) operating, reviewing and responding to CCTV surveillance of Steinhoff UK Beds’s premises, including monitoring footage and sharing with appropriate recipients on request or voluntarily</p> <p>(i) for conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role</p> <p>(j) for the prevention and detection of crime (including use of CCTV and photographs on ID cards) and for compliance and risk management</p>
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We may convert your Personal Data into statistical or aggregated data in such a way as to ensure that you are not identified or identifiable from that data. We may use this aggregated data to conduct research and analysis, including to produce statistical research and reports. We may share such anonymous aggregated data with third parties. Aggregated and anonymous information does not personally identify you and is therefore not Personal Data.

**3. Do we process Sensitive Personal Data?**

In addition to Personal Data, Steinhoff UK Beds may also process information about you which is classified as sensitive (“Sensitive Personal Data”). Examples of Sensitive Personal Data include the following:

- Racial or ethnic origin
- Physical or mental health or condition
- Criminal offences or allegations

Your Sensitive Personal Data will be processed as explicitly set out in this Privacy Notice for the purposes described below. Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public.

<p>Where necessary, processing based on your <b>explicit written consent</b>.</p>	<ul style="list-style-type: none"> <li>• Physical or mental health or condition</li> <li>• Racial or ethnic origin</li> <li>• Criminal offences or allegations</li> </ul>	<p>(a) to record any medical conditions where necessary for making adjustments to your working environment prior to commencement of employment</p> <p>(b) for compliance with legal and regulatory requirements (including but not limited to health and safety laws and employment laws) and good governance obligations</p> <p>(c) to determine whether any adjustments are necessary to process your application</p>
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<p>Processing that is necessary to comply with an employment legal obligation to which we as the data controller are subject (other than a contractual obligation) (duty of care and health and safety)</p>	<ul style="list-style-type: none"> <li>• Criminal offences or allegations</li> <li>• Physical or mental health or conditions</li> </ul>	<ul style="list-style-type: none"> <li>(a) monitoring equal opportunities and managing and administering equal opportunity reporting</li> <li>(b) for compliance with legal and regulatory requirements (including but not limited to health and safety laws and employment laws) and good governance obligations</li> <li>(c) Determining whether any adjustments are necessary to process your application</li> </ul>
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#### 4. To whom will your Personal Data be disclosed?

Personal Data may be shared and transferred from us to other Steinhoff group companies for the purposes noted above (or for such other purposes as are notified by Steinhoff UK Beds to you from time to time) and, where requested, to forward your application for consideration for roles within other Steinhoff entities.

Where any Steinhoff group companies process your personal data on our behalf (as our processor), we will make sure that they have appropriate security standards in place to make sure your personal data is protected and we will enter into a written contract imposing appropriate security standards on them, as well as safeguards to ensure the protection of your personal data if it is transferred outside the EEA.

Steinhoff UK Beds may otherwise disclose Personal Data to third parties that are performing services under contract for Steinhoff UK Beds, such as payroll service providers, IT hosting and/or maintenance providers and our professional advisers. Before we disclose your personal data to third parties, we will make sure that they have appropriate security standards in place to make sure your personal data is protected and we will enter into a written contract imposing appropriate security standards on them.

In certain circumstances, we will also disclose your personal data to third parties who will receive it as controllers of your personal data in their own right for the purposes set out above, in particular:

- if we transfer, purchase, reorganise, merge or sell any part of our business or the business of a third party, and we disclose or transfer your personal data to the prospective seller, buyer or other third party involved in a business transfer, reorganisation or merger arrangement (and their advisors); and
- if we need to disclose your personal data in order to comply with a legal obligation, to enforce a contract or to protect the rights, property or safety of our employees, customers or others.

We may also share your personal data with third parties, as directed by you.

For the purposes described above (or for such other purposes as are notified by Steinhoff UK Beds to you from time time), your personal information may be transferred to, and stored, and otherwise processed in, one or more countries outside of the European Economic Area (“EEA”). The jurisdiction of other organisations outside the EEA may not have adequate data protection laws equivalent to those in place within the EEA. For transfers of your Personal Data to third parties outside of the EEA, we take additional steps in line with data protection laws. We have implemented appropriate technical and organisational measures to protect your Personal Data in the form of EU Commission approved forms of contract with the relevant recipient(s) of your personal information. In addition, we will take reasonable steps to ensure that your personal information is adequately protected in accordance with the requirements of the UK data protection law.

#### 5. Security of your Personal Data

As stated above, Steinhoff UK Beds takes the protection of your Personal Data seriously and we have implemented technical, physical and organisational measures to ensure the Personal Data (and Sensitive Personal Data) of Steinhoff UK Beds Applicants is kept accurate, up to date and protected against unauthorised or accidental destruction, alteration or disclosure, accidental loss, unauthorised access, misuse, unlawful processing and/or damage.

## 6. Data Retention

Steinhoff UK Beds will retain your Personal Data only for such period as is necessary to perform the purpose(s) for which it was collected. In many cases this means that Personal Data will be retained for the duration of the application and recruitment process and then for a reasonable time thereafter in order to manage our relationship with you, defend any claims, for tax purposes and/or for any other legal or record keeping purposes. Subject to the provisions of this paragraph, this period is typically a period of not more than 6 months after the end of such period.

If we recruit you, we will keep your personal data for longer and we explain this in our employee privacy notice, which would be shared with you.

## 7. Your Rights

You have certain legal rights, which are briefly summarised below, in relation to any personal data about you which we hold.

Your right	What does it mean?	Limitations and conditions of your right
<b>Right of access</b>	Subject to certain conditions, you are entitled to have access to your personal data (this is more commonly known as submitting a “data subject access request”).	If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations. We must be able to verify your identity. Your request may not impact the rights and freedoms of other people, eg privacy and confidentiality rights of other staff.
<b>Right to data portability</b>	Subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.	If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations.  This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (ie not for paper records). It covers only the personal data that has been provided to us by you.
<b>Rights in relation to inaccurate personal or incomplete data</b>	You may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable. You have a responsibility to help us to keep your personal information accurate and up to date. We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details, telephone number, immigration status.	This right only applies to your own personal data. When exercising this right, please be as specific as possible.
<b>Right to object to or restrict our data processing</b>	Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.	This right applies where our processing of your personal data is necessary for our legitimate interests.  If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.  You can also object to our processing of your personal data for direct marketing purposes.
<b>Right to erasure</b>	Subject to certain conditions, you are entitled to have your personal data erased (also known as the “right to be forgotten”), eg where your personal	We may not be in a position to erase your personal data, if for example, we need it to (i) comply with a legal obligation, or (ii) exercise or

	data is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful.	defend legal claims.
<b>Right to withdrawal of consent</b>	As stated above, where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time.	If you withdraw your consent, this will only take effect for future processing.

Please contact us at [gdpr@steinhoff.co.uk](mailto:gdpr@steinhoff.co.uk) if you would like to exercise any of these rights or if you have any concern about how your personal information is processed and we will try to resolve your concerns.

You also have the right to lodge a complaint with the Information Commissioner’s Office, which is the UK data protection regulator. More information can be found on the Information Commissioner’s Office website at <https://ico.org.uk>

## **8. Updates to this Privacy Notice**

Steinhoff UK Beds may change this Privacy Notice from time to time in order to reflect changes in the law and/or its privacy practices. When this happens and where Steinhoff UK Beds is required to do so by law, it will provide you with a new and/or updated Privacy Notice detailing how the use of your Personal Data is changing and, if necessary, obtaining your consent for the further Processing, as may be applicable.

Policy last updated: September 2018