



## Trax Global Job Candidate and Recruitment Privacy Notice

Here at Trax we are fully committed to being open and transparent with you, our job candidates and applicants, about how we use your personal information throughout the recruitment and application process. We recognize and value the importance of ensuring any personal information we collect, use, store and share ('process') about you is done in a way that protects your privacy rights and meets our legal requirements.

This Privacy Notice explains in detail how we process your personal information. It applies to all individuals that apply for a job at Trax and that go through our recruitment process.

### Who is Trax

Where we refer to 'Trax' in this Privacy Notice, we are referring to the Trax group of companies and the separate business entities that sit under Trax Ltd (this includes the business entities that sit under Trax Technology Solutions PTE. Ltd, BET Information Systems Inc. and Shopkick Management Company Inc.).

The data controller for your personal data will be the Trax corporate entity that you apply to for a job and that is responsible for recruiting you.

### Some terms we use in this Privacy Notice explained:

The term "**CCPA**" means the California Consumer Privacy Act of 2018, Cal. Civ. Code §§ 1798.100 et. Seq. "**CPRA**" means the California Privacy Rights Act of 2020 as it amends and extends the provisions of the CCPA.

The term "**data controller**" means the Trax entity that alone or jointly with others, makes the decisions about why and how your personal information is collected, used, stored and shared by Trax.

The term "**job candidate**" means all individuals that show an interest in, apply for or otherwise contact us about roles and opportunities at Trax.

The term "**EU Standard Contractual Clauses**" mean the Standard Contractual Clauses set out in the Annex of Commission Implementing Decision (EU) 2021/914 of 4 June 2021. These are a set of 'rules' or 'safeguards' that protect the personal information of EU persons when it is transferred outside of the EU to countries without a similar or 'adequate' level of data protection.

The term “**GDPR**” means the 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 (‘General Data Protection Regulation’).

The term “**personal information**” means any information about or that identifies you as an individual.

The term “**sensitive personal information**” means personal information about physical or mental health, racial or ethnic origin, political or religious views, trade union membership, sexual orientation, genetic data, biometric information, the commission or alleged commission of a crime or related proceedings, personal data of children, and also includes in some countries also includes, financial information, personal identification numbers, exact geolocation and contents of private correspondence. Sensitive personal information is usually subject to stricter controls and protections.

The term “**UK GDPR**” means the Data Protection Act 2018, as well as the GDPR as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 and as amended by the Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019 (SI 2019/419).

The term “**UK Standard Contractual Clauses**” means the International Data Transfer Addendum to the EU Commission Standard Contractual Clauses as issued by the UK Information Commissioner’s Office under S119A(1) of the UK Data Protection Act 2018. These are a set of ‘rules’ or ‘safeguards’ that protect the personal information of UK persons when it is transferred outside of the UK to countries without a similar or ‘adequate’ level of data protection.

If you have any questions having read this Privacy Policy about how Trax uses your personal information please contact: [privacy@traxretail.com](mailto:privacy@traxretail.com)

### **This Privacy Policy is split into the following sections:**

1. [How do we collect your personal information?](#)
2. [What personal information do we process about you and why?](#)
3. [What lawful basis do we use for processing your personal information \(for Trax job candidates based in the EU/EEA and the UK\).](#)
4. [How long do we keep your personal information for?](#)
5. [Who do we share your personal information with?](#)
6. [International operations and transfers out of your home jurisdiction.](#)
7. [How can you request access to your personal information?](#)

8. [What other rights do you have over your personal information and how can you exercise them?](#)
9. [Revisions to this Privacy Notice.](#)
10. [Any further questions?](#)

## **1. How do we collect your personal information?**

We collect personal information about you from the following sources:

- Directly from information you provide to us.
- From previous employers.
- From outsourcing and employment agencies and intern referral agencies.
- From referees, either internal or external.
- From background screening providers (where applicable).
- From immigration and other similar governmental and public authorities.
- From background checking agencies in certain jurisdictions.
- From service providers and third parties that manage recruitment activities on our behalf such as recruitment and matching services, job applicant management providers, recruitment and HR management platforms, travel booking providers, insurance providers and other administration services.
- From occupational health or similar health providers.
- From information we collect when you visit one of our websites.

## **2. What personal information do we process about you and why?**

We use the following information to enable you to apply and interview for roles and opportunities with us and to manage our recruitment processes.

- Personal contact details and identification information such as your name, address, contact telephone numbers (landline and mobile), personal email addresses and photograph.
- Your date of birth and social security, national insurance or national identity number (or similar).
- A copy of your passport or similar photographic identification and / or proof of address documents, immigration status and documentation, visas and work permits.

- Employment and education history including your qualifications, job application, employment references, information provided on your CV or resume, reference letters, right to work information and details of any criminal convictions (in countries where we are legally required to collect this information).
- Security clearance details including basic checks and higher security clearance details according to your job (where we are legally required to collect this information).
- Your responses to any feedback surveys we sent to you if this data is not anonymized.
- Voicemails, e-mails, call and video recordings, correspondence, documents, and other information you share with us as part of the recruitment process.
- Health and wellbeing information either declared by you or obtained from health checks, eye examinations, occupational health referrals and reports, sick leave forms, health management questionnaires or fit notes i.e. Statement of Fitness for Work from your GP or hospital.
- Information relating to your ethnicity, race, religion, disability, sexual orientation and gender identification to monitor the diversity of our workforce (this information is generally only collected on a voluntary basis or in certain countries where there is a legal requirement to collect it).
- Information available on your public social media or networking sites such as LinkedIn.
- Information required for us to arrange any travel, accommodation or meals that are required as part of the recruitment process.
- Information that we collect via our use of cookies and similar technologies when you visit any of our websites.
- Information collected from CCTV or security cameras if you visit any of our offices.
- We may use your data to create aggregated statistical or inferred data to further develop and improve our recruitment processes.

If we ask you to provide any other personal data not described above, then the personal data we will ask you to provide, and the reasons why we ask you to provide it, will be made clear to you at the point we collect it.

### **3. What lawful basis do we use for processing your personal information (this information is applicable to Trax staff based in the EU/EEA and the UK only).**

If you are a job candidate in the EU/EEA or the UK, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the context in which we collect it. However, we will normally collect personal information from you based on the following:

<b>Purpose for collecting your personal information</b>	<b>Lawful basis for collecting the personal information under the GDPR and the UK GDPR</b>	<b>Lawful basis for collecting special category information under the GDPR and UK GDPR</b>
<p>Enabling individuals to apply and interview for roles and opportunities with Trax and to manage our recruitment processes</p>	<ul style="list-style-type: none"> <li>• Processing is necessary in order to take steps at your request prior to entering into an employment contract with you.</li> <li>• Processing is necessary to meet a legal obligation which we are subject to.</li> <li>• Processing is in our legitimate interests in order to recruit the best possible talent for our business and is not overridden by your data protection interests and fundamental rights and freedoms.</li> <li>• Processing is undertaken with your freely given consent.</li> </ul>	<ul style="list-style-type: none"> <li>• Processing is necessary to enable us to meet our obligations in the field of employment, social security or social protection law.</li> <li>• Processing is necessary for the purposes of preventive or occupational medicine or for the assessment of the working capacity of our employees.</li> <li>• Processing is necessary for the exercise or defence of legal claims.</li> <li>• Processing is necessary for reasons of substantial public interest.</li> <li>• Processing is undertaken with your freely given, explicit consent.</li> </ul>

In certain cases, in order to comply with our business, legal and contractual obligations, Trax is required to have access to and use certain personal information.

Therefore, in certain circumstances, if you do not provide us with the personal information we request or if you ask that we stop processing your personal information, we may not be able to begin or continue with recruiting you for one of our roles.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal data, please contact us at [privacy@traxretail.com](mailto:privacy@traxretail.com)

#### **4. How long do we keep your personal information for?**

We will keep your personal information for as long as is needed to carry out the purposes we've described above, or as otherwise required by law.

Generally, this means we will keep job candidate information for the following periods:

1. **Successful job candidates** – we will store personal information relating to your recruitment up to 6 months after making a job offer to you. We will then transfer any personal information we require in order to meet our employee obligations to you into your HR file. It will then be stored in line with our Employee Privacy Notice which will be made available to you on joining the company.
2. **Unsuccessful job candidates** – we will store personal information relating to your job application and recruitment for up to 6 months following our decision not to offer you a position at Trax. We will then contact you and ask for your consent to store your personal information for a further 2 years so that we may contact you about future, suitable positions or roles that may be of interest to you.

Where we have no continuing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

#### **5. Who do we share your personal information with?**

We take care to allow your personal information to be accessed only by those who really need it in order to perform their tasks and duties, and by third parties who have a legitimate purpose for accessing it.

We may share your personal information with the following:

- Other Trax group companies.

- Third parties such as government, federal, and other public agencies such as immigration authorities where we have a legal requirement to do so.
- Third parties such as occupational health and health insurance providers and providers that help undertake health and wellbeing checks for job candidates.
- Third party consultancy firms or other organizations that we engage to help deliver and improve our recruitment services and processes.
- Service and solution providers and vendors who provide recruitment and related services on our behalf - such as IT software and cloud providers, data analytics services and IT and cyber security services.
- Employment agencies and intern agencies where they are providing Trax employees or potential job candidates.
- Companies that manage flight, travel services and hotel bookings where required to support individuals in attending interviews with us.
- With our external legal and compliance advisors.

We only share the minimum amount of personal information with our third parties, service providers and vendors in order to meet the purposes outlined above.

If we go through a corporate sale, merger, reorganization, dissolution or similar event, personal information we gather from you may be transferred in connection with such an event. Any acquirer or successor of Trax may continue to use the information as described in this notice provided that the acquirer or successor is bound by appropriate agreements or obligations and may only use or disclose your personal information in a manner consistent with the use and disclosure provisions of this notice, or unless you consent otherwise.

**For job candidates based in California** and subject to the CPPA and CPRA, we do not “sell” or “share” (as these terms are defined by the CCPA and CPRA) your personal information with any third parties.

## **6. International operations and transfers out of your home jurisdiction**

Your personal information may be collected, used, processed, stored or disclosed by us and our vendors and service providers outside your home jurisdiction, including in the U.S, Singapore, Israel and in some cases, other countries. These countries may have data protection laws that are different to the laws of your country.

Trax only transfers personal information to another country, including within the Trax group of companies, in accordance with applicable privacy laws, and provided there is adequate protection in place for the information.

For transfers of your personal information within the Trax corporate group:

- Trax has in place an Intra Group Data Transfer Agreement which provides safeguards for the transfer of personal data amongst its group entities based on the EU and UK

Standard Contractual Clauses. These require all group companies to protect personal information from the EU/EEA and the UK in accordance with EU and UK data protection law.

- Trax has implemented a Global Privacy Policy that requires all of Trax's global entities to apply a similar high standard of data privacy to any personal information they process.

For transfers of your personal information to third parties:

- Where required under local data privacy laws, Trax has in place the required data privacy agreements and relies on the EU and UK Standard Contractual Clauses for transfers of personal information.

We will ensure your personal information is treated in accordance with this Privacy Notice and Trax's Global Privacy Policy wherever we process it. A copy of our Intra Group Data Transfer Agreement and/or Standard Contractual Clauses can be provided by contacting:

[privacy@traxretail.com](mailto:privacy@traxretail.com)

## **7. How can you request access to your personal information?**

A number of Trax's systems such as Comeet allow you to see and/or update the personal information that we hold about you through the recruitment process. If you have personal information that you cannot access via these systems, then you can make a request to access your personal information by emailing: [privacy@traxretail.com](mailto:privacy@traxretail.com)

We may ask you for information to verify your identity and evaluate your right to access the personal information requested. We might need to refuse access to personal information in certain cases, such as when providing access might infringe someone else's privacy rights or impact our legal obligations. If we do need to refuse a request to access your personal information, we will explain to you in writing the reason for this.

## **8. What other rights do you have over your personal information and how can you exercise them?**

Although individual privacy rights can vary across the jurisdictions and countries in which Trax operate, we have adopted a general policy of applying the following rights to all our job candidates. If there is a reason why we are unable to meet one of the rights listed below due to where you live or apply from, we will explain this when you make contact with us.

You have the right to exercise the following in relation to your personal information:



- The right to change and/or correct inaccurate personal information that Trax holds about you.
- The right to request that Trax erase your personal information in certain circumstances, such as where it has been unlawfully processed, or where there is no overriding legitimate ground for processing it.
- The right to request Trax to restrict the processing of your personal information.
- The right to request portability of your personal information in certain circumstances.
- The right to withdraw your consent to the processing of your personal information where we are relying on your consent to do so. Withdrawing your consent will not affect the lawfulness of any processing we carried out prior to your withdrawal, nor will it affect processing of your personal information carried out where we are relying on other lawful grounds other than consent.
- If you are a Californian resident, the right to request to opt out of the sale or sharing of your personal information with a third party and to restrict the sharing of your sensitive personal information in certain circumstances.

You can make any of these requests by emailing: [privacy@traxretail.com](mailto:privacy@traxretail.com)

Please note that the above rights are not absolute. There may be instances where applicable law or regulatory requirements allow or require us to refuse to meet your request in part or in full. In the event we cannot accommodate your request, we will inform you of the reasons why, subject to any legal or regulatory restrictions. We will respond to all requests in accordance with applicable data protection laws.

Depending upon your location, you also have the right to raise a complaint about how Trax processes your personal information with a supervisory authority.

We would always rather that you raise any complaints or concerns with Trax first before making a formal complaint. We are usually able to resolve any concerns quickly and in partnership with our job candidates.

If you would like to raise any concerns about how your personal information is being processed you can raise these with your recruiting manager or contact or with Trax's Privacy Team by contacting: [privacy@traxretail.com](mailto:privacy@traxretail.com)

If you would rather raise a complaint directly with a supervisory authority, you can contact the privacy team for their contact details using the email address above. You can also find a list of

the European Supervisory Authorities by following the link here:  
<https://ec.europa.eu/newsroom/article29/items/612080/en>

## **9. Revisions to this Privacy Notice**

We may, from time to time, make updates or changes to this privacy notice because of changes in applicable laws or regulations or because of changes in our personal information practices.

We will give you notice of any material changes that impact your personal information, and where consent is necessary to make a change to our practices, we will not apply the changes to your personal information until we have that consent.

## **10. Any further questions?**

If you have any further questions having read the information in this Privacy Notice you can contact your recruiting manager or contact or the privacy team at: [privacy@traxretail.com](mailto:privacy@traxretail.com)

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