NEC CANDIDATE PRIVACY NOTICE

What is the purpose of this document?

The NEC is committed to protecting the privacy and security of your personal data. We only process personal data in accordance with the principles contained within the UK General Data Protection Regulations (UK GDPR), the Data Protection Act 2018 and other applicable legislation and codes (together referred to as the "Data Protection Legislation").

This privacy notice describes how we collect and use personal data about candidates who apply to work for us.

The NEC (The National Exhibition Centre Limited) is a "data controller" responsible for the processing of your personal data. This means that we are responsible for deciding how we collect and use your personal data. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.

This privacy notice does not form part of any offer of employment or engagement and may be amended at any time to reflect any changes in the way in which we process your personal data. If you are in the application process when any changes or updates are made to this notice, we will bring any such changes to your attention as soon as is practicable. We may also notify you in other ways from time to time about the processing of your personal data and your rights under the Data Protection Legislation.

Data protection principles

We will comply with the principles under the Data Protection Legislation, which means that your personal data will be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you in this privacy notice and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and where necessary kept up to date.
5. Kept only as long as necessary.
6. Kept securely.

Definitions

"Personal data" is any information that relates to an identified or identifiable individual. This includes information about individuals that can be identified directly (for example by name) or indirectly via a combination of other information (for example by an employee number). It does not include data where any potential identifiers have been removed (anonymous data), or data held in an unstructured paper file.

"Special Category data" is personal data which is regarded as more sensitive and requires a higher level of protection - such as genetic data, biometric data, information about sex life or sexual orientation, race or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and health. For the purposes of this privacy notice, references to special category data will also include personal data relating to criminal convictions or criminal offence data.

When we refer to "processing" your personal data, this means anything we do with the data, from collecting, analysing, amending, sharing, storing or deleting personal data.

The type of information we hold about you

In connection with your application for work with us, we may collect, store and use the following categories of personal data about you:

- The information you have provided to us in your curriculum vitae and any covering letter.
- The information you have provided on an application form, including full name, title, postal address, telephone number, personal email address, education and employment history, qualifications, skills and experience.
- Any information you provide to us during an interview.
- Contents of voicemails, emails, correspondence and other communications between us during the recruitment process.
- If you have been asked to complete any testing or assessment as part of the application process, the results of those tests or assessments.
- Information in connection with your right to work in the UK or background checks, including date of birth, ID verification and passport/visa documents, employment references, professional memberships, address history or financial checks such as any bankruptcy or County Court Judgment history.
- CCTV or ANPR footage and other information obtained through electronic means such as door access records.
- Vehicle registration if you are visiting one of our sites for interview.

We may also collect, store and use the following "Special Category Data":

- Information about your health, including any relevant medical conditions.
- Information about criminal convictions and offences where the type of role requires these checks to be undertaken.

How is your personal data collected?

We collect personal information about candidates from the following sources:

- You, the candidate.
- Recruitment agencies or job boards, if applicable
- The background check provider as notified to you and if applicable (for example for right to work, financial or criminal record checks).

- Where relevant for the job role, Disclosure and Barring Service in respect of criminal convictions.
- Your named referees, if applicable.
- In some instances, we may collect personal data publicly accessible sources, including but not limited to social media platforms.

Where we receive such information, we will only use it in accordance with this privacy notice.

Information about criminal convictions

- We will only collect this information if it is appropriate given the nature of the role you are applying for and where the law allows us to do so. This will usually be where such processing is necessary to carry out our safeguarding obligations or in connection with senior roles.
- We envisage we will only collect this information if it is notified to us by the Disclosure and Barring Service during the recruitment process (if applicable) or otherwise by you directly.
- We will use information about criminal offences and convictions in to make recruitment decisions (if relevant to the role you are applying for).

How we will use information about you

We will process the personal data we collect about you for various reasons, relying on a variety of different bases for lawful processing under the Data Protection Legislation as set out below.

- To comply with legal or regulatory requirements or exercise legal rights conferred upon us. This may include:
  - Checks for eligibility to work in the UK as required by immigration laws, such as obtaining passport and visa documentation.
  - Formal identification documentation relating to you, such as passport or driving licence, to verify your identity (including date of birth).

- To enter into a contract with you. If you are successful in your application we will need to use some of your personal data to finalise the employment contract and onboarding requirements. This may include, your name, address, contact details, NI number, salary details and bank account details.

- To pursue our legitimate interests as a business in connection with processing and assessing applications. This may include:
  - Your contact details such as your name, address, telephone number and personal email address which will be used to communicate with you in relation to the recruitment and onboarding process.
  - Your CV, any education history, employment records, professional qualifications, certifications and any testing or assessment results in order for us to consider your suitability for the role you are applying for.

- Details of the job role you are applying for, any interview notes made by us during or following an interview with you, in order to assess your suitability for that role.
- Pay and benefit discussions with you to help determine whether a job offer may be made to you.
- The results of our background checking procedures to protect the security of our business and the public.
- Voicemails, emails, correspondence, and other communications created, stored or transmitted via our computer or communications equipment, in order to progress the application through the recruitment process.
- You feedback or opinions on the recruitment experience as part of any employment surveys.
- CCTV or ANPR footage of you on our sites for security reasons, for the protection of our property and for health and safety reasons.
- Network and information security data in order for us to take steps to protect our IT network (including your information) against loss or unauthorised access.

- With your consent. This may include if, as part of the application process, you agree to be contacted in connection with future opportunities that might fit your profile and skills.

You should be aware that it is not a condition of your application that you agree to any request for consent from us and you can withdraw any consent at any time, without this impacting your application, by using the contact details provided below.

Having received your CV, covering letter and/or your application form and the results from any assessments you may be required to undertake, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references and/or carry out a criminal record and/or carry out any other checks, including background checks, before confirming your appointment.

Please note that, in some rare circumstances, we may process your personal data without your knowledge or consent, in compliance with the Data Protection Legislation, where this is required or permitted by law.

If you fail to provide personal data where it is needed

You do not have to provide us with any personal data. However, if you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications, work history or references), we may not be able to process your application successfully.

How we use your special categories data

We will also collect and use special category data (including criminal offence data) for a range of reasons, relying on a variety of different bases for lawful processing under the Data Protection Legislation, as set out below.

- For occupational health reasons or where we are assessing your working capability, subject to appropriate confidential safeguards. This may include information about your physical or mental health or disability status to consider whether any adjustments are required during the recruitment process, and for carrying out any medical assessment required for the role, pension and any insurance benefits which may be offered to you as part of the role.
- Where there is a substantial public interest, such as for preventing and detecting unlawful acts, or in relation to our occupational pension scheme. To enable the NEC to perform its legal obligations in respect of employment, social security, social protection law, or as needed in the public interest. This may include health information to assess and/or to comply with obligations under the Equality Act 2010.
- To establish, defend or exercise legal claims in an employment tribunal or any other court of law.
- Where it is necessary for the purposes of the prevention or detection of an unlawful act.

Automated decision-making

We do not envisage that you will be subject to decisions taken about you based solely on automated decision-making (without any meaningful human involvement). We will update this privacy notice and issue communications if this position changes.

Data sharing – Why might you share my personal information with third parties?

We may have to share your personal data with third parties, including third-party service providers.

We require third parties to respect the security of your personal data and to treat it in accordance with the law.

There may be limited occasions where personal data may be transferred outside of the UK and/or EEA, in particular, where our service providers or their supply chain operate from locations outside of the UK/EEA.

You can expect a similar degree of protection in respect of your personal data. If you require more details, including what measures have been put in place to protect your personal data when it is shared with third parties, please contact the DPO (dataprotection@thenec.co.uk).

We may share your personal data internally within the NEC. In particular, it may be shared internally with: the People Team who may be involved in the recruitment process or in the administration of your application; line management; consultants; advisers and/or other appropriate persons who may be involved in the recruitment process for the roles you are applying for.

We may also share your personal data with the following third parties where it is necessary to administer the recruitment process with you, to comply with the law or where we have another lawful basis for doing so:

- Recruitment and HR IT system software or cloud storage providers.
- Background check providers such as Experian and Disclosure and Barring Service.
- Home Office for immigration purposes.

- Providers of legal services or other professional services.
- Recruitment or employment agencies.

How secure is my information with third-parties?

In some cases third parties will be acting as data controllers of your personal data (for example, recruitment agencies) and therefore we advise you to read their privacy notice where applicable. However, where we use third-party service providers (data processors) they are contractually required to put in place appropriate security measures to protect your personal data in line with legal requirements.

Data security

We have put in place appropriate security measures to protect your personal data. Third parties will only process your personal data on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

Your personal data is stored in a variety of secure facilities and IT systems

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed, altered, destroyed or disclosed in an unauthorised way. In addition, we limit access to your personal data to those colleagues, agents, contractors and other third parties who have a business need-to-know. Third party service providers will only process your personal data on our instructions and where they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security incidents and will notify you and any applicable regulator where we are legally required to do so, or we consider notification is otherwise in your interests.

Whenever we propose using new technologies, or where processing is construed as 'high risk', we are obliged to carry out a data protection impact assessment which allows us to make sure appropriate security measures and privacy practices are in place in relation to the processing of your personal data.

Data Retention

We will retain your personal data for as long as is necessary to fulfil the purposes we collected it for.

Job applications, interview records and any assessment results will be held for up to 6 months after we have communicated to you our decision about whether to appoint you to the role (for unsuccessful applicants). This is to show that we have conducted the recruitment exercise in a fair and transparent way. After the requisite retention period we will securely destroy your personal data or anonymise our records.

Your rights in connection with your personal data

By law you have the following data protection rights:

- **To be informed** about the collection and use of your personal data. This information will be found in our privacy notices, or in some cases supplemented by other communications.
- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you together with some supplementary information, subject to some limited exceptions.
- **Request correction** of the personal data 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 data, in certain circumstances, for example where there is no lawful reason for us continuing to process it.
- **Object to processing** of your personal data where we are relying on legitimate interests as the lawful reason for processing the data. You also have the right to object where we are processing your personal data for direct marketing purposes. In such cases we may temporarily stop processing your personal data in line with your objection until we have investigated the matter.
- **Request the restriction of processing** of your personal data, in certain circumstances. This enables you to ask us to suspend the processing of your personal data, for example if you want us to establish its accuracy or challenge the reason for processing it.
- **Request the transfer** of your personal data to another organisation or give it to you (data portability). This only applies to information you have given us. This right also only applies in certain circumstances.

If you want to exercise any of your data protection rights, please contact AskHR@thenec.co.uk or the Data Protection Officer (dataprotection@thenec.co.uk).

You will not have to pay a fee to exercise your data protection rights. However, we may charge a reasonable fee if your request is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

As part of our security requirements, we may need to request information from you to help us confirm your identity, before dealing with your request.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection and use of your personal data for a specific purpose, you have the right to withdraw your consent at any time. To withdraw your consent, please contact AskHR@thenec.co.uk or dataprotection@thenec.co.uk. Once we have received notification that you have withdrawn your consent, we will no longer process your personal data for the purpose you originally agreed to, unless we have another legitimate basis for doing so in law.

Your duty to inform us of changes

It is important that the personal data we hold about you is accurate. Please keep us informed if your personal data changes during your application process.

Complaints

You also have the right to make a complaint to the NEC about the handling of your personal data. If you raise a data protection complaint, you will receive an acknowledgement promptly and in any event within no more than 30 days from the date of receipt of your complaint. We will conduct an investigation and let you know the outcome without undue delay. If you are not satisfied with the outcome of our investigation, you may contact the UK data protection regulator, the Information Commission (ICO). The ICO's contact details can be found at www.ico.org.uk/for-the-public.

If you wish to make a data protection complaint, please contact AskHR@thenec.co.uk or contact the Data Protection Officer at dataprotection@thenec.co.uk.

Data Protection Officer

We have appointed a Data Protection Officer (DPO) to oversee the NEC's compliance with the Data Protection Legislation and the use of personal data in line with this privacy notice. If you have any questions about this privacy notice or how we handle your personal data, please contact the DPO (dataprotection@thenec.co.uk). You can also contact the DPO at: Data Protection Officer, Centre Core Level 4, The National Exhibition Centre, Birmingham B40 1NT.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time. We will notify you when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.