

MOSS BROS.

GROUP PLC

NOTE: The wording in this document reflects the requirements of the General Data Protection Regulation (GDPR), which came effect in the UK on 25 May 2018.

Data controller:

Moss Bros Group Plc
8 St Johns Hill
London
SW11 1SA

HR Data protection contact: hrdpo@mossbros.co.uk

As part of any recruitment process, Moss Bros Group PLC collects and processes personal data relating to job applicants. Moss Bros Group PLC is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does Moss Bros Group PLC collect?

Moss Bros Group PLC collects a range of information about you. This includes [list the appropriate points and expand on them as necessary]:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which Moss Bros Group PLC needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

Moss Bros Group PLC collects this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests.

Moss Bros Group PLC will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check

providers and information from criminal records checks. Moss Bros Group PLC will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

Why does Moss Bros Group PLC process personal data?

Moss Bros Group PLC needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.

In some cases, Moss Bros Group PLC needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

Moss Bros Group PLC has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows Moss Bros Group PLC to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. Moss Bros Group PLC may also need to process data from job applicants to respond to and defend against legal claims.

Where Moss Bros Group PLC relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

Moss Bros Group PLC processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

Where Moss Bros Group PLC processes other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes.

For some roles, Moss Bros Group PLC is obliged to seek information about criminal convictions and offences. Where Moss Bros Group PLC seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, Moss Bros Group PLC will keep your personal data on file in case there are future employment opportunities for which you may be suited. Moss Bros Group PLC will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time.

Who has access to data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy, company recruitment systems and IT staff if access to the data is necessary for the performance of their roles.

Moss Bros Group PLC will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. Moss Bros Group PLC will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

Moss Bros Group PLC will not transfer your data outside the European Economic Area.

How does Moss Bros Group PLC protect data?

Moss Bros Group PLC takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. [Provide more detail of internal policies and controls, eg systems restrictions.]

For how long does Moss Bros Group PLC keep data?

If your application for employment is unsuccessful, Moss Bros Group PLC will hold your data on file for 6 months after the end of the relevant recruitment process. If you agree to allow Moss Bros Group PLC to keep your personal data on file, Moss Bros Group PLC will hold your data on file for a further 6 months for consideration for future employment opportunities. At the end of that period [or once you withdraw your consent], your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file. The periods for which your data will be held will be provided to you in a new privacy notice.

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require Moss Bros Group PLC to change incorrect or incomplete data;
- require Moss Bros Group PLC to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where Moss Bros Group PLC is relying on its legitimate interests as the legal ground for processing; and
- ask Moss Bros Group PLC to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override Moss Bros Group PLC's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact hrdpo@mossbros.co.uk

If you believe that Moss Bros Group PLC has not complied with your data protection rights, you can complain to the Information Commissioner.

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to Moss Bros Group PLC during the recruitment process. However, if you do not provide the information, Moss Bros Group PLC may not be able to process your application properly or at all.

Automated decision-making

Some of Moss Bros Group PLC's recruitment processes are based solely on automated decision-making. Such as right to work within the country of the role applied to.