

**GBG**

**GBG Be/Hired Privacy  
Notice (Workable)**



---

**GBG Be/Hired Data Privacy Policy (Workable)****Contents**

General information and contact details.....	3
What personal data do we collect and why?.....	3
Our legal basis for processing personal data.....	4
Who will we share your personal data with and why? .....	5
How long do we retain your personal data for? .....	5
Transfers of personal data outside of your resident jurisdiction .....	6
Your rights under the GDPR, DPA 2018 and other applicable data protection laws across Asia Pacific region.....	6
Your US Privacy Rights .....	7
How to contact us if you're not happy.....	10
Your right to lodge a complaint with the relevant supervisory authority .....	11

This policy was last updated on 23rd March 2023

## GBG Be/Hired Data Privacy Policy (Workable)

### General information and contact details

GB Group Plc ("**GBG**", "**we**", "**us**" or "**our**") take the protection and security of your personal data very seriously. This privacy notice sets out the personal information we collect and process about you through our products and services, the purposes of the processing and how you can exercise your privacy rights.

You may be reading this notice because of a link provided by one of our third party data suppliers, one of our customers, or you simply want more information on processing in relation to our products and services.

Where we collect personal information from you directly, for example, through our website or because you have applied for a job with us, please see our [Website Privacy Notice](#).

Our customers and data suppliers will have a lawful reason for processing your data and may have a separate relationship with you. They are separately required to provide you with information (for example through their own privacy notice) about how they collect and process your data.

We have offices in 19 locations, and our registered head office is located within the United Kingdom at:

GB Group Plc  
The Foundation  
Herons Way  
Chester Business Park  
Chester  
United Kingdom  
CH4 9GB

Our Company Registration Number is: 02415211

If you have any questions about how we use your personal data, please contact our Data Protection Officer by email at [DPO@gbgplc.com](mailto:DPO@gbgplc.com) or call + 44 (0) 161 909 6713.

Our EEA representative is located in Spain at the following address,

GBG  
Edifici El Triangle 4a planta  
Placa de Catalunya  
1 08002 Barcelona  
Spain  
T: +34 (0) 935 451 156

We review this privacy notice on an annual basis, sooner if changes to regulation require it or we change the way we process personal data.

**This policy was last updated on 23rd March 2023**

### What personal data do we collect and why?

GBG uses Workable, an online application provided by Workable Software Limited, to assist with our recruitment process. We use Workable to process personal information as a data processor on our behalf. Workable is only entitled to process your personal data in accordance with our instructions.

When you apply online for a position with GBG we will use the personal data you provide to assist in the recruitment and selection process. The application for a role is a choice you have made, and this

## GBG Be/Hired Data Privacy Policy (Workable)

is the minimum information we require to process your application, which within the software are depicted as mandatory fields.

We may also receive your personal data from a third party, for example a recruitment company you have a relationship with who recommends you as a candidate for a specific role opening, or for our business more generally.

Workable's technology allows GBG to publicly available sources, for example LinkedIn, which may include your personal data such as your CV or Resume, to find potential candidates for our Talent Pool to fill current or future role openings. Where we find you in this way, we will obtain your personal data from these sources and inform you immediately of this.

If you are successful and accept an offer from GBG, we may also seek additional information from other sources, for example we will perform pre-employment background and reference checks to confirm details about you. All checks are carried out in a fair and consistent manner and will be limited to information that is directly relevant to the position being applied for and in pursuance of our employment obligations.

GBG respects and is committed to protecting the personal information of our candidates.

Information provided at the point of the application and any information obtained from other sources will be retained in all cases electronically only for as long as is required for the purposes of:

- the administration of your application
- future consideration where applicable (you will be notified separately after 3 months to ask whether you wish for your application details be retained for this purpose and if you do not respond your details will be automatically deleted)
- if your application is successful this will form the basis of your employment records
- discharging any legal or regulatory requirements

You have the opportunity to provide information in relation to reasonable adjustments you require in the recruitment process to assist you. As an equal opportunity employer, we are committed to providing fair opportunities for everyone, regardless of age, gender, race, religion, sexual orientation, parental status, or disability. Where applicable please inform your GBG Talent Attraction Specialist if you require any reasonable adjustments to the interview process. This is to ensure we enable all individuals to compete on equal terms.

You may also choose to provide some special category personal information which will assist GBG with its Inclusion and Diversity agenda, this is depicted in optional fields, it is not mandatory and could also be provided voluntarily at a later date if you are successful in securing the role you have applied for. If you do provide this data during the application process, we will always ask for your explicit consent to process it. Please note that neither the special category personal information you provide nor opting out of providing special category personal information will have any negative impact on your candidacy.

## Our legal basis for processing personal data

We rely on your consent as the legal basis to process your data for the purpose of considering and/or securing employment.

In addition to the above, we rely on your explicit consent as legal basis to process any information you choose to provide as part of your application which fall under special category data also known as sensitive personal data in certain region such as health, religious or ethnicity information.

## GBG Be/Hired Data Privacy Policy (Workable)

We will present you with a consent box and key information at the point you are ready to submit your application.

Where we identify and collect personal data directly from open public sources for the purpose of our Talent Pool and potential employment, we rely on our legitimate interests as our legal basis.

## Who will we share your personal data with and why?

GBG will share your personal data with third party service partners, who are acting on behalf of GBG as our data processor, or a data controller in their own right, the details are below of whom GBG will share your personal data with and why:

**Workable Software Limited** provide GBG with the software which controls the be/hired process. The personal data within the software is hosted in the United States.

**External Recruitment Agencies:** This is where you have engaged with an external recruitment agency and they have shared your details with GBG for a role they will have notified you about. We are unable to be more explicit in this statement as to who they are as we work with a large number of agencies globally. If you would like more information regarding your personal information, please contact us by using [this form](#), email to: [compliance@gbgplc.com](mailto:compliance@gbgplc.com) or by writing to: Data Privacy and Compliance, GBG, The Foundation, Chester Business Park, Chester, CH4 9GB.

**SHL:** provide GBG with a global talent assessment platform which is hosted in the United Kingdom. As part of your application journey, you may be asked to complete this assessment via a separate link. To generate this link, GBG will need to have shared your name and email address. The personal data entered is then determined by you.

**PEO Worldwide:** who provide GBG with an outsourced employment relationship for temporary contractors in new territories where GBG does not currently have a branch office. GBG will share the candidate personal data with PEO Worldwide who are based in the United Kingdom. The individual will then be onboarded by and enter into a direct employment relationship with the PEO entity in the relevant country who will also be a data controller.

**Other Third Parties:** This could include contacting the named referee(s) you have provided in order to gain a reference on you or once your application has been successful, your details may be shared with other third parties, such as a payroll provider. You will be notified of any further processing at the appropriate time.

## How long do we retain your personal data for?

Your personal data is retained for 12 months within our recruitment platform, then it is automatically deleted unless when notified of imminent deletion you opt in to GBG holding this personal data for future role consideration. If you would like your personal data to be deleted sooner, please contact using [this form](#) so we can consider your request.

If your recruitment process goes beyond 12 months, you will be aware of this, with your personal data then held by GBG for the duration of your recruitment process.

If you are successful with your application, your personal data will form part of your employment record. There is a separate privacy notice to support how Team Member information is held, which will be shared at the appropriate time.

## GBG Be/Hired Data Privacy Policy (Workable)

### Transfers of personal data outside of your resident jurisdiction

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country.

However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this privacy notice and local data protection laws.

For example, this includes implementing Standard Contractual Clauses for transfers of personal information between our group companies, which require all group companies to protect personal information they process from the EEA and UK in accordance with UK and European Union data protection laws.

Our Standard Contractual Clauses can be provided on request. We have implemented similar appropriate safeguards with our data suppliers, third party service providers and partners, and further details can be provided upon request.

### Your rights under the GDPR, DPA 2018 and other applicable data protection laws across Asia Pacific region.

As an individual, you may have rights under your local data protection laws. We have only listed the applicable individual rights under GDPR in this privacy policy. Should you wish to enquire further about the specific rights in your jurisdiction, please contact GBG's local Data Protection Managers using this form. The rights under the GDPR regarding the use of your personal data are:

- The right to withdraw consent – you can withdraw consent at any time.
- The right to erasure – you can request that GBG remove your personal data from our systems.
- The right to restrict processing – you can request that GBG only process your personal data for the purposes you specify.
- The right to data portability – you can request that the personal data you have provided to GBG be ported to another organisation.
- The right to access your personal data – You have a right to know what personal data GBG hold on you and for what purpose we are processing your personal data. This is known as a Subject Access Request (SAR).
- The right to rectification – you have the right to ask us to rectify any information you believe is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- The right to object to processing – you have the right to object to processing if we are able to process your information because the processing is in our legitimate interests.
- The right to obtain information upon request on the balancing test we have carried out when determining we are able to rely on legitimate interest as our lawful basis for processing your personal data.

Please keep in mind that some of these rights are subject to an internal assessment that one of the grounds under the GDPR and/or applicable data protection law in your region, is satisfied.

## GBG Be/Hired Data Privacy Policy (Workable)

You can send these requests using [this form](#), or by post to:

Privacy & Data Compliance Team  
GB Group Plc  
The Foundation  
Herons Way  
Chester Business Park  
Chester  
CH4 9GB  
United Kingdom

Or you can make a request in person or call 0161 909 6713.

You are not required to pay any charge for exercising your rights. We have one calendar month to respond to you. If GBG are unable to comply with your request, we will provide you with an explanation.

## Your US Privacy Rights

This section describes how we collect, use, disclose, and otherwise process personal information of individual residents of the States of California and Virginia, either online or offline, within the scope of the California Consumer Privacy Act of 2018 and its corresponding regulations, as amended by the California Privacy Rights Act, and the Virginia Consumer Data Protection Act, both as amended from time to time (collectively, the "**US Privacy Laws**"). For the purpose of this Privacy Policy "Personal Data" includes "personal information" as defined under the California Privacy Rights Act.

### California and Virginia residents may exercise the following rights via:

- our [webform](#), or
  - by calling our toll-free number: 1(833) 383 0085
- **Right to Know.** You have the right to request information on, the personal information we collected about you in the last 12 months, including the categories of personal information, the categories of sources from which your personal information was collected from, the business or commercial purpose for collecting, selling, or sharing your personal information, the categories of third parties to whom we disclosed your personal information to, and the specific pieces of personal information we have collected about you;
  - **Right to Delete.** You have the right to request that we delete Personal Data that we have collected from you, subject to certain exceptions.
  - **Right to Correct.** You have a right to request that we correct inaccurate Personal Data that we maintain on you.
  - **Right to Opt Out.** You have the right to opt out of the sale of your Personal Data. However please note that ***we do not sell your Personal Data.***
  - **Right to No Discrimination.** You have the right not to receive discriminatory treatment by us for the exercise of your privacy rights. This includes employee, applicant, or independent contractor rights to not to be retaliated against for the exercise of your privacy rights. We will not discriminate against you, in any manner prohibited by applicable law, for exercising these rights.

Sensitive Personal Data: We will not use or disclose your sensitive personal information for purposes other than those specified in section 7027 of the California Consumer Privacy Act regulations, subsection (m).

## GBG Be/Hired Data Privacy Policy (Workable)

Verification: In order to exercise your rights, we will need to obtain information to locate you in our records and verify your identity depending on the nature of the request. If you are submitting a request on behalf of a household, we will need to verify each member of the household in the manner set forth in this section.

For Right to Know, Right to Correct, and Right to Delete, we will request an ID Document, as well as information on your First Name, Last Name, , Email Address, Phone, Postal Address, and Date of Birth to verify your identity and ask that you declare, under penalty of perjury, that you are who you say you are.

For Right to Opt-Out, we will only request that you provide us with First Name, Last Name, Email Address, Phone, Postal Address, and Date of Birth (but we will not verify your identity and therefore will not need you to provide an ID document).

Authorized Agents: You may use an authorized agent to exercise your rights on your behalf. If you are making any of the requests above through an authorized agent, we will request written authorization from you and will seek to verify you as described above or we will accept a legal Power of Attorney under the California Probate Code to the authorized agent. To make a request using an authorized agent, use our [webform](#) and upload documentation demonstrating you have authorized the agent to exercise rights on your behalf.

Appeal: If you are a resident of a US State that allows you to appeal a decision we have made in connection with your attempt to assert a right under applicable US Privacy Law, you may file an appeal of our decision by contacting us at [compliance@gbgplc.com](mailto:compliance@gbgplc.com). Please ensure you provide us with the postal address in which you reside, accompanied with details for the basis of your appeal.

Your jurisdiction may allow you to file a complaint with the state's Attorney General's Office regarding any concerns with the result of your appeal request. For Virginia, you may do so by using the following: ([www.oag.state.va.us/consumer-protection/index.php/file-a-complaint](http://www.oag.state.va.us/consumer-protection/index.php/file-a-complaint)).

Timing: We will respond to Requests to Delete and Requests to Know, and Requests to Correct, in compliance with the applicable US Privacy Law, within 45 days, unless we need more time in which case we will notify you and may take up to 90 days total to respond to your request.

Minors under 16: Please note that we do not knowingly collect or disclose personal information in relation to minors under the age of 16.

### Your Nevada Notice

If you are a resident of the State of Nevada, you may opt out of future sales of certain covered information that a website operator has collected or will collect about the resident. We do not currently sell covered information thereunder, but should you have any questions as a Nevada resident please email us at [compliance@gbgplc.com](mailto:compliance@gbgplc.com).

Pursuant to US Privacy Law requirements, below is a summary of the Personal Data we collect and process:

Personal Data Collected/Processed. Please note that *we do not sell your Personal Data*:



**GBG Be/Hired Data Privacy Policy (Workable)**

<b>Personal Data Categories</b>	<b>Sources of Personal Data</b>	<b>Business or Commercial Purpose for Collection</b>	<b>Have we Sold the Personal Data</b>	<b>With Whom We Share Personal Data</b>
Identifiers and information protected by Cal. Civ. Code 1798.80(e), such as real name, address, telephone number, email address, date of birth,	You or GBG customers to whom you provide it to.	To enable use of our Sites, Services, products, to communicate with you, to understand how our users interact with our Sites, to improve our offerings, to market our products or services, to secure our Services, to fulfil our legal compliance obligations, in connection with a business merger or transaction, and otherwise for internal business purposes and to comply with applicable legal requirements	No	We share this information with our service providers, and with business customers partners and affiliates, in order to enable our Services and products to function.
Financial information, such as credit or debit card information (solely in relation to our B2B transactions with our customers).	You	To transact with you if you use our products or services, to enable transactions you've requested, and otherwise for our own internal business purposes	No	We share this information with our service providers and business partners and affiliates, in order to enable our Services and products to function
Commercial information and preferences, such as product purchase history, and contact information (name, job, title, work email, phone, and address) (solely in relation to our B2B transactions).	You	To transact with you, in your capacity as a B2B employee, if you use our Sites, products, or services, to enable transactions you've requested as a B2B employee, to market our products or services, and for our own internal business purposes such as record-keeping	No	We share this information with our service providers, third party advertising and analytics partners, and business partners and affiliates, in order to enable our Services and products to function
Internet or other electronic network activity information, such as system version, browser type, internet service provider, browsing history, websites visited prior to our Sites, cookie IDs, device type, details about how you use our Site, the referring web page and pages visited, and other similar activity information	Your device	To enable use of our Sites, to communicate with you, to understand how you interact with our Sites, to secure our Services, to market our products or Services, and to improve our offerings	No	We share this information with our service providers, third party advertising and analytics partners, and business partners and affiliates, in order to enable our Services and products to function
Image: Photo on a passport, driving license, or other identification document, (including the personal information contained therein), self-taken photos	You or GBG customers to whom you provide it to.	To enable use of our services and products.	No	We share this information with our service providers, and business customers partners and affiliates

**GBG Be/Hired Data Privacy Policy (Workable)**

<p><b>Sensitive Personal Information:</b> your driver’s license, passport, social security numbers, and any citizenship/immigration status contained in your passport;</p> <p><b>Biometric Information,</b> meaning facial algorithms match scores for the purpose of authenticating ID documents</p>	<p>You or GBG customers to whom you provide it to.</p>	<p>To enable use of our services and products. For employees, we would collect this for standard and/or legally mandated hiring and HR purposes only.</p>	<p>No</p>	<p>We share this information with our service providers and business customers and partners and affiliates, in order to enable our Services and products to function</p>
<p>Professional or employment-related information, such as job title, employment history, background checks, and organizational affiliation</p>	<p>You, or any third party to whom you have granted permission to provide us with the relevant personal information</p>	<p>To provide services or products you’ve requested, to comply with applicable legal obligations, and for internal business purposes. For employees, we would collect this for standard and/or legally mandated hiring and HR purposes</p>	<p>No</p>	<p>We share this information with our service providers and business partners and affiliates, in order to enable our Services and products to function</p>

For any questions or concerns about our privacy policies and Information Practices please contact our US Data Protection Team using the following email: [compliance@gbgplc.com](mailto:compliance@gbgplc.com).

**How to contact us if you're not happy**

We appreciate that at GBG we may not always get things right and it is regrettable for us as an organisation when we receive a complaint. We take all complaints seriously and can assure you we will do our best to deliver a satisfactory outcome. If you do wish to complain about how your personal data is used by GBG then please use [this form](#), alternatively please write to us at:

Privacy & Data Compliance Team  
 GB Group Plc  
 The Foundation  
 Herons Way  
 Chester Business Park  
 Chester  
 CH4 9GB  
 United Kingdom

GBG will investigate and aim to respond within 10 working days. This allows us time to investigate your complaint thoroughly.

**GBG Be/Hired Data Privacy Policy (Workable)**

## Your right to lodge a complaint with the relevant supervisory authority

Where you believe that GBG have not taken our responsibilities with your personal data seriously, you have the right to complain to the relevant supervisory authority in your country of residence. In the UK, GBG's regulator is:

The Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Telephone numbers: +44 (0)303 123 113 or +44 (0)1625 545 745

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)