

## ARAMARK UK ARMED FORCES WORK EXPERIENCE

### PRIVACY NOTICE

This notice (**Notice**) sets out how Aramark (**Aramark** or **we** or **our**) collect, use, store and share personal data that we collect during the following processes:

- Armed Forces Expression of Interest Mailbox;
- the Career Transition Partnership (CTP) application process; and
- any work experience placement you may have with us

(the “**Purpose**”).

For the purposes of this Notice, Aramark refers to Aramark Defence Services Limited which is a controller of your personal data for purposes of data protection law.

#### 1 Information we collect from you

1.1 Aramark will collect the information you provide us in connection with the Purpose, which can include some or all of the following personal data:

- (a) **Contact information**, such as name, home address, telephone number, personal email address and other contact information;
- (b) **Work authorization status**, such as visa status and work permit information;
- (c) **Biographical information**, such as previous job history and education details;
- (d) **Professional and other work-related qualifications**, such as licenses, certifications and professional memberships;
- (e) **Information relating to references**, such as referees’ names and contact details;
- (f) **General work experience information**, such as place of work, nature of work, manager;
- (g) **Identification information**, including social security / national insurance numbers, driving licence details and passport information, photographs for identification;
- (h) **Dependents’ data**, such as the name and contact details of your dependents, beneficiaries, family members and next of kin and their relationship with you;
- (i) **Development and learning information**, including information on assigned and completed training courses, self-reported information on career aspirations and geographic mobility, manager assessments, and development goals;
- (j) **Any other information you provide to us**, such as work experience preferences and willingness to relocate.

1.2 We ask that you avoid submitting the following categories of personal data (**Sensitive Personal Data**), unless such information is legally required and/or Aramark requests you to submit such information: racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic or biometric data; health data; and data related to your sex life or sexual orientation.

1.3 Any information you provide to us must be true, complete and not misleading. In addition, it is your responsibility to ensure that the information you submit does not violate any third party’s rights.

1.4 If you provide us with personal information of a referee or any other individual as part of your application or candidacy, it is your responsibility to obtain consent from that individual prior to providing the information to us.

#### 2 Information from other sources

We may obtain personal data about you from third parties such as your previous employers and referees, recruiters, background check providers, credit reference and anti-fraud agencies and providers of screening lists and public registers.

### **3 How we use personal data**

3.1 The personal data that you submit to us in connection with the Purpose will be used for Aramark's work experience personnel recruitment, management and planning purposes, as permitted by local law, including:

- (a) Processing your Armed Forces Expression of Interest application;
- (b) Assessing your suitability, capabilities and qualifications for a work placement with us;
- (c) Conducting reference checks;
- (d) Communicating with you regarding your application or candidacy for work experience;
- (e) Conducting background checks if we offer you a placement, such as credit checks, anti-fraud checks, checks to prevent fraud and money laundering, and drug tests - each only as permitted under applicable laws and if appropriate for the placement you are applying for;
- (f) General HR administration, such as communications, on-boarding and off-boarding; and
- (g) information relating to your racial or ethnic origin and your religious beliefs for the purposes of conducting equal opportunity monitoring.

3.2 We process your personal data on the basis that such processing is necessary to take steps to enter a work experience agreement with you or a requirement under local law (eg equal opportunity monitoring or background checks). Alternately, we rely on your consent to process the data you provide to us, as evidenced by its provision to us by you and your agreement to the terms of this notice.

### **4 Sensitive personal data**

4.1 Although we ask that you not provide us with any Sensitive Personal Data unless we specifically request it, we may collect, use and share your Sensitive Personal Data relating to your race or ethnic origin, physical or mental health or condition, trade union membership, commission or alleged commission of criminal offences and any related legal actions only for the following purposes:

- (a) information relating to criminal convictions and offences for the purposes of assessing your suitability for your role;
- (b) information relating to your racial or ethnic origin for the purposes of conducting equal opportunity monitoring; or
- (c) information relating to any disabilities that you may have for the purposes of assessing or making reasonable adjustments and accommodations to the recruitment process.

4.2 Where we use Sensitive Personal Data, generally we do so to perform our legal duties or because it is necessary to establish, defend or prosecute legal claims. On occasion, we may do so on the basis that we are protecting the vital interest of a member of our staff or a third party, or where the purpose is in the substantial public interest.

## **5 How we share personal data**

In connection with the purposes listed above in sections 3 and 4 and consistent with this Notice, we will share your personal data as follows:

5.1 the Aramark group company that engages you may share your personal data with Aramark Services Inc. and Aramark where required for Aramark's internal administrative purposes. Aramark Services, Inc. and Aramark may grant other group entities access to such data where required for the purposes consistent with this Notice; and

5.2 we may share your personal data with third parties who assist us with internal HR administrative activities, such as background check providers, recruiters and head-hunters, and service providers who provide services such as hosting and operating the website where applications are processed or the Careers Transition Partnership. For more information on the latter please refer to their website here:

<https://www.gov.uk/guidance/career-transition-partnership>

## **6 Sending your personal data outside of the UK/EEA**

6.1 We may transfer your personal information to countries other than the country in which the data was originally collected, be that in the UK, for the purposes described in this Notice. Your personal data may be transferred among Aramark and Aramark's group companies or to third parties based in countries outside the UK for the purposes consistent with this Notice. Where we transfer personal data to a country that has not been approved as providing equivalent protections to the UK's data protection laws, we will comply with our legal obligations to transfer it subject to the safeguards that allow lawful transfer of personal data to a third country in accordance with applicable data protection law in the country of collection.

6.2 Please contact us at the contact details in Section 9 below for details about the safeguards we apply in relation to the transfer, if any, of your personal data.

## **7 Storage of personal data**

We will retain your personal data for as long as is necessary for the purposes for which they were collected and any other permitted purposes (such as to comply with regulatory requirements to retain such data). Please note that these periods may be extended where reasonably necessary (for example where we are required to do so by law or by a regulator). We will either irreversibly anonymise or securely destroy personal data that we no longer need. We reserve the right to use anonymous data for any legitimate business purpose without further notice to you or your consent.

## **8 Your rights**

8.1 It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during the application process. Subject to certain conditions and limitations, you have the legal right to request access to (and a copy of), correct, and erase the personal data that we hold about you, or object to or restrict the processing of your personal data under certain circumstances. For certain data, you also have the right to request that we transfer your personal data to another party. Where processing is based on consent, you have the right to withdraw your consent so that we stop that particular processing. You can submit these requests by using our contact details in Section 9 below. If you are not satisfied with our use of your personal data or our response to any exercise of these rights you have the right to complain to Office of the Information Commissioner in the UK. More information on your rights as a data subject is available in our Data Subject Request Handling policy.

8.2 We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

## **9 Your contact for any queries**

If you have any queries or concerns regarding personal data, or if you wish to exercise any of your

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rights set out in Section 8 above, including the revocation to the consent to processing your personal data as detailed herein, please email [gdpr@aramark.com](mailto:gdpr@aramark.com).

## **10 Changes to this Notice**

This Notice was last updated on the effective date listed at the top of this Notice. We will notify you of any material changes to this Notice by posting information about the change on the Intranet or by other reasonable means, prior to the change taking effect.