

Job Applicants Privacy Notice

What is Personal Information?

Personal Information (also known as personal data) is any information that identifies someone and any information that relates to that identified person. For example, your name and email address is information that identifies you, and the qualifications you have is information that relates to you.

Who is the Controller of your Personal Information?

The Controller of your Personal Information is Asda Stores Limited (with registered address at Asda House, Great Wilson Street, Leeds, LS11 5AD) unless we tell you otherwise. **Contact Us** for details on how to contact our Data Protection Officer if you have any questions or concerns about our handling of your Personal Information, or if you wish to make a complaint

What Personal Information do we collect about you and how do we use it?

When you apply for a job, Asda collects Personal Information including:

- Your contact details, such as name, email address, postal address and telephone number. We use this to communicate with you about your application. We may also use it to speak to you about similar vacancies unless you have asked us not to.
- Your application, which includes details such as your skills (education, professional qualifications, training), employment history and referees. We use this to assess your suitability for a role.
- Disability information relevant to you attending an interview. We use this to help us make any necessary adjustments to support you if you're invited for interview/assessment.
- Criminal conviction information, such as unspent convictions. For some roles, we might need to ask you about previous criminal convictions or carry out criminal records checks (such as a DBS check). If this is necessary, we'll make you aware of this as early in the recruitment process as possible.
- Equal opportunities information such as gender, race or ethnic origin, religion or belief, age bracket, sexual orientation and details of any disability. You do not have to provide this if you don't want to, but we request it so we can monitor the effectiveness of our Equal Opportunities Policy.
- A user name and password. This is to help keep your application and the Personal Information you provide secure, and so you can come back to an incomplete application at a later date if you need to.
- Right to work information. If you're application is successful, and we invite you for an interview/assessment we'll need additional information to check you have the right to work in the UK, including a copy of your passport, your National Insurance number and any other relevant proof of your right to work, for example visa or working permits.

Where do we collect your Personal Information from?

We collect nearly all the Personal Information related to job applications directly from you.

If you are applying for a role via an agency we may obtain the required information through them.

In some cases, such as when we need to carry out a DBS (Disclosure and Barring Service) check, we engage with the relevant government body to provide the information they hold.

We may also contact the references you have provided to get their feedback on you.

Why are we allowed to use your Personal Information?

When we need to use your Personal Information, we have to have a legal basis to do so. If we don't have a legal basis then the processing is not lawful and we are not allowed to use it. We carefully review all our activities, to make sure that we are allowed to process your Personal Information before we collect it. The legal bases for processing Personal Information involved in job applications are:

- Asda's **legitimate interest** to assess applicants and to monitor compliance with our policies. For example, we need to collect and use information on your application to help us assess if you are suitable for a role, to correspond with you and to monitor compliance with our Equal Opportunities Policy.
We can only use legitimate interest where we have assessed that there is little or no risk to you or your Personal Information rights, and we do this by performing a balancing test assessment. If you want to know more about these assessments you can contact us via the [Contact Us](#) page.
- To meet our **legal obligations**. For example, we process right to work related information to meet our legal requirement to ensure you are eligible to work in the UK, and in some cases we check criminal records to ensure you are legally allowed to work in certain roles. There are occasions when we may need to process your special category information to meet reporting requirements relating to equality.
- You have specifically given us your permission. The law calls it consent. Where we need your consent to use your Personal Information for a particular purpose, we must be able to show that the consent is:
 - Specific – we have to tell you exactly what activity your consent covers.
 - Informed – we have to provide you with clear details of what you are consenting to.
 - Freely-given – you must have a genuine choice;
 - Unambiguous – this means that you must have clearly indicated your wishes by confirming your agreement to a statement (e.g. by ticking a box) or taking some positive action to show that you intended to give your consent.

When we collect sensitive (special category) information about you, we need to be extra careful about when it can be used and how we protect it. Special category Personal Information that may be involved in job applications include gender, race or ethnic origin, religion or belief, age bracket, sexual orientation and details of any disability.

The law highlights that misuse or loss of this type of information could cause significant risk to you, for example it could lead to discrimination. So, we take our responsibilities for using it correctly and protecting it very seriously.

We are allowed to do this when you have provided your consent for us to do so, or we are required to capture it to be compliant with employment, social security and social protection law.

Who do we share it with?

We have controls to limit access to your Personal Information to:

- a) Individual colleagues who need it to do their job, such as processing your application, interviewing or assessing you, and dealing with enquiries and complaints;
- b) Business partners, including the operator of our online recruitment platform and our parent company Walmart Inc., who need it to provide services to us, such as maintaining our computer systems, application website & recruitment tools.

If requested, and where it is required or permitted by law, we may provide Information to:

- a) Official bodies, such as government agencies, local authorities, regulators and the police, who are authorised to request Information where it is necessary for their lawful purposes;
- b) Asda's advisers, including lawyers, insurers, accountants and auditors;
- c) Other organisations such as law firms or insurance companies acting on behalf of individuals, who may request evidence containing Personal Information, to support a claim.

Where is your Personal Information kept, processed and accessed from?

Some of our computer systems, including our websites, are operated by our parent company Walmart Inc. in the United States or by other companies contracted to provide services to Asda that operate in countries outside the UK or EU. So some of your Personal Information is stored and processed overseas, in the following countries: United States of America (USA), India and Turkey.

Because the law in some of these countries does not provide the same level of protection as UK and EU law, we put in place data transfer agreements (which are considered appropriate safeguards) with Walmart and each company that processes Personal Information outside of the UK.

These agreements require that, wherever your Personal Information is held, it is protected to the same high standard as required by law in the UK. You can request a copy of a data transfer agreement from our Data Protection Officer using the [Contact Us](#) page.

How long will we keep your Personal Information for?

For successful applications we keep your Personal Information for 7 years after you leave Asda as an employee.

For unsuccessful applications we'll retain your Personal Information for 6 months to support any appeals we received.

Any Personal Information you include in the applicant profile you create through our online portal will be retained for as long as your account is active. If you do not log into your account for 12 months it will become inactive and your personal information will be deleted.

How do we protect and secure your Personal Information?

We use security measures, including physical, administrative, and technical safeguards to protect the confidentiality of your Personal Information. These measures include encryption, security certificates, access controls, information security technologies, policies, procedures and other information security measures to help protect your Information.

When designing or implementing new computer systems and processes we look at ways to identify and mitigate potential security risks and then monitor and test our security systems to help protect your Personal Information.

Where possible, we also try to anonymise information so that individuals can't be identified from it. An example of this is what we call Customer Insight. We analyse data about our customers' shopping patterns and habits, and use this to help us improve our product lines, how we display them, how we lay out our stores and so on. However, we don't need to know who these customers are, we just need to know information such as how many bought certain products at certain times, or how much the average customer spends each week. So, instead of just putting all of our customers' information together and analysing it, we first remove the pieces of information that could identify them, such as names, contact details, addresses and so on.

How can I exercise my Privacy Rights?

This Privacy Notice tells you all about how we collect and process your Personal Information, and why we are allowed to do so. If you want to know more about your Privacy Rights and how to make a Rights Request, simply head to the [Rights request](#) page