

# QVC Applicant Privacy Notice

## BACKGROUND

At QVC, we are committed to maintaining the accuracy, confidentiality and security of our team members' information. As part of that commitment, we oversee the use of information about our employees, applicants, and contractors for purposes of the employment or contractual relationship and to enable use of our systems. We realize that your privacy is important to you, and likewise your privacy is important to us.

This notice explains what personal data (information) we will hold about you, how we collect, process, and use it, and how we share information about you during the application process. We are required to notify you of this information, under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we provide to you from time to time when we collect or process personal information about you.

You are not obliged to provide us with this data. However, not doing so and failing to provide data that is required for the recruitment process will adversely affect your chances of recruitment. We therefore encourage you to complete all sections of the application form, as this will be used throughout the recruitment and selection process.

## OTHER LAWS AND PROCESSES

Where QVC's use of personal data is limited by other law (including employment law) or where QVC's use of personal data is subject to other mandatory processes (for example, works councils), then this Notice is subject to those other laws and processes.

## CONTROLLER AND DATA PROTECTION OFFICER

This notice applies to all applicants for EU positions in the Qurate Retail Group ("QRG") and its subsidiaries and Affiliates in the United States and globally. When this Notice uses the term "Affiliates", that means the companies that directly or indirectly own Qurate Retail, Inc., and the companies that Qurate Retail, Inc. directly and indirectly owns, including QVC, Inc., HSN, Inc. and zulily llc.

The controller of your data depends on which QVC business you are applying to. In this notice, when we say "QVC" we mean your applicable data controller, as set out in this table.

QVC business you are applying to	Controller
UK	QVC UK

Italy	QVC Italia S.r.L
France	QVC France
QVC Poland	QVC Poland Global Services Sp. z o.o.

Other controllers of personal data described in this Notice include QVC, Inc., with an address of 1200 Wilson Drive, West Chester, Pennsylvania 19380; HSN, Inc., with an address of 1 HSN Drive, St. Petersburg, Florida 33729; and Qurate Retail, Inc., with an address at 12300 Liberty Boulevard, Englewood, Colorado 80112, USA. You may contact the Data Protection Officer if you have questions about these other data controllers. QVC is a global family of companies. This notice covers the use of applicant information as it relates to recruitment, and the employment or contractual relationship. Use of information when a team member acts as a customer is addressed by the Privacy Policy found on the relevant customer-facing website.

## ABOUT THE INFORMATION WE COLLECT

### WHAT INFORMATION

We may collect the following information up to and including the shortlisting stage of the recruitment process, as required by the position you apply for, in compliance with local law:

#### **Address book data (contact information), such as**

Your name and contact details (ie address, home and mobile phone number, email address);

#### **Job & Organizational Data, such as**

Position ID, job or position title, function, department, manager, business title, job type or code, business site, company, supervisory, cost center and region affiliation;

#### **Additional data related to the execution of the employment contract, as required by the position at time of contract, such as**

Marital status, social security number, citizenship information, visa information, national and governmental identification information, drivers' license information, passport information, military service information, birth date and birth place, gender, related persons data;

#### **Related party information for performance of relocations, benefit contracts or safety interests, such as**

Name and contact information of dependents, emergency contacts, or beneficiaries, including home address, home and work telephone numbers and mobile telephone numbers, date of birth, gender; emergency contacts;

#### **Travel information, such as**

Relocation details, travel arrangements, immigration status of you or your family;

**Data related to Recruiting Processes, such as**

job requisitions, job applications resumes and/or applications, references and interview notes, letters of offer and acceptance of employment, mandatory policy acknowledgement sign-off sheets;

**Talent data, such as**

education, language(s) and special competencies; skills, mobility and certification information; employment history; work experience information;

**Photographs and Recordings, such as**

photographs, videos, CCTV, or audio recordings;

**Compliance and legal requirement data, such as**

Information regarding your criminal record, for select positions, in compliance with local law;

**Device and technical information, such as**

the internet protocol (IP) addresses of computers or devices you use, device identifiers, browser characteristics, operating system details, language preferences, referring uniform resource locaters (URLs), services used, telecommunications data (source, metrics, logs), log files, audit trails, or cookie lds;

**Log and usage data, such as**

system logs, use;

**Communications data you provide, such as**

content of emails or social media;

**Emergency functions data, such as**

data generated from systems used to ensure employee or visitor safety at work or while traveling, data generated from a health or safety emergency;

**Health data, such as**

Accommodation requests or notices regarding disabilities.

QVC also processes certain special categories of personal data, though most such data is processed in-country:

Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a

natural person, data concerning health or data concerning a natural person's sex life or sexual orientation, background check information (such as criminal or administrative violations), and privileged communications that you may have shared (such as with your doctor or lawyer). Data about disabilities may also be processed.

Special categories of personal data will be processed in accordance with applicable local law.

## HOW WE COLLECT AND USE THE INFORMATION

As a general rule, QVC collects personal information directly from you. We also obtain information about you from other sources and combine that with information we collect about you, such as:

- Publicly available information or information from social media platforms, when made accessible by you. This may include posts, blogs, videos, or other content you make available.
- Information that we obtain from third parties (such as references, government regulators, or background check providers): This is added to our existing information about team members to help evaluate candidates for employment, prevent fraud, protect security, or comply with legal requirements.

QVC limits the personal data it processes to what is relevant for the purposes of a particular project, and does not use it for purposes that conflict with how it was collected or authorized to be used. From time to time, QVC may use third party service providers who perform functions on our behalf for the purposes listed above. QVC may also receive information back from those or other providers (for example, the results of interviews with employees, use data about systems maintained for Company's benefit, travel expense data). In all cases, regardless of how we collected it, we will process that information in accordance with this notice.

## WHY WE COLLECT THE INFORMATION AND HOW WE USE IT

We will collect and use this information for the following purposes during the application and hiring process:

- to take steps to enter into a contract;
- for compliance with a legal obligation (e.g. our obligation to check that you are eligible to work);
- for the performance of a task carried out in the public interest;
- for the purposes of our legitimate interests, but only if these are not overridden by your interests, rights or freedoms. Examples of our legitimate interests include management of human resources function; to schedule and support the interview and relocation process; the provision and administration of tools and systems; protection of systems and properties and the prevention of fraud; maintenance and access management of our physical locations; travel administration; business continuity and disaster recovery; ethics and compliance reporting lines; and
- to protect the vital interests of you or others (such as if you have a medical emergency at work or if you are traveling in a location that has become unsafe).

How we use your information, and the legal basis we rely on for doing so, depend on the information in question. The Schedule to this notice sets this out in more detail.

QVC makes limited use of automated decision-making within the applicant process. You have a right to object the decision that was made. Within the applicant process, certain criteria, such as age and visa restrictions may be applicable to a job you apply for, which would result in an automatic dismissal of your application. Furthermore, some positions may have qualification-based questions that, pending your response, may put you into a category of applicants which we advance to the next stage. QVC uses limited automation subject to exceptions allowed by law, including, but not limited to fraud.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to this notice or to the purposes for which we collect and process personal data.

## HOW WE MAY SHARE THE INFORMATION

Your personal information is disclosed so that prior to and to perform the employment contract we can consider if you are the best candidate for a role. Third parties assist in support, maintenance, administration, oversight, or hosting. Furthermore, we have an interest to ensure functionality, efficiency, and a fair application process across our Affiliates. Your information is shared with:

- selected companies (e.g., payroll providers or providers of HR systems) who provide services to QVC;
- Affiliates within the QVC group of companies; this is explained in more detail in the next section.

In the event of a change in ownership of, or a grant of a security interest in, all or a part of QVC through, for example, an asset or share sale, or some other form of business combination, merger or joint venture, to the extent such disclosure or transfer of personal information is required to complete the transaction and permitted by the applicable data protection laws.

To comply with applicable laws and regulations (such as anti-corruption, bribery, national security, or conflict), court proceedings, or to ensure your safety, we may disclose:

- as permitted or required by applicable law or regulatory requirements. In such a case, we will endeavor to not disclose more personal information than is required under the circumstances;
- to comply with valid legal processes such as search warrants, subpoenas or court orders;
- during emergency situations or where necessary to protect the safety of a person or group of persons

Finally, in certain situations we may seek with your consent where such consent is required by law.

## TRANS-BORDER DATA TRANSFERS

QVC and its Affiliates operate in many countries around the world, including the United States, European Economic Area (EEA), Australia, Japan and China. In addition, QVC has centralized certain functions at QVC, Inc. in the United States. Service providers of Company and its Affiliates may also be located in countries outside the EEA. These countries may include countries that may not have received an adequacy decision by the European Commission. Company will transfer portions of your personal data to Affiliates and service providers for support, maintenance, administration, oversight, or hosting. Depending on your job, other markets outside of the EEA may need to view your information as part of the management process, as well. Any transfer of personal data to an Affiliate or service provider is covered by model clauses or transfer mechanism to ensure that team member data is treated with care. You may contact Company's legal counsel to review relevant model clauses or transfer mechanisms.

Where restricted, sensitive personal data types will not be transferred outside of your country. Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sexual orientation, sex life, trade union membership and genetic and biometric data are subject to special protection and considered by EU privacy law to be "sensitive personal data".

## HOW LONG WE KEEP YOUR INFORMATION

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful and you become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymized, and the longer period for which they will be kept. Retention of this information will be reviewed on an annual basis to confirm that the additional purposes still apply.

## HOW WE PROTECT YOUR PERSONAL DATA

QVC maintains security measures to protect personal data from loss, misuse, unauthorized access, disclosure, alteration or destruction taking due account of the nature of the data and the risks involved in the processing.

## QUESTIONS? PLEASE CONTACT:

As a data subject, you have a number of rights. If you would like to exercise such rights, please contact Company's legal counsel or Data Protection Officer. These rights include:

- the right to access and obtain a copy of your data;
- the right to require QVC to change incorrect or incomplete data;
- the right to require QVC to delete or stop processing some data, for example where the data is no longer necessary for the purposes of processing;
- the right to object to the processing of your data where QVC is relying on its legitimate interests as the legal ground for processing; and
- if QVC made certain decisions without human intervention, you could object to the decision that was made if it has a legal or other similar substantial effect, subject to exceptions allowed by law.

We hope that our legal counsel or Data Protection Officer can resolve any query or concern you raise about our use of your personal data. If you have a complaint about violations of your data protection rights, or if you are not satisfied with the results of review, complaint and appeal procedures within Company, you can also contact the relevant Data Protection authority for further information about your rights and how to make a formal complaint. For details of that authority, please contact QVC's Data Protection Officer at: [dpo@qvc.com](mailto:dpo@qvc.com).

The Schedule on the following pages sets in more detail the types of data we process, the purpose of the processing and legal bases we rely on.

## SCHEDULE

Data Type	Legal Basis	Purpose
<b>Address book data (contact information)</b>	Legitimate interest	<p>Maintaining identity of applicant for provisioning access to systems, information, premises; communicating with applicant;</p> <p>To enable HR personnel or the manager of the relevant department to contact you to progress your application, arrange interviews and inform you of the outcome;</p> <p>To inform the relevant manager or department of your application, and to arrange appointments with interviewers</p>
<b>Job &amp; Organizational Data</b>	Legitimate interest	Establishing employment relationship
<b>Additional data related to the execution of the employment contract</b>	<p>To take steps prior to, and to perform, contract;</p> <p>To comply with our legal obligations</p> <p>Legitimate interest</p>	<p>Establishing and maintaining employment relationship, including management of employee;</p> <p>To carry out right to work checks;</p> <p>Information may be shared with the relevant regulatory body</p>
<b>Related party information for performance of relocations, benefit contracts or safety interests</b>	<p>To take steps prior to, and to perform, contract;</p> <p>Legitimate interest</p>	<p>Calculating, paying, and maintaining benefits following contract;</p> <p>Information is used by us and service providers to make travel or relocation arrangements during the interview process or following performance of an employment contract</p>
<b>Travel information</b>	<p>To take steps prior to and to perform the employment contract;</p> <p>Legitimate interest</p>	Information is used by us and service providers to make travel or relocation arrangements during the interview process or following performance of an employment contract
<b>Data related to Recruiting Processes</b>	To take steps prior to, and to perform, contract	Reviewing candidates for establishing and maintaining employment relationship, internal moves to new positions
<b>Talent data</b>	Legitimate interest	Assessing capabilities of employees and managing employees
<b>Photographs and recordings</b>	Legitimate interest	Providing security for premises and systems; physical access management; operation of broadcast retail business

<b>Compliance and legal requirement data</b>	<p>To take steps prior to and to perform the employment contract;</p> <p>To comply with our legal obligations;</p> <p>Legitimate interest</p> <p>For reasons of substantial public interest (preventing or detecting unlawful acts, and protecting the public against dishonesty)</p>	<p>In compliance with local law:</p> <p>To make an informed recruitment decision;</p> <p>To carry out statutory checks;</p> <p>Information shared with regulatory authorities as required</p>
<b>Device and technical information</b>	Legitimate interest	Management of systems, fraud prevention and detection
<b>Log and usage data</b>	Legitimate interest	Management of systems, fraud prevention and detection
<b>Communications data</b>	Legitimate interest	Management of systems, fraud prevention and detection; communication with applicant
<b>Emergency systems data</b>	Vital interest of data subject or other person	Providing for security while employees or visitors are at work or traveling for work; responding to health or other safety emergencies that may occur
<b>Health data</b>	To take steps prior to and to perform the employment contract	If you have requested an accommodation, we will use that request to provide an appropriate interview and work environment