

## NORMAN BROADBENT PLC PRIVACY NOTICE FOR CANDIDATES

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your working relationship with us.

This notice applies to current and former candidates, who we have either placed into a role (Interim or permanent) or who have contacted us/we have contacted about a prospective job role. This notice does not form part of any contract to provide services.

This privacy notice does not apply to you in your capacity as a client of ours. In this case, the privacy notice found [here](#) states the nature and purposes of our processing.

References to **we**, **our** or **us** in this privacy notice are to **Norman Broadbent** (being **Norman Broadbent PLC**, and each of its direct and indirect subsidiaries, trading under the "**Norman Broadbent**" brand including Norman Broadbent Board, Norman Broadbent Executive Search, Norman Broadbent Interim, Norman Broadbent Solutions, Norman Broadbent Research & Insight and Norman Broadbent Consulting. Details of our main trading entities are as follows:

- Norman Broadbent PLC is a company incorporated in England and Wales. Registered Number: 00318267. Registered Office: Milbank Tower, Millbank, London SW1P 4QP
- Norman Broadbent Executive Search Limited is a limited company incorporated in England and Wales. Registered Number: 03326763. Registered Office: Milbank Tower, Millbank, London SW1P 4QP

This privacy notice also covers any joint venture companies, bodies or organisation that we have an interest in and to which you are seconded, carrying out activities on behalf of or are appointed as one of its officers or representatives.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we not required to do so, but our Chief Finance Officer has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "**Contacting us**" section at the end of this privacy notice.

For the purposes of this privacy notice the controller is the relevant part of the Norman Broadbent Group or our joint venture companies, bodies or organisations which is processing your personal information.

### 1. PERSONAL INFORMATION

In order to support your career aspirations and source new job opportunities for you, you may provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details such as name, title, addresses, telephone numbers and personal email addresses and Skype account contact details;
- date of birth;
- gender;
- passport/driving licence details (including copies where we are required to hold such information for identification purposes);
- employment history and location of current workplace, salary, annual leave, pensions and benefits entitlement;

- location of employment or workplace;
- attendance at any events we host or organise;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- recruitment records including references and other information included in a CV, cover letter or as part of the application process) and activities (including information about interviews, jobs applications and offers);
- details about how you use our website e.g. the pages you look at and how you use them, usernames and passwords;
- details of any new position, start date, leaving date and salary (for our interim workers);
- national insurance number and other tax or governmental identifiers(for our interim workers);
- bank accounts, payroll and tax status(for our interim workers);
- limited company details (including directors, bank account details, certificate of incorporation) (for our interim workers)
- timesheets and details of working hours(for our interim workers); and
- referee details, next of kin, beneficiaries, details of family members and emergency contacts.

## 2. **SPECIAL CATEGORIES OF PERSONAL INFORMATION**

We do not generally collect, store and use the following “**special categories**” of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- information about your trade union memberships;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information; and
- biometric information about you, for example fingerprints, retina scans.

If we do collect any special category personal information, we do not currently rely on consent as a basis for processing special category personal information.

We will also not collect, store and use any criminal records information in relation to you. If we do collect any criminal records information, we do not currently rely on consent as a basis for processing criminal records information.

## 3. **WHERE WE COLLECT YOUR INFORMATION**

We typically collect personal information about you when you correspond with us by phone, e-mail or otherwise.

We also may collect personal information about you through other sources such as LinkedIn, personnel recommendations and referrals, hiring platforms and through the use of business development tools.

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

## 4. **USES MADE OF THE INFORMATION**

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

<b>Purpose</b>	<b>Personal information used</b>	<b>Lawful basis</b>
<b>Non- 'special categories' of Personal Information</b>		
<b>To assess your CV and qualifications (where you have provided us with/we have collected your personal information directly from you)</b>	All the personal information we collect for the purposes of the recruitment process.	We need this information to be able to perform and administer the recruitment process for you.
<b>To provide you with information regarding job opportunities that may be of interest to you based on your CV and qualifications (where you have provided us with/we have collected your personal information directly from you)</b>	All the personal information we collect for the purposes of the recruitment process.	As above.
<b>To contact you with information regarding job opportunities that may be of interest to you based on your CV and qualifications (where we have obtained your information from a third party source)</b>	All contact details and all information contained in any CV (including employment and education history and location of current workplace) uploaded online.	Where your personal information has been sourced indirectly from either: (i) a hiring platform; (ii) social media platform where you have selected a function to let recruiters know that you are open to job opportunities; or (iii) a job board onto which you have uploaded your CV we have a legitimate business interest to do so. In all other cases, we will only contact you with information about job opportunities where we have your consent to do.
<b>To manage our relationship with you including dealing with any support enquiries made by you</b>	All your personal information excluding 'special categories' of personal information and criminal records information	To be able to manage and perform our contract with you and it is also in our legitimate business interest to ensure that all enquiries are managed properly.
<b>To share your CV or details of your qualifications with a client in relation to potential job roles</b>	All the non-'special categories' of personal information we collect for the purposes of the recruitment process.	We will only do so with your consent.
<b>To arrange an interview with/introduction to a prospective employer in relation to a particular job role and managing the introductory process, provided you have indicated that you are happy for an introduction to be arranged</b>	All the non-'special categories' of personal information we collect for the purposes of the recruitment process.	We will only do so with your consent.

<b>To check you are legally entitled to work in the UK</b>	Personal contact details and identification documents and right to work documentation	We have a legal obligation to do so and it is also in our legitimate business interest to ensure that you are suitable for a role.
<b>Storage of records relating to you and also records relating to our business such as your recruitment records and records of your interactions with us</b>	All non-‘special categories’ of personal information	To be able to manage and fulfil our contract with you, we may have a legal obligation to do so and we also have a legitimate interest to keep proper records.
<b>Dealing with legal disputes involving you.</b>	All your personal information excluding ‘special categories’ of personal information and criminal records information	We have a legitimate interest to ensure that all legal claims are managed effectively.
<b>To send you information we think you might find useful or which you have requested from us, including information about our services and any events we are running, provided you have indicated that you are happy to be contacted for these purposes</b>	Personal contact details	Where you have given us your explicit consent to do so.
<b>To conduct data analytics studies to review and better understand market trends within the recruitment industry</b>	Records of your attendance at any events hosted by us.  All the personal information we collect for the purposes of the recruitment process excluding ‘special categories’ of personal information and criminal records information.	We have a legitimate interest in doing so to ensure that our business is targeted and relevant.
<b>Complying with health and safety obligations</b>	Personal identifiers and other information obtained through electronic means such as swipecard and key fob records	We have a legal obligation to comply with Health and Safety laws.
<b>Where you are a interim worker contracted with us, to administer the contract we have entered into with you, pay you and manage the invoicing process</b>	Personal identifiers and all the personal information we collect for the purposes of the recruitment process.  Start date, leaving date and pay rate.  All payment and transaction details.	We need this information to be able to perform and administer our contract with you.

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to engage you or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your engagement. For other personal information, whilst you may not be under an obligation to provide it to us, if you do not provide it then we may not be able to properly perform our contract with you.

You should be aware that you are not required under any contract with us to agree to any request for consent. Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "**Contacting us**" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain services to you.

## 5. DIRECT MARKETING

**Email, post and SMS marketing:** from time to time, we may contact you by email, post or SMS with information about products and services we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by emailing us at [enquiries@normanbroadbent.com](mailto:enquiries@normanbroadbent.com). You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

## 6. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- **Companies in the same group of companies as us:** for the purpose of providing a service to you
- **Any party approved by you.**
- **Clients of our business where necessary:** For example the client of ours for whom you are ultimately providing services to.
- **Other service providers to our business and advisors:** for example payroll, email marketing specialists, business development tool providers, professional advisors, contractors and administration and IT services (including CRM, website,). All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information.
- **Purchasers of our business:** buyers or perspective buyers to whom we sell or negotiate to sell our business.
- **Prospective new employers:** our clients for the purpose of introducing you as a prospective new candidate;
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives, for example HMRC or the Information Commissioner's Office; and
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

We do not disclose personal information to anyone else except as set out above.

## 7. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect is not transferred to and stored in countries outside of the UK and the European Union.

Our directors and other individuals working for us may in limited circumstances access personal information outside of the UK and European Union if they are on holiday abroad outside of the UK or European Union. If they do so they will be using our security measures and will be subject to their arrangements with us which are subject to English Law and the same legal protections that would apply to accessing personal data within the UK.

In limited circumstances the people to whom we may disclose personal information as mentioned in the **"Who we share your personal information with"** section above may be located outside of the UK and European Union. In these cases we will impose any legally required protections to the personal information as required by law before it is disclosed.

If you require more details on the arrangements for any of the above then please contact us using the details in the "**Contacting us**" section below.

## 8. HOW LONG WE KEEP PERSONAL INFORMATION FOR

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of 6 years following your last contact with us.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you move home or change your phone number or email address. You can contact us by using the details set out in the "**Contacting us**" section below.

## 9. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example we do not use automated decision making in relation to your personal data. However some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

## 10. CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.



## 11. **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email [enquiries@normanbroadbent.com](mailto:enquiries@normanbroadbent.com) or write to us at: Enquiries, Norman Broadbent, Millbank Tower, Millbank, London SW1P 4QP.

Version dated 24 May 2018