

# Cotton On Group Privacy Policy for Job Applicants

## Introduction

Protecting your privacy and the confidentiality of your personal information is very important to us. This Privacy Policy applies to Cotton On Clothing Pty Ltd (ACN 052 130 462) and all of its member companies in the UK (referred to in this document as "we", "us" or "our"), including our UK registered company Cotton On (UK) Pty Limited (Company Number 09680832) as well as our UK-based businesses Cotton On, Cotton On Body, CO. by Cotton On, Free by Cotton On, Cotton On Kids, Rubi Shoes, T-Bar and Typo. This Privacy Policy (which incorporates our Fair Processing Notice) explains the policies adopted by us, for the collection, use, disclosure and storage of personal information we collect from you when you apply for a job with us. This Privacy Policy also gives you choices as to how we use your information. We are required to notify you of this information under data protection legislation. Please be sure to read this Privacy Policy carefully before you provide any personal information when applying for a job with us.

We will provide you with a copy of this Privacy Policy when you submit a job application to us. You may also access a copy of this Privacy Policy at any time on our UK job application website.

Whenever you provide personal information to us regarding your job application, you are consenting to the collection, use, disclosure and storage of that information in accordance with this Privacy Policy.

We comply with all privacy principles and laws which regulate how we collect, use, disclose, store and protect your personal information.

## Who collects the information?

Cotton On Group (including each of its member companies) is a data controller and gathers and uses certain information about you.

## What personal information do we collect?

Personal information is information about you that can be used to identify you individually. Some common examples of personal information include your name, postal address, telephone number, email address and other information necessary to process your job application.

Every time you submit a job application to us, we collect the personal information you provide in the application.

We may collect the following information:

**Your name**, home and mobile phone numbers, **home** and email **address**;

**Details of your qualifications, experience and employment history** (including job titles, salary and working hours, details of any conduct, grievance or performance issues, appraisals, and details of punctuality and attendance);

[Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs;]

**[Information regarding any criminal record];**

**Your nationality and immigration status and information from related documents such as your passport or other identification and immigration information;**

Details of your referees and any information they provide us;

Information about your academic history and any academic professional qualifications; and

**[Your driving license];**

You are required by law or in order to enter into a contract to provide the information marked in bold above to enable us to verify your right to work [and suitability for the position].

## How we collect the information

We may collect this information from you, your referees, your education provider, a relevant professional body, [the Disclosure and Barring Service (DBS)] and the Home Office.

## **Why do we collect personal information and how do we use it?**

The information we collect allows us to assess and process your job application with a view to entering into a contract of employment with you, enables us to comply with our legal obligations or is in our legitimate interests, but only if these are not overridden by your interests, rights or freedoms. Personal information collected or received by us will only be used for the stated purpose for which it was provided.

You may receive emails, letters or telephone calls from us regarding your job application. If you choose not to provide certain types of personal information to us, we may be unable to process your job application.

We do not make decisions about you or your information through any automated means.

## **When do we disclose personal information?**

We do not share, sell, rent or trade personal information about you to or with third parties or affiliates, except as otherwise set forth in this Privacy Policy. We may disclose your personal information to ex-employers, third parties and affiliates as is necessary to achieve the purposes for which it was collected, such as HR consultants, professional advisers or for checking references in your job application. We may also share your personal information with third parties or affiliates in the event of an acquisition of our business or similar transaction, to enforce our legal rights or those of others, or if we are required to do so by law.

We may share information with governmental agencies or other third parties for purposes of prevention or investigation of fraud or other illegal activities. We may only do so when:

1. Permitted or required by law;
  2. Necessary to prevent actual or potential fraud, unauthorised transactions, or other illegal activities;
- or
3. Investigating fraud incidents or other illegal activities.

If personal information is disclosed to a third party, they will be bound by confidentiality obligations and appropriate safeguard controls. Some of our suppliers, who provide services to us, may be located overseas and at present we have servers in Australia, Singapore and the USA hosting our website(s).

## **How do we store personal information?**

Your personal information may be stored by us in various forms including both electronic and hardcopy. You should be aware that there are inherent risks associated with the transmission of personal information via the internet, however, we will take reasonable steps to maintain the integrity and security of any personal information we have stored, including taking reasonable steps to prevent interference and loss, misuse, unauthorised access, modification or disclosure of such personal information. Information may be held at our offices and those of our member companies, third party agencies, service providers and representatives and agents of the above.

It is important that you protect your privacy by ensuring that no one obtains your personal information and you must contact us if your details change. If you do not wish to use the internet to transmit personal information you can mail or phone the Privacy Officer. If we no longer require your personal information for the purposes stated in this Privacy Policy or we have received it inadvertently, we will take reasonable steps to securely destroy or de-identify it as soon as practicable, as long as it is lawful to do so.

## **How long do we keep your personal information?**

We keep your personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep it will depend on whether your application is successful and you become employed by us, the nature of the information and the purpose for which it is processed.

## **How can I access, correct, update, transfer, object to processing and/or delete personal information you have collected?**

You may request access to some (but not always all) of your personal information we have by contacting our Privacy Officer. We will provide you with access once you have proved your identity. If your personal information is incorrect or you wish us to delete it or transfer it to another data controller identified by you, or you wish to object to us processing it you can unsubscribe where appropriate or contact our Privacy Officer .

## **Keeping your information secure**

We have appropriate measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

## **How to report fraud**

You can help us identify attempts at fraud. We will never ask you for personal information in an email. If you receive a suspicious email appearing to come from us, such as one requesting that you confirm personal information like your credit card number, or if you have received an email implying that it has been sent by us after you have opted out of receipt of emails from us, you may forward the suspicious email to our Privacy Officer. You should not respond directly to suspicious email nor should you open any link in the email.

There are a few common features of fraudulent emails that can help you identify them as spam. The two most frequent are: 1.receiving an email that contains mistakes such as misspelled words or grammatical errors; and 2.receiving an email that asks for your confidential information or asks you to take immediate action on your account.

## **Children's Privacy**

We do not knowingly request or collect personal information from any person under 13 years of age without prior verifiable parental consent. If we become aware that an individual is under the age of 13 and has submitted any information to us for any purpose without prior verifiable parental consent, we will delete his or her information from our files.

## **Do you have any questions or concerns?**

If you have any questions about our Privacy Policy or if you have a complaint, please contact us with your concerns and we will respond to your request within 30 days. We hope that we can resolve any query or concern you raise about our use of your information but if not, you can contact the Information Commissioner for further information about your rights and how to make a formal complaint.

**Mail:** The Privacy Officer, Cotton On Group, 14 Shepherd Court, North Geelong, Victoria 3215

**Phone:**

UK: 0800 085 5123

**Email:** [privacyofficer@cottonon.com](mailto:privacyofficer@cottonon.com)

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