

#### **Entain Careers Privacy Notice**

#### 1. Introduction

This Privacy Notice (the "Notice") aims to inform you about how we gather, process, and protect your personal data when you are applying for jobs at Entain Group companies ("Entain"). The Notice details what data we collect from you directly, other parties we might engage with, how we process your information, the purposes for doing so, whom we share it with, how we justify the processing (i.e., the legal basis) and how long we retain it.

Entain takes its data protection obligations of applicants and future employees' personal data very seriously. We process personal data in accordance with applicable data protection laws, including but not restricted to the EU General Data Protection Regulation ("GDPR"), the UK Data Protection Act 2018 and the Gibraltar Data Protection Act 2004.

This Notice does not form part of any contract of employment or other contracts to provide services. The Notice applies only to job applicants for the duration of the recruitment process. Applicants that are offered a role are subject to Entain Employees Privacy Notice.

Please be aware that this is a global Privacy notice, intended to apply across various regions. However, certain local laws and regulations may impose specific requirements or exceptions that differ from those described here. In such cases, local law will take precedence, and adjustments to our practices may be necessary to ensure compliance.

#### 2. Definition of personal data

For the purposes of this Notice, personal data is any information that relates to an identifiable individual, and sensitive personal data, includes information related to race, ethnic origin, political opinions, religion, trade union membership, genetics, biometrics (where used for identification purposes e.g., fingerprints), health and sex orientation or behaviour, which requires a higher level of protection.

We will only process special categories of personal data in the following circumstances:

- With your explicit written consent;
- Where we need to carry out our legal obligations or exercise rights in connection with the recruitment process;
- Where it is needed in the public interest, such as for equal opportunities monitoring;
- Where it is necessary for the establishment, exercise or defence of legal claims;
- Where it is necessary for the purposes of occupational medicine or the assessment of your working capacity, or to administer benefits.

If we approach you for consent to allow us to process sensitive personal data, we will give you full details of the information sought and the reasons we need it, so that you can make an informed decision as to whether you consent.



#### 3. Information we collect from you and why

We collect information directly from you throughout the application and recruitment process, when you register and apply for vacancies with us. In some circumstances, we may obtain your information from other sources. For instance, this could happen if you are referred by a current Entain employee (e.g., Scout), approached via LinkedIn by recruiters or external recruitment agencies, or if you apply directly through our careers site.

We may also collect information about you from third parties, such as individuals who you provide as references, recruitment agencies, background check providers (where criminal or other pre-employment checks may be undertaken, according to local legal requirements and according to the position you are applying to). We only use this information in line with this Notice and privacy commitments of the Entain Group.

The below table provides you with an overview of the data we might collect for the duration of the recruitment process and prior to entering into an employment contract. The information detailed below may vary depending on the role or the country where you are applying for a role at Entain.

Categories of data	Data elements	Purposes	Legal basis <sup>1</sup>
Personal contact details	<ul> <li>Name</li> <li>Maiden name</li> <li>Home address</li> <li>Telephone number</li> <li>Email address</li> <li>Other contact information</li> </ul>	<ul> <li>To provide you with recruitment and career services, where you register and make applications for a job on our career webpage.</li> <li>To have our careers team contact you where you have indicated an interest in working with Entain.</li> <li>When you contact us or otherwise interact with us, including via e-mail, letter, phone or chat functions.</li> <li>So that we can contact you about a role you have applied for and keep you up to date on its progress.</li> <li>To provide you with service messages, about changes to our website, services or changes to our terms, conditions and policies.</li> <li>To provide you with direct communications, such as job alerts and to request your feedback on our recruitment process. (We will only do this in line with your preferences and you can opt-out of receiving such communications at any time.)</li> </ul>	<ul> <li>Performance of contract or steps taken at your request prior to entering into a contract</li> <li>Legal obligation</li> <li>Legitimate interest</li> </ul>

<sup>&</sup>lt;sup>1</sup> Please note the relevant legal basis might differ according to the applicable Data Protection Law.



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Categories of data	Data elements	Purposes	Legal basis <sup>1</sup>
Demographic information	<ul> <li>Date of birth</li> <li>Marital status</li> <li>Birthplace</li> <li>Gender</li> <li>Preferred language</li> <li>Immigration status (where applicable)</li> </ul>	<ul> <li>To promote equality and diversity in the workplace.</li> <li>To comply with any legal and regulatory obligations and duties regarding employment, diversity, and equality (where applicable)</li> </ul>	<ul><li>Performance of contract</li><li>Legal obligation</li><li>Consent</li></ul>
Driving licence information (If applicable)	We may also collect your results of driving licence checks provided to us by car leasing agencies, Management companies or the UK DVLA which may include details of any endorsements, disqualifications, insurance, eyesight and/or medical restrictions on driving (if driving on business is necessary for your role).	To determine your eligibility/suitability to drive on company business.	Legal obligation
Recruitment information	<ul> <li>Nationality/Citizenship</li> <li>Country of residence</li> <li>National insurance number</li> <li>Passport</li> <li>ID cards or other Government issued ID</li> <li>Copies of right to work documentation and Visa information immigration</li> </ul>	<ul> <li>To evaluate whether or not to proceed with your application and offer you a contract of employment or a contract for services (as applicable) with Entain.</li> <li>To check that you are legally entitled to work in the country of the workplace</li> <li>To determine the terms and conditions of your employment or engagement if we decide to proceed with your application.</li> <li>To protect, investigate and deter fraudulent, unauthorised or illegal activity. Including undertaking necessary security and identifying verification checks.</li> </ul>	<ul> <li>Performance of contract or steps taken at your request prior to entering into a contract</li> <li>Legal obligation</li> <li>Legitimate interest</li> </ul>



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Categories of data	Data elements	Purposes	Legal basis <sup>1</sup>
	<ul> <li>Pre-employment screening (may be carried out by a third party, depending on the jurisdiction)</li> <li>Information about criminal convictions and offences (where required for the role)</li> <li>References</li> <li>CVs/application forms</li> <li>Notes of interviews</li> <li>Results of assessments and psychometric testing</li> <li>Employment history</li> <li>Start date</li> <li>Location of workplace</li> </ul>	<ul> <li>Please note, we will only collect details related to criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so to assess suitability for roles.</li> <li>As part of the onboarding process for new recruits and depending on the location and the role for which you have applied or the service you intend to provide, we may need to undertake certain background searches relating to you. These searches may provide us with 'special category data'. Where we need to undertake these searches, we will let you know in advance what searches will be undertaken and the reason for them. You can object to us undertaking these searches, however, if you do object then it is likely that we will be unable to proceed with your application.</li> </ul>	
Education details	<ul><li>Educational background</li><li>Qualifications</li><li>Training records</li></ul>	To assess your qualifications, skills and experience for a particular role and to assess your suitability for a role for which you have applied or for services you intend to provide.	<ul> <li>Performance of contract or steps taken at your request prior to entering into a contract</li> <li>Legitimate interests</li> </ul>
Financial/payroll information	<ul> <li>Salary (current, preferred and offered)</li> <li>Pension</li> <li>Benefits</li> </ul>	<ul> <li>This is so we can administer your pay, benefits and pension scheme, under the terms of your contract of employment.</li> <li>Inviting you to participate in share plans and/or granting awards under share plans and/or administering participation in share plans (if relevant to you).</li> <li>Liaising with your pension provider.</li> </ul>	<ul><li>Performance of contract</li><li>Legal obligation</li></ul>



Categories of data	Data elements	Purposes	Legal basis <sup>1</sup>
HMRC (UK contractors only)	Results of checks with HMRC and/or Companies House.	This is so we can review your connection with the intermediary through which your services are provided.	<ul><li>Performance of contract</li><li>Legal obligation</li></ul>
Social media posts or details	Publicly accessible comments and opinions.	Where relevant for the role and in line with local laws, if available to us when you have applied for a job through these channels.	Legitimate interests
Photographs and other visual images (applicable for candidates attending face to face job interviews).	<ul><li>CCTV footage</li><li>Photographs</li></ul>	<ul> <li>Supporting the prevention and detection of crime in our premises (CCTV records).</li> <li>Maintaining the safety and security of our employees and our offices.</li> </ul>	<ul> <li>Legal obligation</li> <li>Protect the vital interests of data subjects and others</li> <li>Legitimate interests</li> </ul>

Where we rely on legitimate interest as a ground for processing your information, we carry out a 'balancing test' to ensure that our processing is necessary and that your fundamental rights of privacy are not outweighed by our legitimate interest, before we go ahead with the processing. We keep a record of these balancing tests. Where we are processing data based on your consent, you have the right to withdraw that consent at any time. You should be aware that, depending on the role you are applying for, this could result in the company being unable to perform some elements of the necessary pre-employment checks.



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#### 4. Who we share your data with:

We will only disclose information about you internally to hiring managers, HR and, in some circumstances other employees eg. your interviewers, future team member or colleagues. Other than as mentioned in this Notice we shall only disclose your information to third parties if we are legally obliged to do so or where we need to comply with any pre-contractual duties to you, which may include:

- Any Entain Group company, involved in the recruitment process;
- Third-party providers of application tracking services, in order to storage and manage applications;
- Professional advisers, such as our external recruiting, accounting and legal advisers, where require information to provide advice to Entain;
- Third party service providers, who may provide verification services for the purposes of validating the information you provide to us in the course of the application process;
- Background checks providers, as further explained in section 8 of this Policy;
- Third-party suppliers of email distribution services for the purposes of sending you job alerts in accordance with your preferences.

All of our third-party providers are required to take appropriate security measures to protect your personal data in line with this Notice. We only allow them to process your personal data for specified purposes and in accordance with our instructions.

#### 5. Data Transfers

Entain is a global organisation, headquartered in the United Kingdom and Gibraltar. To ensure the provision of effective and efficient services and communication throughout the Group, we may be required to transfer some of your personal data between our international offices, including places outside of the European Economic Area (EEA), Gibraltar and the UK, in countries that may have different data protection laws.

However, we will only transfer your personal data outside these locations where appropriate safeguards have been put in place in compliance with the applicable data protection laws.



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#### 6. How long we store your data for

Starting from the closure of the application and hiring process, we apply a six (6) months retention period. This period may extend depending on the purposes for which these data are being processed, if any legal obligations require longer retention e.g. regulatory compliance or relevant legitimate interest are involved, such as potential disputes and legal claims. For positions in the United States and Canada, please note that the retention period is typically one (1) year, with possible extensions as outlined above.

After the expiration of the retention period, personal data will be securely deleted/destroyed in accordance with our data retention policies and procedures.

#### 7. Monitoring

In the course of conducting our business, we may monitor our premises and property as well as email and telephone communications.

For example, potential future employees may have their communications recorded and monitored when communicating with an Entain employee in the recruitment team regarding a job role. In such cases, the candidates shall be informed in advance.

Another example is where visitors attend a job interview at one of our office locations, some of which are equipped with surveillance cameras (CCTV) for the purposes of protecting employees and third parties against theft, vandalism and damage to Entain goods and property. Recorded images are routinely deleted in line with our data retention policy. The data are not shared with third parties unless there is suspicion of a crime, in which case it may be turned over to the police or other appropriate government agency or authority. In such cases, the necessary CCTV notices are displayed on our premises.

This section is not meant to suggest that all potential future employees will in fact be monitored or their actions are subject to constant surveillance. It is meant to bring to your attention the fact that such monitoring may occur and may result in the collection of personal data from potential future employees, as described above.

#### 8. Background checks

Depending on the role you are applying for and the job location, we may need to perform appropriate pre-employment checks, as permitted or required by and in accordance with local laws. These checks could include right to work verification, background and criminal record checks, references checks, credit history, and/or driving license verification. If we need to conduct any of these searches, we will notify you in advance and provide further information.

#### 9. How we protect your data

Entain takes the security of your personal data very seriously, therefore we have put in place internal controls and security measures to protect it from accidental loss, unauthorised access, use, alteration



and disclosure, e.g., secure firewalled datacentres, certified encrypted webpages and ISO27001:2013 certified business practices.

Access to your personal data is restricted to employees, workers and agents who strictly need this information to perform their role on a "need-to-know" basis. We take steps to ensure that third parties who have access to your personal data only process it on our instructions and are subject to a duty of strict confidentiality.

#### 9. Your privacy rights

Under the GDPR and other data protection laws, you have a number of rights regarding your personal data. You can exercise these rights by sending an email at <a href="mailto:Dataprotectionofficer@entaingroup.com">Dataprotectionofficer@entaingroup.com</a>, who may also liaise with the local Entain HR teams as necessary. These rights generally include:

	Description of Right
Access to your information	You have the right to request a copy of your personal data. All requests will be dealt as required by applicable laws. In most cases we process only the data that you shared with us, or uploaded on our career's portal.
Right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and what are your rights; this is why we are providing you with the information in this Notice.
Correcting your information	Where we hold information about you that is inaccurate or incomplete, you have the right to ask us to rectify or complete it.
Erasure of your information	You have the right to request erasure of the personal data Entain holds about you. There are, however, certain situations where processing is necessary and exempt from erasure, such as compliance with a legal obligation or the establishment, exercise or defence of legal claims.
Restriction of processing	In certain circumstances, a right to restrict our processing of personal data held by us about you. This right will only apply where (for example) (i) you dispute the accuracy of the personal data held by us; (ii) or where you would have the right to require us to erase the personal data but would prefer that our processing is restricted instead; (iii) or where we no longer need to use the personal data to achieve the purpose we collected it for, but you require the data for the purposes of exercise or defence of legal claims.
Right to data portability	You have the right to obtain your personal data which you provided to Entain in a structured, commonly used, and machine-readable format. You can also request that we transmit this personal data directly to another controller. However, this right only applies when the lawful basis for processing this information is consent or for the performance of a contract



	and you are carrying out the processing by automated means (i.e. excluding paper files).
Right to withdraw your consent	A right to withdraw your consent, where we are relying on it to use your personal data (for example, to provide you with information about new available roles).
	You may contact <u>Dataprotectionofficer@entaingroup.com</u> if you wish to make a complaint.
Right to make a complaint	You can also file a complaint with your local Data Protection Authority about any matter concerning your privacy and personal data.
	However, we take our obligations seriously, so if you have any questions or concerns, we encourage you to raise them with us first, and we shall endeavour to resolve them.

Please note that depending on the location you're applying for, some of your rights, as limited above, might be limited, and other exemptions shall apply in accordance with local laws. If you have concerns or questions about the rights that might be applicable to you, please contact us via <a href="mailto:dataprotectionofficer@entaingroup.com">dataprotectionofficer@entaingroup.com</a>, and our team will provide you with the relevant information.

#### 10. Automated decision-making information

We use automated decision-making in the recruitment process to enable us to make a preliminary list of candidates which are then subject to manual review to produce a short-list. We only use this automated decision-making to preliminary identify applications that would not be able to proceed for a legal reason, including where the applicant is under the age of 18 or has previously self-excluded from a betting shop, casino or online betting site. As a result, if you identify on your application that you are under 18, or you have previously self-excluded or banned, your application will automatically be rejected.

### 11. Cookies

We use cookies on our recruiting portal for various purposes including making your experience in our website better and efficient. For more information on our use of cookies, please see our *Cookies Notice*.

#### 12. Changes to this notice

Any changes to this Notice in the future will be posted on this webpage, and where appropriate, notified to you by email. Please check back frequently to see any updates or changes to this privacy Notice.

This Notice was last reviewed October 2024.



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### **Country-Specific Section**

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