

Nurol Makina UK Ltd

Privacy Notice for Employees, Workers, Candidates and Contractors

Scope of this privacy notice

We are committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with applicable data protection laws, including the General Data Protection Regulation (GDPR), as retained under English law, the Data Protection Act 2018, and any other laws concerning the processing of personal data and privacy. We are required to notify you of this information under data protection legislation.

It applies to all current and former employees, workers, candidates and contractors.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

For the purposes of this privacy notice, the following company is the “data controller”:

Nurol Makina UK Ltd., registered and incorporated in England and Wales with company number 15000944, whose registered office is at C/O Gateley Legal One Eleven, Edmund Street, Birmingham, England, B3 2HJ (also referred to **we, us, our**).

This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

Data Privacy Enquiries and Supervisory Authorities

If you have any questions about this privacy notice or how we handle your personal information, please contact Contracts Department.

You have the right to make a complaint at any time to your local supervisory authority for any data protection issues. In the UK this is the Information Commissioner's Office (**ICO**): ico.org.uk.

Data protection principles

We will comply with applicable data privacy laws. We will ensure the personal data held about you is:

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

Personal data, or personal information, means any information about an individual from which that person can be identified (i.e. not data where the identity has been removed (anonymous data)).

“Special categories” of more sensitive personal data require a higher level of protection.

We may collect, store, and use the following categories of personal information about you (the following is a non-exhaustive list): personal contact details including your name, title, addresses, telephone numbers and personal email addresses; date of birth; gender; marital status and dependants; next of kin and emergency contact information; national insurance number; bank account details, payroll records and tax status information; salary, annual leave, pension and benefits information; start and end date of employment or work; location of employment or workplace; copy of driving licence or passport or other identity document; recruitment information (including copies of right to work documentation, 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); compensation history; performance information; disciplinary and grievance information; photographs for the company website or for social reasons; information about your use of our information and communications systems; photographs.

How is your personal information collected?

We collect personal information about employees, candidates, workers, and contractors 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.

We will collect additional personal information in the course of job-related activities throughout the period of you working for us, including directly from you.

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you (*).
2. Where we need to comply with a legal obligation (**).
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (**).

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.
3. In limited circumstances where we have validly obtained your consent.

Situations in which we will use your personal information

A non-exhaustive list of situations in which we will process your personal information are listed below. *We have indicated by asterisks the purpose(s) for which we are processing or will process your personal information:*

- Making a decision about your recruitment or appointment***.
- Determining the terms on which you work for us***.
- Checking you are legally entitled to work in the UK**.
- Paying you and, if you are an employee, deducting tax and National Insurance contributions*.
- Providing benefits to you (such as a pension, if applicable)**.
- Administering the contract we have entered into with you*.
- Business management and planning, including accounting and auditing***.
- Conducting performance reviews, managing performance, and determining performance requirements***.
- Making decisions about salary reviews and compensation*.
- Assessing qualifications for a particular job or task, including decisions about promotions***.
- Gathering evidence for possible grievance or disciplinary hearings**.
- Making decisions about your continued employment or engagement or its termination***.
- Education, training, and development requirements***.
- Dealing with legal disputes involving you, or other employees, workers, and contractors, including accidents at work**.
- Ascertaining your fitness to work***.
- Managing sickness absence*.
- Complying with health and safety obligations**.
- Equal opportunities monitoring**/**.
- To prevent fraud**.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies***.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution***.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations and in line with our data privacy standard.
3. Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme, and in line with our data privacy standard.
4. Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.

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

- information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws.
- 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, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.

Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data privacy standard.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.

Data sharing

We may share your data with other affiliated companies in our group and with third parties.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the UK.

If we do, you can expect a similar degree of protection in respect of your personal information.

We may share your personal data with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

"Third parties" may include third-party service providers (including contractors and designated agents) and other entities within our group. The following activities may be carried out by third-party service providers: recruitment services, accounting and payroll, pension administration, data server hosting, IT services and legal and auditing service.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. Third-party service providers are only permitted to process your personal data for specified purposes and in accordance with our instructions.

We may share your personal information with other entities in our group as part of our regular reporting activities on company performance, to utilise shared and centralised management and resources, for system maintenance support and hosting of data.

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Where it is necessary to transfer your personal data to a third country, we will ensure suitable safeguards are in place so that your data is treated by those third parties in a way that is consistent with and which respects the UK laws on data protection.

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.

Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, or otherwise as required under applicable laws. In some circumstances we may anonymise your personal information so that it can no longer be associated with you.

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **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 would like to exercise any of the above rights, please contact us.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing, and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Privacy Manager. Thereafter, we will no longer process your information for the original purpose(s), unless we have another legitimate basis for doing so in law.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.