

Farfetch Group Candidate Privacy Policy

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1. ABOUT THE FARFETCH GROUP AND THIS PRIVACY POLICY

The Farfetch Group Candidate Privacy Policy (the “Privacy Policy”) applies to all recruitment and selection processes within the Farfetch Group (“we,” “us,” or “our”) and outlines the key principles governing how we process any personal data you provide as part of your application to any of our vacancies.

This Privacy Policy outlines the basis on which we process any personal data you provide to us through our recruiting software, cloud-based storage, and candidate tracking service provider (the “Provider”), as well as any data we receive from you or third parties (such as referees) in connection with your job application.

By submitting your job application and/or using our Provider’s Portal (the “Portal”), you acknowledge and agree to the practices described in this policy. Please read it carefully to understand how we view and handle your personal data.

In the context of personal data processing for recruitment and selection within the Farfetch Group, the relevant Farfetch Group entities act as joint data controllers, as outlined below. The specific joint controller depends on the office to which you are applying.

Our group of companies includes subsidiaries, our ultimate holding company, and its subsidiaries as defined in Section 1159 of the UK Companies Act 2006. These include but are not limited to, Farfetch UK Limited, Browns (South Molton Street) Limited, Luxclusif (Upteam Corporation Limited), Farfetch Portugal – Unipessoal, Lda., Farfetch (Shanghai) E-Commerce Co. Ltd., Farfetch.com US LLC, Stadium Enterprises LLC, Farfetch.com Brasil Serviços Ltda., and New Guards Group (collectively referred to as the “Farfetch Group,” “Group,” “Group Company,” or “Group Companies”).

The Farfetch Group is part of a larger group of companies, which comprises Coupang, Inc., headquartered in Delaware, USA, along with its affiliates (collectively referred to as “Coupang”), with offices in South Korea, the United States of America, China, Hong Kong, India, Taiwan, and Singapore. Your personal information may be shared with other Farfetch Group companies or Coupang for the purposes outlined in the following sections.

Below are the relevant and special provisions governing the processing of your personal data by Farfetch (Shanghai) E-Commerce Co. Ltd. Regardless of your specific data controllers, if you have any questions or concerns about this policy, please reach out to our Group’s Data Protection Officer at privacy@farfetch.com.

2. INFORMATION WE COLLECT FROM YOU

We will receive and use the following information about you:

- **Information you provide as part of your application:** When you apply for a role through our Portal or communicate with us via phone, email, or other methods, you will provide us

with information about yourself. This includes details you submit when registering for and using the Portal, such as your name, contact information, work experience, educational qualifications, and your eligibility to work in the country where you are applying. It also encompasses any information you choose to upload to the Portal, including details from your CV.

- **Sensitive information you may provide:** Where permitted by local law, you may choose to provide certain sensitive personal data with your consent, such as information regarding your disability status, gender identification, or ethnicity/race. This data is used solely for statistical purposes and equal opportunity monitoring. This information is kept entirely separate from your application and has no bearing on its outcome. It is treated confidentially and will not be accessible to any of our hiring managers or recruiters. If you choose not to provide this data, your application will remain unaffected.
- **Information we collect about your usage of the portal:** We automatically collect certain data when you use our Portal. This includes your IP address or other unique device identifiers, information gathered through cookies related to your usage of the Portal, your mobile carrier (if applicable), time zone settings, operating system and platform, as well as details regarding your interaction with the Portal (“Usage Information”).
- **Information from third parties:** We obtain information from third parties related to your application, including referees, recruiters, and organizations that conduct background checks. This may encompass right-to-work verifications and other checks as permitted by applicable law.

3. COOKIES

We use cookies to enhance your experience while using the portal. Cookies are small files that, when placed on your device, allow us to provide specific features and functionality. The portal will detect and utilize your IP address or domain name for internal traffic monitoring, capacity management, and overall administration of the portal.

We use the following cookies:

- **Strictly necessary cookies:** These cookies are essential for the operation of the portal. For example, they enable you to log into secure areas.
- **Analytical/performance cookies:** These cookies help us understand usage patterns among our users. They allow us to recognize and count the number of visitors and track how they navigate the portal. This information helps us enhance the portal's functionality, ensuring users can easily find what they are looking for.
- **Functionality cookies:** These cookies recognize you when you return to the portal, allowing us to personalize content for you, greet you by name, and remember your preferences (such as language or region). If you prefer not to use cookies, you can disable them by adjusting your browser settings. However, this may impact your experience on the portal, and we will no longer be able to provide personalized content. Unless you opt-out, we will assume you consent to the use of cookies.

4. HOW WE USE YOUR INFORMATION

We use your information to:

- Identify and assess you for employment positions.
- Determine and validate your qualifications for employment.
- Conduct background checks as permitted by applicable law (including checking references and qualifications).
- Create an employment record if you are a successful candidate.
- Conduct diversity and equal opportunity monitoring, as permitted or required by applicable law.
- Provide user support for the Portal.
- Communicate with you.
- Assess whether your profile matches other available positions within the Farfetch Group that you have not applied for.
- Send notifications about new positions that align with your profile.
- Improve the Portal and ensure its content is presented effectively for you and your device.
- Administer the Portal and manage internal operations, including troubleshooting, data analysis, testing, research, and statistical purposes.
- Maintain the security of the Portal.
- Develop the Portal and enhance our recruitment processes.

5. FARFETCH'S LEGAL BASIS FOR PROCESSING PERSONAL DATA

We rely on several legal bases for processing your information, as explained in the table below:

Pre-Contractual: We process your information to undertake the necessary pre-contractual steps to perform a contract with you.

Legal Obligations: We must comply with legal obligations, such as verifying your eligibility to work in the country where you are applying.

Legitimate Interests: We have legitimate interests in processing your information, including verifying your professional track record, monitoring employment diversity, maintaining the security of our Portal, and improving our recruitment process.

Consent: We process your information based on your consent when required (for example, when asking for your permission to retain your CV in our database).

6. HOW WE SHARE YOUR INFORMATION

If we believe that your professional profile may match a vacancy in another office of the Farfetch Group that you haven't applied for, we can share your information with our group companies. The use of your personal information for this purpose aligns with this Privacy Policy.

When transferring personal information to one of the Group Companies outside the EEA, including those in the United Kingdom, Brazil, China, Japan, South Korea, the UAE, or the USA, we rely on

the Commission's adequacy decisions, where applicable, or the Commission's model contractual clauses (i.e., the standard contractual clauses) for the transfer of personal data to third countries.

We also share your information with selected recipients. These categories include our Provider, which we use to collect and process your information, as well as any referees from your previous jobs.

For specific information regarding your personal data processing by Farfetch (Shanghai) E-Commerce Co. Ltd., please see below.

7. WHERE WE STORE YOUR INFORMATION

The information we collect from you will be stored by our Provider, which may store it outside of the European Economic Area ("EEA"). Depending on the specific location of the data storage and whether your personal data is stored outside of the EEA, we rely on various adequacy measures, as applicable:

- **Adequacy Decisions:** The European Commission determines whether a country outside the EU provides an adequate level of data protection.
- **Model Clauses:** We utilize the Commission's model contracts for the transfer of personal data to third countries (i.e., the standard contractual clauses).

For further specific information regarding your personal data processing by Farfetch (Shanghai) E-Commerce Co. Ltd., please see below.

8. THE SECURITY OF YOUR PERSONAL DATA

Keeping your personal information secure is very important to us. Once we receive your information, we will implement appropriate technical and organizational measures to protect your data against loss, theft, unauthorized use, access, or modification. This includes using Transport Layer Security (TLS) to encrypt the personal data you send us during the order process.

However, please note that the transmission of information via the Internet is not completely secure. While we will do our best to protect your personal data, we cannot guarantee the security of any information transmitted through the Portal; such transmission is at your own risk.

9. DATA RETENTION

We will retain your information throughout the recruitment process and for up to three (3) years after your last interaction with us or the Portal, if your application is unsuccessful. This retention is for the purpose of verifying your suitability for future vacancies, unless you instruct us otherwise. If your application is successful, your information will be transferred to your employee file and will be subject to the retention periods associated with that file.

With your consent, we can retain your personal data for an additional three (3) years. You can withdraw your consent at any time by contacting us and requesting the deletion of your personal data. If you choose not to provide consent, or if we do not receive a response from you, your data will be permanently anonymized.

Your information may be retained for longer than the periods mentioned above if required by law or court order, or as necessary to defend or pursue legal claims.

10. YOUR PRIVACY RIGHTS AND HOW TO EXERCISE THEM

You have certain rights regarding the personal data we hold about you. Some of these rights apply only in specific circumstances, as detailed below. We also explain how to exercise these rights.

Please note that we will need to verify your identity before responding to any requests. This may include asking a series of security questions to confirm your identity. If you have appointed someone else to make a request on your behalf, that person or organization must provide a valid document demonstrating their authority to act for you.

We are committed to responding to your requests without undue delay, and within one month at the latest. This response time may be extended by an additional two months in certain circumstances. To exercise any of your rights, please complete our [Data Subject Request Form](#).

You have the following rights regarding your personal data:

- **Access:** You have the right to access your personal data held by Farfetch, including information about how we use it and who we share it with.
- **Portability:** In certain circumstances, you have the right to receive your personal data in a structured, commonly used, and machine-readable format, or to request that we provide it to a third party. However, we may not provide certain personal data if doing so would infringe on someone else's rights or if another exemption applies. We will only do this if it is technically feasible; we are not responsible for the security of your personal data once it has been received by the third party.
- **Correction:** You can request corrections to any inaccurate or incomplete personal data we hold about you, including by providing a supplementary statement. Please explain in detail why you believe the information is inaccurate or incomplete, so we can assess whether a correction is needed. While we evaluate your request, you may also exercise your right to restrict our processing of the applicable data, as described below.
- **Erasure:** You have the right to request that we erase your personal data in certain circumstances, such as when you believe it is no longer necessary for us to hold it, when you withdraw your consent for processing based on consent, or when you object to processing based on our legitimate interests. Please provide details to support your request, so we can assess whether there is an overriding interest for us to retain your data. While we consider your request, you may exercise your right to restrict our processing of your personal data, as described below. We will retain your data if there are valid legal grounds for us to do so (e.g., for legal claims or freedom of expression), and we will inform you if that is the case.
- **Restriction of Processing to Storage Only:** In certain circumstances, you have the right to require us to stop processing your personal data, except for storage purposes. Please note that if we stop processing the data, we may still use it again if valid grounds under Data Protection Law apply (e.g., for legal claims).

- **Objection:** You have the right to restrict or object to our processing of your personal data in certain circumstances (e.g., when you request correction or erasure). You also have the right to withdraw your consent if you have provided personal data voluntarily or consented to its use.
- **Right to Complain:** You have the right to complain to a supervisory authority regarding our processing of your personal data.

You may exercise the rights set out at items by fulfilling the [Data Subject Request Form](#).

11. SPECIAL PROVISIONS GOVERNING PERSONAL DATA PROCESSING BY FARFETCH (SHANGHAI) E-COMMERCE CO. LTD.

The following provisions apply if you are applying for a vacancy at Farfetch (Shanghai) E-Commerce Co. Ltd. or if your application is being analyzed or evaluated by this company, as outlined in this Privacy Policy.

Data Transfers: When transferring personal information to any Group Company outside mainland China, which may include entities registered in the EEA, Brazil, Japan, South Korea, the UAE, or the USA, we rely on contracts for the transfer of information in accordance with PRC data protection laws. We also share your information with selected recipients, including our Provider, who collects and processes your information, and any referees from your previous jobs. If information is collected or generated within mainland China and needs to be provided abroad, we will conduct a security evaluation in accordance with relevant regulations and enter into contracts with the recipients.

Data Storage and Security Evaluation: In compliance with PRC data protection regulations, we will store personal information and important data collected during our operations within mainland China. If such information needs to be transferred to any Group Company or third party outside mainland China, we will conduct a security evaluation and execute a contract with the recipient.

12. UPDATES TO THIS PRIVACY POLICY

Any future changes to this Privacy Policy will be posted on this page. Where appropriate, we may also notify you via email. Please check back regularly for updates or changes.

13. CONTACT

We welcome any questions, comments, or requests regarding this Privacy Policy. Please address them to the Farfetch Group Data Protection Officer at: privacy@farfetch.com.