

PLUG-IN PROGRAMME CANDIDATE PRIVACY POLICY

WHAT IS THIS POLICY ABOUT?

We are the Farfetch Group (“we”, “us” or “our”) and this policy sets out the basis on which we process any personal data that you provide to us through our recruiting software, cloud-based storage and candidate tracking services provider (the “Provider”) in connection with your application to the Plug-In Programme (the “Programme”). Please read the following carefully to understand our views and practices regarding your data and how we will treat it. By submitting your application and/or using our Provider’s Portal (the “Portal”) or our Provider’s Interview Platform you acknowledge and agree to the practices described in this policy.

DATA CONTROLLER CONTACT DETAILS

Farfetch is the data controller for the purposes of the General Data Protection Regulation and any relevant local legislation (“Data Protection Laws”).

For all data privacy inquiries and any questions or concerns you may have about this Policy, please contact privacy@farfetch.com.

THE TYPES OF DATA WE RECEIVE AND USE

We will receive and use the following information about you:

Information you provide as part of your application. You will provide us information about you to apply for the Programme or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register for and use the Portal, such as your name, contact information, work experience, educational qualifications and any information you choose to submit on or upload to the Portal (such as information from a CV).

Information we collect about your usage of the portal. We automatically collect certain data from you when you use our Portal, including IP address or other unique device identifiers, information collected by cookies on your usage of the Portal, mobile carrier (if applicable), time zone setting, operating system and platform and information regarding your use of the Portal (“Usage Information”).

Information we collect about your usage of the Interview Platform. By recording your interview on our Partner’s platform, we will collect and record your voice and image.

COOKIES

We use cookies to enhance your experience using the Portal. Cookies are small files which, when placed on your device, enable us to provide certain features and functionality. The Portal will detect and use your IP address or domain name for internal traffic monitoring and capacity purposes or to otherwise administer the Portal.

We use the following cookies:

Strictly necessary cookies. These are cookies that are required for the operation of the Portal. They include, for example, cookies that enable you to log into secure areas of the Portal.

Analytical/performance cookies. They allow us to record patterns of usage of our various users e.g. recognizing and counting the number of visitors and to see how visitors move around the Portal when they are using it. This helps us to improve the way the Portal works, for example, by ensuring that users are finding what they are looking for easily.

Functionality cookies. These are used to recognize you when you return to the Portal. This enables us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region). If for any reason you wish to not take advantage of cookies, you can disable cookies by changing the settings on your browser. However, if you do so, this may affect your enjoyment of the Portal and we will no longer be able to offer you personalized content. Unless you opt out of cookies, we will consider that you consent to their use.

HOW WE USE YOUR INFORMATION AND OUR LEGAL BASIS FOR PROCESSING

We use your information to:

- Identify and evaluate you for the Programme;
- Determine and validate your qualifications the Programme;
- If you are a successful candidate, create an internship record;
- Provide you with user support of the Portal and the Interview Platform;
- Communicate with you;
- Assess if your profile matches with other positions available at the Farfetch Group which you haven't applied to;
- Send you notifications about new positions that match your profile;
- Improve the Portal and to ensure content from the Portal is presented in the most effective manner for you and your device;
- Administer the Portal and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; or
- Keep the Portal safe and secure; or
- Develop the Portal and improve our recruitment processes.

Our legal basis for processing your information is to undertake the necessary pre-contractual steps in order to perform a contract with you, or ensuring that we comply with our legal obligations as, for example, verifying your eligibility to work in the country where you are applying to. We also have legitimate interests in processing such information, such as verifying your professional track record, monitoring employment diversity, keeping our Portal secure, conducting online interviews, and improving our recruitment process. We also process your information based on your consent, when such consent is required (for example when asking you to extend the time to keep your CV in our database).

HOW WE SHARE YOUR INFORMATION

If we think that your professional profile may match one of our vacancies in another office of the Farfetch Group which you haven't applied to, we can share your information between our group companies. The use of your personal information for this purpose is consistent with this Privacy Policy.

When transferring personal information to one of the Group Companies outside the EEA, which among others, might be registered at UK, Brazil, China, India, Japan, the UAE or the USA, we rely either on an Adequacy Decision or the Commission's model contracts for the transfer of personal data to third countries (i. e, the standard contractual clauses) pursuant to Decision (EU) 2021/914 of 4 June 2021 and takes all necessary security and legal precautions to ensure the safety and integrity of personal data that is transferred within its group.

Also, we share your information with selected recipients. These categories of recipients include our Providers, which we use to collect and process your information or conduct the online interviews. Some suppliers are located outside the EEA. All suppliers that process personal data outside of the EEA are required to provide appropriate safeguards, such as executing the Standard Contractual Clauses for the transfer of personal data. In case such information is collected or generated within the territory of mainland China and is required to be provided abroad, we will conduct security evaluation in accordance with relevant regulations and conclude contracts with the information receivers.

WHERE WE STORE YOUR INFORMATION

The information that we collect from you will be stored by our Provider, which might store it outside of the European Economic Area ("EEA").

Depending on the specific location of the data storage and shall the Provider store your personal data outside of the EEA, we rely on different adequacy measures, as applicable:

1. **Adequacy Decisions:** The European Commission may determine whether a country outside the EU offers an adequate level of data protection;
2. **Model Clauses:** We rely in the Commission's model contracts for the transfer of personal data to third countries (i.e. the standard contractual clauses);

Should you want to learn more about the way and site where your data is stored, please contact us at privacy@farfetch.com.

THE SECURITY OF YOUR PERSONAL DATA

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your information transmitted through the Portal; any transmission is at your own risk. Once we have received your information, we will take appropriate technical and organizational measures to safeguard your personal data against loss, theft and unauthorized use, access or modification.

DATA RETENTION

We will retain your information as part of the application for the entire moment of the Programme recruitment process and up to three (3) years after your last interaction with us or with the Portal, if your application was unsuccessful, for the purposes of verifying your suitability for future vacancies, unless you tell us otherwise.

We will retain the recording of your online interviews only for the time the Programme recruitment process lasts and we will permanently delete it when the process is concluded. When your application is successful, your information will be transferred to your internship file and will be subject to the retention periods associated with that file.

We can keep your personal data for additional periods of three (3) years, with your consent, which you can withdraw at any time by contacting us and requesting to erase your personal data. Should you choose not to consent or otherwise we do not receive an answer from you, your data will be permanently anonymized.

Your information will be retained for longer if required by law or a court order and/or as needed to defend or pursue legal claims.

YOUR RIGHTS

You have certain rights in relation to the personal data we hold about you. Some of these only apply in certain circumstances as set out in more detail below. We also set out how to exercise those rights. Please note that we will require you to verify your identity before responding to any requests to exercise your rights. To exercise any of your rights, please send an email to privacy@farfetch.com.

You have the following rights in relation to your personal data:

1. **Access:** to access the personal data held by Farfetch about you and certain information about how we use it and who we share it with;
2. **Portability:** in certain circumstances, you have the right to receive or ask us to provide your personal data to a third party in a structured, commonly used and machine-readable format, although we will not provide you with certain personal data if to do so would interfere with another's individual's rights (e.g. where providing the personal data we hold about you would reveal information about another person) or where another exemption applies (we can only do so where it is technically feasible; we are not responsible for the security of the personal data or its processing once received by the third party);
3. **Correction:** to correct any personal data held about you that is inaccurate and have incomplete data completed (including by the provision of a supplementary statement). Where you request correction, please explain in detail why you believe the personal data we hold about you to be inaccurate or incomplete so that we can assess whether a correction is required. Please note that while we assess whether the personal data we hold about you is inaccurate or incomplete, you may exercise your right to restrict our processing of the applicable data as described below;
4. **Erasure:** that we erase the personal data we hold about you in certain circumstances referred to below: you believe that it is no longer necessary for us to hold the personal data we hold about you; we are processing the personal data we hold about you on the basis of your consent, and you wish

to withdraw your consent; we are processing the personal data we hold about you on the basis of our legitimate interest and you object to such processing. Please provide us with detail as to your reasoning so that we can assess whether there is an overriding interest for us to retain such personal data; or you believe the personal data we hold about you is being unlawfully processed by us; Also note that you may exercise your right to restrict our processing of your personal data whilst we consider your request as described below. Please provide as much detail as possible on your reasons for the request to assist us in determining whether you have a valid basis for erasure. We will retain the personal data if there are valid grounds under law for us to do so (e.g., for the defence of legal claims or freedom of expression) but we will let you know if that is the case;

5. **Restriction of Processing to Storage Only:** to require us to stop processing the personal data we hold about you other than for storage purposes in certain circumstances. Please note, however, that if we stop processing the personal data, we may use it again if there are valid grounds under Data Protection Law for us to do so (e.g. for the defence of legal claims);
6. **Objection:** in certain circumstances, the right to restrict or object to our processing of your personal data (e.g. where you request correction or erasure, you also have a right to restrict processing of your applicable data while your request is considered);
7. Where you have provided personal data voluntarily, or otherwise consented to its use, the right to withdraw your consent; and
8. The right to complain to the relevant supervisory authority, which is the Portuguese Authority (Comissão Nacional de Protecção de Dados).

You may exercise the above-mentioned rights by contacting the Farfetch Group Data Protection Officer by fulfilling this form [Data Subject Request Form](#).

If you want more detail on when the rights apply, please contact Farfetch Group Data Protection Officer at privacy@farfetch.com.

We will respond to your request promptly as possible without undue delay and at least within one (1) month. However, in certain circumstances, due to a more complex request, this may be extended by a further two (2) months.

In the event that you wish to make a complaint about how we process your personal data, please use our Data Subject Request Form, and on the Request Type, select Other, and we will endeavour to deal with your request as soon as possible. This is without prejudice to your right to launch a claim to the relevant data protection authority as stated above.