

# PRIMARK APPLICANT PRIVACY NOTICE

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## Purpose of this notice

The protection of your personal data is of paramount importance to Primark (“we”, “us” and “our”). This Notice gives you information about how Primark collects, processes, stores and otherwise uses information about you, when you apply for a position with us or submit information in support of your application.

Personal data means any information about you that directly or indirectly identifies you, such as your name, email or phone number.

This Privacy Notice also tells you how you can exercise your rights, including the right to object to some of the data handling we carry out. More information about your rights and how you can exercise them is set out in the “Your Rights” section below.

We will tell you whether the information we are requesting is essential so that we can progress your application or whether the supply of this information is optional.

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.

## Who are we?

References to “**Primark**”, “**us**”, “**we**” or “**our**” in this notice mean Primark Limited (Company Number 47371, Arthur Ryan House, 22-24 Parnell Street, Dublin 1, Dublin, D01 P7W2, Dublin), who is the data controller.

Primark has appointed Bird & Bird Privacy Solutions, Bird & Bird DPO Services SRL, Avenue Louise 235 Box 1, 1050 Brussels, Belgium, as Data Protection Officer (DPO). The DPO may be reached by using the following email: [dataprotection@primark.com](mailto:dataprotection@primark.com).

## What categories of personal data does Primark collect?

We collect and use the below information to assess your suitability for the position you are applying for in support of your application:

- Your name, address, age, gender and contact details (including email address and telephone number)
- Details of your qualifications, skills, experience and employment history.
- Information during the interview, such as interview schedule, rating and summary, position preferences, willingness to relocate, desired salary, interests and aspirations
- For Internal Employees - Employee ID, Current Job title, Office/Store and Reporting Manager
- Results of any online assessments taken during the recruitment process
- References by your former employers
- Information about your interaction with the SmartPal chatbot
- Information about your entitlement to work in a particular country if it is necessary.
- Information about your online use of the SmartRecruiters Platform.

If your application is progressed and it is necessary and appropriate for the job role you are applying for, we may also collect and process the below categories of personal information about you with your consent

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where applicable:

- Criminal records data
- Sanctions & enforcement data

For certain roles we may also process additional information to comply with anti-bribery and corruption legal requirements. If this information is necessary for the role you are applying for, we will provide you with a separate in-time notice.

## Sensitive personal data?

We may also use sensitive personal data, such as personal information about racial or ethnic origin, political opinion, religious or philosophical belief or trade union membership, for equal opportunities purposes to ensure equal treatment to all applicants. We also process certain sensitive personal data in Northern Ireland to ensure we are complying with our legal obligations. Where sensitive personal data is collected, we will ensure that any additional legal requirements are complied with.

## Why do we collect and use your personal data?

We use your personal data for the following reasons:

- Administering and managing our recruitment process (Checking candidate availability for interviews, confirm interview bookings, requesting additional information, providing updates on application status, offer management, offer management, onboarding, processing internal and external referrals, assessing candidate suitability based on answers to application questions). [Legitimate Interests].
- Ensuring compliance with the applicable laws and our policies, and protecting our legitimate business interests. [Legitimate Interests, Legal Obligations]
- Protecting the security of our systems and your personal information. [Legitimate Interests]
- Protecting our business interests and legal rights, including, use in connection with legal claims, compliance, regulatory, auditing, investigative and disciplinary purposes and ethics and compliance reporting requirements. We also have an interest in analysing and monitoring the diversity of the workforce in accordance with applicable laws including, for example, compliance with equal opportunity employment laws. [Legitimate Interests, Legal Obligations]
- Future opportunities (We use your personal data to contact you about potential future career opportunities at Primark. This involves storing your information, keeping it up to date, and reaching out to you when relevant opportunities arise). We process your name, address and contact details (including email address and telephone number), details of your qualifications, skills, experience and employment history [Consent].
- Deciding whether to enter into a contract of employment with you. [Performance of contract, Legitimate Interests]

This information will be shared with companies who host our recruitment portal and systems. This includes SmartRecruiters, Inc in relation to the SmartRecruiters Platform.

## Sources of information

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We process information you provide to us when you apply via our website, our recruitment channels or via our SmartPal Chatbot.

We sometimes process data about you from other sources than yourself, for example from recruiters, recruitment agencies, LinkedIn, online assessment third-party providers, from a background check report or the references supplied by your former employers.

## Communicating with you about your application.

When you first complete your application, you will be asked to select your contact preferences. For each communication method (Email, SMS or WhatsApp) you will be asked to select your desired mode of contact, either when applying/providing your details or in response to the first message.

## Assessments

We use a range of different assessment methods in our selection processes to evaluate the suitability of an application for the position applied, based on job-related criteria such as key skills or behaviours. These assessment methods may include, but are not limited to application questions, online assessments, interviews and case studies / work samples. The outputs of the assessments are reviewed by trained assessors, however, in some instances, we may utilise online assessment tools that rely on computer algorithms to produce outputs and reports that inform our selection decisions. Please be assured that the providers of these assessment tools regularly conduct checks to ensure that their algorithms are functioning effectively with specific attention to bias. In addition, the assessment are routinely monitored and updated by assessment specialists to ensure accuracy and reliability. If you would like to know more about our assessments, including specific methods or their purposes, please contact us using the details below.

## Automated decision-making

Automated decision-making refers to the process of making objective decisions using automated means, based on predefined criteria, without any human intervention. In cases where we anticipate a significant volume of applications for a particular position, we may employ automated decision-making to assist in evaluating the suitability of your application for the role you have applied for. We will only use automated decision-making in our recruitment where permitted by law in the following instances:

- It is necessary for entering into, or performance of, a contract between you and Primark, or
- We have your explicit consent

It is important to note that your application may be automatically declined if it does not meet the pre-defined requirements. If your application is automatically rejected, you may contest this decision, express your point of view and ask for human intervention. Please see more information on how to exercise these Rights in the 'Your Rights' section below.

## Background Screening

If you receive an offer from us, we may conduct a background check on you or instruct a third party to do so on our behalf. Background screening will only be done where permitted by the law applicable to the location where the position is located and to the extent necessary and proportionate to the role that you are being offered. A background check can involve criminal record data, sanctions & enforcement data and/or

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directorship data (depending on the job role you are applying for). If a background screening is required, you may be contacted by a third-party background screening service provider to request your consent in processing your personal data, and at that time you will be provided with further information about the process and what personal data it might involve.

### How long do we keep this information?

We take steps to ensure that we only process personal data that is adequate, relevant, and limited to what is necessary in relation to the specific purpose(s) of processing.

We will retain your data in a form that identifies you for no longer than is necessary for the purposes for which the personal data is processed.

In general, information will be retained on unsuccessful candidates for a period of 12 months.

If your application is successful, relevant information gathered during the recruitment process will be transferred to your employee file for the purpose of administering your subsequent employment. We will retain and use this data in accordance with our employee privacy policy (a copy of which will be provided when you take up your employment).

### Who do we share this information with?

Where necessary to manage our recruitment process, we will share your information with our service providers and professional advisers, such as:

- recruitment agencies,
- former employers and referees, if your application is progressed,
- providers who carry out background checks on our behalf, if applicable to the role you are applying for, and if allowed by applicable law,
- suppliers who run candidate assessment programmes for us

We will also share your information with third parties in order to comply with our legal obligations, and third parties involved in, or assisting with, litigation (including legal advisers, witnesses, experts and judicial and quasi-judicial authorities).

If Primark merges with or is acquired by another business or company in the future (or is in meaningful discussions about such a possibility) we may share your personal information with the (prospective) new owners of the business or company.

### Where do we transfer this information to?

You may expect some of the recipients we share your data with might be located in countries outside of Europe depending on the location of the role you are applying for. In some cases, this may include countries located outside the European Union and/or European Economic Area ("EEA"). We ensure that we comply with the applicable legal requirements when transferring personal information outside the UK or the EEA. If the recipient is located in a country that is not considered to offer the same level of data protection as the European Union, Primark will implement appropriate safeguards to transfer your personal data to such recipients by entering into Standard Contractual Clauses ("SCC") and adopting additional measures to ensure the confidentiality of your personal data.

### Security

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We have taken appropriate technical, administrative, physical and procedural security measures, consistent with local and international information practices, to protect your personal information from misuse, unauthorised access or disclosure, loss, alteration, or destruction.

### Your Rights

If you wish to access and request a copy of your personal information or exercise any of any of your rights as listed below, you can contact us at [dataprotection@primark.com](mailto:dataprotection@primark.com). If we need more than one month (from receipt of your request) to respond to your request, we will come back to you and let you know.

You have the right to ask us at any time for a copy of your personal data. In relation to personal data you supply to us electronically, and which is held by us for the purpose of entering into a contract between us or on the basis of your consent, you are entitled to ask us for a copy of this information in a structured, commonly used and machine readable format so that you can reuse it or share it with other organisations.

If you think the personal data we hold about you is inaccurate or incomplete, you can ask us to correct it or complete it.

In some circumstances you also have the right to object to our processing of your data where we are relying on legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground, and in some instances you can ask us to restrict our use of your data (e.g. if you want us to check its accuracy) and to delete it (e.g. if there is no good reason for us to continue to process it).

Also, if our processing of your personal data is based specifically on your consent, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

There are some exceptions to these rights, however. For example, it will not be possible for us to delete your data if we are required by law to keep it or if we hold it in connection with a contract with you.

In case our processing is based on automated decision making and your application is automatically rejected, you also have the right to a human assessment of the decision made.

Similarly, access to your data may be refused if making the information available would reveal personal information about another person or if we are legally prevented from disclosing such information.

If Primark cannot comply with your request, for example because the processing of certain personal data is required to comply with legal and regulatory obligations, or because of other legal exceptions, Primark will provide a reasoned explanation.

### Contacting us and your rights of complaint

Questions, comments or requests concerning this privacy notice are welcomed and should be addressed to the Primark Data Protection Co-ordinator at [dataprotection@primark.com](mailto:dataprotection@primark.com) or send your query by post to:

Primark Limited,  
Arthur Ryan House,  
22-24 Parnell Street,  
Dublin 1,  
Ireland

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If you have a concern about the way we handle your personal data you have the right to complain to Primark's lead supervisory authority, the Data Protection Commissioner ( Address: Data Protection Commission, 21 Fitzwilliam Square, South Dublin 2, D02 RD28, Ireland, Website: <https://forms.dataprotection.ie/contact>) or your local supervisory authority.

*This privacy notice was last updated on 30<sup>th</sup> June 2025.*