



## **Privacy Notice – Applicants**

This Privacy Notice explains how the Pilgrim's Europe group of companies, which includes Moy Park Limited, Kitchen Range Foods Limited, Moy Park France SAS, Moy Park Beef Orléans SARL, Albert Van Zoonen B.V., Pilgrim's Pride Ltd, Pilgrim's UK Lamb Ltd, Pilgrim's Food Masters UK Limited, Pilgrim's Food Masters Ireland Limited, Pilgrim's Shared Services Ltd, Oakhouse Foods Limited and Rollover Limited ('we', 'us', 'our', or 'Company') handle and use information (both hard copy and electronic) it collects about you as job applicants. This notice is non-contractual and can be amended at any time.

The Company named above that you are submitting your application to is the "Data Controller" as defined under EU and UK GDPR. This means that we are responsible for deciding what personal data we collect about you, how it is collected and used and for what purposes. The relevant Company address can be found in the footer of this notice.

We will comply with our obligations under the relevant data protection laws, including the: (i) EU General Data Protection Regulation ((EU) 2016/679) ('EU GDPR'); (ii) UK General Data Protection Regulation (as defined in The Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019) ('UK GDPR'); and (iii) Data Protection Act 2018, and any subsequent national legislation, guidance or codes of practice in the applicable jurisdiction which may be introduced from time to time (together the '**Data Protection Law**') when handling your personal data.

Overall responsibility for monitoring compliance with data protection sits with the Privacy Steering Group, the main contact of which is the Group Privacy Officer (gpo@pilgrimseurope.com) For further information on security measures placed on your personal data, please contact the Group Privacy Officer.

### **1. What general type of information do we hold?**

- "Personal data": this means any information about an individual from which that person can be identified. It does not include data where the individual's identity has been removed (anonymous data).
- "Special category of personal data" ("SCPD"): this means data about an individual of a more sensitive nature, which may include data about an individual's health, including any medical condition, health and sickness records.
- (UK and Ireland only) "Criminal Offence Data": this covers any personal data which is linked to criminal offences, or which is specifically used to learn something about an individual's criminal record or behaviour.
- "Consent": any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

### **2. On what basis do we process your information?**

We will only use your personal data in the circumstances defined below and as permitted by the law. Most commonly, we will use your personal data:

- If you are successful, where we need to enter into an employment contract with you or during the interview process.
- Where we need it to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. The legitimate interests of the Company are to recruit the best candidate for any vacancy, and we believe that this is not incompatible with your rights and freedoms.
- The legitimate interests of the Company may also include: (i) taking precautions to protect employees and workers who may drive as part of their role within the Company and, consequently, members of the general public; and (ii) to detect/report criminal activity. Each of the preceding activities we believe is not incompatible with your rights and freedoms.

We may process SCPD in the following circumstances:

- in limited circumstances, with your explicit written consent;
- where we need to carry out our legal obligations and in line with our data protection policy and health and safety obligations;
- where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards; and
- where it is necessary to comply with employment law.

### **3. What kind of personal data do we process?**

We process some of your personal data, which we have broken down into the following categories:

- **Identification data**
  - Name, title, address, marital status, personal contact details, national insurance number and bank details;
  - Information relating to age, date of birth and gender;
  - Driving licence, passport or national identity card;
  - Nationality and first language.;

**Pilgrim's Pride Ltd:** Company No: 00608077. VAT no: 390583825. **Pilgrim's UK Lamb Ltd:** Company No: 01010230. VAT no: 199338508. **Pilgrim's Food Masters UK Limited:** Company No: 13352340. VAT No: 496976167. **Pilgrim's Shared Services Ltd:** Company No: 13876078. VAT No: GB496976167. **Oakhouse Foods Ltd:** Company No: 4226390. VAT No: 793641791. **Rollover Ltd:** Company No. 2606878. VAT No. 887 120 901.

All the above registered in England & Wales with a Registered office address at Seton House, Warwick Technology Park Gallows Hill, Warwick CV34 6DA.

**Moy Park Limited:** The Food Park, 39 Seagoe Industrial Estate, Craigavon, Northern Ireland, BT63 5QE. Registered in England No: NI004842 VAT No: GB496976167. **Kitchen Range Foods Ltd:** Kingfisher Way, Huntingdon, Cambridgeshire, PE29 6FJ. Registered in England No:1004539 Vat No: GB 239361747.

**Pilgrim's Food Masters Ireland Limited:** Unit C, First Floor, Apex Business Centre, Blackthorn Road, Sandford Business Park, Dublin, D18 E3P8, Ireland. Registered in Republic of Ireland. Company No: 87159. VAT No: 4655528J. **Moy Park France SAS:** 712 Chemin de Noyelles, 62256 Hénil-Beaumont, France. Company No: 444 575 120. **Moy Park Beef Orléans Sarl:** Rue des Pins, ZI des Bicharderies, 45404 Fleury-les-Aubrais, France. Company No: 343 206 389. **Albert van Zoonen B.V.** Grotewallerweg 4, 1742 NM Schagen, Netherlands. Company No: 37042002.

- **Recruitment data**
  - Evidence of the right to work in the UK or the EU;
  - Application form, CV and/or cover letter, education/job history, interview notes, references, pre-employment assessment, proof of qualifications;
  - Any correspondence relating to the outcome of the recruitment process (either successful or unsuccessful).
- **Security data**
  - CCTV footage captured when you visit our premises.

We may also collect, store and use the following ‘special categories’ of more sensitive personal information:

- (UK only) Information relating to ethnic origin
- (UK and Ireland only) race, religious, philosophical or moral beliefs, or your sexual life or sexual orientation;
- (UK and Ireland only) Information on motoring convictions and mandatory criminal record checks; and
- Information on criminal convictions.

Where we collect and process any SCPD, we only do so either with your express written consent, where permitted under applicable law, to ensure meaningful equal opportunity monitoring and reporting, or to determine your suitability for employment with the Company.

#### 4. How and why do we process your personal data?

This privacy notice is designed to comply with both the UK General Data Protection Regulation (UK GDPR) and the EU General Data Protection Regulation (EU GDPR). While the UK GDPR allows multiple lawful basis for processing, the EU GDPR requires that only one lawful basis is identified per processing purpose.

For example, under the UK GDPR, we can rely on both our legal obligations and the necessity of processing prior to entering into an employment contract with you to ensure you have the right to work for the Company. For EU GDPR purposes, we have selected the need to enter into an employment contract with you as the primary lawful basis for this processing.

The primary lawful basis for processing in the EU is indicated in the following table with an asterisk (\*).

Processing activity	Purpose of processing	Personal data types	Lawful basis
<b>Recruitment</b>	Ensuring you have the right to work in the relevant region and for the Company.	<ul style="list-style-type: none"> <li>• Identification data.</li> <li>• Recruitment data.</li> </ul>	Processing necessary prior to entering into an <b>employment contract (*)</b> .  <b>Legal obligation.</b>  <b>Legitimate interest.</b>
	Making a decision about your recruitment and/or appointment.		
	Managing the recruitment process.		
<b>HR activity</b>	For identification purposes.	<ul style="list-style-type: none"> <li>• Identification data.</li> <li>• Recruitment data.</li> </ul>	To enter into an <b>employment contract with you (*)</b> .  <b>Legitimate interest.</b>
	To communicate with you in relation to your application and potential employment with the Company.		
	To assess your suitability for the relevant job role.		
	To provide feedback to you on request as part of the application process.		
	Determining the terms by which you may work for the Company.		
	Where permitted under applicable law, to monitor equality and diversity within the Company.	<ul style="list-style-type: none"> <li>• Identification data (UK &amp; Ireland only).</li> </ul>	<b>Legal obligation (*)</b> .  <b>Legitimate interest.</b>

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	Where permitted under applicable law, to ensure compliance with legal requirements and obligations to third parties and that you are able to perform the applicable job role.	<ul style="list-style-type: none"> <li>Identification data (SCPD) regarding motoring convictions and criminal convictions (UK &amp; Ireland only).</li> </ul>	<p>Ensuring performance of your obligations under a <b>contract of employment (*)</b>.</p> <p><b>Legal obligation.</b></p> <p><b>Legitimate interest.</b></p>
<b>Payroll activity</b>	To enable an account to be set up for future payment and relevant deductions.	<ul style="list-style-type: none"> <li>Identification data.</li> </ul>	To enter into an <b>employment contract</b> with you.
<b>Ensuring safety of our premises, employees and visitors.</b>	To ensure the safety of the premises, employees and individuals while on Company premises.	<ul style="list-style-type: none"> <li>Identification data.</li> <li>Security data.</li> </ul>	<p><b>Legal obligation (*)</b>.</p> <p><b>Legitimate interest.</b></p>

## 5. How do we collect your personal data?

We typically collect personal information about applicants either directly from candidates or sometimes from an employment agency.

We may sometimes collect additional information from publicly available sources, such as social media sites and the internet and from government authorities.

## 6. What happens if you fail to provide personal information?

Where the provision of your personal data is required for us to enter into an employment contract with you, or is a statutory requirement, (e.g. evidence of a right to work in the UK or the EU, details of salary/benefits, national insurance number, health and safety of workers), refusal to provide this personal information will prevent us from being able to offer you employment.

## 7. Will you be subject to automated decision making?

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making unless we have a lawful basis for doing so and have notified you.

## 8. Who will your personal information be disclosed to?

Your personal information will be accessed by authorised staff who need to have access to that information (i.e. the recruiting manager and HR Manager).

We will also share your personal data as necessary with other Pilgrim's Europe companies named above and their affiliates who we provide services to and who provide support services to us, including IT, HR and other key function services. These companies are bound by terms of confidentiality and must meet the Company standards in regards data protection.

We may also have to share your data with third parties, including third-party service providers and other entities in the group or where required by law, where it is necessary to administer or complete the recruitment application process with you or where we have another legitimate interest in doing so. We require third parties to respect the security of your data, to take appropriate security measures and to treat it in accordance with the law. We only permit third parties to process your personal data for specified purposes and in accordance with our instructions.

## 9. Will your personal data be transferred to third parties outside of the European Economic Area or UK?

During the application stage of the recruitment process, we may transfer the personal data we collect about you outside of the UK or EEA to a country that may have privacy protections less stringent than in the EEA or UK. For instance, we may transfer your personal data to our parent company, Pilgrim's Pride Corporation ('PPC'), and its majority shareholder, JBS USA, (both based in the United States of America) in order to review, assess or determine your application for employment.

Our ethics hotline is provided by a third-party company who store the data in the EEA but the data will be shared with JBS USA who administer and oversee ethics investigations in the United States of America. Copies of the applicable privacy notice will be provided to you at the time of logging any ethics concern.

In the absence of an adequacy decision from the EU Commission or UK Parliament, we will implement measures to ensure that your personal data receives an adequate level of protection where it is transferred outside the UK or EEA, such as EU standard contractual clauses or UK International Data Transfer Agreement, together with technical and organisational safeguards to ensure that your personal data is treated in a way that is in compliance with and which respects the EU and UK laws on data protection. For further information on the safeguards in place

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please contact the Group Privacy Officer.

**10. How long will we use your information for?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected the personal information for, including for the purposes of satisfying any legal, accounting, or reporting requirements. For further information on our retention of your information, please see our Retention Guidelines available from the Group Privacy Officer.

**11. What are your rights relating to your personal information?**

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

- Request access to your personal information (commonly known as a “data subject access request”).
- Request correction of the personal information that we hold about you.
- Request the erasure of your personal information.
- Request the restriction of and objection to processing of your personal information.
- Request the transfer of your personal information to a third party.

In France only, data subjects can also instruct the individual(s) who are required to deal with their affairs (e.g. executors of their will) of how they wish for their personal data to be processed after their death, which may include the use of some of the rights listed above.

In addition, in the limited circumstances where you may have provided your consent to the processing of your personal information, you have the right to withdraw your consent at any time. This will not affect your contractual relationship with us. To withdraw your consent, please contact the Group Privacy Officer in writing. Some of these rights are not automatic, and we reserve the right to discuss with you why it might not comply with a request. If you want to exercise any of the above rights, please contact the Group Privacy Officer in writing.

**12. Who can you contact if you have concerns about our use of your personal information?**

You retain the right at all times to lodge a complaint about our management of your personal data to

- The Information Commissioner’s Office in the UK - <https://ico.org.uk/concerns/>
- The Data Protection Commission in Ireland – <https://www.dataprotection.ie/en/contact/how-contact-us>
- CNIL in France – <https://www.cnil.fr/en/contact-us>
- Autoriteit Persoonsgegevens in the Netherlands - <https://autoriteitpersoonsgegevens.nl/en/contact-dutch-dpa/contact-us>

If you have any concerns or queries about our use of your personal data, please contact the Group Privacy Officer [gpo@pilgrimseurope.com](mailto:gpo@pilgrimseurope.com)

Governance	
Version	1.0
Date	April 2025
Owner	Debbie Bloomfield
Authorised By	Kirsty Wilkins
Review Frequency	Annual

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