

Employee Privacy Policy

DFS Trading Limited takes the privacy of its employees very seriously and the security of your personal information is extremely important to us.

This policy sets out what information we collect about you, and how it will be used and stored by us when you use apply for a role at DFS, accept a role and DFS and become an employee and when you choose to leave DFS.

When we say 'we', 'our', 'us' or 'DFS' in this policy we are referring to DFS Trading Limited

For the purpose of the General Data Protection Regulation (EU 2016/679), the data controller is DFS Trading Limited. Registered Office: 1 Rockingham Way, Redhouse Interchange, Adwick-le-Street, Doncaster, DN6 7NA. Registered number 01735950 (England and Wales).

When you apply for a job with DFS?

DFS use a variety of methods to find the right candidate for all job roles. You can apply directly to DFS for any advertised roles that you feel are suitable for you. When you apply directly with DFS we will request that you complete an online or paper application form. This form will then be used internally and may lead to an invite to interview for a role. This form will be stored securely at all times and may be shared with DFS Group Companies, if they have vacancies we think you may be suitable for. The information you provide to us will only be used for the purposes of matching you to current vacancies and we will store this for 12 months.

DFS use Resourcebank, who are a carefully selected partner, who source suitable candidates for us and will share you information with us. When you provide information to Resourcebank you are consenting to them using your information to find you a role within DFS. The information that they collect about you will be used only for the purpose of matching you to a vacancy within DFS or DFS Group Companies. If you are offered a role within DFS, your details will then be retained on their systems as detailed in their privacy statement that was made available to all candidates. Once you have provided your details to them, they will contact you with relevant vacancies. You can opt out of this at any time using the unsubscribe link on the emails they send. Resourcebank are a data processor for DFS and their Privacy Policy is available on request.

In some cases, DFS will advertise vacancies on job agency websites. When using these websites and inputting your personal information you should always read their Privacy policy that will inform you how they use your information.

If your application is considered suitable, your application details will then be shared internally with the individual responsible for recruiting for that vacancy.

DFS have an 'Introduce a Friend' scheme. If you recommend a role to a friend and they are offered and accept that role you are entitled to an agreed payment. When you complete a

form, you must enter details for your 'friend'. The information you provide is only used to track the application and to pay you if required. This will be retained for three months after your final payment for the purpose of query resolution.

If you are invited for an interview with DFS:

Once you have been invited for interview a decision will be made as to your suitability for the role. If you are accepted for the role, we will contact you to make you aware of this and your information will be passed to our People Team who will send out a formal offer letter.

If you are not accepted for the role, your details will be stored for 6 months and if an alternative role comes available we will contact you to discuss this.

If you accept a role at DFS:

On your application form, we request you provide us with the details of two referees. Once you have accepted the role we will contact these individuals for references. Employment will only commence on receipt of satisfactory references.

For certain roles it may be necessary to complete a Basic Criminal Records (BSR) check. If this is relevant, you will be made aware of this, and your information will be shared to allow us to complete this. Once completed we will not complete any further BSR checks once you are in the employment of DFS unless we make you aware of this. The information will be held on our systems for your duration of your employment and for six years after you have left the company.

You will also be added to the DFS Learning Management System (LMS). This LMS system will record details of all courses attended and modules completed. You will have access to this system prior to you starting your employment with DFS.

When you start work at DFS

When you start to work at DFS, we will complete a 'new starter' form. This new starter form allows us to add you onto our HR Platform, 'My Place'. This platform will store all personal information that you provide to us. You will be provided with a log in for this system and it is your responsibility to ensure that the contact details and next of kin information is correct and kept up to date. We do this so that we can provide our contractual requirements to you that may include sharing some personal information with payroll providers who will act as a data processor for DFS, and ensure that you receive your salary.

DFS will store on our systems records of performance reviews, internal employee transfers, return to work forms and any disciplinary action. It may be necessary in some instances to share personal information about you with insurers if a claim has been made, or solicitors if legal advice is required.

DFS are required to set a pension for all employees. To do this, personal information, including your name, address, national insurance number and date of birth are shared with Aegon. Aegon are our pension provider and will become joint controllers of your personal information. Their full privacy policy is available on request.

If, as part of your employment contract, you are eligible for a company car your personal details including name, address, contact details, and driving license number will be shared with Hitachi Capital Ltd. Hitachi are the selected third party DFS use to manage their company car fleet. Further information as to how Hitachi use your personal information can be found in their privacy policy that is available on request. They will store this information securely on their systems and will delete it twelve months after resignation for tax accounting purposes. They will be made aware of any road traffic penalties, parking fines and criminal records.

In addition, if it is part of your employment contract, DFS will share your information with a number of third parties who work with our insurers who will write to you about Healthcare cover you may be entitled to. They will keep this information on their records for the duration of your cover and for seven years after your employment with DFS has ended. They will only ever contact you concerning the benefits you are entitled to as an employee of DFS. This information will be deleted on resignation.

If you are unable to work due to long-term health problems or illness, we may pass your personal information to our Occupational Health provider. We will only do this after discussions with yourself and you consent to us doing this.

At DFS, we take the Health and Safety of all employees very seriously. In some business areas, we will complete random drug and alcohol testing. This will be to ensure the vital interest of you and other DFS employees. These tests are completed by a third party called Randox who will share the results of the test with us. Once the tests have been shared, this information will be retained for ten years for insurance purposes.

We also work with a third party called Cordant. DFS employ Cordant to conduct Health surveillance of our employees. With your consent, they will for example, conduct hearing tests for employees working in noisy environments. The results of these tests will be passed to DFS and kept on our records. These can be retained for up to 40 years depending on different claims, and for insurance purposes. Details of the retention of information can be provided by Occupational Health surveillance records in CoSHH ('Control of Substances Hazardous to Health').

Under the GDPR we must have a lawful reason for using (or 'processing') your personal information. One of the lawful reasons is 'legitimate interests'. Legitimate Interests means that we can process your personal information if we have a genuine and legitimate reason *and* we are not harming any of your rights and interests in doing so.

So, what does this mean? When you provide your personal details to us, we use your information for our legitimate business interests to ensure we can provide you with the best service possible and help us ensure you only receive relevant information from us.

Before doing this, though, we will also carefully consider and balance any potential impact on you and your rights.

We will process the personal information you have supplied to us to conduct and manage our business to enable us to give you the most appropriate marketing, information, service and products and provide the best and most secure experience. These are what we consider our 'Legitimate Interests'.

The following are when and why we would use this approach:

Workplace: DFS use Workplace (by Facebook) as a companywide communication and engagement tool. All employees who are issued with a DFS company email address are able to set up accounts. If any individual without a company email address they need to contact Internal Communications who will set this up. DFS do not pass any information to Workplace without an employee's consent. An employee can close their account at any time.

Sharescheme: DFS operates a share scheme that all employees are invited to join at certain times of the year. Employee information such as name, address and employee number are shared with Equiniti, our share scheme provider, to enable them to manage the share scheme. When you choose to purchase shares through Hargreaves Lansdown, at the end of share scheme they become the data controller and you should always read their privacy policy.

DFS Lifestyle: All DFS employees are encouraged to set up a DFS Lifestyle account to give them access to employee benefits. To do this DFS are required to share personal information including name, and employee number so that Sodexo who run the scheme are able to verify that an individual is an employee of DFS and the Lifestyle scheme is available to them. They store this for the duration of your employment with DFS, once you leave the business your records will be destroyed immediately.

Expenses: Sometimes at DFS it will be necessary for you to claim back expenses. Each relevant employee is set up with an account on our Expenses system operated by Software Europe. Your name, address, and bank account details are passed to Software Europe for them to set up an account. Once in place it is your responsibility to keep this information up to date. This information is stored on their systems for the duration of their employment at which point your account will be deleted.

Team DFS: All DFS employees are encouraged to set up a Team DFS log in to allow them to nominate colleagues as part of celebrating success internally. To give them access to Team DFS we are required to share personal information including name, and employee number so that Sodexo who run the scheme are able to verify that an individual is an employee of DFS. Once the employee has left the business their personal details will be destroyed.

Best Companies Surveys: DFS participate annually in the Best Companies Survey. Contact details will be shared with them to enable them to contact you and ask you to complete the survey. This information is deleted after the survey results have been completed by the process of anonymisation.

Your interests

When we process your personal information for our legitimate interests, we will consider and balance any potential impact on you and your rights under data protection and any other relevant law. Our legitimate business interests do not automatically override your interests – we will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

When you leave DFS:

When you leave DFS we will keep your employee files for six years after your resignation.

How do we store your data?

Where we have given you (or where you have chosen) a password which enables you to access certain employee benefits, you are responsible for keeping this password confidential. We ask you not to share passwords with anyone.

In accordance with the General Data Protection Regulations (EU 2016/679), we employ strict physical, electronic and administrative security measures to protect your information from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage both on-line and off-line. The transmission of information via the internet is, however, not secure and therefore we cannot guarantee the security of data sent to us electronically by you. Any transmission of such data is therefore entirely at your own risk. If you have any questions relating to security of your data, please contact us using the details set out in the Contact Us section.

Legal Obligations

You should be aware that if we are requested by the police or any other regulatory or government authority investigating suspected illegal activities to provide your personal information, we may be obliged to do so.

Where we sell part or all of our business to a third party, in which case we may disclose your personal data to the prospective or actual seller or buyer of such business or assets.

Where we are legally required to disclose your information or in order to enforce or apply our terms and conditions or other agreements; or to protect our rights, property, or safety or those of our employees, customers or other third parties.

Access to information and other rights

The GDPR gives you the right to:

- Access information that we hold about you. If you wish to exercise your right of access, you must submit a written request and provide proof of your identity before we supply the information to you.
- Ask us to prevent processing that is causing - or is likely to cause - you substantial damage or distress;
- Require us not to make certain decisions automatically if they significantly affect you;
- Ask us to make any necessary changes to the personal data we hold about you in order to ensure that it is accurate and up to date;
- Ask us to have your personal data erased and to prevent processing in specific circumstances:
 - Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed.
 - When the individual withdraws consent.
 - When the individual objects to the processing and there is no overriding legitimate interest for continuing the processing.
 - The personal data was unlawfully processed (i.e. otherwise in breach of the GDPR).
 - The personal data has to be erased in order to comply with a legal obligation.
 - The personal data is processed in relation to the offer of information society services to a child.

We may refuse to comply with a request for erasure when personal data is processed for the following reasons;

- to exercise the right of freedom of expression and information;
- to comply with a legal obligation for the performance of a public interest task or exercise of official authority.
- for public health purposes in the public interest;
- archiving purposes in the public interest, scientific research historical research or statistical purposes; or
- the exercise or defense of legal claims.

Should you wish to contact us about any of these matters, please use contactus@dfs.co.uk

Contact Us

If you have any questions or concerned with how DFS process your personal information please do not hesitate to contact us the DFS People Team.

If you are unhappy with how we are processing your personal information, you have the right to refer the complaint to the regulator, the Information Commissioners Office. You can do this by visiting their website or contacting them at 0303 123 1113.

This Privacy Policy was last updated in May 2018.

|