



## Job Candidate Privacy Notice - UK

Krispy Kreme U.K. Limited (Krispy Kreme) is a "controller" in relation to personal data. This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the UK General Data Protection Regulation (UK GDPR).

### 1.0 Data protection principles

- 1.1 We will comply with data protection law and principles, which means that your data will be:
- 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.

### 2.0 Who is your personal information collected from?

- 2.1 We collect personal information about candidates from the following sources:
- You, the candidate.
  - Recruitment agencies.
  - TrustID
  - Applicant Tracking System (ATS) - Peoplebank
  - Background check providers.
  - Credit reference agencies.
  - Disclosure and Barring Service in respect of criminal convictions.
  - Your named referees.
  - Publicly accessible sources.

### 3.0 The kind of information we hold about you

3.1 In connection with your application for work with us, 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, address, telephone number, personal email address, education history, qualifications and employment history.
- Any information you provide to us during the interview process.
- Any information you provide to us in our Applicant Tracking System, Peoplebank

3.2 This may involve us collecting, storing and using the following types of more sensitive personal information:

- Information about your race or ethnicity, religious or philosophical beliefs, trade union membership, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

### 4.0 How we will use information about you

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



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- a. Assess your skills, qualifications, and suitability for the role.
- b. Carry out background and reference checks, where applicable.
- c. Communicate with you about the recruitment process.
- d. Keep records related to our hiring processes.
- e. Comply with legal or regulatory requirements.

4.2 It is in our legitimate interests to decide whether to appoint you.

4.3 We also need to process your personal information to decide whether to enter into a contract of employment with you.

4.4 We will process the information we have collected to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the work. If we decide to offer you the work, we will then take up references, carry out a criminal record, and carry out any other check before confirming your appointment.

### 5.0 If you fail to provide personal information

5.1 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), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

### 6.0 How we use particularly sensitive personal information

6.1 Where appropriate we will use your particularly sensitive personal information in the following ways:

- a. We use information about disability to consider whether we need to provide appropriate adjustments during the recruitment process.
- b. We use information about racial or ethnic origin, religious or philosophical beliefs, disability or sexual orientation to ensure meaningful equal opportunity monitoring and reporting.

### 7.0 Information about criminal convictions

7.1 We may decide that we need to collect and process information about criminal convictions.

7.2 If we decide that we do, we will collect information about your criminal convictions history if we would like to offer you the work (conditional on checks and any other conditions, such as references, being satisfactory). We are [required **OR** entitled] to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the work. In particular:

- a. We may be legally required to carry out criminal record checks for those carrying out certain roles.
- b. The role may be one which is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (SI 1975/1023) and is also included in the Police Act 1997 (Criminal Records) Regulations (SI 2002/233) so is eligible for a standard or enhanced check from the Disclosure and Barring Service.
- c. We may consider that the role requires a high degree of trust and integrity and so we would like to ask you to seek a basic disclosure of your criminal records history. If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your manager or HR as soon as possible.



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### 8.0 Automated decision-making

8.1 You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

### 9.0 Data sharing

9.1 We will only share your personal information with third parties for the purposes of processing your application. All our third-party service providers and other entities in the group 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 data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### 10.0 Data security

10.1 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. 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.

10.2 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.

### 11.0 Data retention: How long will you use my information for?

11.1 We will retain your personal information for a period of 12 months after we have communicated to you our decision about whether to appoint you. 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. After this period, we will securely destroy your personal information in accordance with our data retention policy.

### 12.0 Rights of access, rectification, erasure, objection, restriction and data portability

12.1 Your rights in connection with personal information: Under certain circumstances, by law you have the right to:

- a. **Request access** to your personal information (commonly known as making 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.
- b. **Request rectification** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- c. **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).
- d. **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 particular 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.
- e. **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.
- f. **Request the transfer** of your personal information to another party.



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12.2 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 contact our data protection officer (DPO) whose contact details are NKrishnmurthy@krispykreme.co.uk.

### 13.0 Questions or complaints

13.1 If you have any questions or concerns about this privacy notice or how we handle your personal information, please contact our data protection officer (DPO) who has been appointed to oversee compliance with this privacy notice and whose contact details are NKrishnmurthy@krispykreme.co.uk.

13.2 You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) who is responsible for data protection issues in the UK and whose contact details are available at: <https://ico.org.uk/global/contact-us/>

Date	Changes	Version	Reviewed By
1 February 2026	New Policy	1.0	Ashtons Law & KK HR