

## **ASOS RECRUITMENT: CANDIDATE PRIVACY NOTICE**

### **PROTECTING YOUR PRIVACY**

At ASOS, we are committed to protecting the privacy of and securing the data of all candidates who apply for a role with us. As the Data Controller, ASOS.com Ltd decides what information to collect and how to use your data - of course, we only use it as outlined in this document or any additional notices we may provide to you.

For the purposes of data protection law, the following entities are covered by this statement (depending on the location of the vacancy for which you have applied):

- ASOS Australia Pty Limited
- ASOS GERMANY GmbH
- ASOS Payments Europe B.V.
- ASOS Payments UK Ltd.
- ASOS US Sales LLC
- ASOS US Inc,
- ASOS.com Ltd (Hong Kong)
- ASOS.com Ltd (Turkey)
- ASOS.com Ltd (UK)

If you have any questions about how we protect your privacy, drop us a line at [dataprotection@asos.com](mailto:dataprotection@asos.com).

### **HOW WE USE YOUR INFORMATION**

We use your information in several different ways — what we do depends on the information. The information below explains what we do, why we do it and the legal reasons for it.

### **INFORMATION WE COLLECT AUTOMATICALLY ABOUT VISITORS TO OUR SITE**

When you visit [asoscareers.com](https://asoscareers.com), we collect and store certain information automatically about your device and how you use the site. This information will include the content you view and features you access, the web pages you view immediately before or after visiting our site, how you interact with content on our site, the date and time of your visit and the search terms you enter, the type of device you are using, the operating system and version, your IP address, your general geographic location as indicated by the IP address and your browser type. We also collect information using browser cookies and similar technologies (together, “**Cookies**”). For further information about how we use Cookies, please see our Cookie Policy in the cookie preferences on the [asoscareers.com](https://asoscareers.com) site.

Please note that once you click “Apply Now” you will be redirected to the SmartRecruiters site to complete an application and you will be able to provide your personal details, upload your CV and any other relevant information. For more information about how SmartRecruiters uses Cookies, please see the SmartRecruiters Cookie Policy ([here](#)).

### **PERSONAL INFORMATION WE COLLECT ABOUT CANDIDATES**

When you engage with us as a candidate, we may collect the following personal data from you:

<b>Personal information we may collect</b>	<b>Why we collect it</b>	<b>Why we need to process it (the legal reason)</b>
Your name, email address, phone number and, if you choose to give it to us, your address	<ul style="list-style-type: none"> <li>To manage your application, know who you are and so we can contact you</li> </ul>	<ul style="list-style-type: none"> <li>We'll only do this with your consent – it's up to you whether you submit an application for our review and consideration, and we may use this information to contact you during the recruitment process</li> </ul>
Your curriculum vitae (CV), job application and additional details about your work history, education, qualifications and skills	<ul style="list-style-type: none"> <li>To assess your application and suitability for a role</li> </ul>	<ul style="list-style-type: none"> <li>We'll only do this with your consent – it's up to you whether you submit an application for our review and consideration, and we may use this information to contact you during the recruitment process</li> <li>We have a legal obligation to do this in case there is a claim relating to your application under the Immigration Act 2016</li> </ul>
Information from social media and websites that you link us to, if relevant to your application	<ul style="list-style-type: none"> <li>To assess your application and suitability for a role</li> </ul>	<ul style="list-style-type: none"> <li>We'll only do this with your consent, if you choose to provide this as part of your application</li> </ul>
Your work history with us, previous applications and whether you have been successful in the past	<ul style="list-style-type: none"> <li>So, we can identify who has applied for roles with us in the past, which we use to inform hiring decisions, statistical analysis and to train our staff</li> </ul>	<ul style="list-style-type: none"> <li>It's in our interests to us to know who has applied for roles with us in the past</li> </ul>
Your date of birth, national insurance number, sex and passport	<ul style="list-style-type: none"> <li>To check your nationality and right to work</li> <li>To set you up with our payroll service provider</li> </ul>	<ul style="list-style-type: none"> <li>We have a legal obligation to do this under the Employment Rights Act 1996 and Immigration Act 2016</li> </ul>

		<ul style="list-style-type: none"> <li>It's necessary for us to perform our contract with you</li> </ul>
How you heard about us, such as information from your browser to indicate that you have been referred from another website (such as LinkedIn) or if you've been referred by a friend	<ul style="list-style-type: none"> <li>To improve our recruitment strategy</li> <li>So we can find the best candidates to fill our roles</li> <li>To help us identify the best channels to advertise opportunities at ASOS</li> </ul>	<ul style="list-style-type: none"> <li>It's important to us to have a good recruitment strategy and make our roles visible to as many potential candidates as possible</li> </ul>

### SPECIAL CATEGORY, DIVERSITY, EQUITY AND INCLUSION DATA

At ASOS, we're committed to creating an environment where everyone has the confidence to be who they want to be. We want our world to reflect the diverse customer base that we're so proud of, and for our ASOSers to feel respected, valued and an important part of our ASOS family.

If you choose to do so, you can tell us about the below information for diversity, equity and inclusion purposes:

Personal information we may collect	Why we collect it	Why we need to process it (the legal reason)
Age range, disability, gender identity, pronouns, race & ethnicity, religion, socio-economic background (such as type of school attended, parents' highest qualification and main job) and sexual orientation	<ul style="list-style-type: none"> <li>To support the wellbeing of everyone and to protect potential ASOSers from discrimination, harassment and victimisation</li> <li>Diversity, Equity and Inclusion monitoring</li> <li>To offer and/or make reasonable adjustments to anyone with a disability</li> <li>To conduct anonymous reporting for internal reports to support external initiatives</li> <li>To conduct anonymous external reports for candidates applying for vacancies based in Northern Ireland</li> </ul>	<p>We only do this with your explicit consent, but it is important to us to ensure ASOS is a diverse, inclusive and welcoming place for all to work</p> <p>For some of the purposes, we have a legal obligation to report on candidates' diversity data to relevant authorities (for example, Northern Ireland Fair Employment Monitoring)</p>

The information collected may also be used in an anonymised and aggregated way to help inform initiatives that support ASOS' vision.

### CRIMINAL CONVICTION DATA

Personal information we may collect	Why we collect it	Why we need to process it (the legal reason)
Criminal conviction data or allegations of criminal behaviour	<ul style="list-style-type: none"> <li>• If it is relevant to your role</li> <li>• If you choose to disclose a conviction or allegation to us during your employment or contract</li> <li>• If a conviction or allegation comes up as part of the recruitment process</li> <li>• To make decisions regarding suitability for the role</li> <li>• In possible grievance or disciplinary matters</li> </ul>	<ul style="list-style-type: none"> <li>• We have a legal obligation to do so</li> <li>• In some cases, we'll only do this with your explicit consent</li> </ul>

### WHERE WE COLLECT YOUR PERSONAL INFORMATION FROM

ASOS collects personal data about potential employees as part of the recruitment process. This data comes directly from candidates, including via the SmartRecruiters site, and sometimes from external employment agencies and background check providers.

If you are successful, we sometimes collect information from third parties including:

- former employers
- credit reference agencies or other background check agencies
- doctors, medical and occupational health professionals
- Disclosure and Barring Service (DBS)
- UK Visas and Immigration

### SHARING YOUR PERSONAL INFORMATION

ASOS do not, and will not, sell any of your personal data to any third party.

We do share your data with the following categories of companies as an essential part of managing your application and offering roles to successful candidates:

- companies in the ASOS group, because sometimes different bits of our group are responsible for different activities

- professional service providers, such as companies that handle applications (for example, SmartRecruiters), onboarding of successful applicants and payments to them; recruitment agencies, and the Disclosure and Barring Service (DBS) and criminal records bureaus (as they may ask for additional information to carry out their services)
- companies which advertise roles for us on their platforms, such as LinkedIn
- members of ASOS staff who have referred you for the role via our 'Refer a Friend' scheme

## **YOUR INFORMATION AND COUNTRIES OUTSIDE THE UNITED KINGDOM (UK) AND EUROPEAN ECONOMIC AREA (EEA)**

ASOS is a global business with operations inside and outside of the UK and EEA and we use suppliers located outside these territories. Some of these locations will not offer the same level of protection for your personal data as the UK or the EEA, but if we transfer your information to one of these locations, we will take steps to ensure that your data and rights are protected through methods approved within the relevant Data Protection laws. Please contact us if you would like further information about how we securely transfer your information.

### **KEEPING YOUR INFORMATION**

Even if your application is not successful, in most situations, we will retain your information for 12 months after we have made a decision about your application. Data retention periods may vary depending on your location or the location of the job (for example, If you are applying for a role in Ireland, we will retain your information for 24 months after we have made a decision about your application). For further information about ASOS' retention periods, please contact [dataprotection@asos.com](mailto:dataprotection@asos.com). We are required to do this in order to meet our legal or regulatory requirements, prevent fraud or enforce our contractual rights.

We will also retain some data in completely anonymous form – you will not be identifiable from any of this information. We will use this to produce reports and statistics on our recruitment activities. It is important for the growth of our business to understand how our recruitment strategies are working.

If your application is successful, we'll process your personal data under the terms of our Employee Privacy Notice, which we'll share with you as part of the onboarding process.

### **YOUR RIGHTS**

You have many rights relating to your personal information, but these are not absolute rights. Your rights include:

- The right to be informed about how your personal information is being used (which we're doing in this privacy notice)
- The right to access the personal information we hold about you
- The right to request the correction of inaccurate personal information we hold about you

- The right to request that we delete your data, or stop processing it or collecting it, in some circumstances
- The right to stop direct marketing messages
- The right to withdraw consent for any consent-based processing at any time
- The right to request that we transfer or port elements of your data either to you or another service provider
- The right to complain to your data protection regulator — in the UK, the Information Commissioner’s Office

## **CHANGES TO HOW WE PROTECT YOUR PRIVACY**

We may change this notice from time to time to reflect how we’re processing your personal information. If we make significant changes, or we create a supplementary notice, we will aim to notify you about this (e.g. via email or on our website) so that you are aware of any updates.

## **HOW TO CONTACT US**

If you have any questions or feedback about this privacy notice, want to exercise any of your rights as set out above, or have a complaint, please don’t hesitate to contact our Data Protection Officer (DPO) and our Privacy team by emailing [dataprotection@asos.com](mailto:dataprotection@asos.com).

**Last updated: 4 March 2024**