



**LAST UPDATED: JUNE 2024**

## **NELSONS' RECRUITMENT PRIVACY NOTICE EEA/UK**

At Nelsons we are committed to protecting the personal data of individuals.

This recruitment privacy notice ("**Notice**") offers information about Nelsons' processing of your personal data in the context of the recruitment process. For example, it applies to individuals who apply to work for or register in a talent community, attend a recruitment event, undertake an evaluation with Nelsons or participate in other recruitment processes ("**Applicants**").

The aim of this Notice is to provide you with additional information on what personal data we process, why we process your personal data and what privacy principles we abide by, as well as informing you of the rights you can exercise in relation to your personal data.

Any personal data provided to or collected by Nelsons is controlled by Nelsons. This means that we are responsible for deciding how we hold and use your personal information and ensuring that we comply with relevant data protection laws when processing your personal data.

For the purposes of this Notice, "Nelsons" means A Nelson & Co Limited and any of its subsidiaries and affiliates, as existing from time to time.

### **1 COLLECTING YOUR PERSONAL DATA**

#### **Personal data collected directly from you**

As part of a recruitment process and your application for a position with Nelsons, we will collect personal data about you to progress your application for employment with Nelsons (including your name, email address, telephone number, address, your academic and professional qualifications and experiences, etc.). You may choose to import information about yourself from other websites (for example, from LinkedIn).

#### **Special categories of personal data**

As part of your application, you may provide sensitive personal data, often referred to as special categories of personal data (for example, information relating to your race or ethnic origin, political opinions, religious beliefs, trade union membership, criminal records, physical or mental health, biometric information, or sexual orientation.) If you do provide sensitive



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personal data, you do so voluntarily and agree that such information may be used as described in this Notice.

We process these special categories of personal data in limited circumstances and in accordance with applicable privacy law.

#### **Personal data collected from third parties**

We may also collect personal data provided by third parties via referrals, recruitment agencies, background screening providers etc.

## **2 PROCESSING YOUR PERSONAL DATA**

We may use the personal data that we collect or obtain about you for purposes related to selection, assessment, and interview process:

- Profile management: We may process personal data to manage your profile in our recruitment systems so that we can provide current and future job opportunities, tailoring the content we provide you, based on your skills, interests, location, etc.
- Pre-screening: We check that you can lawfully enter a contract and fulfil the essential job criteria e.g., you have the relevant work authorisation and have answered job specific screening questions.
- Profile Review and Evaluation.
- Personal interview: When you are invited for a physical or video conferencing interview (e.g., Microsoft Teams), the interviewer may ask relevant questions to assess your suitability for the role.
- Communication: We may contact you via email to answer any recruitment related queries, sending communications & scheduling interviews.

We do not use profiling (where an electronic system uses personal information to try and predict something about you) or automated decision making (where an electronic system uses personal information to make a decision about you without human intervention).

## **3 DATA RETENTION**

We will retain your personal data for as long as is considered necessary for the purpose(s) for which it was collected (including as required by applicable law or regulation).



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If your application is unsuccessful, Nelsons may retain and use the information you provided to us for a period of twelve (12) months following the recruitment decision to deal with any matter which may arise in connection with your application, for contacting you regarding other employment opportunities, and for Nelsons' legitimate business purposes.

Where personal data is no longer necessary or relevant for our identified purposes or where you have indicated that you are no longer interested in staying in contact with us, we will securely dispose of your personal data.

#### **4 PERSONAL DATA AND LOCATION OF PROCESSING**

We may share your personal data for purposes related to the recruitment process with subject to and in accordance with applicable law and requirements:

- Other companies within the Nelsons Group including with those which may be located outside of your location and/or the EEA/UK;
- Authorised third party agents, service providers and/or subcontractors of Nelsons and authorised third parties who carry out reference and background checks on behalf of Nelsons; and
- Competent public authorities, government, regulatory or fiscal agencies, to comply with a legal obligation.

##### **International data transfers**

We may transfer personal data internationally. If we do transfer personal data abroad, Nelsons will make sure that the personal data is protected with a similar level of protection as required by law in its country of origin and in accordance with any applicable localisation or data transfer requirements.

If you are in the EEA/UK, please be aware that as an international group of companies we do transfer personal data to outside of the EEA/UK.

Nelsons will make sure that it is protected in the same way as if it was being used in the EEA, and where applicable we will put in place a contract with the third-party from a country that means they must protect personal data to the same standards as the EEA/UK.



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## **5 WHAT ARE YOUR RIGHTS?**

When we process your personal data, you have a number of rights regarding how the data is processed. You can exercise these rights at any time. Below is an overview of these rights, along with an explanation of what this means for you.

You have the right to:

- to be informed about the collection and use of your personal data. You have the right to receive clear, transparent and easy-to-understand information about how we use your personal data and what rights you have in this context. Therefore, we provide you with this information as part of this Notice;
- request a copy of personal data we hold about you;
- request that we update the personal data we hold about you, or correct such personal data that you think is incorrect or incomplete;
- request that we delete personal data that we hold about you, or restrict the way in which we use such personal data;
- request that we restrict our processing or you may object to our processing of your personal data;
- request to withdraw your consent to our processing of your personal data (to the extent such processing is based on consent and consent is the only permissible basis for processing); and
- complain to a Data Protection Authority in your country.

### **Exercising your rights**

In order to exercise your data privacy rights you can contact the People team or by email at [dataprotectionofficer@nelsons.net](mailto:dataprotectionofficer@nelsons.net).

Please only submit applications for a current position using the proper channels (e.g., on Nelsons career sites). Receiving your request at the right contact point helps us process your request faster.



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## **6 HOW DO YOU CONTACT NELSONS?**

Your Data Protection Officer can be contacted at Nelsons House, 83 Parkside, Wimbledon, London, SW19 5LP or by email at [dataprotectionofficer@nelsons.net](mailto:dataprotectionofficer@nelsons.net).

To find more information about Nelsons's privacy practices for Recruitment purposes in a specific country, please get in touch with the People team.

### **Changes to this notice**

This Notice may be changed over time. This Notice was last updated in June 2024.