

WHAT IS THE PURPOSE OF THIS DOCUMENT?

Post Office Limited is a "Data Controller". This means we are responsible for deciding how we hold and use personal information about you. You are being provided a copy of this privacy notice because you are applying to be appointed as an Agent for Post Office Limited.

Its purpose is to make you aware of how and why your personal data will be used. Primarily, the document sets out how and why Post Office Limited uses your personal information during the application process, as well as setting out the retention period for the personal information we collect in support of your application.

DATA PROTECTION PRINCIPLES

Post Office Limited will comply with Data Protection legislation. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up-to-date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

THE INFORMATION WE HOLD ABOUT YOU

As part of the application process we will collect, store and use the following categories of personal information about you:

- Personal contact details such as name (i.e., first name, middle name and previous surnames if applicable), title, address, telephone numbers and personal email address.
- Date of birth.
- Gender and age range.
- Work history such as name of company, position held, start date, end date, employment type.
- Details of criminal convictions (including conditional discharges) and impending prosecutions.
- Hold a contract to operate a Post Office at present.
- Have previously held a contract to operate a Post Office.
- National Insurance number.
- Bank account details.
- Location of Post Office and property details (e.g. name of landlord).
- Copies of Identity documentation, e.g. Driving license, passport, other national identifiers.

- Appointment information (including copies of right to work documentation and other information included in the business application process).
- Voice recordings.
- Photographs.
- Personal expenditure information.
- Bank statements.
- Funding arrangements.
- Business account information.
- Equifax reports.
- Company Experian report.

We may also collect, store and use the following special categories of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Trade union membership.
- Information about your health, including any medical conditions, and health records.
- Information about criminal convictions and offences.

Where you give us information about other people, you must have permission from them to do so and you must show them this Privacy Notice.

HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect personal information about Agents through the appointment process, either directly from applicants. Post Office may also collect information from Equifax Ltd in regards to background, credit and credit checks and Experian Ltd for Company reports.

We may also collect additional information from third parties including: former employers, Government agencies, the Courts, law enforcement agencies, credit reference agencies or other background check agencies.

HOW WE WILL USE INFORMATION ABOUT YOU

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to comply with a legal obligation.
2. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
3. Where we have your consent⁴. We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your vital interests (or someone else's interests).
- Where it is needed in the public interest.

Some of the above grounds for processing will overlap and there may be several grounds that justify our use of your personal information.

Situations in which we will use your personal information

We need all the categories of information in the list above primarily to allow us to assess your application and suitability to be appointed as an Agent. We will process your personal information for the following purposes:

- Making a decision about your appointment.
- Checking you are legally entitled to work in the UK.
- Carry out background, reference and credit checks.
- Communicate with you about the appointment process.
- Comply with legal or regulatory requirements.
- Keep records relating to our appointment process.
- Business management and planning, including accounting and auditing.
- For security, equality, health and safety obligations
- Where it is needed to assess any reasonable adjustments that need to be made during the application process.
- Where necessary to ensure the safety, health and security of our Agents.
- For the prevention and detection of fraud.

If you fail to provide personal information

If you fail to provide certain information when requested, which is necessary for us to consider your application for appointment, we may not be able to process your application successfully or we may be prevented from complying with our legal obligations.

Change of purpose

We will only use your personal information for the purposes we collected it for, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

INFORMATION ABOUT CRIMINAL CONVICTIONS

We collect information about criminal convictions as part of the Agent application process. We will use information about criminal convictions and offences in the following ways:

- Suitability for offering Post Office services on behalf of Post Office Limited.
- Regulatory and client requirements.
- Fraud and anti-money laundering monitoring and detection.

We use your personal information about criminal convictions to comply with regulatory and statutory obligations placed upon Post Office Limited including anti-money laundering legislation, Proceeds of Crime Act, Regulatory Investigatory Powers Act and counter-terrorism.

AUTOMATED DECISION-MAKING

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

DATA SHARING

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary for the purpose of processing your application, or where we have another legitimate reason for doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers. The following activities are carried out by third-party service providers: credit referencing, criminal records checks, background checks and IT service provision.

How secure is my information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law, for example, with law enforcement agencies.

Transferring information outside the European Economic Area (EEA)

Where we transfer the personal information we collect about you outside the EEA to perform our contract with you, we will ensure that the necessary safeguards have been applied to the transfer including the use of: Model Clauses, Consent, Binding Corporate Rules or Privacy Shield.

If you require further information about this you can contact the Post Office Limited Data Protection Officer at data.protection@postoffice.co.uk.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those Post Office employees, suppliers, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be

obtained from the Post Office Limited Data Protection Officer who can be contacted at data.protection@postoffice.co.uk.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

DATA RETENTION

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention policy, which is available on request.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes by contacting the NBSC.

Your rights in connection with personal information

By law you may have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check we are lawfully processing it.
- **Request correction** of the personal information we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Information Rights Team in writing at Information.rights@postoffice.co.uk.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Information Rights Team at Information.rights@postoffice.co.uk. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

DATA PROTECTION OFFICER

We have appointed a Data Protection Officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Officer at data.protection@postoffice.co.uk. You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues.

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact our Data Protection Officer at data.protection@postoffice.co.uk.