Candidate Privacy Notice

The purpose of this document

This Privacy Notice informs you how Group 1 Automotive and its subsidiaries and/or affiliates ("Group 1", "We" or the "Company") collect and manage Candidate Personal Information. It also describes the Company's expectations for those who collect and manage Candidates' Personal Information.

Our registered office is at First Point St. Leonards Road, Allington, Maidstone, Kent, England, ME16 0LS. All of the companies within Group 1 Automotive are registered with the ICO as data controllers.

As a data controller we are responsible for deciding how we hold and use your personal information. We are required under data protection legislation to notify you of the information contained in this Privacy Notice.

We are dedicated to ensuring that all personal data that we process is done so in a fair, lawful and transparent manner. We take the security of your data very seriously and adhere to all relevant data protection legislation including the Data Protection Act 2018, the UK General Data Protection Regulation, The Data (Use and Access) Act 2025 (DUAA) and The Privacy and Electronic Communications (EC Directive) Regulations 2003 ("PECR").

This Privacy Notice is relevant to you because you are applying for work with us (whether as an employee, worker or contractor). It is important that you read and retain this Privacy Notice, together with any other Privacy Notice we may provide on specific occasions when we are collecting or processing your personal information. It advises you how and why your personal data will be used (namely for the purposes of the recruitment exercise), how long it will be retained and your rights under the data protection legislation.

We make reasonable efforts to ensure that Candidate Personal Information is reliable for its intended use. Candidates are equally responsible for updating and checking the accuracy of the information they or others provide to Group 1 Automotive on their behalf.

Data Protection Principles

We will comply with applicable data protection laws and ensure that any personal information we hold about you is:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

Types of information we hold about you

We collect and manage the minimum amount of Candidate Personal Information in compliance with applicable legal requirements to; promote Group 1 Automotive as a potential employer; to assess Candidates' employment applications; facilitate Candidates' onboarding as an employee (if an employment offer is extended and/or accepted),and to keep Candidates informed of additional roles of relevance to their employment interests and goals.

The collection of your information and access to such information will vary depending on legal and/or business requirements. We will notify you at the point of collection whether the information that we request about you is required or is voluntary to proceed with your recruitment process.

We will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter.
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, educational and vocational experience and qualifications.
- Any information you provide to us during the application process or at an interview.
- Proficiency tests results and psychometric reports, if required.
- If legally permitted, we may also collect, store and use the following types of more sensitive personal information: Information about your race or ethnicity, religious beliefs, sexual orientation, disability status.
- If legally permitted, we may also collect, store, and use information about criminal convictions and offences.
- Any information you provide to us via the Equal Opportunities Form as part of the application process or otherwise (if applicable).

How we collect your personal information

We collect personal information about candidates through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

The lawful bases we rely upon to process your information

The primary lawful basis for collecting and using Candidate Personal Information is your consent. The lawful basis may also be pre-employment contract data processing requirements, our legitimate business interests, and/or to comply with legal obligations. Further information on your right to withdraw consent is provided below.

How we use your information

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role (or roles, as the case may be).
- Carry out background, medical and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.
- Shortlist, interview, employ or appoint you.

- If you decide to complete the separate, voluntary Equal Opportunities Form for us to meet our company aspirations in respect of equality and diversity (it is not required that you complete this as part of your application, this information is solely collected to create statistics and is not used as part of the recruitment decision making process).
- Depending on your profile visibility options, highlighted below, you may be added to a talent pool by the Talent Acquisition Team if your vocational and qualification skill set match an opportunity at Group 1 Automotive. Our Talent Acquisition Team may use this to contact you about any opportunities which your skillset matches for and invite you to apply for roles.
- Send you a feedback survey on your experience. (Your response to the survey is voluntary, and only Group 1 Automotive can view and use the survey results. The survey doesn't require you to enter any sensitive confidential or proprietary information.)
- Use your feedback experience to investigate and improve our recruitment systems.

Having received your curriculum vitae/covering letter/application and the results from any background checks and/or tests, we will then process that information to determine whether you meet the basic requirements to be shortlisted for the role. If you are shortlisted, we will invite you for an interview. We will use the information provided and any additional information you may provide to us at the interview to decide whether to offer you the role. If we offer you the role, we may then take up references and/or carry out a criminal record check and/ or carry out any other checks. Following the successful completion of this process, we will confirm your employment or appointment in writing.

It is in our legitimate interests to collect and process your personal information for the purposes set out above to decide whether to shortlist, interview, assess or employ or appoint you for the role (or roles) that you have applied for. We also rely on the legitimate interest legal basis in the processing of feedback survey information to further improve the experience for all candidates.

We also need to process your personal information to decide whether to enter a contract with you (such as a contract of employment or a contract for services).

If you fail to provide information when requested, which is necessary for us to consider your application, (such as evidence of qualifications or work history) this may delay or obstruct the processing of your application.

How we use particularly sensitive information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

We may process special categories of personal information:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations or exercise rights in connection with employment.
- Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided, we do so in line with legal requirements and this Privacy Notice.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us.

Automated decision making

For some roles, we use automated screening questions to ensure candidates meet essential job-based criteria. For example, if a candidate indicates that they do not have the right to work in the UK, they will be automatically screened out and unable to continue with the application process. In these cases, candidates receive an automated email notification regarding the decision.

This automated screening only applies to specific qualifying questions, no other automated decision making is used in our hiring process.

Data sharing

We share your personal information depending on the choices you have made on your profile (see above) and with the following third parties for the purposes of processing your application, for example, a medical background check provider or DBS check provider, Customer thermometer (for feedback survey). All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes and in accordance with our instructions.

The following third-party service providers process personal data about you for this purpose:

- Application & recruitment providers
- Employment engagement providers
- DBS and Identity Check Service
- Apprentice providers (Where applicable)

Data security

We have put in place appropriate security measures to protect your personal information. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

The retention of your personal information will depend on your progress through the recruitment process and employment or appointment (if successful). Should you be successful, your personal information will be retained until 7 years after your relationship with Group 1 Automotive comes to an end.

If, however, you are unsuccessful, your personal information and application profile will be retained for a period of 1 year, or until such time as you choose to delete your personal information or request your personal information is deleted, subject to applicable laws. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way.

Should you wish to remain in our talent pool for consideration for further vacancies after 1 year of registration then you can request to do so. Your profile will automatically be deleted after 1 year with no activity.

Your rights

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct, or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please notify your contact at Group 1 Automotive or please email us at: dpo@group1auto.co.uk

Right to withdraw consent

When you applied for this role, if you provided consent to us processing your personal information for a particular purpose during the recruitment exercise, you have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please notify your contact at Group 1 Automotive or please email us at: dpo@group1auto.co.uk

Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our Data Retention Policy, we will dispose of your personal information securely.

Contacting us

If you have questions about your Candidate Personal Information, want to exercise any of your rights under applicable data protection laws or have concerns about a potential data breach, please email us at: dpo@group1auto.co.uk

Post: FAO Data Protection Team, First Point St. Leonards Road, Allington, Maidstone, Kent, England, ME16 0LS

Updating this Privacy Notice

We reserve the right to amend this Privacy Notice as required, for example, to comply with changes in laws or regulations. We keep our Privacy Notice under regular review to ensure that it properly reflects our use of your personal information. This Privacy Notice was last updated on 1 November 2024.

Where such changes materially affect our processing of your Candidate Personal Information, we will notify you accordingly.