



GENTING
UNITED KINGDOM

Genting Privacy Notice

for prospective employees, workers and contractors

Edition Date: 22 May 2018

What is the purpose of this document?

Genting Casinos UK Limited (registered in the United Kingdom under company number 01519689 and with the registered office of Genting Club Star City, Watson Road, Birmingham, England, B7 5SA) (“Genting”, “we”, “our” or “us”) is committed to protecting the privacy and security of your personal information.

This privacy notice explains what we do with your personal data, when you submit your personal data to us in the course of your application for a role at Genting.

It describes how we collect and use this personal information in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018, together with the data protection legislation.

Throughout this document we may also refer to the “Genting Group” and “Genting Worldwide Group”.

“Genting Group” includes:

- Genting UK Plc, Coastbright Limited, Genting Solihull Limited and Genting Casinos Egypt Limited all incorporated and registered in the United Kingdom under company numbers 01519749, 01519689, 05176386, 06601106, 02885976 respectively and with the registered office of Genting Club Star City, Watson Road, Birmingham, England, B7 5SA.
- Park Lane Mews Hotel London Limited incorporated and registered in the United Kingdom under company number 07672723 with the registered office of 2 Stanhope Row, Mayfair, London, England, W1J 7BS.
- Genting Alderney Limited incorporated and registered in Alderney under company number 1664 with the registered office of Century House, 12 Victoria Street, Alderney, GY9 3UF.

“Genting Worldwide Group” includes:

- Genting Berhad (listed in Malaysia under No. 7916-A) and Genting Hong Kong Limited (listed in Hong Kong under stock no. 678), their subsidiary companies, jointly controlled entities and associated companies.

Genting is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under the data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former candidates ("you" or "your"). This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

This notice explains what personal data Genting holds about you, how we share it, how long we keep it and what your legal rights are in relation to it.

Contact Details

The Genting Group has a Data Protection Officer, whose contact details are: DPO@GentingUK.com.

Data protection principles

We will comply with the 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 kind of information we hold about you

Personal data, or personal information, means any information relating to you as a living individual from which you can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

The categories of personal information that we may collect, store, and use about you include (but are not limited to):

- The contact details that you provide to us, including names, titles, addresses, telephone numbers and personal email addresses.
- Personal details/data such as date of birth, gender, marital status etc.

- Family details such as next of kin and emergency contact information, details of any life assurance beneficiaries.
- National Insurance number.
- Lifestyle and social circumstances.
- Trade union membership.
- Your current position, role, contract terms, grade, salary, benefits and entitlements. Working hours, training records and your reason for leaving previous employment
- Records linked to your recruitment, including your application paperwork, details of your qualifications/education, past employment, references and referee details, requests for special arrangements, communications regarding our decisions, and relevant committee and panel reports.
- Details of any relevant criminal convictions or charges that we ask you to declare to us when you apply to work for us. Relevant criminal convictions or charges are those that indicate you might pose an unacceptable risk to the business, customers or staff.
- Further, as part of the recruitment process Genting may be required to conduct a Disclosure and Barring Service check, which will provide us with details of any relevant criminal convictions and/or cautions that you have received. In circumstances where we conduct a Disclosure and Barring Service check, we do not receive the certificate in which any convictions are included. This certificate is sent to your home address and we will ask you to consent to providing us with a copy to enable us to consider the impact of any convictions returned in relation to the relevant role.
- Copies of passports, driving licence and driving history, right to work documents, visas and other immigration data.
- Pensions membership data, including identification numbers, quotes and projections, terms benefits, current remunerations and contributions.
- Details of any medical issues and/or disabilities that you have notified to us, including any consideration and decision on reasonable adjustments made as a result.
- Social Security Number.
- Equality monitoring data.
- Dietary requirements.
- Your financial details, including bank and building society account numbers, sort codes, BACS IDs, NI numbers, tax codes, payslips, payroll records, tax status information and similar data.
- Visual images, personal appearance/photographs, audio and video recording (including CCTV).
- Gambling Commission personal licence information.
- Information on your interests and needs regarding future employment, collected directly and inferred, for example from jobs viewed or articles read on our website.
- Copies of curriculum vitae and cover letters.
- Other information that you choose to tell us.
- Extra information that your referees choose to tell us about you.
- Extra information that our clients may tell us about you, or that we find from other third party sources such as job sites.
- The dates, times and frequency with which you access our services.

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

- Information about your race, ethnicity (including nationality), religious or philosophical beliefs and sexual orientation (this information will only be collected during the appointment process), or in instances where it is visible in CCTV or photograph images we have or are provided with.

- Information about your health, including any medical condition or disability and health and sickness records obtained from you or from your GP/Consultant or Occupational Health services with your consent.

Please note that the above list of categories of personal data we may collect is not exhaustive.

Further categories of data what we hold in relation to you are set out in this Record of Processing Activity:

Personal Data Collected	Use of Personal Data	Processing condition
Name and other contact information (including title, date of birth, place of birth, address, telephone numbers, email address, gender, nationality, national insurance number, username, marital status, emergency contact details).	<ul style="list-style-type: none"> To carry out our obligations under your prospective employment contract with us. To administer your application for employment. To provide you with information about your prospective employment. To check you are legally entitled to work in the UK. To ascertain your fitness to work. To comply with legal obligations. 	<ul style="list-style-type: none"> Performance of a contract. Compliance with a legal obligation. Necessary for the purposes of our legitimate business interests.
Ethnic origin	<ul style="list-style-type: none"> To carry out our obligations under your prospective employment contract with us. To check you are legally entitled to work in the UK. To comply with legal obligations. 	<ul style="list-style-type: none"> Compliance with a legal obligation. Consent
Closed circuit television (CCTV), photographs, or audio recordings of you	<ul style="list-style-type: none"> To carry out our obligations under your prospective employment contract with us. To comply with legal obligations. 	<ul style="list-style-type: none"> Compliance with a legal obligation. Necessary for the purposes of our legitimate business interests.
Religion	<ul style="list-style-type: none"> To carry out our obligations under your prospective employment contract with us. Compliance with legal and regulatory obligations. 	<ul style="list-style-type: none"> Consent
Offences	<ul style="list-style-type: none"> Compliance with legal and regulatory obligations. Sharing with, or processing by, third parties. 	<ul style="list-style-type: none"> Consent
Technical / device information (including IP address, cookies, geo-location, browser information and operating system information)	<ul style="list-style-type: none"> To carry out our obligations under your prospective employment contract with us. Sharing with, or processing by, third parties. To comply with legal obligations 	<ul style="list-style-type: none"> Performance of a contract. Compliance with a legal obligation. Necessary for the purposes of our

Personal Data Collected	Use of Personal Data	Processing condition
		legitimate business interests.
Employee records (including curriculum vitae, contracts, training, employment status, eligibility to work document, language, gaming licence details, ID documents, marriage certificate)	<ul style="list-style-type: none"> • To carry out our obligations under your prospective employment contract with us. • To administer your application for employment. • To provide you with information about your prospective employment. • To check you are legally entitled to work in the UK. • To ascertain your fitness to work. • Sharing with, or processing by, third parties. • To comply with legal obligations. 	<ul style="list-style-type: none"> • Performance of a contract. • Compliance with a legal obligation. • Consent. • Necessary for the purposes of our legitimate business interests.
General correspondence	<ul style="list-style-type: none"> • To carry out our obligations under your prospective employment contract with us. • To administer your application for employment. • To provide you with information about your prospective employment. • To check you are legally entitled to work in the UK. • To ascertain your fitness to work. • Sharing with, or processing by, third parties. • To comply with legal obligations. 	<ul style="list-style-type: none"> • Performance of a contract. • Compliance with a legal obligation. • Necessary for the purposes of our legitimate business interests.
Medical records	<ul style="list-style-type: none"> • To carry out our obligations under your prospective employment contract with us. • To administer your application for employment. • To provide you with information about your prospective employment. • To ascertain your fitness to work. 	<ul style="list-style-type: none"> • Consent

People whose data we receive from candidates and staff, such as referees and emergency contacts:

In order to provide candidates with suitable employment opportunities safely and securely and to provide for every eventuality for them and our staff, we need some basic background information. We only ask for very basic contact details, so that we can get in touch with you either for a reference or because you've been listed as an emergency contact for one of our candidates or staff members.

All we need from referees is confirmation of what you already know about our candidate or prospective member of staff, so that they can secure that job they really want. To ask for a reference, we'll obviously need the referee's contact details (such as name, email address and telephone number). We'll also need

these details if our candidate or a member of our staff has put you down as their emergency contact so that we can contact you in the event of an accident or an emergency.

How is your personal information collected?

We typically collect personal information about candidates through the application and recruitment process as follows:

1. Personal data that you, the candidate provide

There are numerous ways you can share your information with us. It all depends on what suits you. These may include:

- Entering your details on the Genting website or via an application form, as part of the registration process.
- Leaving a hard copy CV at a Genting recruitment event, job fair or office.
- Emailing your CV to a Genting employee or being interviewed by them.
- Entering your personal details into a Genting microsite.
- Entering your information on a social media channel such as Facebook or Twitter.

2. Personal data that we receive from other sources

We also receive personal data about candidates from other sources. Depending on the relevant circumstances and applicable local laws and requirements, these may include personal data received in the following situations:

- Your referees may disclose personal information about you.
- We may obtain information about you from searching for potential candidates from third party sources, such as LinkedIn and other job sites.
- If you 'like' our page on Facebook or 'follow' us on Twitter we may receive your personal information from those sites.
- If you are making an application via a recruitment agency, we may receive information from that recruitment agency.

3. Personal data that we collect automatically

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us.

- We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies. We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

Website users:

When you visit our website there is certain information that we may automatically collect, whether or not you decide to use our services. This includes your IP address, the date and the times and frequency with which you access the website and the way you browse its content. We will also collect data from you when you contact us via the website, for example by using the chat function.

We collect your data automatically via cookies when you visit our website, in line with cookie settings in your browser. If you would like to find out more about cookies, including how we use them and what choices are available to you, please view our Cookies Policy. We will also collect data from you when you contact us via the website, for example by using the chat function.

How we will use information about you

We will use your personal information as follows:

- To carry out our obligations under your application to enter into an employment contract with us.
- To administer your prospective employee file.
- To provide you with information relevant to your prospective employment.
- To manage your application.

Our lawful basis for these activities above is necessity to perform our employment contract with you.

- Checking you are legally entitled to work in the UK.
- Ascertaining your fitness to work.

Our lawful basis for these activities above is necessity to comply with our legal obligations.

- At the end of your recruitment process for analysis or retention for a short period of in the event of further opportunities arising.

Our lawful basis for this activity above is the pursuit of our legitimate interests of recruiting individuals into Genting as part of our business plan, provided your interests and fundamental rights do not override those interests.

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

We may also use your personal information, typically in an emergency, where this is necessary to protect your vital interests, or someone else's vital interests. In a small number of cases where other lawful bases do not apply, we may process your data on the basis of your consent.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to consider you as part of the recruitment process or perform any subsequent contract we have entered into with you and/or we may be prevented from complying with our legal obligations. For example:

- Copies of your passport, right to work, and visa information will be collected by us at the time of your application to enable us to comply with UK Immigration and Visa requirements. We may also be required by law to retain that data, along with related information (such as your application paperwork, short-lists and selection committee papers) until a certain point after your application for employment with Genting.

The consequences for any failure to provide such data will depend on the particular circumstances. For example, a failure to provide copies of your passport, right to work and visa information, may mean that we are unable to enter into, or continue, with your employment.

Some data that you give to us is provided on a wholly voluntary basis – you have a choice whether to do so. Examples include:

- Equality monitoring data, which is requested by Genting as part of the equality monitoring that we undertake pursuant to our legal obligations under the Equality Act 2010.
- Disability and health condition information, which you may choose to provide to us in order that we can take this information into account when considering whether to make a reasonable adjustment.

Change of purpose

We will only use your personal information for the purposes for which we collected it, 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.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations.
3. Where it is needed in the public interest, such as for equal opportunities monitoring.
4. Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Our obligations as a prospective employer

We may use your particularly sensitive personal information in the following ways:

- We may use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws.
- We may use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.
- We may use information about your race or national or ethnic origin, religious beliefs, or your sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- We may use details of your nationality (racial or ethnic origin) to check your entitlement to work at Genting and to ensure that we do not discriminate.
- We may use information about your physical or mental health, or disability status to ensure that we treat employees fairly.

Criminal convictions and allegations of criminal activity

Further legal controls apply to data relating to criminal convictions and allegations of criminal activity. We may process such data on the same grounds as those identified for “special categories” referred to above.

Details of our processing activities, including our lawful basis for processing

Details of the lawful bases we rely on for the processing of the categories of data that we hold in relation to you are set out in our Record of Processing Activity.

Do we need your consent?

We do not need your consent if we use special categories of your personal information to carry out our legal obligations or exercise specific rights in the field of employment law in accordance with our written policy. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it will never be a condition of any contract you enter into with us that you agree to any request for consent from us.

Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration.
2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

Data sharing

We do not, and will not, sell your data to third parties.

We may have to share your data with third parties, including third-party service providers and other entities in the Genting Group. We may also have to share your data with Genting Worldwide Group Companies.

We require third parties to respect the security of your data and to treat it in accordance with the law.

Why might you share my personal information with third parties?

We may share your personal information with third parties where required by law, where it is necessary to administer the recruitment application or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including recruitment agents and software providers) and other entities within the Genting Group or Genting Worldwide Group.

Examples of bodies to whom we are required by law to disclose certain data include, but are not limited to:

Organisation	Why?
Home Office; UK Visas and Immigration	To fulfil Genting's obligations as a visa sponsor.
Disclosure and Barring Service (DBS)	Required for certain posts to assess an applicant's suitability for positions of trust or where the post holder works with vulnerable people or children.
HM Revenues & Customs (HMRC)	Real time information released to HM Revenue & Customs (HMRC) in order to collect Income Tax and National Insurance contributions (NICs) from employees.

Examples of bodies to whom we may voluntarily disclose data, in appropriate circumstances, include but are not limited to:

Organisation	Why?
Other entities within the Genting Group or Genting Worldwide Group	We will share your personal information with other entities in our Genting Group as part of our regular reporting activities on company performance, in the context of a business reorganisation or Genting Group restructuring exercise, for system maintenance support and hosting of data.
Agencies with responsibilities for the prevention and detection of crime, apprehension and prosecution of offenders, or collection of a tax or duty.	For the prevention, detection or investigation of crime, for the location and/or apprehension of offenders, for the protection of the public, and/or to support national interest.
Third party service providers	To facilitate activities of Genting including activities that are carried out by third-party service providers for example: payroll, pension administration, benefits provision and administration, IT services and Auditors. Any transfer will be subject to an appropriate, formal agreement between Genting and the third party service provider.
Third party employers	To facilitate the requesting or giving of references in instances where such references are requested.

Where information is shared with third parties, we will seek to share the minimum amount of information necessary to fulfil the purpose.

How secure is my information with third-party service providers and other entities in our Genting Group?

All our third-party service providers and other entities in the Genting Group 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 (as written in the contract between us) 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.

Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

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 employees, agents, contractors and other third parties who have a business requirement to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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.

Sharing your data outside the European Union

The law provides various further safeguards where data is transferred outside of the EU.

When you are resident outside the EU in a country where there is no “adequacy decision” (a country outside the EU that ensures adequate level of data protection due to its domestic laws or international commitments) by the European Commission, and an alternative safeguard is not available, we may still transfer data to you which is necessary for performance of your contract with us.

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.

For prospective employees the maximum length of time we will retain your personal data is 12 months, unless you enter into an employment contract with us. In these circumstances you will be provided with a new privacy notice and will also have access to our internal data retention policy.

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.

Retention periods may increase as a result of legislative changes, e.g. an increase in limitation periods for legal claims would mean that Genting is required to retain certain categories of personal data for longer. Any such changes will be reflected in updated versions of our data retention policy.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. We may keep anonymised statistical data indefinitely.

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 during your relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you 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 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 in certain circumstances. These circumstances are where:
 - our retention is no longer necessary in relation to the purposes for which the data were collected;
 - if we are processing your data with your consent, you wish to withdraw this consent (please note that in the main we will not be processing your data with your consent, in such circumstances we will not be obliged to comply with your request);
 - if we are processing your data in our legitimate business interests and we have not demonstrated overriding legitimate grounds to continue to process your data in the event that you have objected to such processing (see below);
 - if your personal data have been unlawfully processed;
 - if we are required to erase your data in compliance with a legal obligation.

- **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. In the event that you object we are obliged to cease our processing of your personal data unless we can demonstrate competing legitimate grounds for the processing which override your interest, rights or freedoms, or for the establishment, exercise or defence of legal claims.
- **Request the restriction of processing of, or suspend the processing of** your personal information. This enables you to ask us to restrict or suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Object to any direct marketing** (for example, email marketing or phone calls) by us, and to require us to stop such marketing.
- **Object to any automated decision-making** about you which produces legal effects or otherwise significantly affects you.
- **Request the transfer** of your personal information to another party.

Please be aware that these rights are subject to certain conditions and exceptions as set out in the data protection legislation.

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 **our Data Protection Officer** in writing at DPO@GentingUK.com and they will explain any conditions that may apply.

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 data protection officer at DPO@GentingUK.com. 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.

As we have already pointed out, in the main we will not be processing your personal data with your consent. In such circumstances this right will not apply.

Further guidance on your rights is available from the Information Commissioner's Office (<https://ico.org.uk/>). You have the right to complain to the UK's supervisory office for data protection, the Information Commissioner's Office at <https://ico.org.uk/concerns/> if you believe that your data has been processed unlawfully.

Changes to this privacy notice

We may need to update this notice from time to time, for example if the law or regulatory requirements change, if technology changes or to make Genting's operations and procedures more efficient. If the change is material, we will give you not less than two months' notice of the change so that you can exercise your rights, if appropriate, before the change comes into effect. We will notify you of the change by email.

If you have any questions about this privacy notice, please contact us at DPO@GentingUK.com.