Recruitment Privacy Notice

USA

EFFECTIVE DATE: October 2026

INTRODUCTION

This recruitment privacy notice ("**Privacy Notice**") explains what personal information we collect about you in connection with our recruitment process, how we hold and use it, how we may share information about you and your rights in relation to your personal information. Please ensure that you read this Privacy Notice and any other similar notice or policy we may provide to you from time to time when we collect or process personal information about you. Employees with disabilities may contact Human Resources to receive this Privacy Notice in an alternative format. This Privacy Notice applies to the recruitment activities of all companies owned directly or indirectly by Ocado Group plc, including where relevant, internal recruitment activities. Currently in the United States, this includes:

Company Name
Ocado Solutions USA Inc.
Kindred Inc.
6 River Systems LLC

each an "**Ocado Group Company**," and referred to as "**Ocado**", "**we**", "**us**", and "**our**" in this notice.

This Privacy Notice contains the disclosures that we are required to provide you under the California Privacy Rights Act.

Data Protection Officer

We have appointed a data protection officer ("**DPO**") 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 us or our DPO using the contact details below:

Email: privacy@ocado.com
Postal address: Data Protection Officer, Ocado Group, Buildings One and Two, Trident Place, Mosquito Way, Hatfield, Hertfordshire, United Kingdom, AL10 9UL.

Who collects the information

Each Ocado Group Company is the 'data controller' or 'business' in each respective jurisdiction and where applicable, gathers, shares and uses certain information about you in line with this recruitment Privacy Notice. A data controller or business is the entity which determines the purposes for which and the manner in which your personal information is processed.

About the personal information we collect and process

The table set out in Part A of the Schedule below summarises the personal information we collect and hold up to and including the shortlisting stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared.

The table in Part B of the Schedule below summarises the additional personal information we collect and hold before making a final decision to hire (i.e., before making an offer of

employment unconditional), how and why we do so, how we use it and with whom it may be shared.

We also use cookies and similar technologies in relation to our online recruitment activities and you should refer to our Cookie Policy for further information which is available on our website, https://careers.ocadogroup.com

Automated decision-making

We do not use your personal information to make automated decisions about you which have a legal or similarly significant effect on you.

If you fail to provide personal information

If you fail to provide information when requested, where this information is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require references for this role and you fail to provide us with relevant details, we will not be able to take your application further. However, when we rely on your consent to collect your personal information and you select not to provide such information, this will not affect your application with us in any way. If we rely on your consent or if any information we request during your application process is optional, we will let you know at that point.

How long we keep your information

We will normally retain your personal information for a period of six months after we have communicated to you our decision about whether to appoint you to the role, unless we are required to hold this for longer in your state. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy, de-identify or aggregate your personal information in accordance with our applicable data retention policy, please contact privacy@ocado.com for further information.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your consent to retain your personal information for a fixed period, usually two years, on that basis.

Your rights in connection with personal information

Under certain circumstances, by law you have certain rights in relation to your information:

If you are applying for a role with one of our companies and you are a California resident, you have the following rights subject to certain exceptions and limitations:

- **Request to know** the categories and specific pieces of personal information we collect, use, and disclose about you, the categories of sources from which we collected personal information about you, our purposes for collecting or disclosing personal information, and the categories of third parties to which we have disclosed personal information.

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the specific pieces of personal information that we hold about you.

- **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 deletion of your personal information**. This enables you to ask us to delete or remove personal information. Please note that this is not an absolute right and that we will be able to retain certain information where we have a legitimate legal ground to do so.

- **Right not to receive discriminatory treatment** for the exercise of your privacy rights.

- **Withdraw your consent** for processing of your personal information (where we rely on your consent) at any time. However, if you withdraw your consent, this will not affect the lawfulness of any processing of your personal information carried out prior to the withdrawal of your consent.

Please note these rights may be **limited**, for example if fulfilling your request would reveal personal information about another person or if you ask us to delete information which we are required by law to keep or have another lawful reason for keeping. We will inform you of the relevant exemptions upon which we rely when responding to any request you make.

California law provides the right to opt out of certain processing of sensitive personal information, but Ocado does not offer this right to individuals covered by this document because we use your sensitive personal information only for purposes that do not require an opt-out opportunity. California law also provides the right to opt out of "sales" of personal information and the right to opt out of sharing of personal information for cross-context behavioral advertising, but Ocado does not offer these rights to individuals covered by this document because we do not engage in such sales or sharing.

If you want to exercise any of your data protection rights, please contact Ocado using the following information and submit the verifying information, as further described below:

- In writing, addressed to the DPO.
- By email to individualrights@ocadogroup.com.
- Face-to-face with the current line manager.

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 legally required and is an appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

You may designate an authorized agent to submit a request on your behalf. In order to designate an authorized agent to make a request on your behalf, you must provide the agent with signed permission to do so and provide proof of your identity, or the agent must have a valid power of attorney. An authorized agent can make a request on your behalf through one of the submission methods noted above. In order for us to process the request, the authorized agent will be required to provide evidence of signed permission and your e-mail address to verify your identity, or proof of valid power of attorney.

Keeping your personal information secure

We have security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information are subject to a duty of confidentiality.

Sharing your personal information with third parties

Your personal information will primarily be accessed by our employees who are involved in your recruitment process, our HR, IT, finance and facilities departments, to the extent it is necessary for them to fulfil their tasks in relation to your application. We may share personal information with other Ocado group companies, when necessary in relation to the application process and with third parties as we describe below:

a) To process your application, to enable appropriate checks and aptitude tests to be carried out, and to facilitate and undertake recruitment interviews on our behalf. For example, we work with Hireright to help us carry out background checks (only where this is legally permitted), recruitment and applicant tracking system providers, and the relevant driver licensing authority to conduct driving licence checks. We may also contact your referees to confirm your work history. We also use third-party service providers, such as IT system and technology application providers, to process and store your personal information;

b) in line with our Privacy & Cookie Notices (which is available on our website,https://careers.ocadogroup.com/), we engage third-party service providers to help us monitor website performance, utilisation of features and services, traffic and demographic trends, and browser versions, to improve our website and services and tailor them to your interests;

c) we share information with our business advisors, such as legal advisors or business/ recruitment consultants, to the extent it is necessary for them to provide us with their services;

d) we may share information with regulatory and government authorities and/or law enforcement agencies if required by law or if necessary for the legal protection of our legitimate interests in compliance with applicable laws;

e) in the event that our business is sold or integrated with another business, your details may be disclosed to our advisers and any prospective purchaser's adviser and passed to the new owners of the business.

f) we may share information for the purposes of company reporting and analysis.

When we engage third-party service providers, we require that they 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 information for their own purposes. We only permit them to process your personal information for specified purposes and in accordance with our instructions.

We may share information that has been de-identified or aggregated without limitation.

Please see the Schedule below for additional details about the personal information we collect and how we use the information. For purposes of California law, this information falls into the following categories personal and online identifiers; characteristics of protected classifications under U.S. law or other applicable laws (such as age, racial or ethnic origin, or gender); health information (including information you may provide through a medical questionnaire when permitted by applicable law); Internet or other electronic network activity information (such as interactions with our website or applications); audiovisual information (such as voice recordings); professional or employment-related information; education information; sensitive information (as further described below, such as diversity data you choose to provide and citizenship information for eligibility purposes); inferences drawn from the other information we collect about your predicted characteristics and preferences; and other information about you that is linked to the personal information we collect

ABOUT THE INFORMATION WE COLLECT AND HOLD

PART A

Up to and including the shortlisting stage

The information we collect	How we collect the information	Why we use and may share the information
Your name, contact details (for example, address phone number, email address) and details of your work history (for example your CV)	From you	• To enable Talent Acquisition personnel or the manager of the relevant department to contact you to progress your application, arrange interviews and inform you of the outcome. • To keep you informed of opportunities which may be of interest, if you agree to this. • To inform the relevant manager or department of your application.
Details of your qualifications, experience, CV, employment history including job titles, salary, notice period, and working hours and interests (if you provide us with this information)	From you, in the completed application form, CV and interview notes (if relevant)	To enable Talent Acquisition personnel or hiring managers in the relevant department to evaluate your application and make informed recruitment (shortlisting and hiring) decisions.
Diversity information, including information about your ethnic background, religious beliefs, disabilities and health conditions, sexual orientation, as part of our equal opportunities form (to the extent legally permitted) **Completing our Equal Opportunities form is optional**	From you, when you select to complete our Equal Opportunities form as part of your application. See the notice which will be presented to you if you participate in Diversity & Inclusion assessment processes	• To monitor equality of opportunity in our recruitment process, to carry out statistical analysis and to take any necessary steps to improve equality in our workplace. • We do **not** use diversity and inclusion information to make decisions affecting you and your application.

The information we collect	How we collect the information	Why we use and may share the information
Pre-screening comments based on telephone interviews, manager interview notes and aptitude testing results and notes	From you in your completed application form, telephone and in-person interview notes, and from relevant aptitude testing	To enable Talent Acquisition personnel or hiring managers in the relevant department to evaluate your applications and make informed recruitment (shortlisting and hiring) decisions. We may use third parties to carry out such pre-screening activities on our behalf.
Information regarding your criminal record **Note, that we only collect this information where local legal requirements permit and we will carry out criminal record checks only after we have made an employment offer to you**	From you, in your completed application form and from our provider carrying out criminal record checks	• Information shared with regulatory authorities as required • Used to make an informed recruitment decision
Details of your referees	From your completed application form	• To carry out a fair recruitment process • Used to make an informed recruitment decision • Information shared with relevant managers, Talent Acquisition personnel and the referee
Details about disability status and health **Note, that we only collect this information where local legal requirements permit**	From your completed application form, medical questionnaire, interview, or otherwise from you directly	• To carry out a fair recruitment process. • Information shared with relevant managers, Talent Acquisition personnel or other Ocado employees who participate in the interview process.

The information we collect	How we collect the information	Why we use and may share the information
Details as are provided by you in relation to any whistleblowing complaint raised either via our third-party whistleblowing hotline provider or directly with us. This may include your name, contact details and any personal information contained in the detail of your allegation, which may include sensitive personal information. **Please note that where permitted to do so by local law, you may make any whistleblowing complaint on an anonymous basis.** **Details about you that may be contained in the whistleblowing allegation (for example, if allegations are made against you or if you are mentioned as a witness), which may include sensitive personal information.**	From you and/or from the person submitting a whistleblowing report	• To comply with legal/regulatory obligations and to fulfil Ocado's legitimate business interests, including to investigate any allegations and take appropriate action. • Information is shared with our third-party Whistleblowing provider, internally with relevant managers, People personnel and administrators, and where necessary with our (internal and external) legal advisors. If the information is relevant to criminal investigations, it may also be shared with law enforcement agencies, as appropriate. • For more information on the process relating to whistleblowing complaints, see our Whistleblowing policy, available here .

Any of the above information	From you and where relevant, from the requesting public authority	• To respond to legitimate requests for the disclosure of information, made by public authorities, law enforcement or governmental bodies or under a court order. • To respond to complaints, to protect our legal rights and to establish, exercise or defend legal claims relating to our recruitment process.

Part B

Before making a final decision to hire

The information we collect	How we collect the information	How we use and may share the information
Information about your previous academic and/or employment history, from references obtained about you from previous employers and/or education providers (if you provide us with them)	From your referees (details of whom you will have provided)	• To verify the information you have provided and confirm your academic and/or employment history you're your referees, and to make an informed recruitment decision. • Information is shared with relevant managers and HR personnel.
Information regarding your academic and professional qualifications*	From you, or where permissible, from your education provider, and/or from the relevant professional body	• Information shared with relevant managers and HR personnel • To carry out a fair recruitment process • Used to make an informed recruitment decision

The information we collect	How we collect the information	How we use and may share the information
Information regarding your criminal record **Note, that we only collect this information where local legal requirements permit and we will carry out criminal record checks only after we have made an employment offer to you**	From you, or our background screening provider	• Used to make an informed recruitment decision. • Information shared with regulatory authorities as required.
Your nationality and immigration status and information from related documents, such as your passport, driving licence, visa, Social Security number or other identification and immigration information – to the extent permitted by local law*	From you and, where necessary, relevant government departments	• To carry out eligibility to work checks. • Information may be shared with relevant government departments, where we have a legal obligation to do so.
A copy of your driving licence and relevant driving checks and driving assessment comments – if driving skills are required for the position you are applying*	From you and from the relevant driver licensing authority	• Used to make an informed recruitment decision. • To ensure that you have a clean driving licence. • Information may be shared with our insurer.

The information we collect	How we collect the information	How we use and may share the information
Any of the above information	From you and where relevant, from the requesting public authority	• To respond to legitimate requests for the disclosure of information, made by public authorities, law enforcement or governmental bodies or under a court order. • To respond to complaints, to protect our legal rights and to establish, exercise or defend legal claims relating to our recruitment process.

You are required to provide the categories of information marked '*' above to enable us to verify your eligibility to work and suitability for the position.