



## GLOBAL PROCEDURE

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Approved by	Chief Executive Officer, Uni-Select Inc.



FINISHMASTER®



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GSF CAR PARTS

# GLOBAL CANDIDATE PRIVACY NOTICE

The header is for the internal approval process only and will not appear on the website.

Renewed August 1<sup>st</sup>, 2022.

## 1. INTRODUCTION

The Global Candidate Privacy Notice **“Notice”** applies to persons applying for one or more positions at Uni-Select Inc. and its subsidiaries, many which operate under GSF Car Parts®, Bumper to Bumper®, FinishMaster®, or other store logos (hereinafter referred to collectively as, **“Uni-Select”** or **“we”**, **“our”**, **“us”**).

## 2. USEFUL INFORMATION

The legal entity that you have applied for a job with is the **“controller”**, which means they decide how and why your personal data is used. You, the employment candidate is the **“data subject”** or **“individual”**. A **“service provider”** is a person or business that processes personal data on our behalf for a business purpose pursuant to a written contract.

By **“personal data”** (also called **“data”**), we mean the information we have gathered about you, either because you’ve given it to us or we’ve collected or generated it. This is information that relates to and identifies you or can be used to identify you, like your name, email address, job experience or certain digital identifiers like an IP address.

**“Processing”** your data just means anything we do with it – collecting it, using it, storing it, sharing it, and deleting it.

Our **Global Privacy and Data Protection Officer** ensures that we are clear and fair about how we use your personal data and comply with any law that may affect your privacy. You can contact our Global Privacy and Data Protection Officer through email at: [privacy@uniselect.com](mailto:privacy@uniselect.com) or mail at: Attn: Global Privacy and Data Protection Officer – Uni-Select, 170 Industriel Blvd. Boucherville QC (Canada) J4B 2X3.

## 3. CANDIDATE PRIVACY NOTICE

As part of our recruitment process, we collect and process personal data relating to job applicants. We are dedicated to meeting our data protection obligations and are committed to being transparent with you about how we collect, use, disclose and retain your personal data. We know that confidentiality is important to you and we safeguard the data that we collect us as part of the recruitment process.



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### 3.1 The personal data we collect

Personal data marked with an asterisk (\*) may be considered special category or sensitive data.

We collect and processes a range of data about you. This may include:

**Contact data**, like your name, physical address, email address and telephone number

**Identification**, like a driver's license\*, passport\* or other form of government ID\*

**Resume (CV) and interview data**, like details of your qualifications, skills, experience and employment history

**Pay and benefit data**, like your expected level of remuneration, including benefit entitlements.

**Accommodations data**, like whether or not you have a disability\* for which the organization needs to make reasonable adjustments during the recruitment process

**Entitlement data** like your entitlement to work in the jurisdiction in which you are applying, and whether you have a criminal record\*

**Employment equity and diversity data** only where permitted by law, like data about your ethnic origin\*, sexual orientation\* and religious beliefs\*

**Other data** that you provide to us through any channel

### 3.2 How we collect your personal data

We may collect this personal data in a number of ways:

- Directly from you or through other people who know about you, like your personal references
- From third parties or service providers, like recruitment firms or companies who provide criminal record checks
- From publicly available or online sources where you have chosen to share your data subject to their privacy policy, like LinkedIn, CV databases or other platforms

### 3.3 How we use your personal data

We will only use your personal data where we are permitted to do so by applicable law.

#### To communicate with you

- We may contact you about your employment application
- We may process your personal data to communicate with you in your preferred language

#### To complete the recruitment process

- Processing data from job applicants allows us to manage the recruitment process, assess and confirm your suitability for employment

- We need to process data prior to and during the recruitment process until an offer has been presented and accepted
- For some roles, we obtain data about criminal convictions and offences to carry out our obligations and exercise specific rights in relation to employment. This may occur at any time during the process, but only if we intend to or have extended an offer of employment

#### **To provide recruitment accommodations**

- We may process the data you provide about a disability or other personal circumstance to allow us to make reasonable adjustments or accommodations

#### **For employment equity**

- We may process special categories of data, such as data about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. We process such data to carry out our obligations and exercise specific rights in relation to employment

#### **To address claims, issues or concerns**

- We may need to process data from job applicants to respond to concerns or defend against legal claims

#### **To comply with laws**

- We may need to process data to ensure that we are complying with our legal obligations, for example, to check a successful applicant's eligibility to work in the jurisdiction before employment starts

### **3.4 Lawful basis for processing data of employee candidates in the United Kingdom (UK) and European Economic Area (EEA) only**

If you live in the UK or EEA, the use of personal data must be justified under one of a number of legal grounds. The principal legal grounds that justify our use of your personal data are:

- **Contract performance:** Where your data is necessary to enter into or perform our contract with you
- **Legal obligation:** Where we need to use your data to comply with our legal obligations.
- **Legitimate interests:** Where we use your data to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights.
- **Legal claims:** Where your data is necessary for us to defend, prosecute or make a claim against you, us or a third party.
- **Consent:** Where you have consented to our use of your data

### **3.5 Who has access to your personal data**

We have to share your personal data for a number of reasons, but we only share it with employees who are part of your recruitment process and service providers if we need to. We may also share your personal data with others who you have asked us to contact as part of your application.

Employees who may access your personal data include:

- **Human Resources** who manage the recruitment process and workforce management

- **Hiring managers and interviewers** who are involved in the recruitment process
- **Information Technology** who manage recruitment systems
- **Other employees** who may have a legitimate need to review your personal data to perform their duties

Types of service providers we may use include:

- **Recruitment firms** to help us find and assess employment candidates
- **Background check firms** to assess the appropriateness of your employment with us, depending on the role you have applied for
- **References and former employers** may be contacted if your application for employment is successful and we make you an offer of employment, to provide a reference for you
- **IT providers** to allow you access to and manage platforms we use as part of the recruitment process

### 3.6 How we safeguard your data

We maintain appropriate technical and organizational measures, including, but not limited to policies, physical and technical safeguards, all designed to protect your personal data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure and access.

Even though we have put mechanisms and procedures in place for the protection of your personal data that are considered effective, because there are bad actors out there, no data transmission (including over the internet or on any website) can be guaranteed to be secure.

### 3.7 Cross border transfers of your personal data

As a global company, we cannot limit our processing of your personal data to the country where you are based. Your personal data may be transferred outside the country where you applied but only if certain conditions are met.

If you are based in the UK or EEA, your data may be transferred to countries outside the UK or EEA, only if we are confident that the same data protection safeguards that we deploy will be deployed, for example we may take contractual measures to ensure that your personal data is protected in accordance with applicable data protection laws.

If you are based in Quebec, you should know that your data may be transferred outside of Quebec for processing, including storage and hosting. The transfer will be preceded by a formal or informal assessment of privacy protection, taking into consideration a number of factors like the sensitivity of the data, the purposes for which it is to be used, the protection measures (including contractual) that would apply to it, and the data protection principles applicable in the jurisdiction.

### 3.8 How long we retain your data

Our aim is to keep your personal data for only as long as we need it to achieve the purpose for which we collected it. How long we keep it depends on the type of personal data we are holding and why we need it. We keep your personal data while you're going through the recruitment process so we can manage your application. If you're offered a job, we'll keep your personal data

as part of your employment record and you will receive a copy of the *Global Employee Privacy Notice* to tell you how we'll use and retain your personal data as an employee.

We keep some of your data even if you don't get a job with us. Sometimes we keep it to comply with a legal obligation. Often we have legitimate reasons for keeping your personal data such as being able to review your recruitment history with us, consider you for future opportunities, respond to questions or even defend against claims.

If you live in the UK or EEA and your application for employment is unsuccessful, we will hold your data on file for 12 months after the end of the relevant recruitment process. If you agree to allow us to keep your personal data on file for consideration for future employment opportunities, we will hold your data on file for a further 12 months. At the end of that period we will contact you for if you wish to extend the agreement for a further 12 months, if we do not hear back from you or once you withdraw your consent, your data is deleted or destroyed.

### 3.9 Your rights as an employment candidate

Data protection laws are in place to help you feel confident about how your personal data is being handled. However, there are certain circumstances where we might legitimately refuse your request to exercise one of your rights. If we do, we will explain our reasons and inform you of your right to complain to the appropriate regulatory body.

**Privacy Notice** – You can ask us to provide you with the personal data we are collecting and how we process and disclose it

**Access your personal data** – You can ask us for a copy of the personal data we hold about you

**Rectify your personal data** – You can ask us to change incorrect or incomplete data, or to make changes yourself where you have access

**Withdraw consent** – Where you've given consent but changed your mind, you can ask us to stop using your personal data for that purpose, subject to restrictions. We will advise you of any consequence of withdrawing your consent at the time of your request.

**Delete your personal data** – You can ask us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing

And if you are in the UK or EEA, you can also:

**Object to the processing of your personal data** – Where we rely on our legitimate interests as the legal ground for processing

**Restrict the processing of your personal data** – Which means we can store it but not use it

We want to keep your data accurate and up to date, so if you think any personal data that we hold about you is incorrect or incomplete, please contact us.

We do not sell your personal data. We do not make employment decisions based solely on automated decision making or profiling. We will not discriminate against any one for exercising their rights.

### 3.10 Exercising your privacy rights and challenging our compliance

You can make a request to exercise your privacy rights, ask any questions about this Notice or challenge our compliance with applicable privacy laws by contacting the Global Privacy and Data Protection Officer at [privacy@uniselect.com](mailto:privacy@uniselect.com) or in writing to:

Attn: Global Privacy and Data Protection Officer – Uni-Select  
170 Industriel Blvd. Boucherville QC (Canada) J4B 2X3

You can also contact your local regulatory authority, but we appreciate having the opportunity to address your concern before you do so.