

# Applicant Privacy Policy

## Processing Your Personal Data - The Headlines

What categories of personal data does **Fleetcor Europe Limited of 64-65 Vincent Square, London SW1P 2NU ("FLEETCOR")** collect about me and why?

"Personal data" means any information relating to *you*. During the application process, FLEETCOR will collect, process and use your personal data, for a range of different purposes. For example:

### ***What personal data?***

- Identification data
- Contact details
- Education and work experience
- Other application data (e.g. information contained in your CV and obtained from recruiters)
- Information collected as part of your interview process
- Background check information

### ***Why?***

- To process your application
- To determine your eligibility for the role you have applied for
- To conduct background checks as part of your application
- To communicate with you about future job opportunities
- To comply with the law and our obligations
- To communicate with you and with FLEETCOR employees and third parties
- To comply with our financial and regulatory obligations

It's important to know that FLEETCOR may also need to process sensitive personal data about you such as health and medical data and race or ethnicity data.

Find out more about what data FLEETCOR processes and why by reading our full form [Applicant Privacy Policy](#), a copy of which can be found [here](#).

Who might FLEETCOR share my personal data with, and what happens if it's transferred out of your country?

As you know, we are part of the global FLEETCOR group - and entities across the FLEETCOR network are involved in processing data. We might also need to transfer your data to other third parties - e.g. potential business partners, acquiring entities, suppliers, customers, or government bodies. Our policy is to limit who has access to that data as much as we can. If we need to transfer data out of your country, we will take all necessary measures to ensure your data is adequately protected and meet all legal obligations in doing so.

Find out more about who your data is shared with, and what steps we take to protect it [here](#).

How long will FLEETCOR keep my personal data for?

We won't keep it for any longer than we need to, either to comply with the law or to ensure that we are complying with our obligations to you and other third parties. **Find out more [here](#).**

What rights do I have in respect of my personal data?

You have a number of rights in relation to your data. These include a right to access, correct and erase your data as well as more technical rights to restrict the way we process it, and to transfer your data.

Your rights are important, and we've set them out in detail [here](#).

Who can I contact if I have questions?

If you have concerns or questions regarding your personal data, please contact our Data Protection Officer by post at Fleetcor, Windmill Hill Business Park, Whitehill Way, Swindon SN5 6PE; by email at [dpo@fleetcor.com](mailto:dpo@fleetcor.com) or by telephone at 01793 888 870.

## Applicant Privacy Policy (Full Form)

FLEETCOR has prepared this Applicant Privacy Policy ("**Policy**") for applicants to roles with FLEETCOR.

When we say "FLEETCOR", "we" or "us" in this document, we mean the FLEETCOR entity that you're applying to work for. In addition, you will see a number of references to the "FLEETCOR Group", which includes all other FLEETCOR entities globally. We may update this document from time to time, for example if we implement new systems or processes that involve the use of personal data.

In connection with your application we have to process your personal data. We think that it is very important that you understand how we use your personal data, and we take our obligations in this regard very seriously. The purpose of this Policy is therefore to give you information about how FLEETCOR collects, processes, stores and otherwise uses information about you, and your rights in relation to that information.

FLEETCOR needs to process your personal data in order to process your application for employment. There are also statutory requirements we have to comply with in relation to your application. If we are not able to carry out the processing activities we describe in this Policy we may not be able to continue with your application. Of course, we hope it would never come to that, and this is simply information we are obliged to provide to you as part of this Policy.

We need to ask for your specific consent to process your personal data in a particular way in certain circumstances, such as for the purpose of conducting background checks prior to you commencing employment with us, to enable relevant third parties to release information about you as part of those checks. **Please sign and complete the consent form** at the end of this Policy to confirm you consent to us processing your data for the purposes of carrying out the background checks listed.

Although we are seeking your consent in relation to certain background checks, you should note that in most cases we will process your personal data for the reasons set out in this Policy and it won't be appropriate or necessary for you to provide consent as the legal basis for processing your personal data.

In this Policy you will see reference to "**GDPR**" - that refers to the European Union General Data Protection Regulation which is a European law governing your rights in relation to your personal data, and how organisations should protect it.

### Index

To help you find information quickly on any particular question you might have, we have set out an index below. Just click on the question you would like answered and you will be taken to the relevant section:

<b>What categories of personal data does FLEETCOR collect about me? .....</b>	<b>3</b>
<b>Got it - but who might FLEETCOR share my personal data with? .....</b>	<b>6</b>
<b>How long will FLEETCOR keep my personal data for? .....</b>	<b>7</b>
<b>What rights do I have in respect of my personal data?.....</b>	<b>7</b>
<b>Who can I contact about this stuff?.....</b>	<b>8</b>

### What categories of personal data does FLEETCOR collect about me?

"**Personal data**" means any information relating to you. FLEETCOR will collect, process and use the following categories and types of personal data about you:

- **identification data**, such as your name, date of birth, nationality, audio and visual data (e.g. from video interviews), and social media account;
- **contact details**, such as your home address, telephone number and email address;

- **education and work experience**, such as contact details for your current/former employer, information about your educational background and qualifications, your work experience and other experience;
- **other application data**, such as previous applications made to FLEETCOR, the information included in your application form/CV, skills, hobbies and interests, leaver details (maternity/dismissals/long term absences);
- **information collected as part of the interview process**, such as notes taken from your interview or information provided from recruitment agencies;
- **background check information**, such as information obtained through reference checks, and confirmation about your work/educational background.

together "**Applicant Data**". This includes information we may collect through your LinkedIn account.

In addition to the collection, processing and use of the Applicant Data, FLEETCOR collects, processes and uses the following special categories of personal data about you which we describe as "**Sensitive Applicant Data**":

- **health and medical data**, such as information on disability; and
- **race or ethnicity data**.

**Why does FLEETCOR need to collect, process and use my Applicant Data and Sensitive Applicant Data and what is the legal basis for doing so?**

We collect and use Applicant Data and Sensitive Applicant Data for a variety of reasons linked to processing your application for a role with us (the "**Processing Purposes**"). However, we can only collect and use this data if we have a valid legal basis for doing so, and we are required to explain the various legal bases that we rely on to you.

To give you the full picture, we have set out each of the reasons why we collect and use Applicant Data, i.e. the Processing Purposes, and mapped these against the different legal bases that allow us to do so. We appreciate that this is quite a lot of information to take in, so please bear with us:

Processing Purposes	Legal Bases
<ol style="list-style-type: none"> <li><b>1. Administering and processing your application (including processing a job offer should you be successful)</b> including identification data, contact details, information about your qualifications and employment history, and information obtained during your interview and information contained in your CV.</li> <li><b>2. To determine your eligibility for the role you applied for and any future vacancies</b>, including identification data, contact details, information about your work and education experience, information obtained during your interview and information contained in your CV.</li> <li><b>3. Conducting background checks as part of your application</b>, including identification data, contact details, information about your qualifications, employment history and criminal records.</li> </ol>	<p>Processing Purposes 1 to 3:</p> <ul style="list-style-type: none"> <li>• Necessary for performing a contract with you as the data subject;</li> <li>• Legitimate interests of FLEETCOR;</li> <li>• Compliance with legal obligations which FLEETCOR is subject to in relation to employment law; and</li> <li>• Your consent as data subject.</li> </ul> <p>Criminal records:</p> <ul style="list-style-type: none"> <li>• Necessary to carry out the obligations and to exercise specific rights of FLEETCOR or you in the field of employment and social security and social protection law.</li> </ul>
<ol style="list-style-type: none"> <li><b>4. Complying with applicable laws and employment-related requirements</b> along with</li> </ol>	<p>Processing Purposes 4 to 5:</p>

the administration of those requirements, such as income tax, national insurance deductions, and employment and immigration laws which involves the processing of identification data and contact details.

5. **Monitoring and ensuring compliance with applicable policies and procedures and laws**, which involves the processing of your identification data and contact details, including the operation of a whistleblowing hotline.

- Compliance with legal obligations which FLEETCOR is subject to, particularly in relation to tax law, employment law, social security law and immigration law; and
- Legitimate interests of FLEETCOR.

6. **Communicating with you, FLEETCOR employees (such as the hiring manager and our recruitment and HR teams) and third parties (such as existing or potential business partners and suppliers), including informing you of future opportunities with FLEETCOR**, which involves the processing of identification data and your contact details.

Processing Purpose 6:

- Necessary for performing a contract with you as the data subject;
- Legitimate interests of FLEETCOR; and
- Compliance with legal obligations which Fleetcor is subject to.

7. **Responding to and complying with requests and legal demands from regulators or other authorities** in or outside of your home country which involves the processing of identification data and contact details.

Processing Purpose 7:

- Compliance with legal obligations which FLEETCOR is subject to; and
- Legitimate interests of FLEETCOR.

8. **Complying with corporate financial responsibilities**, including audit requirements (both internal and external) and cost/budgeting analysis and control which involves the processing of identification data, contact details, and information about the role you have applied for, including the role's salary and benefits.

Processing Purpose 8:

- Legitimate interests of FLEETCOR, i.e. we need to ensure that we manage our business effectively; and
- Compliance with legal obligations which FLEETCOR is subject to.

Below are the Processing Purposes and corresponding Legal Bases for Sensitive Applicant Data:

Processing Purpose	Legal Bases
1. <b>To accommodate your application and interview and for compliance with legal obligations</b> , we may use health and medical data.	<ul style="list-style-type: none"> <li>• Your explicit consent as allowed by local data protection law; and</li> <li>• Necessary to carry out the obligations and to exercise specific rights of FLEETCOR or you in the field of employment and social security and social protection law as permitted by local data protection law.</li> </ul>
2. <b>Equal opportunities monitoring and diversity monitoring and initiatives</b> may involve us using race or ethnicity data.	<ul style="list-style-type: none"> <li>• Necessary for reasons of substantial public interest as permitted by local data protection law; and</li> </ul>

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- Your explicit consent as allowed by local data protection law.
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We appreciate that there is a lot of information to take in, and we want to be as clear with you as possible over what this means. Where we talk about the "legitimate interests" of FLEETCOR or third parties, this can include:

- Assessing your suitability for employment/engagement with FLEETCOR;
- Implementation and operation of a group-wide organisational structure and group-wide information sharing;
- Right to freedom of expression or information, including in the media and the arts;
- Prevention of fraud, misuse of company IT systems, or money laundering;
- Operation of a whistleblowing scheme;
- Physical security, IT and network security;
- Internal investigations;
- Compliance with our legal obligations;
- Proposed mergers and acquisitions.

When relying on the legitimate interests basis for processing your personal data, we will balance the legitimate interest pursued by us and any relevant third party with your interest and fundamental rights and freedoms in relation to the protection of your personal data to ensure it is appropriate for us to rely on legitimate interests and to identify any additional steps we need to take to achieve the right balance.

#### **Got it - but who might FLEETCOR share my personal data with?**

As you may know, we are part of the global FLEETCOR Group, and several entities in this group are involved in the Processing Purposes. To ensure that the Processing Purposes can be completed, your information may be shared with any of the entities within the FLEETCOR Group network. Where we do share data in this way, however, it is our policy to limit the categories of individual who have access to that personal data.

FLEETCOR may transfer personal data to third parties, including to entities within and outside the FLEETCOR Group located in any jurisdictions where FLEETCOR Group entities are located, for the Processing Purposes as follows:

- **Within the FLEETCOR Group.** As the FLEETCOR entity that you are applying to is part of a wider group headquartered in Georgia, United States with offices located across the globe, which all partially share management, human resources, legal, compliance, finance and audit responsibility, FLEETCOR may transfer the Applicant Data and Sensitive Applicant Data to, or otherwise allow access to such data by other entities within the FLEETCOR Group, which may use, transfer, and process the data for the following purposes: to maintain and improve effective administration of the workforce; to communicate information about the FLEETCOR Group; to maintain a corporate directory; to maintain IT systems; to monitor and assure compliance with applicable policies and procedures, and applicable laws; and to respond to requests and legal demands from regulators and other authorities.
- **Regulators, authorities, and other third parties.** As necessary for the Processing Purposes described above, personal data may be transferred to regulators, courts, and other authorities (e.g., tax and law enforcement authorities), independent external advisors (e.g., auditors), insurance providers, pensions and benefits providers, and internal compliance and investigation teams (including external advisers appointed to conduct internal investigations).

- **Data processors.** As necessary for the Processing Purposes described above, personal data may be shared with one or more third parties, whether affiliated or unaffiliated, to process personal data under appropriate instructions ("**Data Processors**"). The Data Processors may carry out instructions related to recruitment, workforce administration, IT system support and maintenance, payroll and compensation, training, compliance, and other activities, and will be subject to contractual obligations to implement appropriate technical and organisational security measures to safeguard the personal data, and to process the personal data only as instructed.

For a full list of the FLEETCOR Group entities and third parties that we may share your data with, please contact us as set out below ("**Who can I contact about this stuff?**").

As you may expect, some of the recipients we may share Applicant Data and Sensitive Applicant Data with may be located in countries outside of Europe. In some cases, this may include countries located outside the European Union and/or European Economic Area ("**EEA**").

Some countries where recipients may be located already provide an adequate level of protection for this data (e.g. Canada), and transfers to other countries such as the USA may be protected under arrangements such as the EU-US Privacy Shield. If recipients, including other FLEETCOR Group entities, are located in other countries without adequate protections for personal data, FLEETCOR will take all necessary measures to ensure that transfers out of the EEA are adequately protected as required by applicable data protection law. This will include using appropriate safeguards such as the EU Standard Contractual Clauses. You can ask for a copy of the such appropriate safeguards by contacting us as set out below ("**Who can I contact about this stuff?**").

### **How long will FLEETCOR keep my personal data for?**

It is our policy not to keep personal data for longer than is necessary. We may, for example, keep your personal data for a reasonable time after your application process is completed, in case we have future job opportunities that we consider you are suitable for. Where personal data is kept, that period will be determined based on the applicable local law. For further information, please refer to the FLEETCOR Records Retention Policy or contact us as set out below to request further details on how long FLEETCOR will retain different categories of personal data.

### **What rights do I have in respect of my personal data?**

You have a number of rights in relation to your Applicant Data and Sensitive Applicant Data. These can differ by country, but can be summarised in broad terms as follows:

#### **(i) Right of access**

You have the right to confirm with us whether your personal data is processed, and if it is, to request access to that personal data including the categories of personal data processed, the purpose of the processing and the recipients or categories of recipients. We do have to take into account the interests of others though, so this is not an absolute right, and if you want to request multiple copies we may charge a fee.

#### **(ii) Right to rectification**

You may have the right to rectify inaccurate or incomplete personal data concerning you. We encourage you to review this information regularly to ensure that it is accurate and up to date.

#### **(iii) Right to erasure (right to be forgotten)**

You may have the right to ask us to erase personal data concerning you.

#### **(iv) Right to restriction of processing**

In limited circumstances, you may have the right to request that we restrict processing of your personal data, however where we process Applicant Data and Sensitive Applicant Data based on FLEETCOR's legitimate interest, such interest may override a request that you make or we may need to continue processing it to establish, exercise or defend legal claims.

**(v) Right to data portability**

You may have the right to receive personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit that data to another entity.

**(vi) Right to object and rights relating to automated decision-making**

Under certain circumstances you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data, including profiling, by us and we can be required to no longer process your personal data. This may include requesting human intervention in relation to an automated decision so that you can express your view and to contest the decision.

To exercise any of these rights, please contact us as stated under below (**Who can I contact about this stuff?**).

You also have the right to lodge a complaint with the competent data protection supervisory authority, which in the UK is the Information Commissioner's Office (ICO) who can be contacted by post at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF; by email at [casework@ico.org.uk](mailto:casework@ico.org.uk); or by telephone at 0303 123 1113.

**Who can I contact about this stuff?**

If you have concerns or questions regarding this Policy or if you would like to exercise your rights as a data subject, you can get hold of the right person here:

Data Protection Officer by post at **Fleetcor, Windmill Hill Business Park, Whitehill Way, Swindon SN5 6PE**; by email at [dpo@fleetcor.com](mailto:dpo@fleetcor.com) or by telephone at 01793 888 870.

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I understand that if FLEETCOR makes me an offer of employment, such offer will be conditional upon receipt of satisfactory references, criminal record checks and background screening and I hereby give my consent for FLEETCOR, Experian and/or LexisNexis on behalf of FLEETCOR to conduct the following background checks:

- Credit reference checks
- Anti-money laundering checks
- Address verification
- Proof of identity

I understand that FLEETCOR is not relying on consent as the legal bases for conducting the background checks under data protection law, but is obtaining consent for practical purposes, so that those providing responses to these checks will be able to do so.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_