

Full Privacy Notice:

Applicability

This privacy notice applies to all candidates for employment with Carnival UK including shore staff, crew, contractors, temporary staff, external agents, partners, consultants and vendors (including concessions staff on board Carnival UK ships) working on behalf of Carnival UK (referred to in this privacy notice as ‘candidates’). It covers processing of candidate data for Cunard and P&O Cruises (where the employing entity will be either Fleet Maritime Services International Limited or Fleet Maritime Services Bermuda Limited), and for the UK office activities of Princess Cruises, Holland America Line and Seabourn.

Who we are

Cunard, P&O Cruises, Princess Cruises, Holland America Line and Seabourn are trading names of Carnival plc (‘Carnival UK’). When applying for employment through Carnival UK personal data about you is controlled by Carnival plc. Carnival plc is registered in England & Wales number 04039524, and is registered as a data controller with the UK Information Commissioner’s Office number Z8383204.

Where to find out more

All questions relating to privacy and data protection should be sent to: Data Protection Officer, Data Privacy Team, Carnival House, 100 Harbour Parade, Southampton, SO15 1ST, or call +44 (0)344 338 8650, or email privacy@carnivalukgroup.com.

Why we process personal data

Carnival UK needs to process personal data about you for the purpose of recruitment. We rely upon consent and our legitimate interests as a lawful basis for processing employment applications, and may also process personal data where we are obliged to by law or regulation. Where we wish to process personal data about you for other purposes we will obtain your consent for processing beforehand.

Our purposes of processing personal data about candidates include:

- Recruiting new employees;
- Conducting background checks to ensure the suitability of candidates;
- Reporting on candidates’ backgrounds where we are obliged to do so;

- Maintaining health, safety, security and discipline, and preventing fraud;
- Monitoring and improving the effectiveness of our resourcing and processes.

In addition, we operate CCTV systems in our offices and on board our ships for the purposes of safety and security.

Personal data about our candidates may be analysed to improve the training and career development provided to our employees, to track the response to our careers marketing communication, to review, develop and improve the employment services we offer (including market research), and for statistical analysis.

We conduct identifiable and anonymous research to provide longer-term insight into the effectiveness of our candidate services, and to support our service planning and delivery.

What personal data we collect

Personal data you provide to us

We collect personal data you provide to us through your application for employment, including but not limited to personal details (name, gender, age etc.), contact information (home address, phone number, email address etc.), details of your background, employment history, qualifications, interests and communications preferences, personal and professional references, evidence of professional and academic qualifications.

Should we wish to offer you employment, further personal data will be required, including but not limited to contact information for next of kin, beneficiary and family, bank details, proof of travel documents (driving licence, passport, national identity card, merchant seaman's card), professional certificates, references and other relevant information.

Personal data generated by your application to us

Your application for employment with us will result in personal data being generated by us. Examples include:

- Candidate records: Details of applications across all Carnival brands, including interview details, audio/video recordings of interviews, outcomes and associated notes;

- **Assessment records:** Results of pre-employment checks and references, and analysis of applications, interviews and other tests;
- **Correspondence:** In the course of your application you will be referenced in, or the subject of, internal records including emails, documents, structured data, paper records, the nature of which will depend upon your application.

Personal data received from other organisations

As part of your application for employment, we may receive personal data about you from third parties. Examples include professional and personal references, and pre-employment checks. Personal data about you may be shared with law enforcement agencies for security and immigration purposes. Personal data may also be shared with these agencies in order to prevent and detect crime as well as to safeguard children and vulnerable adults. These checks may involve sending personal data between different countries.

Sensitive personal data

We do not process sensitive personal data about you except where we have a need and a lawful basis to do so. Sensitive personal data that may be processed by us can include:

- **Health and welfare:** We may require candidates to undergo health screening as part of their pre-employment checks. We may also require you to be tested for the use of drugs and other substances where these are illegal or prohibited by company policy. We provide occupational health services and may request information about treatment or support required;
- **Racial or ethnic origin:** We process details of racial or ethnic origin solely for the purposes of equalities reporting;
- **Religious or philosophical beliefs:** We may process personal data you choose to provide about your religious, philosophical or spiritual beliefs to provide an inclusive environment where employees may exercise those beliefs, such as providing opportunities for worship;
- **Trade union membership:** We do not seek to maintain details of trade union membership, but may become aware of a candidate's trade union status through their contract of employment, correspondence or union representation;

- **Biometrics:** Photographs of employees are used for identification purposes to maintain security and safety whilst they are on board our ships, and will be required as part of the recruitment process;
- **Sexual orientation:** We may process personal data you choose to provide about your sexual orientation or gender identity to provide an inclusive and safe environment for you, and to provide additional employment-related services where requested.

We may from time to time process personal data relating to suspected or actual criminal activity of individuals, for example disclosures made as part of the recruitment process or as a condition of specific roles, or if screening checks reveal information about criminal activity.

Sharing personal data

Sharing personal data within Carnival group companies

We process personal data about our employees at our offices in the United Kingdom and worldwide depending upon the type of role and the Carnival company that is recruiting. We may transfer personal data about you to other Carnival group companies for purposes connected with your application, or the management of the company's business. Personal data exchanged with other Carnival companies is subject to appropriate legal and technical controls to ensure that it is processed lawfully and securely.

Sharing personal data with third parties

We will share your personal data where we are obliged to by law or regulation, where there is a legitimate interest that is not overridden by your interests or in cases where we have obtained your consent for that sharing. Where personal data about you is disclosed to third parties in connection with your application or as otherwise required by law, it will be restricted to only those details that are required for the purpose in hand. Care will be taken that personal data is not disclosed to unauthorised persons and checks will be carried out where there is any doubt about the entitlement of the third party to be given your personal data.

We use Oracle Recruiting Cloud to capture and process employment applications. When you provide personal data to Oracle Recruiting Cloud, they are acting under

our instructions, and may not use personal data about you for other purposes except where you give consent for them to do so.

Examples of personal data that is shared where we are obliged to do so include:

- **Immigration authorities:** We are required to co-operate with government and law enforcement agencies and public authorities, including customs and immigration authorities;
- **Tax, benefits and corporate reporting:** We are required to report to appropriate government agencies on your earnings and any tax deducted at source;
- **Law enforcement:** Where required to do so, we will disclose personal data to law enforcement authorities;
- **Maritime authorities:** Where required to do so, we disclose personal data to maritime authorities.

We contract other companies and individuals to perform certain activities on our behalf. Examples include:

- **Pre-employment screening:** We conduct pre-employment and employment background screening, and may share sufficient personal data about you with recognised screening providers.
- **Drug screening:** Where candidates are required to undergo screening for illegal substances, these tests will be processed by third party providers;
- **Travel:** If the company arranges travel for you we may pass your personal data on to relevant suppliers of your travel such as travel agents, airlines, hotels and transport companies.
- **Health:** We may share personal data with third party healthcare providers with your consent or where it is in your vital interests or the public interest to do so;
- **Occupational Health:** If you require occupational health support, you may be asked to provide personal data to an external occupational health provider contracted to act on our behalf.

We do not routinely share personal data with trade unions, but may do so at your request and with your consent.

At your request and with your consent, information relating to your employment or earnings may be disclosed to other parties in connection with applications or requests you may have made to or through them.

Transferring personal data to third countries

We collect and process personal data in the European Union (EU). When necessary we will process your personal data worldwide, including on board our ships, depending upon the Carnival brands to which you have applied, and the destinations you travel to in the course of your employment. This may involve sending your personal information between different countries, including countries outside the EU where controls on data protection may not be as strong as the legal requirements in the EU.

Storing personal data about you

We retain your personal data for no longer than the period required for processing, or where we are under an obligation to do so, for example employment data retained for mandatory reporting requirements. We operate data retention schedules to define retention periods. Typically we will retain employment applications for up to two years for reporting purposes, to investigate disputes and for the prevention and detection of fraud; or for the duration of employment if the candidate is successful in obtaining employment.

Securing personal data

We take the security of candidate personal data seriously, and use organisational and technical security measures including policies, standards, technology solutions and ongoing training to safeguard the personal data we process from improper access, use, alteration, destruction and loss.

Where we share personal data with other companies, we require those companies to process personal data to an equivalent or higher level of security.

Your rights concerning personal data

You have rights over how we use personal data about you, and may exercise those rights by contacting our Data Protection Officer, Data Privacy Team, Carnival House, 100 Harbour Parade, Southampton, SO15 1ST, or call +44 (0)344 338 8650, or email privacy@carnivalukgroup.com. In some cases our ability to uphold these rights for you may depend upon our obligations to process personal data for security, safety, fraud prevention or legal defence reasons, or because processing is

necessary for the performance of your contract of employment. Where this is the case, we will inform you of specific details in response to your request.

Accessing the personal data we hold about you

If you wish to view personal data held about you or would like to receive a copy of personal data held about you, you should apply by contacting the Data Privacy Team and setting out the information you require.

Controlling how we process personal data about you

The majority of the personal data about employees is processed under contract or as a result of our legitimate interests. If we have obtained your consent for processing of personal data about you, you have the right to withdraw this consent at any time. Where we process personal data about you in ways for which your consent is not required, you may in some circumstances ask us to cease processing, or restrict the nature of the processing, if you wish. You may object to automated decision-taking or profiling where it is used.

Ensuring the accuracy of personal data we hold about you

To ensure that all personal data held is correct and up to date, please notify us as soon as there are any changes in your personal circumstances. We will update or amend personal data we hold about you if you inform us of inaccuracies.

Deleting personal data we hold about you

We will delete personal data we hold about you if you ask us to do so, except where exemptions apply.

How to find out more or to complain about our processing of personal data

If you have a concern or complaint about our processing of personal data, please contact our Data Protection Officer in our Data Privacy Team at Carnival House, 100 Harbour Parade, Southampton, SO15 1ST, or call +44(0)344 338 8650, or email privacy@carnivalukgroup.com.

If you are not satisfied with our processing of personal data, how we have responded to your complaint about the processing of personal data, or you believe our processing of personal data is not in accordance with the law, you have the

right to complain to the Information Commissioner's Office (ICO) by calling +44 (0)303 123 1113, or visiting

Changes to this privacy notice

This policy was last updated on 25th June 2018. When changes are made to this privacy notice that affect the processing of personal data, we will notify candidates with details of the changes.