Candidate Privacy Notice

1 WHAT IS THE PURPOSE OF THIS DOCUMENT?

- 1.1 This Candidate Privacy 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, Singular and Sporting Life brands within Flutter Entertainment plc, and all of its subsidiaries ('Flutter', 'we', 'us', 'our') whose personal information ('you', 'your') is used within the recruitment process. Depending on the jurisdiction whose laws you are subject to, different provisions may apply. These are specified in country-specific Annexures.
- 1.2 The purpose of this Notice is to describe 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 also explains your rights regarding your personal information and how to exercise them.
- 1.3 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

2.1 There are a number of brands within Flutter. As part of our global Flutter talent community, your personal information may be accessed by any <u>brand</u> 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 the relevant data controller.

3 HOW IS YOUR PERSONAL INFORMATION COLLECTED?

- **3.1** We collect information directly from you during your recruitment journey and depending on your location, 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.
- 3.2 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). Where applicable, we will contact you promptly to notify you that a candidate profile has been created and where required by applicable law, you will receive a request to consent for your profile to be part of our Flutter talent community.
- 3.3 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, culture.singular.uk 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, or otherwise in accordance with applicable laws.

- 3.4 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).
- 3.5 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/.
- 3.6 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 "Data re-enrichment preferences 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.
- **3.7 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. Where required under applicable law, we will always have a lawful basis under privacy laws to collect and process your data, see details below in sections 5 and 6.

4 THE CATEGORIES OF INFORMATION WE HOLD ABOUT YOU

We may collect, store, and use the following categories of personal data about you (note that this list is comprehensive but not necessarily exhaustive and it may differ from one location to another):

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 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, tenure, financial sanction check where carried out and permitted by applicable laws). The following categories are not applicable to candidates based in Portugal: references, background and verification information The following categories are not applicable to candidates based in Romania background and verification information
Training and	- Data relating to training and development needs or training received, or assessments
development Sensitive	completed. Where permitted by law or provided voluntarily special sategory data regarding rase
Sensitive	Where permitted by law or provided voluntarily, special category data regarding, race,

	health, ethnicity, religious belief and sexuality.		
	 We also collect the following types of data which we protect with the same degree of care as special category data, if permitted by law or provided voluntarily: 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. The following categories are not applicable to candidates located in Portugal, Romania (with few exception clearly specified in law) or Ireland Criminal data relating to criminal convictions and offences. 		
Online / publicly available data	 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	 Any other personal information which you choose to disclose to us during your recruitment whether verbally or in written form. 		

5 HOW AND WHY WE WILL USE PERSONAL INFORMATION ABOUT YOU

We will use your personal data for the following purposes and related lawful bases:

Purpose	se Purpose for Processing Categories of Personal Data		Lawful Basis for Processing	
Recruitment	To enable us to make decisions regarding your suitability to work for us. 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.	
Pre-employment verification and background screening (if and to the extent allowed by law) To undertake appropriate pre- employment screening. Including to enable us to make decisions regarding your suitability to work for Flutter,		Recruitment	Our legitimate interests of ensuring suitable candidates are placed in roles. In certain circumstances and for specified roles to comply	

	including where applicable, psychometric testing		with a legal obligation to verify the suitability of candidates.
Profile enrichment/ Re- enrichment	To gather and process data and to recruit an effective workforce to meet our customer requirements. Enabling recruiters to effectively manage attraction campaigns, candidate shortlist and candidate engagement for future job opportunities. https://beamery.com/data-enrichment-policy/	Online/ publicly available Personal Recruitment	Our legitimate interest for recruiters to search for prospective candidates and contact them regarding career opportunities. Your consent to join our Flutter talent community which includes enrichment. Our legitimate interest to create candidate profiles to identify suitable candidates for current and future
Use of artificial intelligence and algorithms	To analyse and find commonalities between candidates based on location, job title, language, skills and keywords found in contacts' profile attachments. We may use algorithms to identify candidate profiles in order to assist us with shortlisting candidates most suited to roles.	Personal details Recruitment	career opportunities. Our legitimate interest to create candidate shortlists for roles to identify candidates most suited to roles.
Reporting and insights	To analyse, discover trends and prevent bias between the opportunities for candidates based on gender at each stage of the recruitment process.		Our legitimate interests in identifying, assessing, and recruiting suitable candidates for roles.
Job opportunities & Flutter talent community communications	To contact you in relation to job opportunities which we consider may be of interest to you. To send you recruitment related communications.	Personal details Recruitment	Our legitimate interest to identify suitable candidates for roles. Your consent to receive recruitment related communications.
Intragroup data sharing	We will share your personal information with other entities in Flutter where it is necessary for the reasons set out in section 7.	All	Our legitimate interest to share a candidate profiles for roles across brands within Flutter. To comply with our legal

	and regulatory obligations in some jurisdictions.
	Contractual necessity to meet our obligations in your contract of employment where those obligations might be fulfilled by a member of Flutter other than your Flutter contracting employing entity.

If you are an Indian resident, Flutter processes your personal data based on your voluntary provision of such data for the purposes set out in this section

6 SENSITIVE PERSONAL INFORMATION

6.1 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			Special Category Processing Exemption
Recruitment (where applicable)	To assess and review your 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. In certain locations, to comply with legal provisions regarding the hiring of candidates with disabilities. 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	Sensitive	Your explicit consent to the processing or provided voluntarily by you. To comply with our legal and regulatory obligations in some jurisdictions.

Vital interest Public interest	experiences of our candidates. Specific Diversity, Equity & Inclusion notices are available on relevant recruitment webpages. 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. Safeguarding of children and individuals at risk/ Safeguarding of economic well-being of	Sensitive	To protect your vital interests. In the wider public interest
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.

If you are an Indian resident, Flutter may process personal data on lawful bases that are prescribed under local laws. Please see Annex 1.

6.2 <u>Consent to Process Sensitive Personal Information</u>

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, or where permitted by or in accordance with applicable law.

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.

6.3 <u>Information about Criminal Convictions Data</u> (Note: This section does not apply to candidates located in Portugal, Romania (with few exceptions clearly specified by law, or Ireland) We may only use information

relating to criminal convictions on the basis of applicable national law. We do not gather, access, store or otherwise process a comprehensive register of information relating to criminal convictions. For a limited number of roles as determined by our regulatory requirements, we may need to provide ongoing information on 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 Online/Public	To comply with our legal obligations as employer. Our legitimate interest to protect our organisation against risk of financial crimes such as money laundering, terrorism and bribery.

If you are an Indian resident, Flutter may process personal data on lawful bases that are prescribed under local laws.

7 DATA SHARING

- 7.1 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.
- **7.2** 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.

7.3 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 access it. As part of a global organisation, your personal information may be accessed by colleagues across Flutter where we have a legitimate interest, for the following 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.

• Depending on the circumstances, third parties, or internal legal entities (brands/employers) in Flutter may be considered Data Controllers, Data Processors or Joint Controllers of your personal information.

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

7.5 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, as
 required by law;
- 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. If you believe your personal information has been leaked or breached, please contact us. The matter will be investigated immediately.

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

- 9.1 We endeavour to ensure that personal information is kept as up to date 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. We also consider specific country laws which we apply on a country by country basis. Prior to the end of the 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.
- **9.2** Where we process data based on your consent, you have the right to ask for your data to be deleted at any time, see section 10 for further details.
- **9.3** Where your recruitment process is successful and you become an employee of Flutter, your information will be retained as described in our Staff Privacy Notice (which will be provided to you upon joining).

10 DATA SUBJECT RIGHTS

- **10.1** 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 relates 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.
- **10.2** Depending on the jurisdiction, you may have other rights provided to you under applicable law or you may not be qualified to exercise some of the rights provided above. For more information about these rights or to make a request to exercise your rights as described in this section please contact us in the manner provided under section 12.

10.3 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. Where required by applicable law, you may 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.

10.4 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 DP@Flutter.com 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 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 (which include careers.fluttergroup.com, careers.fluttergroup.com, careers.flutterinternational.com, careers.flutterinternational.com, careers.flutterinternational.com, careers.glutterinternational.com, <a href="mailto:careers.gluttern

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. Please also be aware there may be local addendums to this notice to comply with local legal requirements, such as in Romania.

Version 5. Version Date: 15.03.2024

Appendix 1

Brand	Data Controller		
Group Functions	Power Leisure Bookmakers Limited		
	Betfair Limited.		
Including			
 Blip 	TSED Unipessoal LDA		
 Betfair Romania 			
	Betfair Romania Development S.R.L		
Paddy Power (online	Power Leisure Bookmakers Limited (Ireland)		
and retail)	D McGranaghan Limited (retail only)		
	Power Leisure Bookmakers Ltd (UK)		
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		
PokerStars	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		
Fanduel Daily Fantasy	FanDuel, Inc		
Fanduel 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.		
Fanduel	FanDuel Ltd. (Scotland)		
	FanDuel Canada ULC		
Sportsbet	Sportsbet Pty Limited		
tombola	tombola Ltd		
	tombola International Plc		
	tombola International Malta		
	tombola Services BC		
	tombola Services SL		
	tombola Italy SRL		
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Annexure 1 – Country-Specific Terms

The following annex applies to Flutter candidates in India:

For the purposes of this Notice, the term "data controller" shall be replaced with "data fiduciary".

For the purposes of Flutter's operations in India, the sections of the notice mentioned below shall be substituted as follows:

- 1. **Section 3.6** shall be read as: "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. If you wish to opt out of re-enrichment at any time, you can complete the "Data re-enrichment preferences form which is accessible within the talent community forms on our career websites."
- 2. Section 5 shall include the following clause in addition to the details mentioned under the Notice:

Purpose	Purpose for	Categories of Personal Data	Lawful Basis for
	Processing		Processing
Background	To enable us to	Address, contact information and address	Your consent to
Screening	make decisions regarding your suitability to work for us.	history Criminal, police or court records, driving records, Education history, Eligibility to work, volunteering history, including fiduciary or directorship responsibilities Financial history, including credit history, bankruptcy and financial judgments, Gap activities, including travel Health information, including drug tests. Identity, including identifying numbers and identity documents, Inclusion on watch or sanctions list, Membership, registration, or disciplinary action with regulatory or professional bodies, other people's opinions about your performance or character	such processing.

- 3. **Section 7.3** shall be read as: "Within our own systems we have restricted access to your data. This means only those who need to use it, can access it. As part of a global organisation, your personal information may be accessed by colleagues across Flutter for the following 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."
- 4. **Section 10.4** shall be read as: "If you have any complaints, you have the right to contact the Data Protection Board of India ("**Board**"). However, we ask that you contact us, in the manner provided under section 12, in the first instance to allow us the opportunity to address your concerns."
- 5. **Section 12** shall be read as: "If you have any questions about this Notice or how we handle your personal information, please contact DPO specified below.

Name: Flutter Group Data Protection Officer

Address: Belfield Office Park, Beech Hill Road, Clonskeagh, Dublin 4, Ireland

Email Address: DP@Flutter.com"