

## **PRIVACY NOTICE FOR VACANCY APPLICANTS**

When you choose to apply for any role with Watches of Switzerland Group Plc or any of our group companies, we capture personal information about you and we need to process that personal data but we respect and protect your privacy and do all we can to honour the trust you place in us by being transparent about what personal information we collect and how we use it.

We are Watches of Switzerland Company Limited part of Watches of Switzerland Group Plc of Aurum House, 2 Elland Road, Braunstone, Leicester LE3 1TT and we are a Data Controller registered with the UK Information Commissioner's Office with registration number Z5617669.

We hold and process information about you on behalf of ourselves and also on behalf of the other contractual employers within the Watches of Switzerland Group, namely Watches of Switzerland Operations Limited who is a Data Controller registered with the UK Information Commissioner's Office with registration number Z5617729 and Watches of Switzerland Group PLC who is a Data Controller registered with the Information Commissioner's Office with registration number ZA531335.

Our Data Protection Officer is contactable via [dpo@thewosgroup.com](mailto:dpo@thewosgroup.com)

### **1. THE KIND OF INFORMATION WE COLLECT ABOUT YOU**

1.1 The sort of information we hold includes your personal contact details such as:

- Recruitment information (including information about your entitlement to work in the UK such as your nationality copies of right to work documentation, including your National Insurance number, copies of your Driving Licence, Passport, Birth Certificate, and proof of current address, such as Bank Statements and Council Tax bills, references and other information included in a CV or cover letter or as part of the application process).
- Personal contact details such as name, date of birth, gender, title, addresses, telephone numbers and personal email addresses.
- Application form and references, details of your qualifications, skills, experience and employment history, including start and end dates with previous employers.
- For some roles we will ask for details of dismissals in the past 5 years and details of Unspent Criminal Convictions to enable us to establish whether or not you have committed an unlawful act or been involved in dishonesty or other improper conduct.
- We may also obtain details of your financial situation and history from a credit reference agency (or similar organisation). This is to enable us to ascertain whether there are any issues of a financial nature that could affect your suitability for employment.
- Where you browse our careers webpages, we will collect usage data such as your IP address, the length of your visit to our webpages, and communications and metadata associated with those communications generated by use of our website forms.
- If you attend an interview at our premises we may process CCTV footage, Automatic Number Plate recordings and other information obtained through electronic means such as a record of entry to and exit from the building, information about your use of information and communication systems.
- During the interview and selection process we may also ask you to complete online competency tests and our interviewers may take personal notes for their own benefit. If you are an internal candidate, we may ask your current manager for information about you. If you are an external candidate, we may contact the individuals that you have told us will provide a reference.

We may also ask you to provide some more sensitive information called Special Category data. We Ask for: Details of medical or health conditions, including whether or not you have a disability for which we need to make reasonable adjustments in the recruitment process or if you are successful in your application, information about your ethnic origin, sexual orientation and religion or beliefs, political opinions, trade union membership and information about criminal convictions and offences.

## **2. HOW WE WILL USE INFORMATION ABOUT YOU**

**2.1** The information we hold and process will be used for our management and administrative use. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process and, if you are successful, whilst you are working for us, at the time when your employment ends and after you have left.

This includes using information to enable us to comply with the employment contract, to comply with any legal requirements, pursue the legitimate interests of the Company and protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

Specifically, the situations in which we will process your personal information include:

- Administering and managing our Applicant's Tracking system and our careers webpages.
- Considering your application for job opportunities and making a decision about your recruitment such as assessing of qualifications for a particular job or task or appointment to include promotions and determining the terms on which you work for us.
- Checking that you are legally entitled to work in the UK.
- Determining performance requirements.
- Adding to our talent pool.

Due to the nature of our business activities, we may sometimes need to process your data to pursue our legitimate business interests, for example to prevent fraud, administrative purposes or reporting potential crimes.

The nature of our 'legitimate interests' are in relation to the interest of the business or those of third parties, or where it is required in the public interest or for an official purpose. We will never process your data where we believe that these interests are overridden by your own interests.

In limited and necessary circumstances, your information may be transferred outside of the UK or to an international organisation to comply with our legal or contractual requirements.

### **2.2 Sensitive Personal Information**

We may process special categories of personal information in any of the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations and in line with our policies.
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.
- In relation to legal claims.
- 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.

We will use your sensitive personal information in the following ways:

- In order to comply with our health and safety and occupational health obligations to consider how your health affects your ability to do your job and whether any adjustments to your job might be appropriate.
- Information relating to your racial or ethnic origin, religion, philosophical beliefs, sexual orientation will be used to ensure meaningful equal opportunity monitoring and reporting. We will always obtain your explicit consent to those activities unless this is not required by law or where the information is required to protect your health or wellbeing in an emergency.
- We may use information relating to criminal convictions where the law allows us to do so, for example where it is necessary to carry out our obligations, provided that we do so in a lawful manner.

Where we are processing data based on your consent, you have the right to withdraw that consent at any time.

## 2.3 LEGAL BASIS FOR USING DATA

We are required to set out the lawful basis for our processing of your personal data and the lawful bases we rely on are:

**1. As necessary to perform our contract with you such as any contract of employment with you**

**2. As necessary for the pursuit of our legitimate interests** - This is where we rely on our interests as a reason for processing, generally this is so we can continually improve our solutions, to monitor our assets and keep our information secure or in limited circumstances to monitor employees to ensure that they are complying with policy and standards. Other legitimate interests include:

- Good governance, accounting and managing of our operations and complying with our legal obligations.
- Preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies.
- Protecting our company, its employees and customers, by taking appropriate legal action against third parties who have committed criminal acts or are in breach of legal obligations to us.
- Handling any legal claims or regulatory enforcement actions taken against us; and
- Fulfilling our duties to our customers, colleagues, shareholders and other stakeholders.

**3. As necessary for complying with our legal obligations** - This is where we have a statutory or other legal obligation to process the information such as for equality monitoring or in reporting to HMRC including:

- where you exercise your rights under data protection laws
- for compliance with legal and regulatory requirements; or
- to establish or defend our legal rights

**4. Based on your consent** - This is where we have asked you to provide explicit permission to process your data for a particular purpose such as the provision of certain employee benefits and occupational health if your application is successful.

You have the right to withdraw consent at any time. Where consent is the only legal basis for processing your personal data, we will cease to process your personal data for that purpose after consent is withdrawn.

### Data Shared with Third Parties

We will never sell or rent your personal information to other organisations for marketing purposes.

We will not disclose your personal information to any third party, except for those referred to below.

We may share your data with:

- Other companies within our group.
- Our legal and other professional advisers, including our auditors.
- Credit reference agencies where necessary for carrying out credit checks.
- Our service providers and suppliers such as applicant tracker system providers who help us manage the application process, document copying and scanning system providers in order to allow records to be copied or scanned and talent acquisition software providers for recruitment purpose.
- CCTV and ANPR system providers and monitors for security purposes; and
- Governmental bodies, regulators, law enforcement agencies, courts/tribunals and insurers where we are required to do so:-
  - to comply with our legal obligations and/or the administration of justice
  - to exercise our legal rights (for example in court cases)
  - for the prevention, detection, investigation of crime or prosecution of offenders; and
  - for the protection of our employees and customers.

We only allow our service providers to handle your personal information when they have confirmed that they apply appropriate data protection and security controls. We also impose contractual obligations on service providers relating to data protection and security, which mean they can only use your information to provide services to us and to you, and for no other purposes.

Please see here for a non-exhaustive list of the types of service providers with whom we share personal data:

- Talent Acquisition software provider.
- Application Tracker system provider.
- HR/Payroll System provider (currently SD Worx) for storing and processing of employee information for HR and Payroll functions.
- Pension providers and pensions consultants for administering your pension contributions and entitlement.
- Electronic Platform Providers to create online application.
- Email Administrators for the provision of the email system; and
- Document Disposal Managers to dispose of documents.

## 5. DATA SECURITY AND RETENTION

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 relation to unsuccessful job applications from external candidates your data is stored for 12 months from capture. For unsuccessful internal applicants, and for successful applicants, your data is retained in accordance with our Privacy Notice for Employees, Workers and Contractors which can be found here [\[link\]](#)

## 6. AUTOMATED DECISION- MAKING

Currently, we do not make decisions about you using automated means. If this changes in the future, then the privacy notice will be updated accordingly.

## 7. YOUR RIGHTS

The law gives you certain rights relating to the use of your data.

**The right to be informed about our processing of your personal data** which is the aim of this Notice.

**The right to access** – You have the right to request Our Company for copies of your personal data. We may charge you a small fee for this service.

**The right to rectification** – You have the right to request that Our Company correct any information you believe is inaccurate. You also have the right to request Our Company to complete the information you believe is incomplete.

**The right to erasure** – You have the right to request that Our Company erase your personal data, under certain conditions.

**The right to restrict processing** – You have the right to request that Our Company restrict the processing of your personal data, under certain conditions.

**The right to object to processing** – You have the right to object to Our Company's processing of your personal data, under certain conditions.

**The right to data portability** – You have the right to request that Our Company transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you wish to exercise any of the above rights, you can always:

- call our Customer Relations Team on telephone 0800 085 8250 but we will ask you to put your request in writing; or
- email us at either [customer.relations@thewosgroup.com](mailto:customer.relations@thewosgroup.com) or [dpo@thewosgroup.com](mailto:dpo@thewosgroup.com); or

- contact us by post to either Customer Relations or the Data Protection Officer, Watches of Switzerland Company Limited, Aurum House, 2, Elland Road, Braunstone, Leicester LE3 1TT, United Kingdom.

You have the right to lodge a complaint with the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow SK9 5AF, United Kingdom if you believe we have not handled your personal data in accordance with the law. Further information, including contact details, is available at <https://ico.org.uk>.

## **8. CHANGES TO THIS PRIVACY NOTICE**

This privacy notice does not form part of any contract of employment, and we reserve the right to update it at any time.

Our Company keeps its privacy policy under regular review and places any updates on this web page.

This privacy policy was last updated in October 2021 Version 1