

# PRIVACY POLICY

Managing your personal data

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This Privacy Policy applies to the personal data that we at easyJet collect and process when you use this careers portal and you apply for a role at easyJet. Our Policy explains what personal data we collect about you, how and why we use it, who we disclose it to and how we protect your privacy.

easyJet is committed to being open and upfront with everyone who works with us or wants to become part of our team. The law requires that our Privacy Policy is detailed which is why it is so long – we wanted to make sure it has all the information you might need. If you are in a hurry, the TL;DR version is:

- We require your CV and quite a bit of your personal data to assess your application for a role at easyJet.
- As an airline, safety is our number one priority so we may ask for more information than you are used to providing. We look at the background of all our employees in order to ensure that we keep everyone safe.
- The personal data that we collect about you throughout our selection process depends on the role for which you are applying. For example, if you apply for a pilot role we will need to collect more information about you, including some information about your health, your training and your background compared to if you were to apply for a head office role.
- During our selection process, we may share your data within our group of companies and other companies that provide services to us.
- You have rights over the data we hold about you, including the right to access, correct and, under conditions, delete such data.
- If you are successful, your personal data will be transferred into our HR system to the extent this is necessary for our ongoing employment relationship with you.
- If you are unsuccessful, we will automatically delete your data when we no longer need it, in accordance with applicable laws.
- If you apply for a pilot role specifically and your application is unsuccessful, you will need to wait for another two years until you are able to re-apply and for this reason we will need to retain some limited data on you during this period.

## 1. Who is responsible for your data

We are easyJet Airline Company Limited and we are a company registered in England and Wales with the registration no 3034606 and our registered office at Hangar 89, London Luton Airport, Luton, Bedfordshire, LU2 9PF.

We control how we collect and use your personal data and for which purposes we process your data and we are the “controller” for the purposes of data protection laws that apply to us, like the EU General Data Protection Regulation (the “GDPR”).

## 2. Personal data we collect about you

When we refer to “**personal data**” in this Policy, we mean any information that relates to you, for example your name, your CV or your qualifications. We only collect your personal data where it is necessary for the purposes described in this Policy and in accordance with data protection laws.

We mainly collect your personal data directly from you. Sometimes, we will also collect information about you from third parties, as explained below:

- From the recruitment agency through which you may submit your application;
- From our screening provider and from your named referees, when conducting reference checks;
- From the Disclosure and Barring Service where appropriate or from equivalent national bodies in other countries where you may have lived;
- From our training providers and partners;
- From publicly available sources in order to conduct financial probity checks, like checking for registered debts or court judgments to the extent permissible by applicable laws;
- From sources like LinkedIn and other job board websites, where you have made your information available on these in accordance with their Privacy Policies.

Where we consider it mandatory that you provide us with specific personal data, we will inform you of this when we collect such data. For example, when you complete our online application, mandatory fields will be marked with an asterisk. If you do not provide us with required information, we will not be able to process your application further and as such your application will be rejected.

Because easyJet is an airline, we are required to take particular care when we recruit people; that’s why you may find that we ask for more information than you may have provided when applying for roles with other organisations.

### Categories of personal data

During each stage of our selection process, we collect and use the following information about you. Please note that our selection process differs depending on the role for which you are applying, which means that some roles will not follow all the steps below or they may follow these in a different order than set out below.

- **Your application and your account on easyJet careers portal**

Submitting your application along with some required information is the first step of your application process.

You can directly apply for an easyJet role by creating an account on the easyJet careers portal and submit your application through your account. When filling in your application, we will ask for the following information:

- Your username and password for your account;
- Your LinkedIn profile, only if you choose to import information from your LinkedIn profile. Please note this is not mandatory;
- Your title, full name, your address and contact details;
- Whether you have the right to work in the UK or in any other country where you may be based or may need to travel to as part of your easyJet role;
- Whether you have any spent or unspent criminal convictions;
- Your notice period, your current remuneration and your salary expectations;
- Your CV and any other information you may wish to send us to support your application;
- Any special assistance you may require; and
- Your gender and age if you choose to provide this information. Please note that this information will only be collected for the purpose of equal opportunities reporting and easyJet will only receive such information at an aggregate level in the form of an anonymised report.

If you are applying for a crew member or pilot role, we will also ask you to provide us with information about whether you fulfil our minimum requirements in order to be considered for such role. You can find a list of these in the description of the specific role for which you are applying.

You may also apply through a recruitment agency that we have authorised to find the most appropriate candidates for our vacancies. In this case, you will not need to create an account with us directly as the recruitment agency will transfer your information to us. Please note that we only have control over the information you provide to a recruitment agency for the purposes of applying for an easyJet role and not in the context of any other arrangements you may have with such agency.

- **Your online test**

If you are applying for specific roles, including cabin crew, cabin manager or pilot roles, you will be asked to complete some ability tests, for example behavioural and verbal reasoning tests. These online tests may be provided by our suppliers and we will need to process your replies and your test results in order to assess whether your application will move on to the next stage.

If you are applying for specific pilot roles, you may also be asked to complete a psychometric test.

- **Application review**

Once you have completed the above steps as appropriate, we will review your application and use the information you have provided to assess whether you are eligible to move on to the next step of our selection process.

- **Your assessment day(s)**

If you are applying for specific roles, including cabin crew, cabin manager or pilot roles, and are invited to an assessment centre, we will collect information relating to your performance in the assessment activities, and we will keep notes that will allow us to assess your performance. Please note that the structure of the assessment day will depend on the specific role and you will be provided with more information when you receive an invitation to this.

- **Your interview**

If you are invited to an interview, we will use the information you have provided so far and we will also collect information you provide us with during the interview and keep notes in order to assess your performance during the interview.

- **Reference checks**

If you are successful and are offered a role at easyJet, you will need to undergo some reference checks so that we can ensure that you comply with our high standards of integrity. At this stage, you will be required to provide information about your background, including your activity history, or any gaps you may have in your career. For this purpose, we will ask you to provide documents that would allow us to verify the information you have provided and to confirm your suitability for your easyJet role and also to name referees for the same purpose. The checks that we may perform through our screening providers depend on the role that you have been offered and will include some or all of the following:

- Identity check;
- 5-year professional activity history;
- UK Basic disclosure check or international criminal background check, if applicable;
- Financial probity check;
- Professional Qualifications check; or
- Any additional checks that we will be required by law to perform, depending on the nature of your role.

When you reach this stage, we will provide you with more detailed information about the checks that we will need to perform, your personal data that we will collect, the parties to which we may disclose your data or from which we may collect your data and how we will process such data.

Throughout your application process, we will also collect and retain your communications with us, for example the emails or letters you exchange with our HR department.

### **Special categories of personal data**

Where this is legally permitted, we may also need to collect a limited amount of personal data that is considered “special categories of personal data” under the GDPR and other data protection laws, for example information revealing your racial or ethnic origin, physical or mental health, religious beliefs or trade union membership. We will also collect information in relation to criminal convictions and offences when this is necessary throughout your application process.

The information that we collect depends on the role for which you are applying. For example, when you apply for a cabin crew role, you will need to provide some information about your health to our medical provider so that we can ensure the safety of our operations. Also, when you apply for a pilot role, we will need to verify that you have the required medical certificate so that we can ensure that you are eligible to fly our aircraft.

### 3. Why we use your data

We will process your personal data listed above in order to assess your application and decide whether you are eligible and suitable for the role for which you have applied. When processing your data, we will always make sure that we do so in a lawful manner in accordance with the data protection laws. More specifically, we have identified the following purposes for which we process your data and the lawful basis on which each of these purposes relies.

Purpose of processing	Lawful basis
<p>Recruitment and selection</p> <p>The principal and overarching reason for which we collect and process your data is to assess whether you are suitable for an easyJet role.</p>	<p>This is a necessary step before entering into an employment contract or a contract for services with you.</p> <p>It is also necessary for fulfilling our legitimate interests:</p> <ul style="list-style-type: none"> <li>a. to fully assess job applications to ensure that only suitable and appropriate candidates go through the application process and are selected;</li> <li>b. To protect our business interests, effectively manage our business operations and maintain our world class reputation; and</li> <li>c. To ensure the safety and integrity of our operations.</li> </ul>
<p>Performance of appropriate reference checks to ensure eligibility for the role and to verify your compliance with easyJet standards of integrity</p>	<p>This processing is necessary for compliance with our legal obligations, for example our obligation to verify whether you have the right to work where your role is based.</p> <p>It is also necessary for fulfilling our legitimate interests to:</p> <ul style="list-style-type: none"> <li>a. protect our business interests, effectively manage our business operations and maintain our world class reputation; and</li> <li>b. to ensure the safety and integrity of our operations.</li> </ul>
<p>Conducting criminal record checks and processing information relating to criminal convictions and offences</p>	<p>This processing is necessary to fulfil our legitimate interest to ensure the safety and integrity of our business operations and will only take place where it is permitted by law.</p>

Processing information about health to assess your eligibility for the role and to make any necessary adjustments in our selection process	<p>This processing is necessary for the purposes of carrying out the obligations and the rights of you or easyJet in the field of employment and social security and social protection law, where this is permitted.</p> <p>For example, to respect your right to not be discriminated during the selection process and to fulfil our right and our obligation to ensure your safety and the safety of people towards whom we have a duty of care, like our employees and customers.</p>
Processing information about your gender and age for equal opportunities reporting	The processing of this information is based on your consent and easyJet will only receive such information at an aggregate level in the form of an anonymised report.
Maintaining recruitment records to efficiently organise and administer the recruitment process	This processing is necessary to fulfil our legitimate interest to efficiently manage our recruitment processes.
To protect our legal rights and to be able to manage any legal claims to which easyJet may be involved in relation to the recruitment process	This processing is necessary to fulfil our legitimate interest to protect easyJet from breaches of its legal obligations and to defend ourselves in the event of litigation.
To ensure that the candidates we select as pilots and cabin crew meet our minimum requirements and have the necessary licences to fly easyJet's aircraft	<p>This processing is necessary for compliance with our legal obligations and to fulfil our legitimate interest to ensure the safety of our operations.</p> <p>In addition, it is a necessary step before entering into an employment contract or contract for services with you.</p>
To keep a record of unsuccessful candidates for pilot roles for a period of two years, so that such candidates are not able to reapply within this period.	This processing is necessary for our legitimate interest to ensure the safety of our operations and to implement our policy in this respect.

If at some point we need to collect information about you for another purpose which is not set out above, we will make sure that we inform you at the time about that purpose, its lawful basis and provide any other relevant information in relation to such processing.

#### **4. How long we keep your personal data for**

At easyJet we try to process as little data as possible and ensure that we keep your data only for as long as necessary for the purposes for which we need such data, as explained in this Privacy Policy. If your application is successful and you become an easyJet employee, we will transfer your data into our HR systems to the extent this is necessary for our ongoing employment relationship. When we no longer need your data, we will ensure that we and our partners that may process your data on our behalf securely delete it or anonymise it so that the information we hold no longer allows us to identify you.

##### **If you are unsuccessful**

If you are unsuccessful in your application, we will retain your data for 6 months after our selection process is complete. This will be in order for easyJet to be able to respond to enquiries, complaints or claims and to demonstrate that the selection process was carried out properly. Please note that this retention period may vary depending on the country where the role you have applied for is based and the local laws applying to such country.

If your personal data is necessary for a specific legal purpose, we will need to retain it for as long as this is necessary for such purpose.

If you have specifically applied for a pilot role and you have been unsuccessful in your application, you will have to wait for two years until you are able to reapply with us. We follow this policy for safety reasons and that's why we will need to keep some information about you during this period in this particular case.

#### **5. Protecting personal data**

We are committed to protecting the personal data we hold and we have implemented appropriate technical and organisational measures against unauthorised, accidental or unlawful access, loss, destruction or damage of such data.

In addition, we only allow access to your data to our employees, agents, contractors or other parties who have a business need to know. When we trust third parties to process your data on our behalf, we require that they will protect your data the same way we do and that they comply with appropriate security standards.



## 6. Sharing personal data

In order to fulfil the purposes set out under section 3 above, we may need to disclose part of your data to the following categories of other parties, as appropriate;

- **Our Group of companies**

We are part of a corporate group of companies (“our Group”), and part of your personal data may be shared with our associated companies or company branches, including the following:

- easyJet Switzerland S.A.;
  - easyJet Europe Airline GmbH;
  - easyJet Airline Company French branch;
  - easyJet Airline Company Italian branch;
  - easyJet Airline Company Portuguese branch;
  - easyJet Airline Company German branch;
  - easyJet Airline Spain;
  - easyJet Airline Company Holland.
- **Disclosure and Barring Service** and the equivalent national bodies in countries where you have lived in the past 5 years, where appropriate
  - **Recruitment agencies**, if you have submitted your application through one of these
  - **Your named referees** whom we will contact during the screening process
  - **Our supplier(s) offering the following services for us:**
    - **screening services;**
    - **support services**, for example the company administering this careers portal or the company providing IT services to easyJet;
    - **services in relation to the provision of our online assessments;**
    - **services in relation to the administration of our assessment centres, performance of assessment days** and provision of assistance during the selection process.

Some of our suppliers or their sub-processors may be situated outside the European Economic Area (the European Economic Area being the European Union and Iceland, Lichtenstein and Norway, also referred to as “EEA”) and your personal data may be accessed by and processed outside the EEA. Where this is the case, we require that one of the following appropriate safeguards is in place in accordance with data protection laws:

- There is a decision by the European Commission that the country where personal data is accessed from provides an adequate level of protection;
- In absence of such decision, the contracts that we have in place with these companies include EU approved model clauses in relation to the protection of personal data;
- If data is transferred to a US company, in absence of EU approved clauses, we aim to ensure that such company participates in the EU-US Privacy Shield framework.

## 7. Your data protection rights

The GDPR and other data protection laws give you specific rights that allow you to understand and to an extent control the way we process your personal data.

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

You have the right to receive a copy of the personal data we hold about you and to receive information about how we process such data.

We try to ensure that the personal data we hold is accurate and up-to-date. If you suspect that we hold inaccurate or incomplete information about you, please let us know so that we can update and complete our records. Please also make sure that you notify us when there is a change that could affect the personal data we hold about you, for example when your address and contact details change.

Under certain circumstances, you have the right to request that we delete your data. **Please note that we will automatically delete or anonymise your data after its retention period has passed and as such, you do not need to submit a specific request for this.**

### Additional rights

Under certain circumstances, you may also have the following rights:

Right to restriction of processing: in certain circumstances, you may request that we do not process your data, but only store it. You may request restriction of processing where:

- You contest the accuracy of your data that we hold, until we have corrected it or verified its accuracy;
- Where the processing is unlawful but you request that we do not delete the data;
- Where we no longer need your data but you require it for litigation purposes; or
- Where you have objected to the use of your data, until we verify whether we have grounds to continue using your data.

Right to withdraw consent: As explained above, we may rely on your consent for the processing of your data in very limited circumstances. Where this is the case, you have the right to withdraw consent at any time. We will respect your choice and stop processing your data further; however, any use of your data before you withdraw consent will not be affected.

Right to object: You may consider that you have reasons to object to the use of your personal data when such use is only based on our legitimate interests as described in this Policy. Before using your data for legitimate interests, we have balanced these interests against your rights and freedoms. However, if you consider that you have grounds to object to the use of your data, you can explain to us your particular situation and we will individually review your request.

Rights in relation to automated decision making: Please note that easyJet does not take decisions about individuals during the recruitment process based solely on automated processing.

Right to data portability: According to the GDPR, where the processing of your data is based on consent or on a contract and the processing is carried out by automated means, you have the

right to receive such data in a structured, commonly used, machine-readable format. However, in the context of your application process this right would not be applicable.

You can exercise your above rights by contacting our Group Data Protection Officer at the address contained in section 9 below.

If you have a concern in relation to the way we process your personal data and satisfy your data protection rights, and if you believe this is not in accordance with data protection laws, you have the right to lodge a complaint with a data protection authority, in particular in your country of residence.

## **8. Updates to this Policy**

Our Privacy Policy is a dynamic tool and we will modify it when there is a change to the way we process your data. We will update this Privacy Policy from time to time to ensure that the information we provide to you is up to date and in accordance with the relevant data protection laws. Any new version of this Policy will be published on our careers portal.

## **9. Contact information**

Questions, comments and feedback regarding this Privacy Policy are welcome and should be addressed to our Group Data Protection Officer in writing to the following address:

easyJet Group Data Protection Officer  
Hangar 89  
London Luton Airport  
Luton, Bedfordshire  
LU2 9PF  
United Kingdom