JAGUAR LAND ROVER PRIVACY NOTICE

PRIVACY INFORMATION NOTICE (Education Programmes & Recruitment)

Jaguar Land Rover

Privacy Information Notice ("Notice")

Introduction

Jaguar Land Rover ("JLR Group," “we,” “our,” “us”) collects and retains certain information about you/your child (collectively “your”) to provide you the services you have signed up to. We are committed to protecting and responsibly handling your information and have produced this Notice to provide you with information regarding JLR Group practices when handling your information and to explain how we collect, use, share and keep your information secure.

Where we collect your information for a specific programme or initiative that is not detailed in this Notice, we may supplement this with specific information about those data handling activities, e.g. if you take part in a JLR event or prize draw. Look out for information notices associated with those specific activities.

Got a question:

Education Programmes: If you would like to get in touch with us regarding the activities described below, our contact details are: takepart@jaguarlandrover.com

Recruitment: If you would like to get in touch with a query contact talent@jaguarlandrover.com. For senior executive appointments please contact exechire@jaguarlandrover.com

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What information JLR holds about you and why.

The information that we hold on you is any information that relates to you/your child where you/your child are identified or identifiable. Most of the information we hold will be provided directly by you or be generated by us as part of recruitment or taking part in one of the Education Programmes. For example:

(a) Information provided by you/your child when your child takes part in one of the Education Programme offerings, such as full name, parent/legal guardian details, contact details.
(b) Information provided by you or generated by us as part of the recruitment process, such as full name, contact details, previous work and CV details, assessment marks, interview notes and the right to work in the UK.
There may be times where we collect information from other sources for the purposes of recruitment. For example, for certain roles, in order to identify the best individuals to fill those roles, we may take a more proactive approach and complete a data gathering exercise using various external sources, such as professional networking platforms, approved background checking providers and other publicly available information sources (e.g. news articles).

We are committed to being transparent and fair in our dealings with you, therefore we only collect and hold your information where we have legally valid reasons to do so. There are various reasons why we require your information, the primary reason is to fulfil the services you have opted in to. Please see the “Tell me more” box below.

**TELL ME MORE.**

...about why JLR holds your information...

The main uses of your information and the legally valid reason we rely on for these are:

<table>
<thead>
<tr>
<th>Why we use your information:</th>
<th>Legally valid reason:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>To organise and facilitate visits to Jaguar Land Rover Education Centres</strong> to participate in educational activities and/or a site tour. It is likely that we will be taking photos of your child’s involvement in the activities or the site tour. These photos may be used for JLR publications, such as our annual report or marketing materials promoting our education activities.</td>
<td>Legitimate business interest to facilitate the visit</td>
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<tr>
<td><strong>To organise and facilitate the participation or application to participate in Jaguar Land Rover competitions</strong> – including Land Rover 4x4 in Schools Challenge and Jaguar Primary School Challenge. It is likely that we will be taking photos of your child’s involvement in the activities or the site tour. These photos may be used for JLR publications, such as our annual report or marketing materials promoting our education activities</td>
<td>Consent to enable us to take photos of the activities undertaken by participants. Where we collect your information with consent, you may withdraw your consent for us to use your information in any of these ways at any time. Please see Your Rights section below for further details. (This right doesn’t effect the lawfulness of processing that was based on that consent before its withdrawal.)</td>
</tr>
<tr>
<td><strong>To organise and facilitate the participation or application to participate in Jaguar Land Rover Work Experience programmes</strong> – including but not limited to the general work experience programme, the</td>
<td>Legitimate business interest to facilitate the Work Experience Programmes</td>
</tr>
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<td></td>
<td>Consent to enable us to take photos of the activities undertaken by participants.</td>
</tr>
<tr>
<td>To organise and facilitate the participation or application to participate in Jaguar Land Rover Career Insight programmes – including but not limited to Furthering Futures, Design Week and any others that may be available from time to time. It is likely that we will be taking photos of your child’s involvement in the activities or the site tour. These photos may be used for JLR publications, such as our annual report or marketing materials promoting our education activities</td>
<td>Where we collect your information with consent, you may withdraw your consent for us to use your information in any of these ways at any time. Please see Your Rights section below for further details. (This right doesn’t effect the lawfulness of processing that was based on that consent before its withdrawal.)</td>
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<tr>
<td>To organise and facilitate the participation or application to participate in Jaguar Land Rover Education Mentoring activities – including Business Class. It is likely that we will be taking photos of your child’s involvement in the activities or the site tour. These photos may be used for JLR publications, such as our annual report or marketing materials promoting our education activities</td>
<td>Legitimate business interest to facilitate the Mentoring activities</td>
</tr>
<tr>
<td>To carry out recruitment analytics - we may use information on your nationality, gender, age, disability and racial and ethnic origin (where provided) as part of diversity monitoring initiatives. Such information will be aggregated and used for equality of opportunity monitoring purposes.</td>
<td>Legitimate business interest ensure effective and fair use of recruitment tools and procedures.</td>
</tr>
<tr>
<td>For the fulfilment of the recruitment process - When you apply for a role, we will use your information to confirm who you are, your eligibility to work for us, as well as whether you are suitable for the role, by assessing your work experience, interviews and tests you may undertake.</td>
<td>Legitimate business interest in fulfilling the recruitment process.</td>
</tr>
<tr>
<td>Nuffield Programme and any others that may be available from time to time. It is likely that we will be taking photos of your child’s involvement in the activities or the site tour. These photos may be used for JLR publications, such as our annual report or marketing materials promoting our education activities</td>
<td>Consent to enable us to take photos of the activities undertaken by participants. Where we collect your information with consent, you may withdraw your consent for us to use your information in any of these ways at any time. Please see Your Rights section below for further details. (This right doesn’t effect the lawfulness of processing that was based on that consent before its withdrawal.)</td>
</tr>
</tbody>
</table>
Please note – disability and ethnicity are not mandatory fields. You may choose the option ‘prefer not to say’.

From time to time we may conduct mapping or research exercises. This is to enable us to understand a particular functional specialism or market. Here, we may include certain aspects of your personal data.

| **To ensure compliance with JLR policies and procedures** - your information may be used as part of the external audit process as well as to ensure the recruitment standards and procedures are accurately followed. | Legitimate business interest to monitor and demonstrate compliance with JLR policies and procedures and external audit requirements. |
| Keeping you informed and asking for feedback - we may share and use the details we hold on you within our Company network if we believe you may be suitable for a future role. | Legitimate business interest to obtain feedback to better improve our services and offer further opportunities to you should they arise. |
| Offer Process and onboarding - if successful in your application, your information will be used to contact you in respect of any offer of employment we choose to make and providing you with information about our onboarding process. | Necessary for the performance of a contract or entering into a contract. |
| Disputes or legal proceedings - we may use your information where it is relevant or potentially relevant to a dispute or legal proceeding affecting us. | Legitimate business interests to manage any legal claims. |

Jaguar Land Rover will, as part of our recruitment process, carry out some automated decision making (including profiling) using your information. This activity enables us to effectively identify candidates (i) who do not meet set criteria critical for a specific role, or (ii) where there are very high volume of applications which require an immediate response. The consequences of automated decision making within the recruitment process is that you will not be able to continue to the next stage of the selection process.

If we propose to use your information in a manner that is not detailed above, we will contact you to inform you of any additional reasons for processing (and where necessary, obtain your consent).

**Who we share your information with and why.**

We may share your information with:

Document: Jaguar Land Rover Recruitment Privacy Notice
JLR-RMP item number: 41.1
JLR retention code: S+1
JLR-RMP security classification: Proprietary

Issue: 3.0
HR
Issue date: September 2020
Review date: January 2021
Those third-party suppliers who need to handle your information so we can provide the Education programme or run the competition, for example, delivery of career insight courses, site visits, or participation in a competition.

Those third-party suppliers who need to handle your information so we can manage the Educational Programmes and the recruitment process, for example, to provide appropriate IT support services and to provide administration support, or background checking services for successful applicants.

For recruitment purposes, we may share your information with other JLR group companies, for example, for Executive Recruitment, we may share recruitment information with other JLR Group companies (e.g. JLR China) when we are leading recruitment projects in these countries.

If we are under a duty to disclose or share your information in order to comply with any legal or regulatory obligation or requests, or in order to enforce these terms or to investigate actual or suspected breaches.

Please see the “Tell me more” box below.

We have safeguards in place with our third-party suppliers to ensure that your data is kept securely, in a lawful manner and used in accordance with the purposes set out in this Notice.

**TELL ME MORE ...**

**... about third-party suppliers ...**
We use a number of third party suppliers to provide recruitment research, Customer Relationship Management (CRM) tools, administrative and technical support, some of these suppliers have access to our systems in order to provide services to us and on your behalf, for example Education specialists who deliver the programmes on our behalf, and the coordination and administration of the recruitment process (including validation and verification exercises).

**... about JLRs independent third parties ...**
We work with a number of independent third parties who provide JLR with support and services, such as legal advice. In limited circumstances, where necessary we may share your information with them where appropriate to support our requirements.

**... about JLR Group companies, and how they may provide service support ...**
As a member of the Tata Group of companies, we can benefit from the large IT infrastructure and expertise that exists within our wider corporate structure. This means that the information you provide to us may be accessed by members of our group of companies only as necessary for service and system maintenance and support, business continuity, IT and administrative purposes.

**... about public bodies, government agencies, law enforcement and regulators ...**
From time to time, the police, other law enforcement agencies, HMRC, Department for Work and Pensions and regulators can request information, for example for the purposes of investigation, preventing or detecting crime, or apprehending or prosecuting offenders.

JLR has strict processes in place which govern such disclosures. These shall be affected where disclosures are mandated by law or by virtue of the authorities’ role and there is a compelling business and legal reason to do so.
Each third-party supplier is only permitted to use your information on our written instructions, within the limited scope of the service contract they fulfil for JLR. We take all necessary steps to safeguard your information by imposing strict restrictions on how your information is used, stored and processed by our suppliers. We have in place audit processes designed to verify that service providers meet our standards.

For further information on how we safeguard your information, please see section below.

**How we keep your information secure and international data transfers.**

We are committed to keeping your information secure. We have put in place organisational and technical security measures designed to adequately protect your information.

You also have a role to play in the security of your information. Where you have a password enabling you to access the recruitment portal, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

We will always aim to use servers which are hosted in the EU. However, in limited circumstances we may be required for access to be granted to your information by a third-party supplier or group company located outside of the EU where this is necessary for the purposes described above. Where this happens, we apply safeguards to add to the data protections that apply to those data transfers. This includes an assessment of the adequacy of the third country in question, use of European Commission approved model contract terms where appropriate.

Please see the “Tell me more” box below.

### TELL ME MORE ...

... about the adequacy checks JLR puts in place for international data transfers ...

Where JLR chooses to share your information with a third-party supplier located outside the EU, the following factors are assessed to support adequate transfer of this data:

- **Internal checks to identify the existence or absence of any adequacy decision by the European Commission.** We have group companies and use third party suppliers located in countries that have been approved by the European Commission as having essentially equivalent data protection laws. A full list of these countries as at the date of this Privacy Policy is: Andorra, Argentina, Canada, Faroe Islands, Guernsey, Israel, Switzerland, Jersey, New Zealand, Uruguay and the Isle of Man. This list and information about the protections the European Commission has considered is available via [this link](#).

- **Use of measures like European Commission approved measures to support adequate transfers of personal data.** We also have group companies and use third party suppliers located in countries that are elsewhere in the world. To manage data protection compliance with these transfers, we will use European Commission approved data transfer mechanisms such as use of model contractual clauses approved by the Commission.
  - To understand the protections required in European Commission approved Model Clauses, a template copy of these [is accessible from this location](#).
How long we keep your information

We'll keep your information for as long as we need it to provide you the services you have signed up to, including adding you to the candidate pool in order for you to be considered for other suitable roles within JLR.

We may also keep it to comply with our legal obligations, respond to queries and resolve any disputes, to meet our legitimate interests and to enforce our rights. The criteria we use to determine storage periods include the following: any applicable contractual provisions that may be in force, legal statutory limitation periods, applicable regulatory requirements and industry standards.

Your data protection rights

You have rights in connection with your information, including: to withdraw consent where you have given it, to be informed and have access to your information, to correct or complete inaccurate data, and in certain circumstances to restrict, request erasure, object to processing, or request portability of your information to another organisation.

If you want to get in touch with us for any reason regarding your data protection rights, please get in touch with the Privacy and Data Protection Team at DPOffice@jaguarlandrover.com, and inform them / add into the subject header that it relates to your data protection rights.

If you are not happy and have a data protection related complaint, please contact us direct at this email address: DPOffice@jaguarlandrover.com. If you are not satisfied, you also have the right to complain to the Information Commissioner’s Office.

To learn more about these data protection rights, see the “Tell me more” box below.

TELL ME MORE ...

... about my data subject rights ...

There may be limited circumstances where you have consented to us collecting and processing your data. Where this is so, you have the right to withdraw your consent at any time. If you withdraw consent, we will cease processing your information for the reasons that consent was obtained.

- You can ask for access to the information we hold about you, object to the processing, request that we correct any mistakes, restrict or stop processing or delete it. If you do ask us to delete or stop processing it, we will not always be required to do so. If this is the case, we will explain why.

If you no longer wish to receive recruitment communications, want to update or delete your Candidate profile you can do so at any time. For non-executive roles, you can do this by logging onto your account and making the changes required. For Senior Executive appointments, please email exechire@jaguarlandrover.com with your preferences.

... about how I can make a complaint...

- You have the right to make an official complaint about the way we handle your information. In the first instance, please contact the Privacy and Data Protection Team (details below). If you do not feel that your complaint has been suitably addressed, you can contact your local data protection regulator. Within the UK, this is the Information Commissioners Office (ICO).
About how to get in touch with the Information Commissioner’s Office (ICO)...

- The Information Commissioner’s Office (the ICO) is the supervisory authority that regulates personal data in the UK. You can get in touch with the ICO in any of the following ways:
- By going to their website: [www.ico.org.uk](http://www.ico.org.uk)
- By giving them a call on 0303 123 1113
- or by writing to them. Their address is: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow SK9 5AF.

Contact us

If you have an issue regarding the information we hold on you or wish to exercise your rights, we would ask that you contact the relevant teams in the first instance:

For Educational Programmes, please contact the Social Impact Team - [takepart@jaguarlandrover.com](mailto:takepart@jaguarlandrover.com) with your query and details of the Educational Programme attended.

For recruitment, please contact the Recruitment Team - [talent@jaguarlandrover.com](mailto:talent@jaguarlandrover.com) with your query and relevant personal details so we can identify you appropriately.

For senior Executive appointments please contact [exechire@jaguarlandrover.com](mailto:exechire@jaguarlandrover.com)

Should you have any complaints or queries that have not been addressed to your satisfaction with the relevant team, feel free to escalate to the Privacy and Data Protection Team at [DPOffice@jaguarlandrover.com](mailto:DPOffice@jaguarlandrover.com)

We will aim to respond to any queries, concerns or complaints raised with the Privacy and Data Protection Team within 5 working days.

Jaguar Land Rover Limited, Abbey Road, Coventry, CV3 4LF.

Company Number 1672070.

How we are regulated: For UK data protection legislation purposes, JLR Group is registered with the Information Commissioner’s Office under registration number ZA020510

Changes to this Privacy Information Notice.

This Privacy Information Notice will be reviewed on an annual basis and updated as required. Whenever any such changes are made, we will aim to issue a notification with a link to the new updated version.

Last Updated: 18.09.2020