

# RUE GILT G R O U P E

## RUE GILT GROUPE EMPLOYEE & JOB APPLICANT PRIVACY NOTICE

### PURPOSE AND SCOPE

Rue Gilt Groupe Ireland Limited (“**Rue Gilt Groupe**”, “**we**” or “**us**”) has issued this Employee & Job Applicant Privacy Notice (“**Notice**”) to describe how we process personal data about candidates for employment or for contractual services and our staff members in the European Union. The term “**staff**” or “**staff members**” includes permanent employees, workers and contractors and those who work on a non-permanent basis, including contingent workers, temporary and contract workers, independent contractors, consultants, professional advisors, secondees, interns and other third parties engaged to carry out work for us and who have access to our premises or our internal systems.

At Rue Gilt Groupe, we understand the importance of privacy and are committed to protecting the personal information we collect, use and disclose in the course of managing our business activities and employment relationships. Rue Gilt Groupe is governed by the requirements of the General Data Protection Regulation (No. 2016/679) (“**GDPR**”), the Data Protection Act 1988 to 2018 and other applicable national and EU privacy legislation (together “**Data Protection Law**”) and we collect, use and/or disclose personal information in accordance with these provisions.

As with other Rue Gilt Groupe policies, we may update this Notice from time to time, for example if we implement new systems or processes that involve the use of personal data. Any material updates to this document which may affect you will be communicated to you through appropriate channels, such as alongside your staff contract, staff handbook or on our office intranet site.

### CATEGORIES OF PERSONAL DATA AND PURPOSES FOR PROCESSING

Description of personal information	Purpose of processing	Lawful basis
Applicant information: information contained in CVs, cover letters, job applications and interview notes	To hire and manage employees, interns and contractors	Performance of the employment contract (Art 6(1)(b) GDPR)
HR files and records: training records and performance and development reviews	To train, manage and promote employees	Legitimate interest of Rue Gilt Groupe to manage its employees (Art 6(1)(f) GDPR)
HR files and records: employee contact details, salary details, benefits, banking details, working time records (including absence records and leave status), Personal Public Service Number (PPSN), marital/civil partnership status, domestic partners and dependents.	To compensate employees and administer benefits  To comply with relevant employment and tax laws	Performance of the employment contract (Art 6(1)(b) GDPR)  Compliance with legal obligations under employment and tax laws (Art 6(1)(c) GDPR)
Information technology and monitoring: usernames, passwords, login information (IP address, date/time), files accessed, content and recipient of emails and recipients of phone calls	To ensure the security of our IT systems and proprietary information in accordance with company policies  To investigate a breach of company policies and apply disciplinary measures where appropriate	Legitimate interest of Rue Gilt Groupe to manage its IT systems and to enforce its company policies (Art 6(1)(f) GDPR)

<b>Description of personal information</b>	<b>Purpose of processing</b>	<b>Lawful basis</b>
Information related to remuneration and pensions: salary details, benefit details, length of employment, partner and dependent information	To enable Rue Gilt Groupe pension trustees and related service providers to administer pension entitlements	Performance of employment contract and pension entitlements (Art 6(1)(b) GDPR)
Employee photographs and videos taken during onboarding and regular course of employment	To introduce new hires to each other and the company. To display in internal directories of staff (e.g. Outlook). To inform other employees about events or achievements.	Legitimate interest of Rue Gilt Groupe to help employees get to know one another and facilitate collaboration
Special categories of data: medical information including medical certificate and sick notes	To manage employees and assess working capacity and to verify employee absences from work and to administer sick pay	Assessment of the working capacity of an employee (Art 9(2)(h) GDPR)

We may also collect personal information from third parties, such as former employers, educational institutions, recruitment agencies, LinkedIn, government agencies, other public domain sources, other employees (e.g., other Rue Gilt Groupe staff, members of the HR Department, etc.). Where we obtain personal information about you from third parties, we will do so in accordance with Data Protection Law.

Rue Gilt Groupe will limit collection of personal information to what is necessary for the identified purposes for which it is collected (those purposes are set out above) unless we have the individual's consent to use it for a different purposes or we are otherwise required to process that information in accordance with applicable law.

## **TRANSFERS OF PERSONAL DATA**

Rue Gilt Groupe is headquartered in the United States and operates throughout the world. In the course of conducting our business, we may transfer employee personal information outside the EEA to other companies in the Rue Gilt Groupe. From time to time we may also need to transfer employee personal information outside the EEA to service providers. If such transfer occurs, Rue Gilt Groupe will ensure that these transfers are in compliance with Data Protection Law and appropriate safeguards are in place such as standard contractual clauses (published by the European Commission) if appropriate. If you require more information on the means of transfer of employee personal information or would like a copy of the relevant safeguards, please contact [security@ruegiltgroupe.com](mailto:security@ruegiltgroupe.com).

## **DISCLOSURE OF PERSONAL DATA**

From time to time, we may disclose personal information with third parties such as affiliates of the Rue Gilt Groupe, our vendors and suppliers, or with professional advisers. The following table sets out the third parties with whom personal data may be shared. It also described the categories of personal data that may be shared, the reason for sharing this information and the location of the recipient.

<b>Disclosure of Personal Data to Third Parties</b>			
<b>Recipient</b>	<b>Personal Data</b>	<b>Purpose</b>	<b>Location of Recipient</b>
Companies and affiliates within the Rue Gilt Groupe	HR files and records Information technology and monitoring Information related to remuneration and pensions Onboarding information	To provide services and support across the group	USA

Payroll service providers	HR files and records	To compensate employees and administer benefits	USA
Employee Benefit Providers	HR files and records Information related to remuneration and pensions	To enable the administration of employee benefits such as stock options	USA
Technical service providers	HR files and records Information technology and monitoring	To provide information technology services and support	USA
Professional advisors such as external lawyers, accountants, tax and pensions advisors	HR files and records Information technology and monitoring Information related to remuneration and pensions Special categories of data	To provide legal, financial, accounting and pension advice	Ireland USA
Governmental agencies such as law enforcement or Revenue	HR files and records Information related to remuneration and pensions	To comply with applicable laws, regulations and governmental requests	USA, EU
A purchaser or potential purchaser of the business	HR files and records Information related to remuneration and pensions	To enable the completion of the relevant merger, restructuring, financing, acquisition, divestiture, dissolution or other corporate change	Worldwide

## DATA RETENTION

Personal information will be retained only as long as necessary for fulfilment of the purposes for which it was collected or as otherwise required by legislation. In general, and unless otherwise required by law, employee information is retained for the period of employment plus an additional seven years to account for any potential employee legal claims. The storage periods will be determined on a case-by-case basis that depends on several factors, including the nature of the information and why it is collected and processed, and whether we are required to keep your information for legal reasons.

## DATA ACCURACY

We will make reasonable efforts to ensure that personal information is as accurate, complete and current as required for the purposes for which it was collected. As a result, from time to time, we may contact individuals to ensure that the information collected is or remains accurate and up-to-date. If you think we've made a mistake, you can ask for us to make corrections to your personal information in our custody or control by emailing [security@ruegiltgroupe.com](mailto:security@ruegiltgroupe.com).

## DATA SECURITY:

Rue Gilt Groupe protects personal information using security safeguards including the following measures:

- Physical (i.e., locked filing cabinets, appropriate security measures when disposing of personal information);
- Organizational (i.e., security clearances, access only on a "need to know" basis);
- Technological (i.e., passwords, firewalls, data disconnection from the internet, and regular backups) and training of employees on the importance of these safeguards.

For further information about how we protect your personal data, please contact us at the email address set out below.

## **DATA SUBJECT RIGHTS**

We are open about the policies and procedures we use to protect personal information. Any inquiries may be made by emailing [security@ruegiltgroupe.com](mailto:security@ruegiltgroupe.com). Data protection requests generally are responded to within one month as set out in Data Protection Law. In certain circumstances depending on the nature and complexity of the request, [security@ruegiltgroupe.com](mailto:security@ruegiltgroupe.com) may inform the individual that additional time (up to two further months) is required to respond to the request.

### **DATA PROTECTION LAW PROVIDES INDIVIDUALS WITH THE FOLLOWING RIGHTS**

- right to receive detailed information on how Rue Gilt Groupe processes personal information;
- right to request a copy of personal information Rue Gilt Groupe holds;
- right to rectify (correct) personal information;
- right to delete personal information;
- right to request Rue Gilt Groupe to restrict processing of personal information;
- right to request we send a copy of personal information to another entity;
- right to object to Rue Gilt Groupe's processing of personal information;
- right to object to automated decision making, including profiling (at this point in time Rue Gilt Groupe does not engage in any automated decision-making); and
- right to complain to the local data protection authority, which in Ireland is the Data Protection Commission.

These rights only apply in certain circumstances and are also subject to exceptions under Data Protection Law. Rue Gilt Groupe may not be able to satisfy a request: where to do so would disclose personal information of another person, where information is related to a potential legal claim or is subject to legal privilege, or where information may not be disclosed or deleted in accordance with applicable law.

## **CONTACT US**

Personal information requests, issues or complaints about Rue Gilt Groupe's compliance with this Notice regarding the handling of personal information, and questions or comments about this Notice may be addressed to:

Email: [security@ruegiltgroupe.com](mailto:security@ruegiltgroupe.com)

An individual always has the right to lodge a complaint with the Data Protection Commission where you are not satisfied with our response.

Last updated November 1, 2022