



GBG

# Talent Attraction Privacy Notice

17th September 2021

## General information and contact details

GBG 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 when you apply for or are identified for a potential role with GBG Plc and its affiliated companies (“GBG”), the purposes of the processing and how you can exercise your privacy rights.

Any personal data collected by GBG through the recruitment process is processed in compliance with the UK GDPR. Outside of the UK, GBG operates in a number of jurisdictions and complies with local laws as required. Whilst this privacy notice focuses specifically on UK law, please be assured that GBG is compliant with the protection of your personal data in every country that it operates.

Where we collect personal information from you for other reasons, for example through our website, please refer to our [Website Privacy Notice](#).

We have offices in 16 locations, and our registered head office is located within the United Kingdom at:

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

Our Company Registration Number is: 02415211

If you have any questions about how your personal data is used by GBG, please contact our Data Protection Officer using [this form](#).

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.

## 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 is the minimum information we require in order 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 your 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.

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.

## **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.

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

**Privacy & Data Compliance Team**

**GB Group Plc**

**The Foundation**

**Hérons Way**

**Chester Business Park**

**Chester**

**CH4 9GB**

**United Kingdom**

Or you can make a request in person or call +44 (0) 1244 657277.

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 rights under the California Consumer Privacy Act of 2018 ("CCPA")**

Under the CCPA, California residents are entitled to know the categories of personal information that we collect on them and the purpose for behind that collection.

Please note that the sole purpose collecting the personal information that you submit to us when you apply with a job at GBG is to vet you as a candidate during the hiring process, as detailed throughout this privacy notice.

Please note that we may provide your personal information to our third-party service providers to have them assist us throughout the hiring process. However, we will not "sell" your personal information, as set out in the CCPA.

The categories of personal information that we collect from you will be as follows:

- Your standard personal information and contact details: name, phone number, postal address, email address, date of birth
- Your user account information when you log-in to apply for a role with us
- Your education, training history, certifications, languages spoken, previous employment
- Any preferences or opinions you may choose to provide (e.g., salary expectations)
- Recordings of communications between us (e.g., emails)
- Special Category Personal Information: this may include your current job title, gender, marital status, disabilities, ethnicity, race, nationality, citizenship status, education, veteran status, religion, sexual identity, caregiver status, marital status, photo, or social media account.

## 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**

**Hérons 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.

## 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 number: 0303 123 113 or +44 (0)1625 545 745

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