

## Privacy Policy

### About this Policy

This Privacy Policy (“**Policy**”) regulates the use by Tesco Bengaluru Private Limited (the **data controller** or otherwise referred to herein as “**we**”, “**us**”, “**Tesco**”, “**our**”) of the personal data (as defined under applicable laws of India) we process about you when using this website. If you are applying for a job with any other Tesco Group<sup>1</sup> entity, then the respective Tesco Group entity will be the data controller.

We are committed to doing the right thing when it comes to how we collect, use and protect your personal data. That’s why we’ve developed this Policy which:

- Sets out the types of personal data we collect;
- Explains how we use your personal data;
- Explains when and why we will share your personal data within the Tesco Group and other third party organisations; and
- Explains the rights and choices you have when it comes to your personal data.

### What data we collect

During our recruitment process we will collect and process the following:

- Your name
- Your address
- Your telephone number
- Your email address
- Your occupation
- Communications between you and us about this website or job application
- Information regarding your “right to work” in India (Applicable to expats only)
- For certain roles, information connected to criminal background (database search) checks,
- Information you submit as part of any job application (for example your career history, education, salary, statutory declarations and forms, and CV)
- Information you may voluntarily submit as part of any equal opportunities questionnaire, including without limitation, any self-declared disabilities, gender, sexual orientation, disability status, nationality and age range that we would need to make a reasonable adjustment for to support your application and any possible future employment

When using this website in some cases, we may collect information about you that is not personally identifiable. Examples of this type of information are:

- Type of Internet Browser you are using
- Type of computer operating system you are using
- The domain name of the website from which you linked to our site or advertisement

### How we use your personal data

We use your personal data to:

- Review and process your application;
- To keep you up-to-date on its progress;
- For data analytical, assurance and review purposes (for example by analysing your application to improve our recruitment process);
- To resolve grievances and complaints that involve you;

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<sup>1</sup> For the purposes of this policy, “Tesco Group” shall mean and include Tesco plc and all its affiliates, including without limitation, any other person or entity directly or indirectly controlling or controlled by or under direct or indirect common control with such specified person or entity under its control or common control with another affiliate. For purpose of this definition, “control” shall mean and include a company or any other corporate body that has the power to, directly or indirectly, secure that the affairs of that company or other corporate body or the affairs are conducted in accordance with a person or corporate body’s wishes or directions by: (a) the holding of shares or the possession of voting power in or in relation to that company or any other corporate body; or (b) any powers conferred by the articles of association or other document regulating that company or any other corporate body.

- In relation to self-declared disabilities in order for us to make reasonable adjustments to support your application and any possible future employment;
- In relation to any equality questionnaire data, to monitor our equality and diversity composition.
- In relation to any right to work information we collect, in order to ensure we comply with the law in employing you;
- In relation to any criminal record checks we complete, in order to ensure we comply with company policy; and In the event that your application is successful, we may use your data to enable you to have the correct access to equipment and systems. For example, we may use your details to prepare work schedules, to create an email address for you or to authenticate your identity when you log into our systems for the first time.

### **Legal basis of processing**

In relation to:

- personal data we process as part of our “right to work” checks, we process this because we are legally required to. If you do not provide us with this information we will not be able to progress your application.
- sensitive personal data we process as part of any equality questionnaire, to make reasonable adjustments to support your application or as part of any criminal background checks, we process this as permitted by employment laws.
- all other uses of your personal data set out in this Policy, we process this because it is in our “legitimate interests” to do so. Our legitimate interests are:
  - operating a fair and transparent recruitment process
  - recruiting and retaining the right candidates
  - ensuring candidates have the right skills and experience for any given role
  - Resolving any complaints in a fair and transparent manner

### **Sharing your personal data**

We may share your personal data with:

- Suppliers, service providers and partners who work with us and provide administration and support services. For example, but not restricted to, conducting right to work checks, candidate screening/assessment and, if applicable criminal background checks.
- Other Tesco Group companies, who provide us with administration and support services
- Government agencies, regulatory bodies and law enforcement agencies where we are obliged to by law
- Any third party who may acquire our business.

### **Grievance Officer**

Tesco has appointed a grievance officer who can be contacted by email at [TescoBengaluruLegal@tesco.com](mailto:TescoBengaluruLegal@tesco.com). You may also write to us at our registered address as follows:

The Grievance Officer  
 Tesco Bengaluru Private Limited  
 #81 & 82, EPIP Zone,  
 Whitefield, Bengaluru  
 Karnataka - 560066

### **How we protect your personal data**

We know how important it is to protect and manage your personal data and have the following measures in place to do this:

- We use computer safeguards such as firewalls and data encryption
- We enforce physical access controls to our buildings and files to keep this data safe, such as access cards and key control.
- We only authorise access to colleagues who need it to carry out their job responsibilities
- We protect the security of your information while it is being transmitted by encrypting it using appropriate data transfer solutions such as Secure Sockets Layer (SSL)
- We may ask for proof of identity before we share your personal data with you.

### **How long we keep your personal data**

We will not keep your personal data longer than we need to. However, the duration depends on several factors, including:

- Why we collected it in the first place;
- How old it is;
- Whether there is a legal/regulatory reason for us to keep it;
- Whether we need it to protect you or us.

In general, we keep information about unsuccessful candidates for 7 months after the conclusion of the recruitment process, although we may delete criminal records and right to work information earlier. We keep information about our colleagues as required and allowed by applicable laws in India.

#### **Candidate Portal**

All candidates who apply to jobs at Tesco have the option to set up a Candidate Portal, which provides them with tools for managing their applications, personal information, and consent

- Candidates can consent, or decline to consent, to the use of their information for recruiting purposes.
- Candidates can access and edit their application information in their profile in the Candidate Portal.
- Candidates can download their profile information.
- Candidates can request for their information to be deleted via the portal. The administrator reviews deletion requests and delete candidates manually.

Alternatively, candidate may request for the withdraw/deletion their consent for us to use it at any time by sending a written request at [Recruitment\\_compliance\\_India@tesco.com](mailto:Recruitment_compliance_India@tesco.com)

#### **Other websites**

The Website may contain links to other sites which are outside our control and not covered by this policy. The operators of these sites may collect information from you that will be used by them in accordance with their policy, which may differ from ours.

#### **Changes to our policy**

This policy replaces all previous versions. We reserve the right to change the policy at any time.