

BELLWAY GROUP
PRIVACY NOTICE FOR THE RECRUITMENT OF
EMPLOYEES, WORKERS, DIRECTORS AND CONSULTANTS

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before and during our recruitment process. A separate and replacement privacy notice will be provided to you to cover your working relationship with us if we do recruit you to work for us.

References to **we**, **our** or **us** in this privacy notice are to the **Bellway Group** (being **Bellway p.l.c.** and each of its direct and indirect subsidiaries, trading under the "Bellway" or "Ashberry" brand including Bellway Homes Limited. Details of our main trading entities are as follows:

- **Bellway p.l.c.** is a public limited company incorporated in England and Wales. Registered Number: 1372603.
- **Bellway Homes Limited** is a limited company incorporated in England and Wales. Registered Number: 00670176.

Both companies have their registered office at Bellway PLC, Woolsington House, Woolsington, Newcastle upon Tyne, NE13 8BF

This privacy notice also covers any joint venture companies, bodies or organisations that we have an interest in and to which you are being considered for employment, engagement or appointment.

For the purposes of this privacy notice the controller is the relevant part of the Bellway Group or our joint venture companies, bodies or organisations which is exercising control over how your personal data is used and/or using it for its own purposes. This will usually be the company which you being recruited by, but in limited circumstances other companies within the Bellway Group may act as a controller of your personal data, for example if they are involved in the decision making process or when handling your personal data for audit and reporting purposes. In all cases your personal information will be handled and protected as described in this privacy notice.

We have appointed a Data Protection Officer to oversee our compliance with data protection laws. Contact details are set out in the "**Contacting us**" section at the end of this privacy notice.

1. PERSONAL INFORMATION

When you interact with us in relation to your work with us, 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;
- date of birth;
- gender;
- referee details;
- salary, annual leave, pension and benefits;
- location of employment or workplace;
- identification documents such as passport, utility bills, identity cards, etc;
- recruitment (including copies of right to work documentation, past employment history, references and other information included in a CV or cover letter or as part of the application process);
- employment records (including job titles, work history, working hours, training records and professional memberships) and education and professional records/qualifications;
- compensation history; and
- images in video and/or photographic form and voice recordings.

We will always aim to make it clear which personal information it is necessary for you to provide and which personal information is optional. However, if you are unsure as to whether you are required to provide any particular piece of personal information please ask.

2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store and use the following “special categories” of more sensitive personal information regarding you:

- information about your nationality, race or ethnicity; and
- information about your health, including any medical condition, disability, health and sickness records, medical records and health professional information and disability information.

Depending on the nature of the role you are applying for, we may also carry out basic criminal records checks on you.

We may not collect all of the above types of special category information about you. In relation to the special category personal data that we do process we do so on the basis that

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims; or
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law.

In the table below we refer to these as the “special category reasons for processing of your personal data”. We do not currently rely on consent as a basis for processing special category information.

3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about employees, workers, directors and consultants through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

If you are providing us with details of referees, 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 them. 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.

Purpose	Personal information used	Lawful basis
Non-‘special categories’ of Personal Information		
Making a decision about your recruitment or appointment and managing the recruitment process and determining the terms on which you work for us	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 to engage you. This is necessary to enter into a contract with you
Checking you are legally entitled to work in the UK	Personal contact details and identification documents and right to work documentation	We have a legal obligation to do so
Business management and planning, including accounting and auditing, conducting our normal business operations and managing our relationship with you	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. We have a legitimate interest to run and manage our business

Purpose	Personal information used	Lawful basis
Non-‘special categories’ of Personal Information (continued)		
Assessing qualifications for a particular job or task, including decisions about your fitness to work, education, training and development requirements	Personal identifiers, performance, disciplinary and grievance information, employment records, compensation history, salary, annual leave, pension and benefits and other personal information excluding ‘special categories’ of personal information and criminal records information	We may be legally obliged to do so. To be able to manage and perform our contract with you We have a legitimate interest to run and manage our business and to ensure that our workers are suitably trained
Complying with health and safety obligations	Personal identifiers, CCTV footage and other working environment information	We have a legal obligation to comply with Health and Safety laws
Dealing with legal disputes involving you, or other employees, workers, directors and consultants, including accidents	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. We have a legitimate interest to ensure that all legal claims are managed effectively
To ensure network, information and premises security	Personal identifiers and CCTV footage	We have a legitimate interest in ensuring our premises and systems are secure
To conduct data analytics studies to review and better understand worker engagement and retention and attrition rates	Employment or rejection records	We have a legitimate interest in order to improve as an employer
For the purposes of equal opportunities monitoring	Name, title, date of birth; gender; marital status; salary, annual leave, pension and benefits; location of employment or workplace	We may have a legal obligation to do so and we have a legitimate interest in doing so to make sure our business is a fair place to work
Storage of records relating to you and also records relating to our business	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
For the purpose of complying with any regulatory requirements	All the personal information about you excluding special category information and criminal records data	We may have a legal obligation to comply with regulatory requirements and we have a legitimate interest in complying with regulatory requirements

Purpose	Personal information used	Lawful basis
'Special categories' of Personal Information		
Storage of records relating to you and also records relating to our business	All 'special categories' of personal information	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above For criminal records information we process it on the basis of legal obligations
We will use information relating to your absence from work, which may include sickness absence or family-related absences, to assess whether to engage you	Information about your health, including any medical condition, health and sickness records, medical records and health professional information	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above
We will use information about your physical or mental health to check whether we can provide you with benefits under your proposed contract	Information about your health, including any medical condition, health and sickness records, medical records and health professional information	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above
We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work	Information about your health, including any medical condition, health and sickness records, medical records and health professional information	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above
We will use information about your race or national or ethnic origin to ensure meaningful equal opportunity monitoring and reporting	Information about your race or ethnicity	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above
Carrying out background checks and using the results to comply with law and in order to determine your eligibility to undertake particular types of work	Information about your criminal convictions and offences	For criminal records information we process it on the basis of legal obligations

You are not under any obligation to provide us with any of your personal information, but if you do not provide it then we may not be able to engage you.

You should be aware that it is not a condition of any contract with us that you agree to any request for consent from us. 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 any 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 engage you. However at present we do not rely on your consent as a basis for any uses we make of your personal information.

DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- **Companies within the Bellway Group and/or our joint ventures:** where individuals from group companies or joint ventures other than that which you are being recruited to are involved in the recruitment process or you may be working with multiple companies within the Bellway Group and/or various joint ventures, and for the purpose of services which are provided at group level, for obtaining group level approval and group level decision making and for the purpose of audit and reporting.
- **Your recruitment agencies or consultants:** For the purpose of managing the recruitment process.
- **Other service providers to our business and advisors:** professional advisors and administration and IT services. 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.
- **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.
- **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.

5. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect about you is not transferred to or stored in countries outside of the UK or European Union except as set out in this section.

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 section "**Disclosure of your personal information**" 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.

6. 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.

- **Successful** – If you are offered a position with us, we will retain all physical and electronic records in our system for 12 months from the time the offer is made before it is deleted.
- **Unsuccessful** - If you are unsuccessful in your application to work for we retain all physical and electronic records for a period of 6 months from the date the successful applicant commences employment with us.
- **Talent pool** – If you have registered your details with us for job alerts we will hold your details for a period of 12 months.

Exceptions to these rules are:

- CCTV records which are generally held for no more than 30 days unless we need to preserve the records for the purpose of prevention and detection of crime;

Information that may be relevant to personal injury claims, employment claims, discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after you have worked for us.

To subscribe to job alerts you will be required to register your details with us and this will be used for the purposes of keeping you informed by e-mail of the latest jobs in the departments or locations that you have selected.

If you decide that you no longer wish to receive this information, a link to the portal is provided to every alert e-mail that you receive. You will be able to log in to your personal profile and amend your preferences.

7. 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. We are here to help and encourage you to contact us to resolve your complaint first.

8. 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.

9. CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please email data.protection@bellway.co.uk or write to the Data Protection Officer at Bellway PLC, Woolsington House, Woolsington, Newcastle upon Tyne, NE13 8BF.