

GDPR Job Applicants Privacy Notice

Effective for 2020

This GDPR Job Applicants Privacy Notice (“Notice”) describes why and how *the FASTSIGNS Franchisee* (“we,” “us,” “our,” or “FASTSIGNS”) processes your personal data when you apply for a position with us, including with whom we might share it and how long we usually keep it, and advises you of your rights under the EU’s General Data Protection Regulation (“GDPR”). This notice does not form a part of any contract of employment or other contract to provide services.

It is important that you read and understand this notice. If you have questions regarding this Notice, please seek additional information from the email address of Franchisee. We reserve the right to modify this Notice from time to time in order that it accurately reflects the regulatory environment and our data collection principles. When material changes are made to this Notice, we will post the revised Notice and provide employees subsequent notice where consistent with local laws or regulations.

1. Definitions

1.1 “Personal data” has the meaning as defined in the GDPR and includes information relating to an identified or identifiable natural person (an individual). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

1.2 “Process”, “processed” or “processing” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

1.3 “Job applicant” or “you” means an identified or identifiable natural person who is acting as a FASTSIGNS job applicant in the EEA. In this context, “job applicant” refers to any person who has submitted his or her candidacy with FASTSIGNS.

2. Personal Data We Collect About You

2.1 In connection with your application to work with us, we may collect, store, and use the following categories of personal data about you:

- information you have provided to us in your Curriculum Vitae (CV) and cover letter;
- information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history and qualifications;
- any information you provide to us during an interview; and

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- any results from applicant testing or references.

We may also collect, store and use the following "special categories" of more sensitive personal data:

- information about your race or ethnicity, religious beliefs;
- information about your health, including any medical condition, health and sickness records; and
- information about criminal convictions and offences.

3. Why Collecting Your Personal Data

3.1 We may use your personal data to:

- assess your skills, qualifications, and suitability for the work;
- carry out background and reference checks;
- enter into a contract of employment with you;
- communicate with you about the recruitment process;
- maintain your contact information for future employment opportunities;
- assist you in case of emergency;
- keep records related to our hiring processes; and
- comply with legal or regulatory requirements.

3.2 Special Personal Information – "Special categories" of personal data (e.g., data that reveal race, ethnic origin, religious or philosophical beliefs, health, sexual orientation, political opinions, or trade union membership) are collected only where permitted by law and are used and disclosed only to fulfil legal requirements unless a job applicant provides consent for such collection or disclosure. We may process special categories of personal data in the following circumstances:

- to consider whether we need to provide appropriate adjustments during the recruitment process; and
- to ensure equal job opportunity.

3.3 Criminal Convictions – We will collect information about your criminal convictions history if we would like to offer you a position (conditional on checks and any other conditions, such as references, being satisfactory). We are required to carry out a criminal-records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. Furthermore, for some roles within the company, we are legally required to carry out criminal record checks for those carrying out work for certain customers.

4. Sources of Personal Data

We may collect personal data about our applicants from the following sources:

- you, the applicant;
- recruitment agencies (where applicable);
- background check providers (where applicable);
- your referees (where applicable); and
- social media checks

5. Grounds for Collecting and Using Your Data

We base our processing of your personal data on your consent and to enable us to comply with legal obligations. If you fail to provide consent when requested, which is necessary for us to consider your application, we will not be able to process your application successfully. For example, if we require a credit check or references for the role you apply and you fail to provide us with consent to process such information, we will not be able to take your application further.

6. Data Sharing

We may disclose your personal data as described below:

- **Service Providers** – We share your personal data with our service providers that process data on behalf of FASTSIGNS. In such cases your personal data is safeguarded by data processing agreements, committing outsourced service providers to process your personal data for specified purposes and in accordance with our instructions, comply with GDPR and apply appropriate security measures to protect your personal data in line with our policies. We do not allow our service providers to use your personal data for their own purposes.
- **Mergers and Acquisitions** – We share your personal data in the context of a business reorganisation or restructuring exercise, for system maintenance support and hosting of data.
- **To Maintain Legal and Regulatory Compliance** – We share your personal data with different governmental authorities, institutions or agencies (or similar), or insurance companies where required by law for the purpose of their regulatory tasks. We may also need to share your personal data with a regulator or to otherwise comply with the law.

7. Data Security

We take precautions to protect data and information under our control from misuse, loss or alteration. Our security measures include industry-standard physical, technical and administrative measures to prevent unauthorized access to or disclosure of your information, to maintain data accuracy, to ensure the appropriate use of information, and otherwise safeguard your personal data.

We have put in place procedures to deal with any suspected data security breaches and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

8. Data Retention

We only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

9. Transferring Personal Data Outside the EEA

If necessary, we will transfer the personal data we collect about you to FASTSIGNS entities outside the EEA, including offices in the United States. When we make such transfers, we ensure that appropriate safeguards are in place which provide adequate levels of protection of your personal data as required by applicable data protection laws. All transfers outside the EEA not made to countries which are considered by the European Commission to provide an adequate level of protection of personal data are safeguarded with agreement based on Standard Contractual Clauses approved by European Commission or such other mechanisms as have been recognised or approved by the relevant authorities from time to time.

10. Automated Decision-Making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

11. Your Rights

Under certain circumstances, by law you have the following rights:

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- Right of Access – Upon your request, we will provide you with a copy of your personal data in our files without undue delay and free of charge, unless we are permitted by law to charge a fee.
- Right to Rectification (or “Correction”) – You may request to correct or update any of your personal data in our files. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Right to Erasure (or the “Right to be Forgotten”) – Upon your request, we will erase any of your personal data in our files that: (i) is no longer necessary in relation to the purposes for which it was collected or otherwise processed; (ii) was collected in relation to processing that you previously consented to, but later withdrew such consent; or (iii) was collected in relation to processing activities to which you object and there are no overriding legitimate grounds for our processing.
- Right to Data Portability – If we process your personal data based on a contract with you or based on your consent or the processing is carried out by automated means, you may request to receive your personal data in a structured, commonly used and machine-readable format, and to have us transfer your personal data directly to another controller, where technically feasible.
- Right to Object to and Right to Restrict Processing – Under certain situations, you may object to or seek to restrict our processing of your personal data.

Please contact us in writing to exercise your rights under the GDPR. We may limit your individual rights requests in the following ways: (a) where denial of access is required or authorised by law; (b) when granting access would have a negative impact on other’s privacy; (c) to protect our rights and properties; and (d) where the request is frivolous or burdensome.

In order to respond to your request, we may need to request specific information from you to help us confirm your identity. Exercising your rights is free of charge. However, we have the right at our sole

discretion, to refuse to fulfil or charge a reasonable fee for fulfilling several similar consecutive requests or requests that are manifestly unfounded or excessive. We are also entitled to decline requests on statutory grounds in which cases we will inform you of such decline including the grounds for the decline.

If you believe that we have infringed or violated your rights under this Notice, please contact us so that we can work with you to resolve your concerns. You also have a right to lodge a complaint with a competent supervisory authority situated in a Member State of your habitual residence or place of alleged infringement.

12. Contact Us

If you have any questions or comments about this Notice, please contact the FASTSIGNS at enquiries@fastsigns.com.

13. Changes to this Notice

We may make changes to this Notice from time to time. To let you know when we make changes to this Notice, we will amend the revision date at the top of the first page. The new modified or amended Notice will apply from that revision date.

We may also make changes as required to comply with changes in applicable law or regulatory requirements.