

# BEAUTY PIE

## APPLICANT DATA PRIVACY NOTICE - UK APPLICANTS

<b>Data controller:</b>	<b>Beauty Pie Limited</b> The Foundry, 2 Smith Square, 77 Fulham Palace Road, London, W6 8AF, United Kingdom
<b>Data Protection Responsible Party:</b>	<b>Data Protection Officer</b> <a href="mailto:dataprotection@beautypie.com">dataprotection@beautypie.com</a>
<b>Last updated:</b>	February 2022

### Reason for this policy

You are being sent a copy of this privacy notice because you are applying for work with us or we have collected personal data about you in relation to potential employment. Beauty Pie is committed to being transparent about how it collects and uses personal data about you and to meeting its data protection obligations, which are outlined in this policy. This policy also provides you with certain information that must be provided under the UK General Data Protection Regulation.

### The kind of information we hold

Beauty Pie collects a range of information about you in connection with your application;

- your name, address and contact details, including email address and telephone number, date of birth and gender;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- information about your entitlement to work in the UK; and
- certain types of more sensitive information (only if you choose to provide it), such as: whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process; and information about your race or ethnicity, religion and sexual orientation (collected anonymously).

We collect this information in a variety of ways. For example, data might be collected:

- directly from you, for example from application forms, CVs or covering letters, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online test
- from publicly available sources (eg LinkedIn) or from someone who has referred you to us for a potential job
- from other third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. The organisation will seek information from these 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 our secure candidate tracking platform and on other IT systems (including email).

### Why does Beauty Pie process personal data?

Beauty Pie has a legitimate interest to decide whether to appoint you to work since it would be beneficial to our business to appoint someone to that work.

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

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In some cases, we need to process data to ensure that we are complying with our legal obligations and to respond to and defend against legal claims. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

We will use sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

For some roles, we are obliged to seek information about criminal convictions and offences. Where the organisation 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, 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 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 People and Talent teams, interviewers involved in the recruitment process, managers in the team with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

We use Greenhouse Software, Inc., a cloud services provider located in the United States of America to help manage our recruitment and hiring process. This involves processing personal data. Accordingly, if you are located outside of the United States, your personal data has been transferred to Greenhouse in the United States. We have protected this transfer with appropriate additional safeguards under the standard contractual clauses. You can obtain a copy of the standard contractual clauses by contacting us at [dataprotection@beautypie.com](mailto:dataprotection@beautypie.com).

We will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. Beauty Pie may 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, should this be applicable to the role you are applying for.

## **How does Beauty Pie protect data?**

Beauty Pie takes the security of your data seriously. We have 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.

## **For how long does Beauty Pie keep data?**

We will retain your personal information for a period of six months after we have communicated to you our decision about whether to appoint you to the role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. If you agree to allow us to keep your personal data on file, we will hold your data on

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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 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 data will be held will be provided to you in a new privacy notice.

## **What if you do not provide personal data?**

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

## **Automated decision-making**

Recruitment processes are not based solely on automated decision-making.

## **Your rights**

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to exercise these rights, please contact [dataprotection@beautypie.com](mailto:dataprotection@beautypie.com) in writing.

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

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## CCPA PRIVACY NOTICE - CALIFORNIA APPLICANTS

Under the CCPA, personal information includes information that identifies and describes who you are, as well as information that relates to, is associated with, or could reasonably be linked to you, one of your devices and/or a member of your household. In this policy, we refer to this information as “Personal Information.” You have the right to receive information about Beauty Pie’s privacy practices, including why we collect Personal Information and how we use that information.

### **What information do we collect from you?**

Beauty Pie collects information supplied by you from the point you submit an application to work with us (such as the information you provide in your application) and throughout your employment with us (e.g. through on-boarding, using our systems, and signing up for benefits) as well as at other points in your services to or engagement with the company.

The information that we may collect and use about you includes but is not limited to:

- Application information (e.g. your resume, application and any references supplied);
- Right to work information (e.g. work permit and visa application information);
- Name;
- Social security number, drivers' license or other government IDs;
- IP address;
- Date of birth;
- Contact details (e.g. telephone number, email address, mailing address);
- Bank account details and tax information;
- Information related to benefit entitlements and programs (e.g. details of participation and contributions);
- Information pertaining to your dependents (used for tax purposes or for benefits)
- Information related to gender, race or ethnic origin for purposes of complying with required reporting or applicable anti-discrimination or diversity legislation (where applicable);
- Medical information, if necessary, to comply with applicable laws, or in order to provide medical care to you including workers’ compensation care and claims;
- Performance related data (e.g. information about and assessments of your performance collected as part of our appraisal process);
- Geolocation information (e.g. tracking technology on Company-owned laptops);
- Information which we need to process in connection with disciplinary actions or investigations;
- Information about your use of our systems (e.g. information from your company email account, information posted on our website, the information you submit through applications or software made available to you);
- Conviction and credit check information (e.g. background or credit checks before or during employment, where permitted by applicable laws); and
- Any other information you provide directly to us.

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## Why do we collect this information?

We may use the information we collect about you for:

- Recruiting;
- Providing you with equipment, training and support so that you can carry out your role;
- Providing training, feedback and appraisals, including maintaining personnel records, conducting investigations or disciplinary procedures;
- Compensation and benefits management, including but not limited to payroll, retirement-related benefits, healthcare and life insurance for you and, where applicable, your dependents;
- Organization management and administration, including the management of staff resources, financial planning, internal audits and other administration;
- Administration of absences in accordance with leave programs;
- Administration of benefits such as workers' compensation benefits;
- Sending or facilitating communications with you;
- Compliance with legal operations, including health and safety requirements, requests for information from government agencies and security investigations;
- Provision of employment references if requested by a potential employer;
- Administering our applications, software and systems;
- Statistical and analytical purposes to understand and improve employee satisfaction and performance;
- Managing absences due to illness or family/parental leave (where applicable) to meet obligations under applicable laws (e.g. to ensure that you receive sick time or parental or other medical leave);
- Complying with equal opportunity or anti-discrimination legislation or regulations (where applicable);
- Obtaining legal advice, establishing or defending legal claims, or otherwise where necessary for the administration of justice in accordance with applicable laws;
- Conducting background or credit checks for employment, where permitted by applicable laws; and
- Such other purposes as we may disclose to you from time to time.