

## Privacy Notice for Job Applicants



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### What is the purpose of this document?

National House-Building Council is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for a role with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

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#### Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

#### The kind of information we hold about you

In connection with your application for a role with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter.
- The information you have provided through our recruitment process including name, address, contact details email address and telephone numbers, employment history, qualifications, details of professional memberships, current and expected salary, “Right to Work” confirmation, unspent convictions, valid driving licence details, how many driving penalty points you have and other job specific information.
- Any information you provide to us during an interview.

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

- Information about your race or ethnicity and religious beliefs.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

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### How is your personal information collected?

We collect personal information about candidates from the following sources:

1. You, the candidate.
2. Your recruitment agency, from which we collect the following categories of data: name, nationality/visa status (if required), education/qualifications, location/post code, current/previous employer, current/previous position, salary expectations and notice period.
3. For certain positions we require a background check and we use Experian for this check. We collect the following categories of data when using Experian:

For the purposes of the Insurance Distribution Directive (and any subordinate legislation from time to time):

- Adverse financial check
  - Identity check
  - Basic criminal check
  - Sanction file check
  - Senior Insurance Managers Regime (and any subordinate regulation from time to time)
  - Adverse financial check
  - Identity check
  - Standard criminal check
  - Sanction check
  - Directors search
4. Disclosure and Barring Service (England & Wales)/ Disclosure Scotland (Scotland & Northern Ireland) in respect of criminal convictions.
  5. Your named referees, from whom we collect the following categories of data: name, personal opinion (if personal reference), position, employment dates, information about the role and performance in role.

### How we will use information about you

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Information about your health, including any medical condition, health and sickness records.
- Comply with legal or regulatory requirements.

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We need to process your personal information to decide whether to enter into a contract of employment with you.

Having received your CV and covering letter or your application form, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references, carry out a criminal record check (if applicable) and carry out any other checks that may be required before confirming your appointment.

### If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

### How we use particularly sensitive personal information

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during an interview.
- We will use information about your race or national or ethnic origin and religious beliefs to ensure meaningful equal opportunity monitoring and reporting.

### Information about background checks

#### For certain positions we need to perform background checks.

We will collect information from the Disclosure and Baring Service (England and Wales)/Disclosure Scotland (Scotland & Northern Ireland) about your criminal convictions history if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). We are entitled to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. The Insurance Distribution Directive requires that anyone involved in activities before, during or after the sale of an insurance policy is of 'good repute'. This means we are required to carry out various background checks for certain positions.

Senior Insurance Managers Regime - under section 59 of the Financial Services and Markets Act 2000, we are required to ensure that individuals seeking to perform one or more of the PRA designated senior management functions seek approval before taking up their position. Not getting approval before taking up the role may lead to enforcement action against us and/or the individual.

We have in place appropriate safeguards which we are required by law to maintain when processing such data. to provide us with relevant details, we will not be able to take your application further.

#### Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

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### Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Data Protection Officer (see below).

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### Data retention

#### How long will you use my information for?

We will retain your personal information for a period of 6 months after we have communicated to you our decision about whether to appoint you to the role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

### Rights of access, correction, erasure and restriction

#### Your rights in connection with personal information

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer in writing.

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### Right to withdraw consent

When you applied for this role, you provided consent to us processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

### Rights of access, correction, erasure and restriction

We have appointed a Data Protection Officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Officer at [dpo@nhbc.co.uk](mailto:dpo@nhbc.co.uk). You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.