



Coles Careers – Candidate Privacy Policy



1. Overview

At Coles, we take the protection of personal information seriously. Personal information means information which identifies you as an individual or from which you can be reasonably identified.

This Coles Careers – Candidate Privacy Policy (**Policy**) can be found at www.coles.com.au/privacy and relates to personal information we collect and handle about you as a candidate, and applies across the pre-employment and recruitment stage for Coles Group Ltd and its subsidiaries except as noted below (together, referred to as “Coles”, “we” and “us”). The brands used by the entities covered by the Privacy Policy include Coles, Chef Fresh, Liquorland, First Choice Liquor Market, Vintage Cellars, CGBV1 Pty Ltd (trading as Swaggle), and BetaElementCo Pty Ltd (trading as QuiteLike). When you see “Coles” in this policy, it refers to Coles Group Ltd and the listed Coles Group companies.

Should you be successfully offered a role at Coles, the personal information we collect from you as a candidate will be used to manage our employment relationship with you as a team member.

We may also collect personal information from you as a customer of Coles, which is subject to the Coles Group Privacy Policy also available at www.coles.com.au/privacy.

This Policy amended August 2024 outlines:

- our commitment to securely manage your personal information in a fair and transparent manner;
- why we collect your personal information, what personal information we collect, how we handle your information, and when it may be disclosed outside of Coles; and
- your rights in respect of the personal information we hold.

We may update this Policy from time to time, so please check back regularly to keep informed of updates to this Policy.

2. Why do we collect and handle your personal information?

We collect, hold, use, and disclose your personal information for business needs associated with your recruitment in connection with recruiting and managing our workforce. This includes, but is not limited to:

- considering you for relevant positions with Coles, including positions you have not applied for (unless you request us not to);
- determining your eligibility to work with Coles;
- determining your rights to work in Australia;
- communicating with you;
- keeping your information up-to-date, verifying your identity and conducting background checks;
- obtaining and giving references;
- requesting feedback through surveys and research and other means so that we can improve our recruitment and team member services;
- managing our relationship with your employer if you are engaged under a

labour hire or secondment arrangement;

- managing our relationship with you such as by scheduling and evaluating interviews and performing assessments;
- working with our service providers, including recruitment providers;
- protecting and defending our legal rights and resolving disputes or complaints;
- complying with our legal obligations – including where we are required or authorised by law to collect personal information, such as under the Corporations Act, Fair Work Act, Income Tax Assessment Acts and other tax laws, occupational health and safety acts, public health acts, Superannuation Guarantee (Administration) Act, surveillance devices and workplace surveillance acts, Telecommunications (Interception and Access) Act and Workers Compensation Acts;
- managing our risks including activities relating to business continuity, security, safety, investigations, fraud and loss prevention;
- monitoring and recording your communications with us (including email and telephone) for security, dispute resolution, and quality and training purposes;
- understanding how our websites and services are being used and to make improvements;
- diagnosing website technical problems, as well as to prevent, detect, mitigate, and investigate potential security issues, as well as fraudulent or illegal activity;
- using your personal information for statistical purposes (e.g. to monitor and report on diversity and equal opportunities); and
- other purposes as required or permitted by law.

Where you are selected or engaged as a team member, your personal information will become part of your team member profile with Coles. This includes all application and assessment documents (such as resume, interview notes, test scores, and working rights documents) collected during the recruitment process.

If you choose not to provide certain personal information, we may not be able to do the things described above, for example, we may not be able to progress your application, or provide you with direct correspondence (e.g. regarding employment opportunities at Coles).

3. Types of personal information collected

Coles collects and maintains different types of personal information, including but not limited to:

- **Your contact details:** this includes your name, residential address, email address, telephone number(s);
- **Identity details:** such as your photo ID, passport information, birth certificate, driver licence details, date of birth, and gender;
- **Your employment details and qualifications:** this includes information about your employment history, your qualifications such as university education, professional certification, licensing, and professional memberships;
- **Sensitive information,** including:
 - o **Health information:** such as information about any physical or mental

condition. For example, we may collect this information so that we can confirm your ability to perform a role and to ensure that we make reasonable adjustments for your interviews, assessments, and the role itself where required;

- o **Diversity & Inclusion information:** such as sexual orientation, ethnicity, ancestry, and disability. Unless we indicate otherwise or this information is directly relevant to the role, you may elect not to provide this information; and
- o **Biometric information or Template:** where you work in premises or access work-related technologies that process this type of information such as a fingerprint scan for time and attendance. There are alternative options available that do not require biometric information.

Please check for further details about our collection and handling of these types of information where we seek or collect this information.

- **Interview details:** this includes information about you that you provide during interviews or assessments (e.g. aptitude and psychometric tests), whether face-to-face, by phone, email, online, or otherwise;
- **Background check:** such as information gathered as part of the pre-employment checks (including working rights, pre-employment medicals, criminal record checks and driving history checks etc.), professional references, employment verification checks, and other checks as the role reasonably requires;
- **Financial and payroll details:** such as your Tax File Number (TFN), Tax Residency Status, bank account details, leave, benefits, pay, visa status, government deductions and superannuation;
- **Market research:** such as information you provide us when you participate in a survey;
- **Location information:** such as your approximate location data through IP address (when you use one of our websites or digital services) or more precise location based on GPS;
- **Log information:** such as information about a browser session, device and network information, statistics on page views and sessions, search queries and browsing behaviour; and
- **Cookies and beacons:** such as log files, cookies, beacons, tags and pixels and similar technologies to collect and use information about the pages you view, links you click, and other actions you take when accessing websites, services, or emails.

Not all types of personal information noted above are requested from every candidate as this will generally depend on the role and the stage of the recruitment process.

4. How do we collect personal information?

We collect your personal information when you interact with us. This includes, but is not limited to, when you:

- apply for a role with us;
- use and create an account on our Coles careers website;
- submit your application form, resumes, cover letter, and other application information; and
- communicate with us, such as through interviews and telephone calls, and other correspondence.

We may also collect information from third parties including from:

- background check providers (e.g. working rights, medical, criminal record, reference and employment verification checks);
- recruitment agencies;
- our other service providers and the parties described in Section 6 (Who do we share your personal information with?);
- your employer (if you work for us under a labour hire or secondment arrangement);
- public sources, such as public registers, LinkedIn and other social media and digital platforms; and
- anyone authorised to act on your behalf.

We may also generate new personal information from time to time e.g. reports or analysis based on other information we hold about you.

You might also need to provide personal information about other individuals to us (e.g. your referee and/or emergency contact details). If so, we rely on you to inform those individuals that you are providing their personal information to us and advise them of the matters in this Policy and, where relevant, the Coles Group Privacy Policy.

5. How do we protect the personal information we hold?

We hold personal information electronically and in hard copy, both at our own premises and with the assistance of our service providers. We implement a range of measures, including people, process, and technology controls, to protect the security of your personal information. Examples of these measures include:

- Controls to limit access to personal information through access and identity management systems;
- Confidentiality and cyber security policies that require team members to protect the security of your personal information; and
- Maintaining and updating an ongoing cyber security program.

6. Who do we share your personal information with?

We often work co-operatively within the Coles Group, and may share personal information with other members of the Group. We also work with suppliers and third parties that carry out specific functions on our behalf, so that we can carry out the activities listed in Section 2. Third parties assist us with services such as:

- Recruitment;
- Labour hire;

- Technology services including application development, technical support, and processing, storing, hosting and analysing data;
- Processing payments and administering payroll;
- Communicating with you;
- Surveys and research;
- Store security and investigative, fraud, loss prevention, and safety activities;
- Business advisory services, such as our lawyers, accountants, income recovery services or other professional service providers;
- Administrative services, including mailing services, printing, archival, and contact management services;
- Medical providers; and
- Digital identity verification services.

Other third parties we share personal information with include:

- your representatives;
- police, courts, government agencies and lawyers, e.g. in connection with regulatory and legal investigations and processes; and
- parties involved in business transfer transactions (and prospective transactions).

Some of these third parties are located outside Australia. While it is not reasonably practicable to list all countries to which your personal information may be disclosed from time to time, it is likely that such countries may include Argentina, Canada, EU Member States, Hong Kong, India, Israel, Japan, New Zealand, Philippines, Singapore, South Africa, United Kingdom, United States, and Vietnam.

7. Access to or correction of personal information

If you wish to access or correct any personal information we hold about you, please contact us as set out in Section 9.

When making an access request, please provide as much detail as you can about the specific information you seek, in order to help us retrieve it. Under the Privacy Act and other relevant laws, we may be required to provide a written response to you if we are unable to respond to your request, outlining the reasons why we were unable to do so.

You are encouraged to help us keep your personal information accurate, complete, and up-to-date by updating your profile on our Coles Careers website when applying for an advertised vacancy.

Where you request Coles to correct information we hold about you, but Coles elects not to make the requested correction, you may request Coles to add a note to your information outlining your position.

8. Retention and deletion of personal information

If you are not a team member and your application is unsuccessful or you withdraw from the process or decline our offer, we will retain your information on file for a period following your application. We retain this information for various reasons, including in case we face a legal challenge in respect of a recruitment decision, to consider you for other current or future jobs at Coles and to help us better understand, analyse and improve our recruitment processes. If you do not want us to retain your information for

consideration for other roles, you can request to have your personal information deleted. The method of doing this varies depending on which version of our careers site your application was made on:

- If you are on the colescareers.com.au website, click the "Personal Information Request" link in the bottom right corner of your screen. From this screen, you can submit a request to have your personal data deleted.
- If you are on a careers.colesgroup.com.au log into your candidate profile, and click "options" in the top right corner of your screen, and "Settings". From this screen, click "Delete Profile" in the bottom right corner.

Once you have made this request, we will take all reasonable steps to delete or anonymise your personal information, unless we need to keep it for legal reasons.

9. Questions and complaints

If you have any queries or concerns relating to our handling of your personal information including a request for access or correction to your data or if you have any questions or complaints about this Policy, you can contact the Privacy Officer via:

Email (via webform): <https://www.coles.com.au/help/enquiry>

Phone: 1800 061 562

Post: Privacy Officer, Coles Group, 800 Toorak Road, Hawthorn East VIC 3123

Once a complaint has been lodged, we will let you know who will be handling your matter and when you can expect a full response within 30 days. If you are not satisfied with our response, please let us know and we will investigate further and respond to you.

If you are still not satisfied, you can contact the Office of the Australian Information Commissioner, whose contact details are set out below:

Office of the Australian Information Commissioner

GPO Box 5218 Sydney NSW 2001

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

Website: www.oaic.gov.au

10. Related Documents

Please refer to Coles Privacy Policy at www.coles.com.au/privacy for an outline of how we handle your personal information where you engage with us in another capacity other than a candidate or team member e.g. as a customer.

11. Policy Amendment

This policy amends the Coles Careers Privacy Policy that was published in May 2023.