

Candidate Data Protection Notice

1 WHAT IS THE PURPOSE OF THIS DOCUMENT?

This Candidate Data Protection Notice ('Notice') is applicable to candidates of Sky Betting & Gaming, Paddy Power, Paddy Power Retail, Betfair UKI, Betfair International, Betfair Romania Development S.R.L, PokerStars, Blip and Flutter Group functions, Timeform and Sporting Life brands within Flutter Entertainment plc ('Flutter', 'we', 'us', 'our') whose personal information ('you', 'your') is used within the recruitment process.

This Notice describes how we collect and use personal information about you before, during and after the recruitment process. Personal data, or personal information, means any information about an individual from which that person can be identified.

It is important that you read this Notice, together with any other 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.

2 WHO WE ARE

There are a number of brands within Flutter. As part of our global Flutter talent community, your personal information may be accessed by any [brand](#) within Flutter for recruitment purposes. The Flutter brand considering your candidate profile, for recruitment purposes, will be the "data controller" of your personal information. The data controller is responsible for deciding how personal information about you is processed. Please refer to Appendix 1 for details of your data controller.

3 HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect information directly from you during your recruitment journey and sometimes we collect information about you from third parties (e.g from an employment agency, talent lifecycle provider, previous employers and background check provider(s)). We may use information collected from publicly available sources, including social media sites such as LinkedIn, to identify, reach out and build a profile of candidates. We will also collect information about you from your use of our webpages.

Our recruitment team may proactively identify and engage prospective candidates for career opportunities in Flutter. Where you have been identified as a candidate, we will create a candidate profile on you based on information gathered through our enrichment process (see below for details of our enrichment process). We will contact you promptly to notify you that a candidate profile has been created and you will receive a request to consent for your profile to be part of our Flutter talent community.

If you have proactively signed up to be a part of our Flutter talent community or applied directly for a role on one of our **career websites** (which include careers.fluttergroup.com, careers.flutterinternational.com, careers.flutteruki.com, retailcareers.paddypower.com, blip.pt, betfairromania.ro) you will be asked to provide your personal information which will be used to create a candidate profile on you in addition to information gathered through our enrichment process (see below for details of our enrichment process). This information may be shared with third parties as required, which may include our talent lifecycle providers, online assessment, or background check provider, where you have agreed to this, or where we have legal requirements to undertake such checks.

If you fail to provide certain information during the application process, when requested, we may not be able to continue with the application process (such as not being able to confirm your right to work in the country that you are applying to work in).

The **enrichment process** is where, through automation, further data about you is gathered from publicly available sources and added to your candidate profile. “Re-enrichment” is where, through automation, new data is gathered and added to your profile after the initial enrichment cycle. Based upon your consent, your profile may be “re-enriched” once every 30 days. To learn more about enrichment, please refer to our talent lifecycle provider’s enrichment policy: <https://beamery.com/data-enrichment-policy/>.

If you submit your application for a role via our career websites, you can choose whether you wish to have your profile enriched when you apply. If you sign up to our Flutter talent community, you can opt out of re-enrichment when you sign up, however in such circumstances, previously enriched data which was collected, at the time your profile was created, will not be deleted by this opt out. If you wish to opt out of re-enrichment at any time, you can complete the “Opt out of re-enrichment” form which is accessible within the talent community forms on our career websites. Previously enriched data can only be erased by deleting your candidate profile, please see section 10 for our contact information.

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.

4 THE CATEGORIES OF INFORMATION WE HOLD ABOUT YOU

We will collect, store, and use the following categories of personal data about you (note that this list is comprehensive but not necessarily exhaustive):

Categories of Personal Data	Types of Data
Personal details	- Name, gender, nationality, civil/marital status, date of birth, age, personal contact details (e.g. address, telephone or mobile number, e-mail), national ID number, languages spoken.
Financial	- Remuneration information (including salary expectation, previous salaries.)
Recruitment	- Skills and experience, qualifications, referrals, CV and application, interview and assessment data, right to work verification (including passport, visas or national identity cards) information related to the outcome of your application, details of any offer made to you, relevant professional and educational qualifications, references, background and verification information (e.g. for appropriate roles, results of credit reference check, financial sanction check where carried out and permitted by applicable laws). The following categories are <u>not</u> applicable to candidates based in Portugal or Romania: - references, background and verification information (e.g. for appropriate roles, results of credit reference check, financial sanction check where carried out and permitted by applicable laws).
Training and development	- Data relating to training and development needs or training received, or assessments completed.
Sensitive	Where permitted by law or provided voluntarily, special category data regarding, race, ethnicity, religious belief and sexuality (which if collected is stored anonymously for equal opportunities purposes). We also collect the following types of data which we protect with the same degree of

	<p>care as special category data:</p> <ul style="list-style-type: none"> - Criminal data relating to criminal convictions and offences; - Financial data that may be used for fraud. For example, debit/credit card details; - Location data; and - Information linked to private activities. For example, where we may gather additional personal information about family relationships, occupation or otherwise. <p>Portugal specific sensitive data collection:</p> <ul style="list-style-type: none"> - Gender, age, nationality; - Health data; - Location data; and - Information linked to private activities. For example, where we may gather additional personal information about family relationships, occupation or otherwise. <p>The following categories are <u>not</u> applicable to candidates based in Portugal or Ireland:</p> <p>Criminal data relating to criminal convictions and offences.</p>
Online / publicly available data	<ul style="list-style-type: none"> - Any personal information which is publicly available, such as LinkedIn profile information, social channels, or media & news outlets including phone, email, social websites links, skills, education history, job history that is available publicly. - Cookies: This information might be about you, your preferences or your device and is mostly used to make the site work as you expect it to. The information does not usually directly identify you, but it can give you a more personalised web experience.
Other	<ul style="list-style-type: none"> - Any other personal information which you choose to disclose to us during the course of your recruitment whether verbally or in written form.

5 HOW AND WHY WE WILL USE PERSONAL INFORMATION ABOUT YOU

Purpose	Purpose for Processing	Categories of Personal Data	Lawful Basis for Processing
Recruitment	To enable us to make decisions regarding your suitability to work for our organisation.	Personal details Recruitment	Our legitimate interests in identifying and assessing potential candidates for open roles.
Safer gambling (where applicable)	To identify signs that could indicate problem gambling. To ensure integrity of our business.	Personal details	Our legitimate interest to protect the integrity of our business and support our safer gambling strategy.
Website management and Cookies	To ensure that our career websites works properly for your device. Identify errors on the site. To understand how people reach our site. To assess the effectiveness of our career websites site and their content.	Online/ publicly available	Our legitimate interest to run effective career websites Where you have provided consent for us to gather data this way.

<p>Pre-employment verification and background screening (if and to the extent allowed by law)</p>	<p>To undertake appropriate pre-employment screening. Including to enable us to make decisions regarding your suitability to work for Flutter.</p>	<p>Recruitment</p>	<p>Our legitimate interests of ensuring suitable candidates are placed in roles.</p> <p>In certain circumstances and for specified roles to comply with a legal obligation to verify the suitability of candidates.</p>
<p>Profile enrichment/ Re-enrichment</p>	<p>To gather and process data and to recruit an effective workforce to meet our customer requirements.</p> <p>Enabling recruiters to effectively manage attraction campaigns, candidate shortlist and candidate engagement for future job opportunities.</p> <p>https://beamery.com/data-enrichment-policy/</p>	<p>Online/ publicly available</p> <p>Personal</p> <p>Recruitment</p>	<p>Our legitimate interest for recruiters to search for prospective candidates and contact them regarding career opportunities.</p> <p>Your consent to join our Flutter talent community which includes enrichment.</p> <p>Our legitimate interest to create candidate profiles to identify suitable candidates for current and future career opportunities.</p>
<p>Use of artificial intelligence and algorithms</p>	<p>To analyse and find commonalities between candidates based on location, job title, language, skills and keywords found in contacts' profile attachments.</p> <p>We may use algorithms to identify candidate profiles in order to assist us with shortlisting candidates most suited to roles.</p>	<p>Personal details</p> <p>Recruitment</p>	<p>Our legitimate interest to create candidate shortlists for roles to identify candidates most suited to roles.</p>
<p>Job opportunities & Flutter talent community communications</p>	<p>To contact you in relation to job opportunities which we consider may be of interest to you.</p> <p>To send you recruitment related communications.</p>	<p>Personal details</p> <p>Recruitment</p>	<p>Our legitimate interest to identify suitable candidates for roles.</p> <p>Your consent to receive recruitment related communications.</p>
<p>Intragroup data sharing</p>	<p>We will share your personal information with other entities in Flutter where it is necessary for the reasons set out in section 7.</p>	<p>All</p>	<p>Our legitimate interest to share a candidate profiles for roles across brands within Flutter.</p>

6 SENSITIVE PERSONAL INFORMATION

We treat the types of personal information listed below as sensitive personal information as they require higher levels of protection and further justification for collecting, storing, and using this type of personal information.

In addition to the information contained in section 5, the following table explains the basis on which we may process sensitive or special category data:

Purpose	Purpose of Processing	Categories of Data	Special Category Processing Exemption
Recruitment (where applicable)	To assess and review eligibility to work for the company in the jurisdiction in which you work.	Sensitive	Necessity to comply with the obligations and exercising specific rights of Flutter or our employees in the field of employment.
Wellbeing, health and safety	To provide any appropriate adjustments or accommodations required in the recruitment process. For certain roles, to assess your fitness to work in that role.	Sensitive	Necessity to comply with the obligations and exercising specific rights of Flutter or our employees in the field of employment. Necessity for the purposes of preventive or occupational medicine, for the assessment of your working capacity, medical diagnosis, the provision of health care or treatment.
Diversity equity and inclusion	To help us root out bias and remove barriers to work, monitor the fairness of our decision making, widen our candidate reach, understand and improve access to opportunity for everyone, understand the lived experiences of our candidates. Specific Diversity Equity & Inclusion notice available on the Privacy Policy page on our Careers websites.	Sensitive No special category data is collected for candidates in Portugal.	Your explicit consent to the processing
Vital interest	To protect you and your interests by sharing information with healthcare providers or other emergency services, or where you may have a health issue that means we need to make reasonable accommodations in order for you to access interview or other recruitment process stages.	Sensitive	To protect your vital interests
Public health or equality of opportunity or treatment and support for individuals with a particular disability	Reasons such as public health such as prevention of spread of infectious diseases (i.e. Covid-19), and general pursuits of equality of opportunity or treatment and support for individuals with a particular disability or medical condition, for example in using feedback or information from one candidate with access requirements to improve the system for all candidates.	Sensitive	In the wider public interest

Consent to Process Sensitive Personal Information

Where we do process special category personal information, we will mostly do so where there is a specific legal requirement as outlined above, where we have a requirement under our obligations as a future employer, where there is a significant public interest, or it is in your vital interests.

In limited circumstances, we may approach you for your written consent to allow us to process sensitive data. If we do so, we will provide you with an explanation of the kind of information we are requesting and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your potential future contract with us that you agree to any request for consent from us. In situations where we rely on our consent to provide information, there will never be any negative repercussions for you where you choose not to provide this information.

Information about Criminal Convictions Data (Note: This section does not apply to candidates in Portugal or Ireland)

We may only use information relating to criminal convictions where the law permits. We do not gather, access, store or otherwise process a comprehensive register of information relating to criminal convictions.

Purpose	Purpose of Processing	Categories of Data	Lawful Basis
Recruitment	Where required, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us.	Sensitive	To comply with our legal obligations as employer. Our legitimate interest to protect our organization against risk of financial crimes such as money laundering, terrorism, and bribery.
Financial Crime	Where permitted, we will complete Adverse Media, PEPs and Sanction screening	Sensitive	To comply with our legal obligations as employer. Our legitimate interest to protect our organization against risk of financial crimes such as money laundering, terrorism and bribery.

7 DATA SHARING

In addition to the purposes involving the processing of your personal information listed above, we will also disclose your personal information to third parties, including third-party service providers and other entities in Flutter. All our third-party service providers and other entities in Flutter are required to have appropriate technical and organisational measures, including security measures to protect your personal information.

We may also disclose your personal information in the following circumstances:

- when required by applicable law or regulation (disclosure to a governmental, regulatory or enforcement authority);
- in order to defend ourselves legally and/or in relation to legal proceedings; and
- whilst negotiating a takeover, purchase, merger or divestiture and pursuant to the same.

Data Sharing within Flutter

Within our own systems we have restricted access to your data. This means only those who need to use it can view it.

We will share your personal information with other entities in Flutter where we have a legitimate interest, for

the following particular purposes:

- Human Resource operations including access by all brands in Flutter to our Flutter talent community
- Providing global support and services in Legal, Compliance & Risk
- Meeting our regulatory obligations
- Reporting and group oversight
As part of our regular reporting activities on company performance, in the context of a business reorganization or group restructuring exercise, for system maintenance support and hosting of data
- For the continuity of recruitment in the event of a merger or takeover.

Data Sharing with Third Party Service Providers

We will share your personal information with third parties. Third parties include third-party service providers (including contractors and designated agents). Some of the activities carried out by third parties- include:

Purpose	Purpose of Processing	Categories of Data	Lawful Basis
Human Resources	<p>To support recruitment related tasks.</p> <p>To create a candidate profile and to assess and review eligibility to work for the company in the jurisdiction in which you work , where applicable.</p> <p>To undertake background screening checks</p>	<p>Sensitive</p> <p>Personal Details</p> <p>Recruitment</p>	<p>Our legitimate interests of ensuring suitable candidates are places in appropriate roles and eligible to work in the jurisdiction.</p> <p>In order to undertake necessary steps to enter in to your contract.</p> <p>In certain circumstances and for particular roles to comply with a legal obligation to verify fitness of candidates.</p>
Legal or Regulatory	To comply with legal and regulatory obligations or the defence of legal claims.	All	<p>In certain circumstances to comply with a legal obligation</p> <p>Our legitimate s interest to protect our organization from legal claims.</p>

Transferring Information Outside the EEA/ UK/ Country of Residence

From time to time personal information we collect about you will be transferred outside the European Economic Area ('EEA'), UK or your country of residence to other Flutter entities or third parties in accordance with our lawful basis for processing that information.

We will ensure that the appropriate measures to protect your personal information are in place for such transfers, including;

- An intra-group data protection agreement which includes all legally required contractual clauses, as well as security contractual clauses, applicable to cross border transfers of personal information in Flutter;
- Where applicable, relevant contractual clauses in our contracts as required by law; and
- Where applicable, additional safeguards to ensure the protection of your personal information in all destination jurisdictions.

8 DATA SECURITY

We take appropriate security, technical and organisational measures to ensure that your personal information is kept secure and to prevent the theft, loss, or unauthorised access to your personal information. We restrict

access to those who need to use and view it. It is important to understand however that security can never be guaranteed, and you will not hold us liable save where the security of your personal information is compromised due to our negligence. If you believe your personal information has been leaked or breached, please contact us. The matter will be investigated immediately. Details of these measures are available on request.

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.

9 DATA RETENTION

We endeavour to ensure that personal information is kept as current as possible, and that irrelevant or excessive data is deleted or made anonymous as soon as reasonably practicable. As part of our Flutter talent community, we generally retain your personal information for 12 months. Prior to the end of the 12-month period, we will contact you to request your consent to continue to be part of our Flutter talent community. Where you have requested to opt-out of receiving Flutter talent community communications, we will delete your candidate profile and we will retain your name, email and social links for the purposes of managing your contact preferences.

You have the right to ask for your data to be deleted at any time, see section 10 for further details.

Where your recruitment process is successful and you become an employee of Flutter, your information will be retained as described in our Employee Privacy Notice (which will be provided to you upon joining Flutter.)

10 DATA SUBJECT RIGHTS

Under certain circumstances, by law you have the following rights in connection with your personal information:

- Request access to a copy of your personal information (commonly known as a “data subject access request”).
- Request correction of the personal information that we hold about you.
- Request erasure of your personal information.
- Object to processing of your personal information where we are relying on our legitimate interests (or those of a third party). You also have the right to object where we are processing your personal information in relation to future job opportunities and recruitment related communications. To opt out of these emails, you can click on ‘unsubscribe’ at the bottom of the emails.
- Request the restriction of processing of your personal information.
- Right to portability. This right allows you to obtain your personal data in a structured and transmittable format.

For more information about these rights or to make a request to exercise your rights as described in this section please contact DP@Flutter.com.

Automated Decision Making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention.

We do not routinely carry out automated decision making and in the event that we were to do so we would make you aware at the time and provide you with the relevant information regarding this. You have the right not to be subject to a decision which is based solely on automated processing (without human involvement) where that decision produces a legal effect or otherwise significantly affects you. This right means you can request that we involve one of our employees or representatives in the decision-making process.

Right to Complain

If you have any complaints, you have the right to contact your own national data protection supervisory authority. However, we ask that you contact us [here](#) in the first instance to allow us the opportunity to address your concerns.

11 RIGHT TO WITHDRAW CONSENT TO RECEIVE TALENT COMMUNITY COMMUNICATIONS

In the circumstances where you have provided your consent to us to use of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. You can do this by completing the 'Manage my Talent Community Communications' form which is accessible within the talent community forms section on our career websites or you can opt out of recruitment related emails by clicking on 'unsubscribe' at the bottom of the email or

12 DATA PROTECTION OFFICER

If you have any questions about this Notice or how we handle your personal information, please contact us on DP@flutter.com.

13 CHANGES TO THIS NOTICE

We reserve the right to update this Notice at any time, and we will provide you with a Notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this Notice, please contact us.

Version Date: 04/11/2022

Appendix 1

Brand	Data Controller
Group Functions Including <ul style="list-style-type: none">Blip career website	Power Leisure Bookmakers Limited TSED Unipessoal LDA

<ul style="list-style-type: none"> • Betfair Romania career website 	Betfair Romania Development S.R.L
Paddy Power	Power Leisure Bookmakers Limited (Ireland) D McGranaghan Limited Power Leisure Bookmakers Ltd (UK) (employing entity for UK head office employees & minor decision making)
Betfair	Power Leisure Bookmakers Limited Betfair Ltd
Sky Betting & Gaming	Hestview Limited Bonne Terre Limited
Sporting Life	Hestview Limited Bonne Terre Limited
Timeform	Hestview Ltd
Tombola	Tombola International Plc
PokerStars US	TSG Interactive Services (Ireland) Limited
Betfair International	Power Leisure Bookmakers Limited
Adjarabet	Aviator LLC
Junglee	Junglee Games
Cayetano Gaming	Power Leisure Bookmakers Limited
Airton	Power Leisure Bookmakers Limited
Singular	Singular Trading Limited
Sisal	Sisal Entertainment SpA
Daily Fantasy	FanDuel, Inc
Skill Games:	FanDuel SG LLC
Sportsbook & Casino:	Betfair Interactive US, LLC
FanDuel TV / TVG	ODS Technologies, L.P. – a subsidiary of BIU.
NumberFire	NumberFire, Inc.

International	FanDuel Ltd. (Scotland) FanDuel Canada ULC
Sportsbet	Sportsbet Pty Limited