Recruitment Privacy Notice

Japan

EFFECTIVE DATE: October 2026

INTRODUCTION

This recruitment privacy notice ("**Privacy Notice**") explains what personal data (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, including the right to object to the processing. We are required to provide you with this information under data protection and privacy legislation. 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.

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, this includes:

Country	Company Name	Address
Australia	Ocado Solutions Australia Pty Limited	Suite 1, Level 11, 66 Goulburn Street, Sydney, NSW 2000
Bulgaria	Ocado Bulgaria EOOD	7th Floor, South Park Building, 13 Henrik Ibsen Str., Sofia 1407
Canada	Ocado Solutions Canada Inc Kindred Systems II Inc.	Suite 1300, 1969 Upper Water Street, McInnes Cooper Tower, Purdy's Wharf, Halifax, Nova Scotia, B3J 3R7 Suite 1700, Park Place, 666 Burrard Street, Vancouver BC V6C2X8
France	Ocado Solutions France SAS	3-5 rue Saint-Georges, 75009 Paris, France
Greece	Myrmex, Inc Greek Branch Office	15 Ermou Street, Kifisia 14563, Attica, Greece
Japan	**Ocado Solutions Japan K.K.**	**Hibiya Fort Tower 10F, 1-1-1 Nishishinbashi, Minato-ku, Tokyo**
Korea	Ocado Solutions Korea Limited	2nd floor, Lotte Mart Songpa branch, 80 Joongdae-ro, Songpa-gu, Seoul
Poland	Ocado Polska Sp z.o.o. Ocado Solutions Polska Sp z.o.o.	High5ive building 4, Pawia 21 St., 31-154, Krakow, Poland ul. Grzybowska 2 lok. 29, 00-131, Warsaw, Poland
Spain	Ocado Spain SLU Ocado Solutions Spain S.L.	Carrer de Pere IV, 105, 109, Sant Martí, 08018 Barcelona Carrer de Pere IV, 105, 109, Sant Martí, 08018 Barcelona

Sweden	Ocado Solutions Sweden AB Ocado Sweden AB	Matarvagen 30, 196 37 Kungsängen, Sweden Mälarvarvsbacken 8, 117 33 Stockholm, Sweden
United Kingdom	Ocado Central Services Limited	Buildings One & Two Trident Place, Mosquito Way, Hatfield, AL10 9UL
United States of America	Ocado Solutions USA Inc. Kindred, Inc. 6 River Systems LLC	 251 Little Falls Drive, Wilmington, New Castle, Delaware 19808

(each an "**Ocado Group Company**") and references to "**we**", "**us**" and "**our**" in this notice are to the relevant Ocado Group Company.

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' 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 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 recruit (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/.

Where information may be held

Personal information may be held at our offices and those of our group companies, and third party agencies, service providers, representatives and agents. Personal information may be transferred internationally to countries in the EU, the UK, the USA, Canada and other countries around the world, including countries that do not have data protection and privacy laws equivalent to those in your local country. Where such transfers are made, Ocado will ensure an equivalent level of protection through contract, group policy, and/or similar appropriate measures. We have measures in place to seek to ensure that there is appropriate security for information we transfer or store outside the UK and the European Economic Area (EEA). In addition, if one of our UK or EEA-based group companies collects

your personal information, they will use one or more of the following safeguards if they transfer your personal information to an organisation outside the UK and the EEA:

- the organisation is based in a country which ensures a level of data protection which is equivalent to EEA or UK standards, as this has been determined by a European Commission decision and/or UK adequacy regulations;
- the organisation is bound by European Commission-approved standard contractual clauses, which offer appropriate data protection safeguards, or equivalent standard clauses approved in the UK; or

- a derogation applies in accordance with data protection laws (for example, you have provided your explicit consent, or the transfer of the data is necessary in order for Ocado to enter into a contract with you).

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 or shorter in your country (e.g in Spain, we will hold onto your personal information for one year). 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 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 depending on where you are applying:

<u>UK & EEA Candidates</u>

If you are applying for a role with one of our companies in the UK or the EEA, you have the following rights:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a confirmation of whether we hold your personal information and if so, to also receive a copy of that personal information and certain information about how we use 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). 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.

- **Object to processing** of your personal information where we are relying on our legitimate interests (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.

- **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** that we provide certain of your personal information in a **"portable" format** (e.g. in a pdf or .csv file) and that we **transfer** this to another party.

- **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.

- **Complain to a supervisory authority.** You have the right to make a complaint at any time to your local supervisory authority for data protection issues (see the section below entitled 'How to complain').

JP Candidates

If you are applying for a role with one of our companies in Japan, you have the following rights:

- **Request to be informed** of information regarding the personal information that we hold about you. This enables you to ask us to notify you of or publish the following information in an easily accessible location:
  (i) our name;
  (ii) the purpose of use of all your personal information retained by us;
  (iii) the procedures by which you may request the disclosure, correction, addition or deletion, discontinuance of use, or discontinuance of provision to a third party of your personal information, and the manner in which we will respond to such requests; and
  (iv) the contact information lodging a complaint with us concerning its processing of retained personal information.

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive information regarding the disclosure of your personal information, the purposes of use of your personal information, and the records of third-party provision of your personal information.

- **Request rectification** of the personal information that we hold about you. This enables you to correct your personal information when the information is not accurate.

- **Request erasure** of the personal information that we hold about you. This enables you to delete your personal information when the information is not accurate.

- **Request stop of processing** of your personal information and **deletion** of your personal information. This enables you to ask us to stop processing your personal information and delete your personal information when we collect or process personal information illegally or process personal information beyond the scope of the purposes of processing of the personal information or when there is a risk of harm, such as data leakage, to the rights or legitimate interests of the data subjects.

- **Request stop of provision** of your personal information to third parties. This enables you to ask us to stop providing your personal information to third parties when the provision of personal information to a third party is illegal or when there is a risk of harm, such as data leakage, to the rights or legitimate interests of the data subjects.

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

If you want to exercise any of your data protection rights, please contact the DPO in writing. 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 an appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

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 described 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 Experian to help us carry out criminal record checks (only where this is legally permitted), recruitment and application tracking system providers,and, where necessary, the relevant authority equivalent to the UK's Driving and Vehicle Licensing Authority (DVLA) 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 Policy (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.

How to complain

We hope that we can resolve any query or concern you raise about our use of your information and would request that you contact us in the first instance.

If you wish to contact your local data protection authority, please see the following:

- Japan Personal Information Protection Commission, Kasumigaseki Common Gate West Tower, 32nd Floor, 3-2-1, Kasumigaseki, Chiyoda-ku, Tokyo, 100-0013, Japan or telephone +81-3-6457-9680.

the Schedule

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 HR personnel or the manager of the relevant department to contact you to progress your application, arrange interviews and inform you of the outcome. • To inform the relevant manager or department of your application. • To keep you informed of opportunities which may be of interest, if you agree to this. • To engage with third parties that provide services to us for the recruitment process such as background checking and screening assessments.
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 HR 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	• 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. • See the notice which will be presented to you if you participate in Diversity & Inclusion assessment processes. • 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 HR 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.
Details of your referees	From your completed application form	• To carry out a fair recruitment process, verify your employment and educational background and make an informed recruitment decision. • Information shared with relevant managers, HR 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 and where necessary, make reasonable adjustments to facilitate the interview process. • Information shared with relevant managers, HR personnel or other Ocado employees who participate in the interview process.
Video and audio recording of remote interviews	From you during video interviewing	Be able to review interviews which you have given remotely to our providers of recruitment related services and to make an informed decision in relation to your application.
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	From you and/or from the person submitting a whistleblowing report	• To comply with legal/regulatory obligations and to fulfil Ocado's legitimate 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.

detail of your allegation, which may include special categories of personal data **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 special categories of personal data**		• 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 recruit

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 to verify your academic and/or employment history by contacting 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	• To carry out a fair recruitment process and to make an informed recruitment decision. • Information shared with relevant managers and HR personnel.
Your nationality and immigration status and information from related documents, such as your passport, driving licence, VISA, national insurance number or other identification and immigration information – to the extent permitted by local law*	From you and, where necessary, the Immigration Services Agency and Ministry of Health, Labour and Welfare	• To carry out right to work checks. • Information may be shared with the Immigration Services Agency and Ministry of Health, Labour and Welfare, 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, where necessary, from DVLA	• 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 right to work and suitability for the position.