

Issued: 12th June 2018

Griffith Foods Job Applicant Privacy Notice

The controller of your personal data is the Griffith Foods Europe legal entity, among the list available in the “Griffith Foods Europe Legal Entities” document, for whom you are contractually employed.

Privacy Coordinator: Kris Notebaert

Griffith Foods has issued this Job Applicant Privacy Notice to describe how we handle personal data that we hold about job applicants (collectively referred to as “you”).

We respect the privacy rights of individuals and are committed to handling personal data responsibly and in accordance with applicable law for the protection of personal data, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (“GDPR”), as well as any applicable national acts and provisions executing the GDPR (hereinafter “Applicable Data Protection Law”). This notice set out the personal data that we collect and process about you, the purposes of the processing and the rights that you have in connection with it.

What personal data does Griffith Foods collect?

We collect a range of personal data about you in the context of your application, including your identification data and employment details.

In this respect we may also collect personal data about you from third parties [*if applicable*: and publicly accessible sources], such as:

- References supplied by former employers.

We will seek personal data about you from third parties only once a job offer to you has been made and will inform you that it is doing so.

Why do we process personal data?

We process your personal data pre-and during the recruitment process and for keeping records of the process. Processing personal data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process personal data from job applicants to respond to and defend against legal claims. For these processing activities we rely on our legitimate interests to manage the recruitment process and to exercise and defend our rights.

In some cases, Griffith Foods needs to process your personal data to ensure that it is complying with its legal obligations. For example, Griffith Foods processes personal data concerning health 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. If your application is unsuccessful, we will keep your personal data on file in case there are future employment opportunities for which you may be suited. We will ask for your consent before we keep your personal data for this purpose and you are free to withdraw your consent at any time.

We may need to process personal data to take steps at your request prior to entering into a contract with you. We may also need to process your personal data to enter into a contract with you.

Where we decide to offer you a job, the provision of certain personal data is a requirement to conclude the employment contract with us and you are obliged to provide us with this personal data. If you do not provide this personal data, we may not be able to conclude the employment contract with you.

Who has access to your personal data?

Your personal data 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.

We will not share your personal data with third parties, unless your application for employment is successful and we make you an offer of employment. We will then share your personal data with former employers to obtain references for you.

As part of our wider business community we will share your personal data with other members of the Griffith Foods group around the world in order to administer human resources, staff member compensation and benefits at an international level on the HR System, as well as for other legitimate business purposes such as IT services/security, tax and accounting, and general business management.

International data transfers

Personal data may be transferred and processed in countries other than the country where you reside. These countries may have data protection laws that are different from the laws of your own country (and, in some cases, may not be as protective). We undertake to transfer your personal data only to the extent that there are sufficient guarantees in terms of security and protection of personal data, in accordance with Applicable Data Protection Law (in particular the existence of an adequacy decision issued by the European Commission). In other cases, we take appropriate protective measures to ensure that personal data remain protected in accordance with this notice. Upon request, we will provide more information on this subject and a copy of these measures.

For how long do we keep your personal data?

If your application for employment is unsuccessful, we will hold your personal data on file for 12 months after the end of the relevant recruitment process for consideration for future employment opportunities. At the end of that period or once you withdraw your consent, your personal data will be deleted or destroyed.



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

Your rights

In accordance with Applicable Data Protection Law, you have the right to request access to and rectification or deletion of your personal data or restriction of the processing concerning you. In accordance with Applicable Data Protection Law, you also have the right to object to the processing of your personal data, or to transmit your personal data to another controller (i.e. the right to data portability).

In case the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time, without this affecting the lawfulness of processing based on consent before this withdrawal.

If you would like to exercise any of these rights, please contact our Privacy Coordinator. You can contact our Privacy Coordinator or make a subject access request through the Privacy Coordinator at GDPR-Advisor@griffithfoods.com

You can also lodge a complaint to the relevant Data Protection Authority, for example if you believe that we have not complied with your data protection rights.

Updates to this Notice

This notice may be updated periodically to reflect any necessary changes in our privacy practices in response to changing legal, technical or business developments, and is linked to the Global Employee Privacy Notice. When we update our notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. You can see when this notice was last updated by checking the date displayed at the top of this notice.
