



Candidate Privacy Notice

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Contents

1. Important Information and Who we are.....	2
2. The Data We Collect About you.....	2
3. How is your Personal Data Collected.....	3
3.1 If you fail to Provide Personal Information.....	3
4. How We use your Personal Data.....	3
4.1 How We will use Information About you.....	3
4.2 How We use Particularly Sensitive Information.....	4
4.3 Information About Criminal Convictions.....	5
4.4 Automated Decision Making.....	5
4.5 Email Marketing.....	5
5. Disclosures of your Personal Data.....	6
5.1 Data Sharing.....	6
6. Data Security.....	6
6.1 Data Protection Principles.....	7
6.2 Data Protection Officer.....	7
7. Data Retention.....	7
8. Your Legal Rights.....	8
8.1 Your Duty to Inform us Of Change.....	8
8.2 Your Rights in Connection With Personal Information.....	8
8.3 Right to Withdraw Consent.....	9
8.4 Right to Complain to The Information Commissioner Office.....	9

1. Important information and who we are

Bentley Motors Limited ("Bentley") is **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 the application and recruitment process.

Bentley, registered in England under company registration number 992897, and whose registered office is Pym's Lane, Crewe, Cheshire, CW1 3PL, UK, is a "data controller". 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.

This notice applies to all candidate profiles registered with Bentley, and applications made with us whether for an employee, trainee or work experience vacancy. **This notice does not form part of any contract of employment or other contract to provide services.**

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 and what your rights are under the data protection legislation. We may update this notice at any time and so recommend that you check on a periodic basis to ensure that you have read the latest version.

2. The data we collect about you

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

In connection with your application to Bentley, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your CV and covering letter.
- The information you have provided on our application form, including name, title, address, telephone number, personal e-mail address, date of birth, national insurance number, employment history, salary, qualifications, current job title, work experience, educational institution, language skills, previous role/s applied for within Bentley.
- If your application is internal, Bentley employment status, SAP number and Line Manager details will be gathered.
- Copies of driving licence, where applicable.
- Copies of right to work documentation, qualifications, certifications and references.
- Interview notes, completed presentations and online assessment results.

We may also collect, store and use the following **more sensitive types of personal information** which **require a higher level of protection**, such as:

- Information about your health, sexual orientation, race, ethnicity, religion, gender, any physical or mental disability and related reasonable adjustments.
- Information about criminal convictions and offences.

3. How is your Personal Data Collected

We collect personal information about candidates from the following sources:

- You, the candidate.
- Recruitment agencies.
- A background check provider.
- Your named references.
- Volkswagen Group.
- Publicly accessible sources, such as public LinkedIn profiles and job boards.

3.1 If you Fail To Provide Personal Information

If you fail to provide certain 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 the role and you fail to provide us with relevant details, we will not be able to take your application further.

4. How We use your Personal Data

4.1 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:

Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests:	• Assess your skills, qualifications and suitability for the role you have applied for. • Communicate with you about the recruitment process and other roles that may arise. • Carry out background and reference checks. • Create accounts on third party sites for the completion of online assessments, if applicable.
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	• To decide whether to appoint you to the role that you have applied for, and whether to enter into a contract of employment with you. • Communicate with you as part of the on-boarding process, if you are offered and accept the role. • Keep records related to our hiring processes.
Where we need to comply with legal obligation	• • Complete a sponsorship process, where this is applicable, e.g. international Intern placement. • • Comply with our legal or regulatory requirements.

Having received your CV and application form, we will review the information to decide whether your application is strong enough to progress to the interview stage. If we invite you for an interview, the information you provide to us at the interview will be used to assess whether to offer you the role, invite you to a further interview or to decline your application. Also at the interview stage, we will conduct the Right to Work check and retain evidence of your eligibility, to meet our legal obligations if we decide to offer you the role. If an offer is made we will then take up references and background checks, including criminal, where applicable before confirming your appointment.

4.2 How we use Particularly Sensitive Information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have implemented appropriate safeguards, as required by law, to protect this information during processing.

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 or exercise rights in connection with employment.
3. Where it is needed in the public interest, such as for equal opportunities monitoring and reporting.

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 reasonable adjustments during the recruitment process.
- Equal opportunities monitoring and reporting.

4.3 Information About Criminal Convictions

If we would like to offer you the role we will collect information about your criminal conviction history. This is conditional upon the successful completion of all necessary checks and other conditions, such as references, being satisfactory. We are entitled to carry out a criminal records check to confirm there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- **For roles that require a high degree of trust and integrity** a standard or enhanced criminal records check will be carried out.
- **For roles that will work in secure areas**, a criminal records check will be required to satisfy our customs obligations.

4.4 Automated Decision Making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making Where we have notified you of the decision and given you 21 days to request reconsideration.

For future talent, apprentice, undergraduate and graduate opportunities, questions regarding academic qualifications will be asked to assess suitability. An automated decision will be made based on the information provided in the responses.

4.5 Email Marketing

You may receive marketing communications from us if you have applied for a position with us or created a candidate profile and you have agreed to receiving that marketing, where consent is required. You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing communication sent to you, or by contacting DPO@Bentley.co.uk .

5. Disclosures of your Personal Data

5.1 Data Sharing

We may have to share your data with third parties, including third-party service providers. Third parties are required to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

- If your application involves an **online assessment**, we will provide our third party testing suppliers with your name and e-mail address for the purpose of processing your application.
- If your application requires a **background check**, we will provide our third party background check provider with your name, date of birth, address, CV, qualifications and references.
- If you have been **successful for an apprenticeship**, your personal information will be shared with our inhouse Skills Development team, relevant training providers and Government authorities.
- If your application relates to an **intern position and you are an international student** requiring sponsorship, your personal information will be shared with a third party sponsorship company.
- 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. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.
- We may also need to **share personal information with a regulator** or to otherwise comply with the law.

6. 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, and 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.

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.

6.1 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.**

6.2 Data Protection Officer

We have appointed a data protection officer (DPO) 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 DPO-** DPO@Bentley.co.uk

7. Data Retention

How long will you use my information for?

We will only **retain your personal information for as long as necessary** to fulfil the purposes we collected it for, including to meet any legal, accounting, or reporting requirements.

Personal information processed as part of the recruitment process is **kept for a period of 1 year** after we have informed you of our decision regarding your appointment to the role. We retain your personal information for this duration so that we can show we have conducted the recruitment process in a fair and transparent way and, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds. After this period, your personal information will be securely destroyed in accordance with our data retention policy.

We may wish to retain your personal information on file, on the basis that a further opportunity arises in future and we may wish to consider you for that, unless you advise otherwise.

8. Your Legal Rights

8.1 Your Duty to Inform us of Change

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 interactions with us. You can view and update your CV, address and contact details at any time by **logging into your Candidate Profile**, in addition to managing your application and job alert preferences.

8.2 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.
- **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 exercise your rights in connection with your personal information, please contact DPO@bentley.co.uk.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, **we may refuse to comply with the request in such circumstances.**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

8.3 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 consent, please contact talent.acquisition@bentley.co.uk . Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, will dispose of your personal data securely.

8.4 Right to Complain

You have a right to complain to us in the event that you think there has been an infringement of data protection legislation with regards to the personal data that we process about you. **If you have a concern, you can raise this with the Bentley DPO using the details below:**

DPO@bentley.co.uk

On receipt of your complaint, we will acknowledge this within **30 days** and request additional information where this is necessary. Following this, we will investigate your concern and inform you of the outcome as soon as we reasonably can.

In the United Kingdom the Information Commissioner's Office (ICO) regulates the processing of personal data and is the supervisory authority for data protection matters. You have the right to make a complaint at any time to the ICO, however we would welcome the opportunity to deal with your concern in the first instance and will work towards addressing issues or complaints that you may have. You may contact the ICO using the following details:

Post:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Phone: 0303 123 1113

Email: casework@ico.org.uk