

1. Purpose

At Coles, we respect the privacy of your personal information in our care. Personal information means information which identifies you as an individual or from which you can be reasonably identified.

This Privacy 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 all Coles group companies and divisions including Supermarkets (Coles Supermarkets, Coles Supply Chain, Coles Online, Coles Financial Services, Coles Local), Coles Liquor (Liquorland, First Choice, Vintage Cellars and First Choice Liquor Market), and Coles Convenience (Coles Express). When you see "Coles" in this policy, it refers to Coles Group Limited and its subsidiaries.

This Policy 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 responsibilities and obligations when you handle any other individuals' personal information, for example when you provide us with your contact details for employment verification checks.

We reserve the right to change the Privacy Policy at any time, so please check back regularly to keep informed of updates to this Policy.

2. Policy Application

This policy covers the personal information of candidates applying for positions at the Coles group. We may also collect personal information from you when you are a customer, which is subject to the Coles Group Privacy Policy found at www.coles.com.au/privacy.

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

3. Definitions

Business needs means those functions or duties requiring access to candidates' personal information that are necessary to carry out Coles' business functions to comply with applicable laws, or to administer People and Culture (P&C) related functions.

Candidate refers to anyone who applies for a job, or who otherwise seeks to work with or for us (whether on a permanent, fixed term, or casual basis).

Coles refers to all Coles Group Limited and its subsidiaries, including Supermarkets (Coles Supermarkets, Coles Supply Chain, Coles Online, Coles Financial Services, Coles Local), Coles Supply Chain, Coles Liquor (Liquorland, First Choice, Vintage Cellars, First Choice Liquor Market), and Coles Convenience (Coles Express).

Personal information (PI) means any information or opinion relating to an individual, which includes a candidate who is reasonably identifiable.

Team member means an individual who is or was employed on a permanent, fixed term, or casual basis by Coles.

4. Policy Requirements

Coles is subject to the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Privacy Act). The APPs set the minimum standards which relate to the collection, security, storage, use, correction, and disclosure of personal information and access to that information. This policy tells you in general terms what our commitment is for recruitment-related information: why we need to collect personal information, what personal information we collect, how we handle it, and who we may disclose it to, both within and outside of Coles.

(a) 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 and pre-employment relationship with Coles so we can:

- process and manage your application for employment with Coles;
- determine your eligibility for employment with Coles;
- determine your rights to work in Australia;
- communicate with you;
- enter into a contract with you (if you are successful during the recruitment process);
- manage your relationship with you such as by scheduling and evaluating interviews and performing assessments;
- consider you for future applications (unless you request we do not consider you for future applications);
- protect our legal rights and resolve disputes or complaints;
- comply with our legal obligations;
- manage our risk such as business continuity and security;
- understand how our websites and services are being used and to make improvements;
- diagnose website technical problems, as well as to prevent, detect, mitigate, and investigate potential security issues, as well as fraudulent or illegal activity; and
- use your personal information for statistical purposes (e.g. to monitor and report on diversity and equal opportunities).

Where your application is successful, your personal information will become part of your employee profile with Coles. This includes all application and assessment documents (such as interview notes, test-scores, and working rights documents) collected during the recruitment process.

(b) Types of personal information collected?

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

- **Your contact details:** this includes your name, residential address, email address, telephone number(s);
- **Identity details:** such as information that includes 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, and licensing, and professional memberships;
- **Sensitive personal information,** including:
 - **Health information:** such as information about any physical or mental condition that you provide to us so that we can confirm that your ability to perform a role and to ensure that we make reasonable adjustments for your interviews, assessments, and the role itself where required; and
 - **Diversity & Inclusion information:** such as information that includes gender, sexual orientation, ethnicity, ancestry, and disability 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 details:** such as information like your Tax File Number (TFN), Tax Residency Status, and bank account details (*where your application is successful*);
- **Market research:** such as information you provide us when you participate in a survey;
- **Location information:** our website might ask for location information to help better serve you information, your geo-location data through IP address or 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, and similar technologies to collect and use information about the pages you view, links you click, and other actions you take when accessing your websites, services, or emails.

Note that not all types of personal information noted above are requested from every candidate as this will generally depend on the requirements of the role being applied for and the stage of the recruitment process.

If you choose not to provide certain personal information, we may not be able to progress your application, or provide you with direct correspondence regarding employment opportunities at Coles.

(c) How do we collect personal information?

We collect your personal information directly from you as part of the recruitment process. Your personal information (including sensitive information) may be collected via your application form, resume, cover letter, recruitment agency reports during interviews and telephone calls, written correspondence, and sometimes from publicly available sources such as LinkedIn or other social media sites.

We may also collect information from third parties (e.g. working rights check, background checks and employment verification checks). These third parties may have their own privacy policies that address how they handle personal information.

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 Privacy Policy.

(d) How does Coles protect the personal information that it holds?

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:

- Access to personal information is controlled through access and identity management systems;
- Team members are bound by internal confidentiality and information security policies that require them to keep personal information secure at all times;
- Protecting personal information in accordance with the Office of the Information Commissioner's Guide to Securing Personal Information; and
- Maintaining an ongoing security program where we invest continually in cyber security.

(e) Who do we share your personal information with?

Your personal information will be shared with Coles team members, recruitment agencies, and other third parties who are engaged to provide recruitment services on our behalf, which includes but is not limited to the following:

- to assess your suitability for employment;
- to manage your recruitment and application process; and
- to conduct surveys.

Some of the technology service providers that hold and process candidates' personal information may have data centres 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 Germany, India, Ireland, Netherlands, New Zealand, Philippines, Singapore, and the United States.

When we disclose your information overseas, we take steps to ensure that our technology service providers are obliged to protect the privacy and security of your personal information in accordance with the standards that apply in Australia, including that they only use personal information for the purpose for which it is disclosed.

(f) 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 5.

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 are 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.

(g) Retention and deletion of personal information

If 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 successfactors.com website, click the "Candidate Login" link in the top right corner of your screen. Then, click "Options", and "My Profile". 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 your personal information, unless we need to keep it for legal reasons.

5. Candidate privacy enquiries 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): www.coles.com.au/customer-service/contact-us

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

6. Breach of Policy

All policies must include the below breach of policy wording, exceptions to this rule can be requested by contacting the P&C Advisory Team.

"Failure to comply with this policy may result in disciplinary action, up to and including dismissal".

7. Related Documents

Please refer to Coles Privacy Policy at www.coles.com.au/privacy for an outline of how we handle and process your personal information from you as a customer.

8. Policy Amendment

This policy amends the Coles Careers Privacy Policy that was published in November 2018. This policy cannot be amended without approval from General Manager, Risk and Compliance.