

## **RECRUITMENT PRIVACY NOTICE**

### **About this Recruitment Privacy Notice**

**Jet2.com, Jet2.plc, Jet2holidays** and their subsidiaries (the "**Company**", "**we**", "**us**" and "**our**") hold and process data on all applicants for roles with us, (including applicants for employment and for any other types of position with us), and the personal data of third parties whose information is provided to us in connection with this relationship ("**Colleagues**" or "**you**" or "**your**").

You are being provided with this Privacy Notice because you are applying to work with us. The purpose of this Privacy Notice is to make you aware of what personal data we collect, how we use it and why we process it (namely for the purpose of the recruitment process). We are committed to only collecting, using and disclosing your personal data in ways that you expect and as we are required or allowed to by law.

It is important that you read this Privacy Notice so that you are aware of how and why we may be using your personal data. This Privacy Notice is intended to comply with our obligations to provide you with information about the Company's processing of your personal data under privacy laws. Please note that it does not form part of any contract of employment or engagement. Where we use the term employment in this Privacy Notice, this also includes other engagements or work relationships.

This notice applies in conjunction with any other notices or communications you receive from the Company in connection with the processing of your personal data.

If you have any questions about the processing of your personal data or your privacy rights or would like to access the information it contains in a different format, please contact [recruitment@jet2.com](mailto:recruitment@jet2.com) or your data protection officer.

### **Who is the controller of your data?**

The company that advertises the role which you apply for will be the data controller of your personal data. In addition, where processing of personal data is undertaken by any other group company for their own independent purposes, that company may be a controller of your personal data.

This Privacy Notice is provided on behalf of the company that advertises the role which you apply for and each of its associated companies.

The Company that employs you under your contract of employment or engages you under your contract for services will be the data controller of your personal data. In addition, where processing of personal data is undertaken by any other group company for their own independent purposes, that company may be a controller of your personal data.

We have a Data Protection Officer ("DPO") who is responsible for compliance with data protection law. You may contact the DPO securely and confidentially at any time if you have any concerns about the processing of your personal data or any data protection issues. The DPOs contact details are [dataprotection@jet2.com](mailto:dataprotection@jet2.com) . The DPO is the same for each company.

### **What data do we process?**

The Company may collect various types of personal data about you during the recruitment process for the purposes described in this Privacy Notice.

This personal data includes:

- *Personal details:* your title, forename, middle name(s) and surname, previous names, preferred name, gender, nationality, civil/marital status, date of birth, age, home contact details (e.g.

address, telephone number, mobile number, e-mail), previous address, national insurance number, immigration and eligibility to work data, languages spoken, next-of-kin/dependent contact information, details of any disability and any reasonable adjustments required;

- *Information relating to recruitment and selection:* information provided during the initial recruitment process (such as personal details, your CV, application form (including any information as to any unspent criminal conviction which may be provided on the application form), employment history, experience and qualifications), interview, selection and assessment data (such as records relating to dates, times and locations of interview, notes and feedback from interviews, video recordings of interviews, data relating to any assessment undertaken and the results of any assessment undertaken, data relating to any interview or assessment using artificial intelligence (AI) and the results of that, where applicable), information related to the outcome of your application, details of any offer made to you, completed medical questionnaire issued post offer. For certain roles (for example where homeworking is available) we may ask additional questions relating to the homeworking environment;
- *Vetting and verification data and regulatory and compliance data:* vetting and verification information and information obtained as a result of pre-screening (e.g. reference check, 2 year or 5 year back ground check, dependent on role, including employment, education and any gap periods,, credit reference check in relation to roles in finance or fraud, basic disclosure criminal record checks relating to unspent convictions (or enhanced checks where required by the applicable role), medical certificate for relevant roles, driving/pilot licence checks in relation to relevant roles, qualification where required such as Engineering, legal or finance qualifications, right to work verification) and any other information relating to the Company's compliance with legal and regulatory requirements including in relation to obtaining airside passes for relevant roles and renewal of the same every three to five years (to include renewed criminal record check and reference check), information about criminal offences provided by you, medical certificates for relevant roles, pilot and driving licences for relevant roles and training records for relevant roles, any record of your registration with any applicable regulatory authority, your regulated status and relevant regulatory certificates and references;
- *Equality and diversity data:* if provided, information relating to gender, nationality and special categories of personal data such as ethnicity and race, disability, religious or philosophical belief, sexual orientation, neurodiverse conditions (e.g., autism, ADHD, dyslexia), and caring responsibilities.
- *Details of third parties:* such the names and details of your emergency contact or referees;
- *Monitoring data (to the extent permitted by applicable laws):* CCTV footage, building and location access control and monitoring systems, video recordings of interviews and data relating to any interview or assessment using AI;
- *Claims, complaints and disclosures data:* subject matter of employment or contract based litigation and disputes, pre claim conciliation, communications, settlement discussions, claim proceeding records; involvement in incident reporting and disclosures;
- Any other information which you choose to disclose to the Company whether in writing (for example by email) or verbally, or additional information which we request pursuant to the recruitment process.

Certain additional information may be collected where this is necessary and permitted by local applicable laws.

### **Special categories of data**

The Company may also collect and process a limited amount of personal data within the data listed above falling into special categories of data, sometimes called "sensitive personal data". This term includes information relating to such matters as racial or ethnic origin, political opinions, religious or philosophical beliefs, physical or mental health, certain maternity/adoption information, trade union membership, sexual orientation, information regarding sexual life, biometric data and genetic data. For the purposes of this Privacy Notice this term will also include criminal records and information regarding criminal offences or proceedings.

### **How does the Company collect data?**

The Company collects and records your personal data from a variety of sources.

Some information will be collected directly from you. You may provide information to us through our Applicant Tracking System and during interviews and assessments.

In addition, further information about you will be generated by internal sources. This could include assessment results and interview feedback. This will include information provided by the relevant recruiter, interviewers/ assessors and the hiring manager. You may also be referred to us by an existing colleague.

In some cases we may obtain your personal data from other group companies or from third parties. This could include where your application is made through a recruitment agency or through contact at the Company. This could also include references from a previous employer, medical reports from external professionals and information from third parties we engage to carry out vetting and verification.

In some circumstances, data may be collected from monitoring devices or by other means (for example CCTV within our buildings, building and location access control and monitoring systems) if and to the extent permitted by applicable laws. When this happens, the data may be collected by the Company or a third party provider. This data may be accessed where required, for example, in relation to an incident or complaints, Data Subject Access Requests, where we are investigating possible breaches of Company policies (such as the CCTV and IT Security for all policies).

If you apply for a role which involves use of our online interview assessment platform, a video of your interview will be recorded and held within the platform, along with your responses to the assessment. Where we ask you to provide personal data to us on a mandatory basis, we will inform you of this at the time of collection. Failure to provide any mandatory information will mean that we cannot carry out certain processes. In some cases, it may mean that we are unable to employ or engage you as we will not have the personal data we believe to be necessary for the effective and efficient administration and management of an ongoing relationship with you.

In certain circumstances we may process personal data of third parties, such as an emergency contact or referees. The personal data regarding third parties that you provide to us will be processed for purposes of your application and to contact your next-of-kin in an emergency. Before you provide data relating to third parties to us, you should ensure you are permitted to do so and provide them with the information contained in this notice.

### **Artificial Intelligence and Automated decision making and profiling**

We may use Artificial Intelligence ("**AI**") to help automate and improve our processes and analyse information that we hold. For example, if you apply for a role, we may make use of AI or similar tools to help identify which candidates are best suited to progress to the next stage of the recruitment process.

Where this technology is deployed, final decisions on whether a candidate should proceed to the next stage in the assessment process will always be made by a member of the Company's recruitment team. Also, all candidates are offered the opportunity to request a review and/or to opt to have the original interview assessed by way of a member of Company staff.

We take steps to assess any such technology we use in advance and minimise the personal data that is used to that which is necessary for our purposes. In appropriate circumstances in relation to the way in which we use AI, we will provide you with additional information to help you understand how we are using it.

**Why do we process your data and what are the legal grounds for that processing?**

Your personal data is collected and processed for various business purposes but primarily to ensure that those who work for the Company are suitable and appropriate.

Data protection laws require us to tell you what legal basis we use for processing your data. These bases are set out in the applicable data protection law. We generally process your personal data under one of the following grounds:

- the processing is necessary for compliance with a **legal obligation** to which the Company is subject (for example avoiding unlawful discrimination);
- where there is no legal obligation, we will process your data where the processing is necessary for the **performance of a contract** to which you are a party or in order to take steps at your request prior to entering into such a contract;
- where the two grounds above do not apply, we may process your personal data where the processing is necessary for the **legitimate interests** pursued by the Company or a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data;
- in exceptional circumstances where we have no legitimate interest, but you ask us to process data for a particular purpose, we may carry out the processing on the basis of your **consent**. Where we rely on this, we will make this clear to you.

The details of our legitimate interest in processing will vary depending on our business purposes. However, in overall terms we have a legitimate interest in attracting and retaining engaged, motivated, high calibre people to work for us; and in securing, defending, managing and developing our business and our people in line with our policies and procedures and in line with our legal and regulatory obligations. Our processing is designed to support these aims. This is important to enable us to deliver our commitments to our customers, to protect our reputation and to achieve our immediate and longer-term business objectives.

We have set out below the further detail about the purposes we may use your personal data for and the legal basis we rely upon in each case:

No.	Purpose for processing	The lawful basis we rely on
a)	<p><b>Recruitment and selection</b>            Considering your suitability to work for us in the role you have applied for, comparing you to other candidates and making recruitment decisions.</p> <p>Communicating with you regarding recruitment and selection.</p>	<p>Some of this processing is necessary for compliance with <b>legal obligations</b> to which the Company is subject, including the requirement to ensure we do not unlawfully discriminate during recruitment and make reasonable adjustments where appropriate in the event you have a disability.</p> <p>Some processing is necessary for taking steps at your request prior to <b>entering into a contract</b> with you. Where you have applied to work for us we need to use your personal data to ensure that you are suitable for the role you have applied for and to make an offer to you where appropriate.</p>

	<p>Making arrangements for recruitment and selection.</p>	<p>Additional processing is necessary for the purpose of the legitimate interest pursued by the Company:  We have a <b>legitimate interest</b> in fully assessing applicants to ensure that only suitable and appropriate candidates are selected, to compare candidates and make a fair decision on the most appropriate candidate for the position. This will contribute towards the Company continuing to meet its business objectives, maintain its reputation and attract high calibre individuals.</p>
<p>b)</p>	<p><b>Pre-employment verification and screening</b>  Appropriate pre-employment verification and screening including, where relevant and appropriate: identity check, right to work verification, credit check, reference check, employment check, relevant professional qualifications check, medical certificate, pilot/driving license check, and information relating to unspent criminal convictions.</p> <p>Further verification and screening to comply with aviation laws and regulatory requirements including those in relation to the provision of airside passes, medical certificates for relevant roles and license checks.</p> <p>Basic disclosure criminal record(or equivalent in other jurisdictions) checks will be carried out as part of the recruitment process. Related information will be processed to help ensure the safety and security of our colleagues, customers and others.</p> <p>In relation to relevant roles processing of basic disclosure criminal record checks are also carried out in order to obtain and renew airside passes in</p>	<p>Some of this processing is necessary for compliance with <b>legal obligations</b> to which the Company is subject including establishment of the right to work in the country in which you are employed and aviation laws and regulatory requirements (including those in relation to the obtaining and renewal of airside passes (requiring a basic criminal record check and 5 year employer reference check), medical certificates for relevant roles and pilot/driver license checks).</p> <p>Where verification and screening is not legally required we rely on the grounds that processing is necessary for the purpose of <b>the legitimate interests</b> pursued by the Company. It is our <b>legitimate interest</b> to ensure that candidates and colleagues do not pose an unacceptable risk to the business, customers or others and considers the verification carried out necessary to prevent crime and other unlawful acts, to protect the business and customers from fraud, dishonesty and incompetence and to ensure the safety of colleagues, customers and others.</p> <p>Further information about criminal record checks is set out in the section below headed '<b>Processing relating to criminal convictions and offences</b>'. These checks are necessary for the purposes of performing or exercising obligations or rights imposed or conferred by law on the Company or you in connection with employment (namely legal and rregulatory requirements) and/or for reasons of substantial public interest including: preventing or detecting unlawful acts; the exercise of a protective function (namely a function which is intended to protect members of the public against dishonesty, malpractice or other seriously improper conduct, unfitness or incompetence, mismanagement in the administration of a body or association or failures in services provided by a body or association); and for the purpose of complying with regulatory requirements relating to unlawful acts, dishonesty, malpractice and other seriously improper conduct.</p>

	<p>accordance with legal and regulatory requirements.</p> <p>For certain roles, a Counter Terrorism Check (CTC) may be required, if so, this will be communicated on the job advert and throughout the recruitment process.</p>	
<p>c)</p>	<p><b>Offers of employment and on-boarding</b>          Making job offers, providing contracts of employment or engagement and preparing to start your employment or engagement where you accept an offer from us.</p>	<p>Some of this processing is necessary for compliance with <b>legal obligations</b> to which the Company is subject including the requirement to issue written terms of employment and the requirement not to unlawfully discriminate in the terms of any offer to you.</p> <p>Additional processing is necessary to take steps to <b>enter into the contract</b> between you and the Company and to perform that contract because we will need information to make an appropriate offer to you and administer your contract if you join us.</p> <p>The remainder of the processing is necessary for the purpose of the legitimate interests pursued by the Company. The Company has a <b>legitimate interest</b> in ensuring the effective engagement of colleagues on appropriate terms and conditions and that there is a smooth transition into employment or engagement for successful candidates and that information supplied in the recruitment process which is relevant to ongoing employment or engagement is maintained. This will contribute towards the Company continuing to meet its business objectives, maintain its reputation and attract high calibre individuals.</p>
<p>d)</p>	<p><b>Health management</b>          Processing medical information regarding physical or mental health to: make adjustments to recruitment/selection procedures, duties or the workplace, determine fitness for work and make management decisions regarding employment/engagement and conduct related management processes.</p>	<p>Some of this processing is necessary for compliance with <b>legal obligations</b> to which the Company is subject including health and safety laws, our duty of care, compliance with employment laws, disability discrimination laws and aviation laws and regulatory requirements.</p> <p>Additional processing is also necessary for the purpose of the legitimate interests pursued by the Company. The Company considers that it has a <b>legitimate interest</b> in managing and supporting candidates/its workforce, managing health and safety risk and operating its business. This includes supporting the welfare of candidates/colleagues and taking steps to ensure fitness for interview/assessment/work and to manage incapacity impacting on the ability of colleagues to be interviewed/assessed/perform their roles. It also includes taking steps to identify and mitigate risks to the health, safety or welfare of candidates, colleagues, customers and others. Such effective support and management support business performance and the attraction and retention of high calibre individuals. This supports our immediate and long-term business goals and outcomes.</p>

e)	<p><b>Future job opportunities</b></p> <p>To contact you if you are not successful in your initial application should another potentially suitable vacancy arise following completion of the recruitment process for the role you originally applied for.</p>	<p>This processing is necessary for the purpose of the legitimate interests pursued by the Company: The Company has a <b>legitimate interest</b> in maintaining an appropriate pool of talent who have shown an interest in working for it and who are potentially suitable candidates for employment or engagement. This will potentially benefit both initially unsuccessful candidates and the Company. It will contribute towards the Company continuing to meet its business objectives, maintain its reputation and attract high calibre individuals.</p>
f)	<p><b>Recruitment feedback and complaints</b></p> <p>To deal with any query, challenge or request for feedback received in relation to our recruitment decisions.</p>	<p>This processing is necessary for compliance with <b>legal obligations</b>, which includes ensuring that we are able to demonstrate our compliance with data protection laws and anti-discrimination laws.</p> <p>Beyond legal compliance processing is necessary for the purpose of the legitimate interests pursued by the Company: The Company has a legitimate interest in being able to provide feedback to candidates to explain our recruitment process, support their future development and to be able to defend any claim made in connection with our recruitment decision. This will assist the Company to avoid the risk of costs incurred through challenges to recruitment decisions and to maintain its reputation.</p>
g)	<p><b>Ensuring equality of opportunity</b></p> <p>Monitoring programmes to ensure equality of opportunity and diversity with regard to personal characteristics protected under applicable anti-discrimination laws.</p>	<p>This processing is necessary for the compliance with <b>legal obligations</b> to which the Company is subject including anti-discrimination laws.</p> <p>Beyond the above processing is also necessary for the purpose of the legitimate interests pursued by the Company: The Company has a <b>legitimate interest</b> in ensuring that it takes action to prevent discrimination and promote an inclusive and diverse workplace. Ensuring equality and diversity ensures attraction and retention of high calibre individuals, protects our reputation and supports the Company in achieving its long-term business goals and outcomes.</p> <p>The Company has a legitimate interest in ensuring equality of opportunity or treatment between people of different age, sex, racial or ethnic origins, holding different religious or philosophical beliefs, people with different states of physical or mental health or people of different sexual orientation.</p>
h)	<p><b>Legal compliance</b></p> <p>Complying with laws and regulation applicable to the Company (for example employment laws, aviation laws and regulatory requirements and other regulation to which the Company is subject in the conduct of its business).</p>	<p>This processing is necessary for the compliance with <b>legal obligations</b> to which the Company is subject.</p>
i)	<p><b>Legal or regulatory disclosures</b></p> <p>To comply with lawful requests by public</p>	<p>This processing is necessary for compliance with <b>legal obligations</b> to which the Company is subject where there is a legal obligation to disclose information or a court or other legal order to complete such disclosure.</p>

	<p>authorities (including without limitation to meet national security or law enforcement requirements), discovery requests, or where otherwise required or permitted by applicable laws, court orders, government regulations, or regulatory authorities (including without limitation aviation, data protection, tax and employment), whether within or outside your country.</p>	<p>Where disclosure is not legally required, processing is carried out on the basis of the <b>legitimate interests</b> pursued by the Company. We have a legitimate interest in cooperating with relevant authorities, regulators, and government bodies where appropriate, to act ethically, transparently, and responsibly in all jurisdictions in which we operate.</p> <p>In certain circumstances, such processing may also fall within a <b>recognised legitimate interest</b> (for example, for the prevention or detection of unlawful acts or the exercise of a protective function).</p>
j)	<p><b>Complaints, claims and litigation</b> To enforce our legal rights and obligations, and for any purposes in connection with any complaints or legal claims made by, against or otherwise involving you.</p>	<p>Some of this processing is necessary for compliance with <b>legal obligations</b> to which the Company is subject including demonstrating compliance with employment and data protection laws.</p> <p>Additional processing is necessary for the purpose of the legitimate interests pursued by the Company: The Company considers that it has a <b>legitimate interest</b> in defending itself from litigation. This is needed to ensure that our legal rights and interests are managed appropriately, to protect our reputation and to protect the Company from other damage or loss. This is important to protect the business of the Company and ensure its continued success and growth. This supports our immediate and long-term business goals and outcomes.</p>
k)	<p><b>HR record and system management</b> To manage and maintain HR records, files and systems including technical support and maintenance for HR information systems and managing electronic and hard copy records.</p>	<p>Some of this processing is necessary for compliance with <b>legal obligations</b> to which the Company is subject including Employment, data protection laws and aviation laws and regulatory requirements.</p> <p>In addition, the Company considers that it has a <b>legitimate interest</b> in managing its workforce and operating its business. This includes maintaining the integrity and security of data and facilitating records management, ensuring information remains up to date and deleting information when it is no longer required. IT is a key part of managing this effectively and efficiently. Effective information management is key to the successful management and administration of the relationship with candidates and colleagues. Effective information management supports the attraction and retention of high calibre individuals, strong business performance and the safety of colleagues, customers and others. This supports the achievement of our immediate and long-term business goals and outcomes.</p>
l)	<p><b>CCTV monitoring and building log in and access records</b> For the purposes of security, prevention and detection of inappropriate</p>	<p>The Company has a <b>legitimate interest</b> in seeking to ensure the security of its operations, prevent and detect inappropriate and unlawful activity and ensure the health and safety of its workforce, stakeholders (including customers, colleagues and others) and the public. This includes managing its workforce and protecting its business,</p>

	and unlawful activity and health and safety.	stakeholders and the public from various risks, to protect the safety and security of the business and such stakeholders and the public, to protect our reputation and to maintain business standards.
m)	<p><b>Video interviews and online assessment</b></p> <p>For the purposes of assessing suitability for the role applied to and assessing the skills and motivation.</p> <p>This includes psychometric and / or behavioural assessments to assess work style, behaviours and potential future future performance.</p>	<p>Some of this processing is necessary for compliance with <b>legal obligations</b> to which the Company is subject including the requirement to ensure we do not unlawfully discriminate during recruitment.</p> <p>Some processing is necessary for taking steps at your request to <b>enter into a contract</b> with you. Where you have applied to work for us, we need to use your personal data to ensure that you are suitable for the role you have applied for and to make an offer to you where appropriate.</p> <p>Additional processing is necessary for the purpose of the legitimate interests pursued by the Company: We have a <b>legitimate interest</b> in fully assessing applicants to ensure that only suitable and appropriate candidates are selected, to compare candidates and make a fair decision on the most appropriate candidate for the position. This will contribute towards the Company continuing to meet its business objectives, maintain its reputation and attract high calibre individuals.</p>

### Special categories of data

Sometimes we process data about you, which the law considers to fall within special categories (see section above for further detail). The legal basis for processing special category data are set out in the applicable law, and we generally process such data under one of the grounds set out above and also by one of the following grounds:

- the processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws;
- the processing is necessary for the purposes of preventive or occupational medicine, for the assessment of your working capacity, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, to the extent permitted by applicable laws;
- the processing is necessary to protect your vital interests or those of another person where they/you are physically or legally incapable of giving consent (for example in exceptional emergency situations, such as a medical emergency);
- the processing is necessary for purposes authorised by applicable law. This includes those purposes set out in Schedule 1 of the Data Protection Act 2018:
  - the processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the Company or you in connection with employment, social security or social protection;
  - the processing is necessary for health or social care purposes to include the purposes of: preventative or occupational medicine; assessment of working capacity; medical diagnosis; provision of health care or treatment; provision of social care; management of health care systems or services or social care systems or services;

- the processing is necessary for reasons of substantial public interest authorised by local law including:
  - ensuring equality of opportunity or treatment between people of different racial or ethnic origins, holding different religious or philosophical beliefs, people with different states of physical or mental health or people of different sexual orientation with a view to enabling such equality to be promoted or maintained;
  - processing necessary for preventing or detecting unlawful acts which must be carried out without that individual's consent so as not to prejudice those purposes;
  - processing necessary for exercising of a protective function (dishonesty, malpractice, other seriously improper conduct, unfitness or incompetence, mismanagement in the administration of a body or association, failure in the service provided by a body or association) which must be carried out without that individual's consent so as not to prejudice that function;
  - processing necessary for regulatory requirements relating to unlawful acts, dishonesty, malpractice or other seriously improper conduct in circumstances where the Company cannot reasonably be expected to obtain consent of the data subject;
  - processing necessary for provision of confidential counselling, advice or support or other similar service provided confidentially;
- the processing is necessary for the establishment, exercise or defence of legal claims;
- in exceptional circumstances the processing is carried out subject to your explicit consent (see below).

We may seek your consent to certain processing which is not otherwise justified under one of the above grounds. If consent is required for the processing in question, then it will be sought from you separately to ensure that it is freely given, informed and explicit. Information regarding such processing will be provided to you at the time that consent is requested along with the impact of not providing any such consent.

We have set out further detail below of the purposes we may use your special category personal data for and the legal basis we rely upon in each case.

No.	Purpose for processing	Additional lawful basis for special category data processing
a)	Documentation such as work permits, details of residency, proof of citizenship will be processed to assess and review eligibility to work for the Company in the jurisdiction in which you work.	This processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws. In particular the requirement to check that you are legally permitted to work in your jurisdiction.

b)	<p>Your racial or ethnic origin, religion, philosophical or political belief, sexual orientation or disability status may be used for the collection of statistical data subject to local laws or where required to record such characteristics to comply with equality and diversity requirements of applicable local legislation or to keep our commitment to equal opportunity under review.</p>	<p>This processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws. In particular compliance with anti-discrimination legislation.</p> <p>Where not legally required this processing is necessary for the public interest of ensuring equality of opportunity or treatment between people of different racial or ethnic origins, holding different religious or philosophical beliefs, people with different states of physical or mental health or people of different sexual orientation with a view to enabling such equality to be promoted or maintained.</p>
c)	<p>Health and medical information may be used to comply with employment, aviation, health and safety laws. For example, to make reasonable accommodations or adjustments and avoid unlawful discrimination or dealing with complaints arising in this regard. It will also be used to comply with aviation laws and regulatory requirements in relation to relevant roles. It may also be used for health and social care purposes.</p>	<p>This processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws. In particular those laws set out in this section.</p> <p>To the extent that this data is managed by occupational health advisers, this processing is necessary for the purposes of preventive or occupational medicine, for the assessment of your working capacity, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, to the extent permitted by applicable laws.</p> <p>The processing is necessary for purposes authorised by applicable law. This includes those purposes set out in schedule 1 of the Data Protection Act 2018 including:</p> <ul style="list-style-type: none"> <li>• necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the Company or you in connection with employment, social security or social protection;</li> <li>• necessary for health and social care purposes to include: the purposes of preventative or occupational medicine; assessment of working capacity; and medical diagnosis; provision of health care or treatment;</li> <li>• processing necessary for the provision of confidential counselling, advice or support or other similar service provided confidentially.</li> </ul>

d)	Special category personal data of any type may be used in the management and investigation of any complaint under our grievance, whistleblowing, anti-bullying and harassment or similar policies and procedures where such information is sufficiently relevant to the particular complaint or issue.	This processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws. In particular employment laws relating to the effective management of complaints, anti-discrimination laws and our duty of care.
e)	Special category personal data of any type may be used in the event of a complaint, claim or litigation or potential claim or litigation by, against or involving you.	This processing is necessary to establish, exercise or defend legal claims.

## **Processing relating to criminal convictions and offences**

The legal bases for processing personal data relating to criminal convictions and offences or related security measures is set out in the applicable law including at schedule 1 of the Data Protection Act 2018. This includes processing necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on us or you in connection with employment or for reasons of substantial public interest including: processing necessary for preventing or detecting unlawful acts which must be carried out without consent of the data subject so as not to prejudice those purposes; processing necessary for the exercise of a protective function (namely a function which is intended to protect members of the public against dishonesty, malpractice or other seriously improper conduct, unfitness or incompetence, mismanagement in the administration of a body or association or failures in services provided by a body or association) which must be carried out without consent of the data subject so as not to prejudice that function; processing necessary for the purpose of complying with regulatory requirements relating to unlawful acts, dishonesty, malpractice or other seriously improper conduct in circumstances where the Company cannot reasonably be expected to obtain consent of the individual.

Personal data relating to criminal convictions and offences will be processed as set out below:

- Any information provided at any time regarding any criminal offence will be processed to help ensure the safety and security of our colleagues, customers and others. Such processing is authorized by applicable laws including those set out above, namely it is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on us or you in connection with employment and for reasons of substantial public interest (including preventing or detecting unlawful acts, for the exercise of a protective function, regulatory requirements relating to unlawful acts and dishonesty etc.
- A basic disclosure criminal record check will be carried out in relation to all roles and must be completed as close to your employment start date. Related information will be processed to help ensure the safety and security of our colleagues, customers and others. In relation to those in relevant roles, processing of basic disclosure criminal record checks is also carried out in order to obtain and renew airside passes in accordance with legal and regulatory requirements. Such processing is authorised by applicable laws including those set out above, namely it is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on us or you in connection with employment and for reasons of substantial public interest (including preventing or detecting unlawful acts, for the exercise of a protective function, regulatory requirements relating to unlawful acts and dishonesty etc.).
- An allegation of a criminal offence or conviction arising during your relationship with the Company may be processed where required or authorized by applicable law, for example where we have a legal or regulatory requirement to report an offence, or applicable laws authorize the Company to process information about the offence (e.g. in a disciplinary process) for the purpose of making a decision regarding your relationship with the Company.

## **Automated decision making and profiling**

In common with many large employers, we do use tools to help us assess candidate suitability for roles. These tools are always used with care, to ensure an appropriate level of review and/or oversight by our team. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

## **How long do we keep your personal data?**

The Company endeavours to ensure that personal data are kept as current as possible and that irrelevant or excessive data are deleted or made anonymous as soon as reasonably practicable.

We generally retain personal data for as long as is required to satisfy the purpose for which it was collected.

For successful candidates' further detail about retention of personal data will be provided to you at the point of on-boarding. However, we will usually retain personal data for the period of your employment/contract with us plus the length of any applicable statutory limitation period following your departure, although some data, such as pension information, may need to be kept for longer. We may keep some specific types of data e.g. tax records, for different periods of time, as required by applicable law. However, some personal data may be retained for varying time periods in order to comply with legal and regulatory obligations and for other legitimate business reasons.

### **Who do we share your data with?**

Within the Company, your personal data can be accessed by or may be disclosed internally on a need-to-know basis to:

- Local or regional HR, including managers and team members;
- local, regional, and executive management responsible for managing or making decisions in connection with the relevant recruitment exercise including colleagues from other departments within the business);
- system administrators; and
- where necessary for the performance of specific tasks or system maintenance by colleagues in other departments.

Certain basic personal data, such as your name, location, job title contact information and any published skills and experience profile may also be accessible to other colleagues.

Your personal data may also be accessed by third parties whom we work together with (including without limitation the provider of our applicant tracking system, virtual assessment platforms, security vetting organisations, our video interview provider or ability testing providers and their associated companies and sub-contractors) for providing us with services such as hosting, supporting and maintaining the framework of our HR systems. Personal data may also be shared with certain interconnecting systems and data contained in such systems may be accessible by providers of those systems, their affiliates and sub-contractors. Examples of other third parties with whom your data will be shared include third party employment services, tax authorities, regulatory authorities, the Company's insurers, brokers, bankers, IT administrators, lawyers, auditors, investors, consultants, other professional advisors, occupational health providers and providers of vetting services.

The Company expects such third parties to process any data disclosed to them in accordance with applicable law, including with respect to data confidentiality and security. Where these third parties act as a "data processor" they carry out their tasks on our behalf and upon our instructions for the purposes mentioned above. In this case your personal data will only be disclosed to these parties to the extent necessary to provide the required services.

In addition, we may share your personal data with government agencies and law enforcement authorities when necessary. This may be to either fulfil our purposes for processing your personal data and/or because those third parties need to process your personal data for their own purposes (such as to safeguard national security and prevent and detect crime). In addition, we may also share personal data with national authorities in order to comply with a legal obligation to which we are subject.

### **Transfer of Personal Data**

From time to time your personal data (including special categories of personal data) will be transferred to group companies other than the company that you are applying to for the purposes described in this

Privacy Notice. Personal data may also be transferred to third parties, as set out above who may have systems or suppliers located outside of the UK or European Union.

As a result, your personal data may be transferred to countries outside of the country in which you work or outside of the UK or European Union to countries whose data protection laws may be less stringent than yours.

The Company will ensure that appropriate safeguards are in place to protect your personal data and that transfer of your personal data is in compliance with applicable data protection laws.

Where required by applicable data protection laws the Company has ensured that service providers (including our associated companies) sign standard contractual clauses as approved by the European Commission or other supervisory authority with jurisdiction as applicable.

The Company is committed to protecting the security of the personal data you share with us.

### **What are your rights**

You have several rights in relation to your personal data and an explanation of each of those rights is set out below.

#### *Right to access, correct and delete your personal data*

The Company aims to ensure that all personal data is correct. You also have a responsibility to ensure that changes in personal circumstances (for example, change of address) are notified to us so that we can ensure that your data is up-to-date.

You have the right to request access to any of your personal data that we may hold, and to request correction of any inaccurate data relating to you. You also have the right to request deletion of any irrelevant data we hold about you.

To correct/update information you will need to contact: [recruitment@jet2.com](mailto:recruitment@jet2.com)

You also have the following additional rights:

- *Data portability* - where we are relying upon your consent or the fact that the processing is necessary for the performance of a contract to which you are party as the legal basis for processing, and that personal data is processed by automatic means, you have the right to receive all such personal data which you have provided to the Company in a structured, commonly used and machine-readable format, and also to require us to transmit it to another controller where this is technically feasible.
- *Right to restriction of processing* - you have the right to restrict our processing of your personal data where:
  - you contest the accuracy of the personal data until we have taken sufficient steps to correct or verify its accuracy;
  - where the processing is unlawful but you do not want us to erase the data;
  - where we no longer need the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims; or
  - where you have objected to processing justified on legitimate interest grounds (see below) pending verification as to whether we have compelling legitimate grounds to continue processing.

Where personal data is subjected to restriction in this way we will only process it with your consent or for the establishment, exercise or defence of legal claims.

- *Right to withdraw consent* - where we are relying upon your consent to process data, you have the right to withdraw such consent at any time. You can do this by contacting: [recruitment@jet2.com](mailto:recruitment@jet2.com)
- *Right to object to processing justified on legitimate interest grounds* - where we are relying upon legitimate interest to process data, then you have the right to object to that processing. If you object, we must stop that processing unless we can either demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or where we need to process the data for the establishment, exercise or defence of legal claims. Where we rely upon legitimate interest as a basis for processing we believe that we can demonstrate such compelling legitimate grounds, but we will consider each case on an individual basis.

For further information regarding your rights, or to exercise any of your rights, please contact [recruitment@jet2.com](mailto:recruitment@jet2.com).

You also have the right to lodge a complaint with supervisory authority if you consider that the processing of your personal data infringes applicable law.

**Information Commissioner's Office (ICO)**

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113

Website: [www.ico.org.uk](http://www.ico.org.uk)

Appendix A – Version Control

<b>Policy:</b>	Recruitment Privacy Policy	<b>Review Date:</b>	January 2026	<b>Related Policies and Systems:</b>	Data Protection Policy
<b>Owner:</b>	Data Protection Officer	<b>Version:</b>	2		IT Security Policies
<b>Colleagues:</b>	All colleagues, workers, contractors, subcontractors (as defined in "Colleagues" above)	<b>Scope:</b>	Group		CCTV Policy

Appendix B – Document History

Version	Description of Change	Date of Issue
Version 2.0	Full review completed	January 2026