

NNA LTD– JOB APPLICANT PRIVACY NOTICE

This Privacy Notice tells you how NNA Ltd ("NNA", "we" or "us") processes your personal data when you apply for a position with NNA. It also describes your data protection rights, including a right to object to some of the processing which NNA carries out. More information about your rights, and how to exercise them, is set out in the Your Choices and Rights section.

We also may provide you with additional information when we collect personal data, where we feel it would be helpful to provide relevant and timely information.

What Personal Data We Collect

We process the following types of personal data when you apply for a position with us.

- **Data you provide to us:** We collect and store any data you provide us through your application, including your contact details; your application materials (CV, cover letter, previous work experience, education, and transcripts, and our notes from any interviews with you); your desired salary, type of employment sought and date available; your identification documents (passport number, government identification numbers where permitted, immigration status); and any other data you submit to us, including any correspondences you may have with us during the application process.
- **Data from other sources:** We obtain data about you from other sources, including recruiters, employment research firms, identity verification services, the references you provide to us, websites and other publicly accessible data on the Internet. We may also receive data you submit to us through third-party websites. In certain countries, where permitted, we collect details of professional registrations, and sanctions with professional bodies, financial checks or criminal convictions where you have consented to background checks.

Why We Collect, Use and Store this Personal Data

We collect, use and store your personal data for the reasons set out below.

- **Where this is necessary for NNA to review and assess your application for employment.**
 - This includes assessing your skills and interest in career opportunities at NNA, processing your application, analyzing your qualifications, verifying your identity and your eligibility for employment, and communicating with you about your application to respond to your inquiries and schedule interviews.
- **Where necessary for NNA's legitimate interests, as listed below, and where our interests are not overridden by your data protection rights.**
 - Protecting our legitimate business interests and legal rights. This includes, but is not limited to, use in connection with legal claims, compliance, regulatory, auditing, investigative and disciplinary purposes (including disclosure of such information in connection with legal process or litigation) and other ethics and compliance reporting requirements.

- Maintaining the security and integrity of our facilities, equipment and electronic platforms. This includes administering access rights, monitoring compliance with company protocols, and where permitted by local law and in accordance with relevant policies, for investigations and disciplinary actions.
- **Where necessary to comply with a legal obligation.**
 - Disclosures to law enforcement agencies or in connection with legal claims, or regulatory purposes (including disclosure of such information in connection with legal process or litigation).
- **Where you have given consent.**
 - For example, we may ask for your permission to conduct a criminal background check.

How We Share Your Personal Data

We share some of your personal data with **other members of the NNA group** to administer and manage group functions, including to make systems available to our employees or to refer you for other open positions.

Your personal data will also be shared with **companies providing services under contract** to NNA, such as training providers, help desk providers and IT hosting and/or IT maintenance providers.

Personal data will also be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the protection of our legitimate interests in compliance with applicable laws.

In the event that a NNA business is sold or integrated with another business (in part or whole), your details may be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business / business unit.

Your Choices and Rights

You have the right to **ask NNA for a copy** of your personal data; to **correct, delete or restrict** processing of your personal data; and to **obtain the personal data you provide in a structured, machine readable format**. In addition, you can **object to the processing** of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement or compelling interest). Where we have asked for your consent, you may **withdraw consent** at any time. If you ask to withdraw your consent to NNA processing your data, this will not affect any processing which has already taken place at that time.

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law or have compelling legitimate interests to keep. If you have unresolved concerns, you have the **right to complain** to the data protection authority in the country you reside, where you work or where we are located.

We will **retain** your personal data only for 12 months or as long as we need it for NNA's legitimate interest in accordance with applicable law, unless you give us permission to hold your records on file for other positions that become available. If you accept employment with us, we will retain your personal data throughout your employment in accordance with a separate notice we provide to you upon your acceptance of employment.

International Transfers

Your personal data may be processed in or accessed from jurisdictions outside the European Economic Area ("EEA") by us and by some of the third parties to whom we share your personal data. When we transfer your data to organisations outside the NNA group we use European Commission-approved standard contractual clauses to safeguard the transfer. Where we transfer personal data to a third party that has implemented Binding Corporate Rules, we may rely on them to safeguard the transfer. For further information, including to obtain a copy of the documents used to protect your information, please contact us as described in the Contact Us section below.

Contact Us

The data controller for your personal data will be NNA Ltd. For applications for certain senior positions, Kentucky Fried Chicken (Great Britain) Limited will also be a data controller of the data you provide for the purposes set out in this Privacy Notice.

If you have questions about this Notice or wish to contact us for any reason in relation to our personal data processing, please contact us at data@nnaltd.co.uk or feel free to discuss this with your HR Manager.

25/05/2018