

HEINEKEN Recruitment Privacy Policy

WHO is the CONTROLLER of your personal data?

Heineken UK Limited (collectively referred to as "we", "us", or "our" in this privacy notice) are part of the Heineken Group. When we mention "we", "us" or "our" in this privacy notice, we are referring to the relevant company which is responsible for processing your personal data. Unless we inform you otherwise, the controller will be Heineken UK Limited. Our contact details are as follows:

Our contact details:

If you have any questions about this privacy notice or our processing activities, we can be contacted as follows:

- **Mail:** 3-4 Broadway Park, South Gyle Broadway, Edinburgh, EH12 9JZ, marked for the attention of the Privacy Officer; or
- **Email:** protectingyourdata@heineken.co.uk.

It is important that you read this privacy notice together with our Cookie Policy and any terms of use that apply to the services or Website which are presented to you. This privacy notice supplements the other notices and is not intended to override them.

HOW and WHAT data do we collect about you?

We respect your privacy and are committed to protecting your personal data. This privacy notice describes how we look after your personal data when you:

- visit our website ("Website");
- create an account on our Website;
- apply for a job with us;
- subscribe to our communications; or
- give us some feedback.

Personal data, or personal information, means any information about an individual from which that person can be identified. We collect this information directly from you during any application process, as well as automatically through your use of our Website and from third party analytics providers such as Google based outside the European Economic Area. We collect, use, store and transfer different categories of information about you which we have grouped together as follows:

Identity Data	name, username or similar identifier, title and date of birth
Contact Data	address, email address and telephone numbers
Applicant Data	information you provide when applying for a job with us, including: details of your qualifications, skills, experience and employment history; information about your current level of remuneration, including benefit entitlements; whether you have a disability for which we need to make reasonable adjustments during the recruitment process; and information about your entitlement to work in the UK.
Technical and Usage Data	information about how you use our services and Website such as internet protocol (IP) address, cookies, mobile device ID, any login data, browsing history, browser type and version, time zone setting and location, viewed pages with date and time stamp (log information), browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Website.
Communications Data	preferences in receiving communication from us

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not process any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health or genetic and biometric data). Nor do we process any information about criminal convictions and offences.

This website is not intended for children and we do not knowingly collect personal data relating to children.

WHY do we collect your personal data?

We collect the above categories of personal data about you for the following purposes:

- To manage our relationship with you (including when you register and create an account on this website and/or register for communications), which will include sending you communications you have requested;
- To respond to any enquiries you have submitted through our Website;
- To process your application for a job with us;
- To register you as a new employee if your application is successful, including sharing your Identity and Contact data with the third parties set out below;
- To add unsuccessful applications to our bank of credible candidates so that we can contact you when suitable job opportunities arise;
- To administer and protect our business and this website (including troubleshooting, testing, system maintenance, support, reporting and hosting of data); and
- To use data analytics to improve the Website, and our services and experiences.

We will only use your personal data for the purposes above, unless we reasonably consider that we have another appropriate reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Further information on the circumstances in which we collect your data is available in Annex 1 of this privacy notice.

What is our LEGAL BASIS for collecting your Data?

Under data protection laws, we must have a legal basis under which we process your personal data. When we collect and use your information, we do so under one of the following:

1. We have a legitimate interest as a business;
2. To perform a contract we have with you;
3. To comply with a legal obligation; or
4. If you have given us consent.

Legitimate Interest as a business means conducting and managing our business to enable us to give you the best service and to promote and grow our business. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We will not use your personal data for activities unless we have a compelling interest which is not overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party, such as your order for purchase of our products, or to take steps at your request before entering into such a contract.

Compliance with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to, such as anti-money laundering legislation.

With your consent: This can only be relied on by us as a legal basis for processing where your consent has been freely given, is unambiguous and clear (i.e. you have actively opted into a service we provide by ticking a box). If you provide us with your consent to process your data at any point on our Website, you can withdraw it at any time, and we will stop all processing activities that were based on consent as a legal basis for processing. Please note we may still process the data if we have another lawful basis for processing (in most instances, this will be for a more limited purpose e.g. back-up storage or to record a withdrawal).

Further information on the relevant purposes and linked legal basis are set out in Annex 1 of this privacy notice.

Where we need to collect personal data due to a legal or regulatory obligation, or in relation to the performance of a contract and you do not provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). We will notify you of this at the time.

WHO do we share your personal data with?

In order to ensure that we provide the best service to you, we may from time to time have to share your personal data with the parties set out below for the purposes set out in the table in Annex 1:

- **Internal third parties** - Other companies in the Heineken group based within the EEA and the UK;
- **External third parties** – In order to provide you with the services specified in your contract with us, we share your personal data with third parties which include:
 - IT and system administration service providers based within the EEA;
 - Service providers such as solicitors and accountants;
 - Pre-employment screening service providers (for successful applications) based within the EEA;
 - Occupational health screening service providers (for successful applications) based within the EEA;
 - First and Third party advertising companies and media agencies for marketing and research purposes; and
 - Courts, parties to litigation and their professional advisers, where we reasonably deem it necessary in connection with the establishment, exercise or defence of legal claims.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. Where third parties act as processors on our behalf, we only permit them to process your personal data for specified purposes and in line with our instructions.

International transfers

Our external third parties may be based outside the UK or the EEA. Whenever we transfer your personal data out of the UK or the EEA, we ensure that the same level of protection is afforded to it by ensuring at least one of the following safeguards are put in place:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#);
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#); and
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

How SECURE is my data?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They are subject to a duty of confidentiality.

Unfortunately, no transmission of information over the internet can be completely secure, and you should also note that the security of information depends in part on the security of the computer you use to communicate with us and the security you use to protect account information and passwords, so please take care to protect this information.

Our Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party websites, plug-ins or applications and are not responsible for their privacy statements. We encourage you to read the privacy notice of every website you visit and third party service/application that you use.

How LONG will my personal data be used for?

We will only retain your personal data to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Further retention details for specific aspects of your personal data are noted in Annex 1.

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.

What are my RIGHTS?

Under certain circumstances, you have various rights in relation to your personal data under data protection laws. If you wish to exercise any of these rights, please email us at protectingyourdata@heineken.co.uk.

You will not have to pay a fee to access your data or exercise any of your other rights, but please note that we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

In order to respond to any request in relation to your data access rights, we may need to request specific information from you to help us confirm your identity. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You have the right to:

Object to processing of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms.

You also have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you;
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected;
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it, or where you have successfully exercised your right to object to processing (see box above);
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you; and
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance using the details at the start of this notice.

This version was last updated in February 2020.

Annex 1 – Legal Basis for Processing

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Retention period
To manage our relationship with you (including when you register and create an account on this website and/or register for communications) which will include, sending you communications you have requested.	Identity Contact Communications	Performance of a contract with you; Necessary to comply with a legal obligation; and Necessary for our legitimate interests (to keep our records updated).	Until you opt out of receiving communications and/or no longer have an account with us.
To respond to any enquiries you have submitted via this Website.	Identity Contact	Performance of a contract with you.	3 years after the enquiry has been dealt with.
To process your application for a job with us.	Identity Contact Applicant	Necessary for our legitimate interests (recruitment of employees and internal administration); and Necessary under employment law (to check the entitlement of workers to work in the UK and to make reasonable adjustments during the recruitment process for any disabilities).	6 months after notification to you that your application was successful / unsuccessful.
To register you as a new employee if your application is successful, including sharing your Identity and Contact Data with the third parties set out in this privacy policy.	Identity Contact Applicant	Performance of a contract with you.	For irrelevant information (i.e. information which has no bearing on the on-going relationship), 6 months after notification to you that your application was successful; and For relevant information, 6 years following the termination of the relationship.
To add unsuccessful applications to our bank of credible candidates so that we can contact you when suitable job opportunities arise.	Identity Contact Applicant	Consent, where expressly provided by you.	1 year after notification to you that your application was unsuccessful.
To administer and protect our business and this website (including troubleshooting, testing, system maintenance, support, reporting and hosting of data).	Identity Contact Technical and Usage	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise); and Necessary to comply with a legal obligation.	26 months from website visit.
To use data analytics to improve this website, services and experiences.	Technical and Usage	Necessary for our legitimate interests (to define types of licensees for our services, to keep this website updated	26 months from website visit or until such time as you withdraw your cookie consent.

		and relevant, and to develop our business); and Where required by privacy laws (for example, in relation to cookies), Consent.	
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