

## **COSTCO RECRUITMENT PRIVACY STATEMENT COSTCO WHOLESALE UK LIMITED**

The purpose of this privacy statement is to explain how we handle personal data about our job applicants and to explain the rights that they have under data protection law. In this privacy statement, we refer to this type of information as “**Recruitment Data**”.

This privacy statement applies to applications submitted via our Careers website (<https://www.costco.co.uk/costco-opportunities>) and third parties, such as recruitment agencies and job boards. It also applies to applications submitted via other means, such as by post and email.

In this privacy statement, “Costco” refers Costco Wholesale UK Limited.

### **What types of Recruitment Data do we collect and process?**

We will only collect personal data in the recruitment process that is necessary to assess you for the post applied for and/or to keep in touch with you for future job opportunities. This may include the following categories of information:

- Information you provide in order to apply for a job vacancy with Costco, such as your name, your email address, your home address, telephone contact details, skills and a copy of your CV;
- Information collected by Costco as a result of the recruitment process, such as your performance at interview or in other assessments and information provided by your referees;
- Information collected in order to keep in touch with you about future job opportunities at Costco, such as your name, email, LinkedIn profile, location, experience and the kind of role you are interested in.
- Information related to your use of our Careers website, for example your IP address. This information may be collected by using cookies.

We generally receive Recruitment Data either (a) directly from you (for instance when you provide information as part of your application or during the recruitment process) or (b) from third parties such as recruitment agencies, your referees, and companies conducting criminal records and drugs tests for us (see below).

### **For what purpose do we use Recruitment Data?**

The main purposes for which we use your Recruitment Data are:

- to support and process any job applications you make to Costco. For example, so we can assess your ability to meet the job specification, in order to shortlist applicants and to verify references and professional qualifications provided by those applicants;

- to provide you with information about our current vacancies or job opportunities which you have requested. For example, where you have contacted us about current job opportunities at Costco;
- so we can learn about and improve the experience of users of the Careers website and applicants seeking to work at Costco, including equal opportunities monitoring.

### **What is Costco's legal basis for processing your Recruitment Data?**

Costco will only process your Recruitment Data for the purposes described above where we have a legal basis for doing so. In each case the legal basis will be one of the following:

- **To decide whether to enter into a contract of employment with you:** Where you have applied for a job and we need to use your Recruitment Data to determine whether we will enter into a contract of employment with you. This will be the legal basis for which we use your personal data in the majority of situations and will cover the use of your personal data from the initial application, through to interview and any other assessments.
- **Where you have provided your consent:** Where you have consented to us using your Recruitment Data. This may be to enable us to obtain a criminal records check, or to provide you with information about job vacancies at Costco.
- **When it is in the legitimate business interests of Costco:** Where it is necessary to understand our applicants in sufficient detail in order for us to deliver an effective recruitment service. For example, where the use of analytics and profiling is necessary in order to provide insights so that we can improve, maintain and manage relationships with applicants and attract talented individuals to work with us. This will be the main legal basis when using your personal data to improve the experience of users of the Careers website, as described above.
- **To comply with our legal obligations:** where we are subject to a legal obligation. For example, under local immigration or employment legislation.

### **Background Checks and Drug Testing**

As part of Costco's commitment to operating in a safe and drug-free environment, we require all successful applicants to complete a basic criminal records check and drug test before they can take up the position. All offers of employment are conditional on passing these checks. Please read the following section for more details.

If you are made a conditional offer of employment Costco, you will receive a request from our third party provider, European Background Limited, to begin a three factor verification process so that your offer can be confirmed. The purposes of these checks is to confirm: (1) that you have the right to work in the UK; (2) that there are no illegal substances in your system; and (3) that you have no

unspent criminal convictions which, in Costco's or European Background Limited's discretion, make you unsuitable for the role.

These checks and tests are carried out by a third party, Synlab Ltd, and usually Costco does not receive anything more than a 'Pass/Fail' in respect of any applicant. In some circumstances, however, European Background Limited may share information about unspent criminal convictions to allow Costco to decide whether or not to confirm the offer. Should an offer be confirmed, this information will not be retained or recorded on your personnel file.

If you refuse to undertake any of these checks, you will be unable to take up the position. Consequently, if you are not willing to undertake a criminal records check or drug test, we suggest that you do not proceed with your application.

### **Who do we share your Recruitment Data with?**

We may share your personal data within the Costco group, which consists of Costco Wholesale Corporation and a number of subsidiary companies in order to process your job application and manage the recruitment cycle. We restrict access to Recruitment Data to people within the Costco group of companies who have a "need to know" such information.

We also use third party service providers in order to conduct and manage recruitment. For example, the Careers portal on our website is provided by Workvine Limited and iintegra Limited. We may share your personal data with third parties who conduct our criminal records check and drug testing. Aside from to our suppliers, we will generally only disclose Employee Data outside Costco in the following circumstances:

- when required to do so by law;
- in response to a legitimate request for assistance by the police or other law enforcement agency; and/or
- to seek legal advice from our external lawyers or in connection with litigation with a third party.

### **Where does Costco store my Recruitment Data?**

Costco is a multinational corporation, and uses service providers based around the world. Consequently, your Recruitment Data may be processed in countries outside of Europe, including in countries where you may have fewer legal rights in respect of your information than you do under local law. If we transfer personal data outside the European Economic Area we will, as required by applicable law, ensure that your privacy rights are adequately protected by appropriate safeguards. Please contact us if you would like more information about these safeguards.

### **How long do we keep your Recruitment Data for?**

We will keep your personal data for no longer than is necessary to fulfil the purpose for which it was collected. If your application is successful, your Recruitment Data will be retained as part of your

personnel file. Typically, Costco will retain Recruitment Data of unsuccessful applicants for 12 months, during which time we may contact you about other opportunities with Costco. You can let us know at any time if you would prefer us not to retain your information for this purpose.

### **Your Rights**

If you are applying for a job with Costco in the European Economic Area (including the UK), you have the right to request access to, rectification or erasure of, your Recruitment Data. You may also have the right to object to or restrict certain types of processing of your Recruitment Data and can request to receive a machine-readable copy of the Recruitment Data you have provided to Costco.

If you notice an error in your application that you would like to correct, please contact us using the contact information below.

Any request to exercise one of these rights will be assessed by Costco on a case by case basis. There may be circumstances in which we are not legally required to comply with your request because of relevant legal exemptions provided for in data protection legislation.

### **Contact Us**

Please contact us at [gdprrquests@costco.co.uk](mailto:gdprrquests@costco.co.uk) if you would like to find out more about any matters to do with this Privacy Notice.

If you have concerns about the way in which Costco has handled your personal data you have the right to complain to your local Data Protection Authority. In the UK, the Data Protection Authority is the Information Commissioner's Office. However, if you have concerns we encourage you to raise any concerns with Costco initially.

### **Updates to this privacy statement**

We may change this privacy statement from time to time in order to reflect changes in the law, regulatory guidance or our data privacy practices in compliance with the law. When this happens and where required by law, we will provide you with a new or an updated notice and, if necessary, obtain your consent for the further processing.

This privacy statement was last updated on 30<sup>th</sup> May 2019.