

Franchise opportunities privacy policy

1 Who we are

We are Vodafone Limited. Vodafone Limited is the controller of your personal information that is collected and processed subject to your agreement with Vodafone. We are a member of the Vodafone Group and manage operations, including the processing of personal information about potential and actual partner agent applicants to Vodafone Limited.

Our registered office is Vodafone House, The Connection Newbury, Berkshire RG14 2FN. We are registered in England under company number 1471587. We are also registered with the Information Commissioner's Office (ICO), registration number Z1933885. We provide details of how to contact us in the **How to contact us** section of this privacy statement.

In this policy, we explain how we collect, use, share and protect your personal information during the partner agent application, assessment and on boarding process.

2 Definitions

In this privacy statement:

"we/us" means Vodafone Limited

"third party" means someone who is not you or us

"Vodafone" or "Vodafone Group" means Vodafone Group Plc and any company or other organisation in which Vodafone Group Plc owns 50% or above of the share capital

3 The Basics

3.1 Personal information we collect about you

3.1.1 Vodafone will process your personal information based on:

- a) **Vodafone's legitimate business interest**, when you registering your interest in and apply to become a partner agent at Vodafone you provide us with your personal information and agree that we can use this information to process and assess your registration and application, progress your application through the application and on boarding processes, make a decision about your suitability as a partner agent and contact you throughout the registration, application, assessment and on boarding processes;
- b) **Consent you provide**, where Vodafone does not rely on another legal basis or in addition to reliance on our legitimate business interests, we may ask you to provide information voluntarily, including for example your age group and gender. You can withdraw your consent at any time by emailing UKpartneragents@vodafone.com
- c) **Compliance with the law**, where certain information is necessary to satisfy a legal or regulatory requirement; and
- d) **The performance of a contract with Vodafone**, in due course subject to the terms of the franchise agreement between Vodafone and you and/or your limited company.

3.1.2 How we collect personal information about you

We collect personal information about you when you register a general interest in and/or apply to become a partner agent at Vodafone. Some of the information we collect about you is required to make an assessment on your application and contact you as you register your interest via the partner agent site and progress you through the application and assessment processes, for example your telephone number, email address, CV. Other personal information we collect about you is subsequently generated during the course of the assessment and on-boarding processes as well as during your partner agent relationship with Vodafone.

If you do not provide this information then we will be unable to make an assessment of your application or contact you to invite you to explore the opportunities available with us, or to enter into a franchise agreement with you. We may collect information about you from third parties (including but not limited to previous employers and security and financial organisations)

3.1.3 The types of information we may collect about you are, for example:

- 1) **Personal details**, such as name, personal email address, current address, home and mobile telephone number.
- 2) **Application information**, such as registration and application forms, CV, resumes, interview and assessment notes references from previous employers, nationality and immigration status, passport and other identification and immigration details (where applicable), financial and criminal records information including the results of security and Disclosure and Barring Service (DBS) checks (where applicable);
- 3) **Identification information**, such as proof of identity;
- 4) **Authentication information**, user name and passwords required to log into Vodafone systems should your application be successful.
- 5) **Cookies**, such as performance and functionality cookies
- 6) **Security in the workplace**, such as onsite CCTV footage and access card records

We may also collect and process sensitive personal information about you where necessary –or when this information is provided on a voluntary basis. For example:

a) we may collect records of criminal convictions through a DBS check or other necessary security background checks or immigration and right to work information in order to perform security background and immigration checks where it is required by local law;

3.2 How we use information about you

We may process the personal information that we collect about you for the following purposes:

- a) **Recording you interest in becoming a Vodafone partner agent and administering your application**, the information you provide to us will be shared within Vodafone and searched by people employed by Vodafone in order to assess and progress your registration, application and assessment and to make any verifications required by local law. If you register your interest for a specific store or location but we are unable to offer this to you at the time, the information you provide to us will be retained, so that we can contact you about and consider you for, future suitable opportunities in the partner agent programme – but only where we have collected your consent to do so. See ‘3.5 How long we keep information about you’ for our retention period.
- b) **Progressing to a conditional offer and creating a partner agent record**, if your application is successful, the information you give during the application process will be used to administer your franchise agreement and manage your relationship with Vodafone and to communicate with you as a partner agent;
- c) **Access management**, such as to give you physical access to Vodafone premises and access to the corporate network and applications when required;
- d) **Training & development**, such as providing you with specific product or tailored training to help you in your role;
- e) **Access management**, such as to give you physical access to Vodafone premises and access to the corporate network and applications when required;
- f) **Cookies**, we use cookies to understand how you use our partner agent website and portal and how we can improve the application experience;
- g) **Meeting our legal and regulatory obligations** during the application and assessment processes and when you are a Vodafone partner agent.

3.3 Who we share information about you with

We may share personal information about you with:

- a) Other companies in the Vodafone Group, which will process your information solely and only for the purposes in 3.2
- b) Internal teams within Vodafone if your application progresses, for example our HR, franchising, IT, Property, Brand and Finance teams;
- c) Third parties, such as security check providers and others who help us identify partner agents, progress registrations and applications and assess the suitability of candidates and progress applications and assessments. Where we use third parties, Vodafone ensures that they meet the same privacy and security standards as Vodafone;
- d) Law enforcement agencies, government bodies, regulatory organisations, courts or other public authorities if we have to, or are authorised to by law;
- e) A third party or body where such disclosure is required to satisfy any applicable law, or other legal or regulatory requirement.

3.4 Where we process information about you

In doing the above, we may need to transfer personal information about you to other companies in the Vodafone Group or third parties located (or whose servers may be located) in countries outside of the country where you have registered and/or applied, including countries outside of the European Economic Area (EEA). If we send personal information about you to a country that is not in the EEA, we will make sure that there is a legal basis for such transfer and that your personal information is adequately protected as required by applicable law, for example, by using standard agreements approved by relevant authorities and by requiring the use of other appropriate technical and organisational measures to protect your personal information.

Please contact the local Privacy Officer if you would like to find out more about the way we comply with our legal obligations in relation to international data transfers. Their contact details are available under the '**How to contact us**' section in this privacy statement.

3.5 How long we keep information about you

We will keep your information for as long as it is necessary for the registration, application, assessment and on-boarding processes and in accordance with our Data Retention Policy; a copy is available from the Partner Agent Team on request. If you are successful, we will keep your information for the duration of your franchise agreement. If we aren't able to offer you an opportunity as a partner agent, we may keep your information for up to 3 years to contact you about future opportunities that may interest you, but only where we have collected your consent to do so – you can withdraw your consent at any time in your candidate profile.

4 Your rights

a) **Right to correct or update information:** you have the right to have information we keep about you corrected if it is not accurate. If the information we keep about you needs updating, or you think it may be inaccurate, you can update your information by contacting UKpartneragents@vodafone.com at any time to update this;

b) **Right to access:** Want a copy of the personal information we hold on you? You can apply for a copy of your personal information by contacting data.protection@vodafone.com

c) **Right to object:** You have the right, in certain circumstances, to object to Vodafone processing your personal information. For more information or to exercise this right, please contact data.protection@vodafone.com

d) **Right to deletion:** in certain circumstances, you have the right to request that we erase the personal information we hold about you. You can request for your information to be deleted by contacting data.protection@vodafone.com

e) **Right to restrict use of your information:** if you feel the personal information we hold about you is inaccurate or believe we shouldn't be processing your personal information, you may have the right to ask us to restrict processing that information. You can request to restrict processing by contacting data.protection@vodafone.com

f) **Right to data portability:** in certain circumstances, you will have the right to take the personal information you have provided to us with you. You can request a copy of your personal information by contacting data.protection@vodafone.com

If we don't take action based on any of the above requests, we will inform you of the reasons why.

5 Changes to this Privacy Statement

This privacy statement is updated from time to time, so we would encourage you to check it regularly on the partner agent website and portal.

6 How to contact us

If you have any further questions about this privacy statement or how we process your information, please contact the local Privacy Officer at data.protection@vodafone.com. Contact details for The Information Commissioner's Office can be found here - <https://ico.org.uk/make-a-complaint/>.