

easyGym Recruitment Privacy Notice

Fore Fitness Ltd. (“**easyGym**”, “**we**” or “**us**”) is committed to protecting your personal information.

- 1.1 All personal information provided by or collected from you, from third party sources such as referees or health professionals, as part of the recruitment process is handled in accordance with privacy and data protection laws in the United Kingdom where we operate and on the terms set out in this Recruitment Statement.
- 1.2 If your application to become an employee, worker or contractor of easyGym is successful your personal information will be handled in accordance with easyGym employment privacy notice for employees.

2 HOW WE COLLECT YOUR PERSONAL INFORMATION

- 2.1 easyGym will collect and store your personal information for the recruitment and engagement of staff, workers and contractors. We may collect your personal information orally, by telephone, in writing, by email and by online application.
- 2.2 easyGym collects personal information directly from the individual to whom it relates, except where that individual has consented to easyGym collecting the personal information from a third party or the law otherwise permits easyGym to do so.

3 WHAT PERSONAL INFORMATION WILL WE HOLD ABOUT YOU

3.1 Personal information

Personal information means any information relating to a person that enables them to be identified either directly or indirectly. Personal information that we hold about you may include your:

- 3.1.1 contact details (e.g. name, address and email address);
- 3.1.2 academic qualifications;
- 3.1.3 work experience;
- 3.1.4 family members
- 3.1.5 citizenship details

- 3.1.6 national identification numbers
- 3.1.7 right to live/work data
- 3.1.8 current and former titles and positions
- 3.1.9 current and historic compensation data
- 3.1.10 previous employment references

3.2 **Sensitive personal information**

In certain circumstances, we may need to collect “special categories” of particularly sensitive personal information about you, which may include information about:

- 3.2.1 your physical or mental health condition; and
- 3.2.2 any criminal offence or alleged criminal offence committed by you
- 3.2.3 racial or ethnic origin
- 3.2.4 religious beliefs

3.3 We will only use such sensitive personal information where we are legally able to so and in order to:

- 3.3.1 administer or process the job application that you have with us; and/or
- 3.3.2 assess and respond to a complaint you might make relating to our job application process.

4 **HOW WE COLLECT PERSONAL INFORMATION FROM THIRD PARTIES**

4.1 Personal information may be collected from, and disclosed to, third parties as necessary in the course of recruitment and engagement, to ensure that the information easyGym has is correct and to determine whether the applicant is suited to the available position. easyGym may take steps to verify that academic, training and professional qualifications are accurate and complete and, in appropriate circumstances due to the nature of the available position. We will only collect information from third parties if your job application progresses with us.

4.2 Third parties may include:

- 4.2.1 recruitment or human resource service providers;

- 4.2.2 health professionals;
- 4.2.3 insurers and insurance brokers;
- 4.2.4 nominated referees;
- 4.2.5 police and other law enforcement agencies.

4.3 In each case, easyGym treats personal information in accordance with the relevant privacy and data protection laws in the country in which we are operating and we will take reasonable steps to ensure the personal information that we store is accurate, complete and up-to-date.

5 HOW WE USE YOUR PERSONAL INFORMATION

5.1 Your personal information is collected primarily for the purposes of the recruitment process, including the registration, application and selection processes, of easyGym. For example, your personal information will be used to:

- 5.1.1 select you as a suitable staff, worker and contractor for easyGym;
- 5.1.2 conduct internal and external research, for example, equal opportunities monitoring;
- 5.1.3 deal with any complaints you might make to us;
- 5.1.4 for our own administrative purposes, including training our staff, conducting internal audits or transferring assets as part of a sale, purchase or investment in the business;
- 5.1.5 assist you with any future requirements, including to answer reasonable inquiries by any of your future employers; and
- 5.1.6 comply with easyGym legal and regulatory obligations.

6 GROUNDS FOR PROCESSING

6.1 To process your data lawfully we need to rely on one or more valid legal grounds. The grounds we will rely upon include:

- 6.1.1 our legitimate interests as a business (except where your interests or fundamental rights override these). For example, it is within our legitimate interests to use your data to:

- (a) engage in HR management by human resources Personnel, assist in personnel recruitment and assist in HR forecasting
- (b) prevent or detect fraud or abuses of our job application process;
- (c) maintain accounts and records of business activities to assess business performance

6.1.2 our compliance with a legal obligation to which easyGym is subject. For example, we have a duty to investigate and check that you are legally entitled to work in this country.

6.2 Where we process “special categories” of particularly sensitive personal information about you or, if applicable personal information relating to criminal convictions and offences, we must put additional protections in place. One of these protections is that we must rely on further legal grounds to process your information, in addition to those set out above. The grounds we will rely upon for processing sensitive personal information will include:

6.2.1 Where it is necessary for us to carry out obligations and exercise specific rights under employment law. For example, we have an obligation to select safe and competent workers, which may require us to check on your health condition in relation to your application for certain jobs.

6.2.2 Where it is necessary for reasons of a substantial public interest based upon applicable law. For example, we may process data revealing racial or ethnic origin for public interest purpose of ensuring equality of opportunity or treatment.

7 **RETENTION OF PERSONAL INFORMATION**

7.1 If you are successful and offered employment or a placement with easyGym, this information will be retained and transferred to your personnel file and used to manage any employment or other relationship with easyGym. If you are not successful, then we will only retain your information to the extent permitted by law, including retaining a record of your application and, unless you tell us that you do not wish us to do so, we may retain a copy of your CV for potential future opportunities.

8 **AUTOMATED DECISION-MAKING**

8.1 Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

- 8.1.1 If applicable law requires it, where we have notified you of the decision and given you 21 days to request reconsideration.
 - 8.1.2 Where it is necessary to carry out your job application, is authorised by applicable law and appropriate measures are in place to safeguard your rights.
 - 8.1.3 In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.
- 8.2 If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights. 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 we have notified you.
- 8.3 If we make an automated decisions solely on the grounds listed above in paragraph 8.1 you will have the right to request human intervention with regards to that automated decision and to contest such decision in accordance with our Privacy Policy.

9 YOUR RIGHTS WITH REGARDS TO YOUR PERSONAL INFORMATION

9.1 Data protection law provides individuals with certain rights, including the right to: access, rectify, withdraw consent, erase, restrict, transport, and object to the processing of, their personal information. Individuals also have the right to lodge a complaint with the relevant information protection authority if they believe that their personal information is not being processed in accordance with the law. Further information about your rights is set out below:

9.2 **Right of obtain a copy of your personal information.** You have the right to obtain a copy of the personal information we hold about you. If you would like to obtain a copy of this information, please contact us at dpo@easygym.co.uk

9.3 You may be required to submit a proof of your identity and a fee.

In certain circumstances easyGym may refuse you access to your personal information in whole or in part.

9.4 **Right to rectification.** You may request that we rectify any inaccurate and/or complete any incomplete personal information. If we disagree and believe the information to be accurate and complete, we will advise you and include a notation on the record that you dispute the information's accuracy. Requests for corrections or supplements to all other personal

easyGym

The Plaza
120 Oxford Street
London W1 1LT

information should be made at dpo@easygym.co.uk We will respond to your request to correct or supplement your personal information within a reasonable time period and, in any event, within any time period specified in relevant laws.

- 9.5 **Right to withdraw consent.** You may, as permitted by law, withdraw your consent to the processing of your personal information at any time. Such withdrawal will not affect the lawfulness of processing based on your previous consent. Please note that if you withdraw your consent, you may not be able to benefit from certain service features for which the processing of your personal information is essential.
- 9.6 **Right to object to processing.** You may, as permitted by law, request that we stop processing your personal information.
- 9.7 **Right to erasure.** You may request that we erase your personal information and we will comply, unless there is a lawful reason for not doing so.
- 9.8 **Your right to lodge a complaint with the supervisory authority.** We suggest that you contact us about any questions or if you have a complaint in relation to how we process your personal information. However, you do have the right to contact the relevant supervisory authority in the relevant country directly.