

## **JOB APPLICANT DATA PROTECTION POLICY**

Ryanair is committed to complying with applicable data protection and privacy standards at all times and takes its responsibility regarding information security very seriously. Any personal data collected by the company through the recruitment process is processed in accordance with this Job Applicant Data Protection Policy, and in compliance with the Data Protection Acts 1988 and 2003, the ePrivacy Regulations 2011 and related legislation (together “the DPAs”), and as from 25 May 2018, the EU General Data Protection Regulation (EU Regulation 679/2016) (“the GDPR”) and related Irish data protection legislation.

### **1. Data Controller**

“Ryanair” (referred to as “we”, “us”, “our” or “Ryanair” in this policy) in this policy primarily refers to Ryanair D.A.C., the main operating company of the Ryanair group, and, where appropriate, to other companies in the Ryanair group or other entities over which Ryanair exercises management control. Ryanair D.A.C. is the “data controller” of all personal information that is collected and used about Ryanair job applicants. Ryanair is registered in Ireland with registration number 104547 and registered offices at Ryanair Dublin Office, Airside Business Park, Swords, Co. Dublin.

### **2. Our Data Protection Obligations**

The data protection rules require that personal information we hold about you must be:-

- Used lawfully, fairly and in a transparent way,
- Collected by us only for valid purposes that we have clearly explained to you and not used in a way that is incompatible with those purposes,
- Relevant and limited to the purposes that we have told you about, and sufficient to meet those purposes,
- Accurate and, where necessary, kept up to date,
- Kept only for as long as necessary for the purposes that we have told you about, and
- Kept securely.

### **3. What Personal Data We Process, and Why**

Personal data means any information relating to you which allows us to identify you, such as your name, contact details, education, qualifications and work experience.

We only collect that personal data which we need to fulfil the purposes outlined in this Policy and we will not retain it for any longer than is necessary.

The information you provide us with during the recruitment process is used to assess your suitability for employment. Our use of this information during this process is based on your consent. You do not have to provide the information we request but it might affect your application if you do not provide it.

We may collect personal data from you at the application stage, when shortlisting applications for an interview, during the interview and the assessment of your profile for the position, and when making a conditional and / or final employment offer. We will perform pre-employment background and reference checks. All checks are carried out in a fair and consistent manner and will be limited to information that is directly relevant to the position being applied for and in pursuance of our legitimate business interests.

Specifically, we may collect the following categories of information:

- a. Personal details including name, contact details, and a photo;
- b. Previous experience and employment entitlements, education, qualifications, a resume and answers to questions relevant to the position you have applied for;
- c. Information provided when completing tests or profile questionnaires and/or attending an interview;
- d. Proof of your identity and qualifications, criminal records if relevant, referees, health information if relevant;
- e. Bank details and emergency contact details.

Personal details about your physical or mental health, alleged commission or conviction of criminal offences, and trade union membership are considered “sensitive” personal data under applicable data protection laws. We will only process such data if you have either given your explicit consent, we are legally required or allowed to collect and process it, or you have deliberately made it public. We will only request such sensitive personal data that is necessary, proportionate and in pursuance of our legitimate business interests. By providing any sensitive personal data you explicitly agree that we may collect and use it in accordance with this Policy.

#### **4. Sharing Your Personal Data**

Your personal data may be shared with other companies within the Ryanair Group.

We may also share your personal data with the following third parties for the purpose described in this Policy:

- a. Third party recruitment agencies we contracted to assist us with the vetting of job applicants.
- b. Third party employee background screening companies who may check your credit history, employment history, driving records and criminal records, if relevant to the position.
- c. Any regulatory body or other organisation which investigates and determines complaints about employment recruitment or which regulates employment or equality legislation, if a complaint is made about the recruitment process. We will also share personal data with our legal advisors in such cases.

We require all third parties processing personal data on our behalf to have appropriate technical and operational security measures in place to protect your personal data, in line with Irish and EU law on data protection standards. We further require that they do not share your personal information with any third parties without our explicit consent and without guaranteeing adequate security standards and that they will hold it securely and retain it for the period we instruct.

#### **5. How Long Do We Retain Your Personal Data**

If you are successful, the personal data you provide during the application process will be securely retained by us as part of your employee file for the duration of your employment plus 7 years following the end of your employment. This includes your criminal records, fitness to work, records of any security checks and references.

If you are unsuccessful at any stage of the recruitment process, the information you have provided will be securely retained for 12 months from the closure of the recruitment campaign. We retain your information in case any queries or issues arise in relation to the recruitment process, and we need the information to respond to such issues or queries, and/or if a suitable position were to arise with the Company within that time period which we may invite you to apply for.

#### **6. Data Protection Officer**

We have appointed a DPO to oversee compliance with this policy. In addition, you always have the right to make a complaint at any time to the Irish Data Protection Commissioner, the Irish supervisory authority for data protection issues which is the lead data protection supervisory authority for Ryanair as an Irish data controller.

## 7. Your rights

Under certain circumstances, by law you have the right to:

- **Request information** about whether we hold personal information about you, and, if so, what that information is and why we are holding/using it.
- **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 that we are lawfully processing it.
- **Request correction** of the personal information that 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.
- **Object to automated decision-making including profiling**, that is not to be subject of any automated decision-making by us using your personal information or profiling of you.
- **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 transfer** of your personal information in an electronic and structured form to you or to another party (commonly known as a right to "data portability"). This enables you to take your data from us in an electronically useable format and to be able to transfer your data to another party in an electronically useable format.
- **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. 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.

If you want to exercise any of these rights, then please submit your request through Ryanair's dedicated web-form which is available [here](#) or contact our DPO by post at Ryanair's Data Protection Officer, Ryanair Dublin Office, Airside Business Park, Swords, County Dublin.

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.

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.

#### **8. Changes to this Data Protection Policy**

Our Job Applicant Data Protection Policy may change from time to time and any changes will be posted on this page.

Status May 2018