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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, address, email or phone number.

This Privacy Notice also tells you what rights you have in regard to that data. More information about your rights are set out in the “Your Rights” section below. Please note that your rights are determined by both US law and state law. We and our 3<sup>rd</sup> party providers for the application process comply with all applicable law.

We will tell you whether the information we are requesting is essential so that we can progress your application. Information that is essential must be provided by you in order for Primark to process your application. If you fail to provide information when requested, which is necessary for us to consider your application (such as education or work history), we will not be able to process your application successfully. Failure to truthfully respond could lead to your disqualification or termination from employment, if already hired. Certain information requested of you will be listed as optional. We will not request any information in violation of applicable law.

If you are a resident of the United Kingdom or European Union, you may have additional rights. For further information, please visit the notice covering your region.

## Who are we?

References to “**Primark**”, “**us**”, “**we**” or “**our**” in this notice mean Primark US Corp., headquartered in Boston, Massachusetts.

If you have any questions or other comments about our privacy policies, you can let us know by using the following email: [dataprotection@primark.com](mailto:dataprotection@primark.com).

## What categories of personal data does Primark collect and why?

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

- Your name, address and contact details (including email address and telephone number)
- Details of your qualifications, skills, experience, education, and employment history
- Information obtained from you during your interview
- Results of any online assessments taken during the recruitment process
- References by your former employers

We collect this data for our legitimate business purposes to be able to administer and manage our recruitment process and to make sure the right people end up in the right positions.

If your application is advanced (e.g. if you receive a conditional offer of employment and/or start employment)

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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, where applicable:

- Criminal history data
- Social security number
- Proof of identity
- Proof of eligibility to work for Primark in the United States

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.

In the US, we voluntarily ask candidates to disclose information about their race/ethnic origin, age, and/or gender for equal opportunities purposes to ensure equal treatment to all applicants. While this information is not used in decision making and will not be shared with those who will make the ultimate decision on your application, it does help ensure that our recruitment process is not having an adverse impact on certain applicants.

### Sources of information

We process information you provide to us when you apply via our website or our recruitment channels. We sometimes process data about you from other sources than yourself, for example from recruiters, recruitment agencies, and from a background check reports or the references supplied by your former employers. We also sometimes process data about you from online assessments conducted by third party providers, but in such instances you will be notified that you are undergoing an online assessment conducted by a third party provider. Additionally, we sometimes process data about you obtained from your LinkedIn profile; in such cases that data will be verified by your application to Primark. We do not use data from any social media sites other than LinkedIn in connection with the recruitment and assessment of applicants.

### Assessments

We may 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 behaviors. 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, where legally permissible, we may utilize online assessment tools that rely on computer algorithms to produce outputs and reports that inform our selection decisions. These assessment tools are regularly checked for legal compliance and to ensure that their algorithms are functioning effectively and do not have any statistical bias with regard to any protected class. In addition, the assessments 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 certain cases, where legally permissible and where we anticipate a significant volume of applications for a particular position, we may employ

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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 and when we have notified you that there will be automated decision making and 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 by contacting us at [dataprotection@primark.com](mailto:dataprotection@primark.com).

## Background Screening

If you receive a conditional offer from us, we will conduct a background check on you or instruct a third party to do so on our behalf. Background checks will only be done in compliance with applicable law, and to the extent necessary to the role for which you received a conditional offer of employment. A background check can involve criminal record data (depending on the job role you are applying for). You may be contacted by a third-party background screening service provider to request your consent in processing your personal data and communicating the results to Primark, and at that time you will be provided with further information about the process and what personal data it might involve. You may also be asked to submit additional information to Primark or its third party background screening provider based upon the initial results of your background screening.

## How long do we keep this information?

We retain specific applicant information for applicants who are not hired no longer than 5 years following the final recruitment decision. After this period, your personal data, if kept, will only be kept in aggregated form where information cannot be attributed to specific applicants, and all other data will be securely deleted. While the data is kept for 5 years, it will not be used for any employment decision after the final recruitment decision as has been communicated to you.

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 start your employment), and our records retention procedure.

## 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 references, if your application is progressed,
- providers who carry out background checks on our behalf, if you receive a conditional offer of employment
- suppliers who run candidate assessment programs 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, legal claims (including legal advisers, witnesses, experts and judicial and quasi-judicial authorities).

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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.

### Security

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

### 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)

**This privacy notice was last updated on 21 July 2025**