



Privacy Notice for Website and Digital Platform Users

PRIVACY NOTICE

About this privacy notice

The NG Bailey Group of Companies, which includes NG Bailey Group Limited, NG Bailey Limited, NG Bailey IT Services Limited, NG Bailey Facilities Services Limited, The Freedom Group of Companies Limited and NGBF Holdings Limited (“we”, “us”, “NG Bailey”) takes the protection of your personal data very seriously and is committed to Data Protection and Information Security in accordance with the UK General Data Protection Regulation (“UK GDPR”). References to NG Bailey, we, us or our in this privacy notice refers to NG Bailey Group Limited, who is responsible for our website and digital platforms and for processing your data.

This privacy notice explains what information we may collect about you, how we may use it, and the steps we take to ensure that it is kept secure. We also explain your rights in respect of your personal data.

This notice applies to anyone providing personal data via our website or any digital platform used by us. Except for information relating to apprenticeships and work experience opportunities, our website is not intended for children, and we do not knowingly collect data relating to children.

Please note that our website and other digital platforms may contain links to third-party websites/digital platforms which are provided for your convenience. We are only responsible for the privacy practices and security of our own digital platforms. We recommend that you check the privacy and security policies and procedures of each and every other website/digital platform that you visit.

We may update this notice at any time, which will be available to view in its latest form on our website www.ngbailey.com or, on request to data@ngbailey.co.uk.

Information about you

This privacy notice applies to any personal information which you give to us ("personal data") via the NG Bailey website located at www.ngbailey.com (or www.ngbailey.co.uk) and other digital platforms used by us.

The information about an individual is known as ‘personal data’, such as name, address, e-mail address and telephone number, and may include ‘sensitive personal data’, such as biometric data and information about health, sexual orientation, trade union membership, religious or other beliefs, racial/ethnic origin or criminal convictions or proceedings.

When using the NG Bailey website or other digital platforms used by us you will encounter areas such as contact, enquiries, feedback, registration and newsletter sign-up forms. In order to use these services, you may be asked to enter identity and contact data such as (but not limited to) your name, organisation, address, e-mail address and telephone number.

How we use your information and why?

We will only use your personal data as the law allows us to. The legal basis will vary depending on the reason we are processing your personal data. Sometimes we might rely on more than one legal basis when we process your personal data depending on the reason why we are processing your personal data. Most commonly we will use your personal information in the following circumstances:

1. We have a contractual obligation under our contract with you or to take steps at your request before entering into such a contract
2. We have a legal obligation
3. We need it to perform a public task
4. We have a legitimate interest
5. In limited circumstances, where we have your consent to do so, subject to your right to withdraw consent (further details provided in the section headed “Your rights” below)

NG Bailey may process your data as part of a contractual obligation for the purposes of recruitment / assessing your suitability for work experience and employment, management of the business, operational processes, processing of salary and benefits, personnel administration, ongoing personal development, and training, supporting HR and our business activities, such as training, talent planning and contingency planning.

NG Bailey may process your personal data for compliance with a legal obligation, for example to comply with employment laws, tax laws and health and safety laws.

NG Bailey may process your personal data to pursue its legitimate interests provided your interests and fundamental rights do not override those interest in order for us to comply with our core business contractual requirements, such as the procurement and administration of our construction, engineering, and service projects.

Due to the nature of our operations, we may disclose and share personal data with other NG Bailey companies who may process such information for the purposes described in this notice.

Any personal data relating to you that we collect will be used and recorded by us in accordance with current data protection legislation and this privacy notice. We will use your personal data mainly for record-keeping purposes and in order to provide and improve our services and products. This may involve us sending you information about us, our affiliates and associated companies and organisations including but not limited to promotional and/or marketing material about our products, services, and offerings. In respect of any direct marketing, you have the right, at any time, to:

- Object to receipt of any marketing material from us
- Opt out or unsubscribe
- Withdraw your consent
- Ask for your personal data to be deleted

We may use your personal data to analyse customer/user behaviour and characteristics in order to measure interest in, and use of, the various areas of the website with a view to improving and/or altering the website and/or provide and improve our services and products. We may provide only anonymised data (i.e. that does not contain any information to link it to any individual) to third parties for this purpose (if applicable).

If you provide personal data for the purpose of job opportunities with NG Bailey, your data will be processed as part of a contractual obligation for recruitment, namely assessing your suitability for work experience or employment. Your data may also be used to notify you about other / future job / apprenticeship / work experience opportunities. You have the right to withdraw your consent for this purpose at any time (further details provided in the section headed "Your rights" below).

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.

We may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

If you fail to provide personal data

Where we need to collect personal data from you in order to comply with our legal obligations or to perform a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the relevant contract (for example to provide you with a service). In this case we may have to cancel the relevant contract.

Who we share information with

For the purpose of providing our services to you we may share your personally identifiable information, such as your name, organisation, address, e-mail address and telephone number, with:

Organisations which provide a service to us or act on our behalf, on the understanding that they will keep the information confidential, for example, our IT providers, accountants and other technical experts and other parties if your application is for a role in one of our partnerships.

Any third party to whom we have a duty to do so in order to satisfy any legal or regulatory requirements, such as the Solicitors' Regulatory Authority, the Legal Ombudsman, HMRC and HM Courts and Tribunal Service as examples.

Our policy is not to share personally identifiable information with third parties, unless required by law, as required to perform our obligations to you, with your consent or as necessary for our legitimate interests or those of a third party as described above.

NG Bailey's assurance to you

All information that is obtained about you will be processed by NG Bailey in accordance with UK General Data Protection Regulation and shall be processed by NG Bailey as explained in this notice.

All our third-party service providers who process personal data on our behalf are required to take appropriate security measures to protect your personal information in line with UK General Data Protection Regulation. We do not allow such 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.

International transfers

NG Bailey may transfer personal data to locations outside the United Kingdom, for example, to service providers. If this occurs, NG Bailey will take steps to ensure that your personal data receives essentially equivalent protection as if it were being processed inside the UK by ensuring at least one of the following safeguards is implemented:

- We will transfer your personal data to countries (such those in the EEA) that have been deemed to provide an adequate level of protection for personal data by UK adequacy regulations
- In some instances, we will take steps to ensure that the recipient has an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information and that appropriate and suitable safeguards are in place to comply with data protection legislation such as standard contractual clauses adopted or approved by the ICO

Your rights

Under the UK General Data Protection Regulation, you have a number of 'rights', in respect of your personal information. Specifically, you have the right:

- To be informed about the processing of your data
- Of access to the information we hold and to receive certain information relating to that data
- To rectification of any errors on the information we hold on you or to complete incorrect data
- To erasure of information we hold if it is no longer necessary in relation to the purposes for which it was collected or processed or if you have successfully objected to the processing (note that we may not always be able to comply with your erasure request for specific legal reasons which will be notified to you, if applicable, at the time of your request)
- To object to how we process your information in certain circumstances, including the right to ask us not to process your personal data for marketing purposes
- To restrict processing, for example, if you want us to establish the accuracy of data or you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it
- To be aware of the existence of automated decision-making including profiling (using your information). We do not envisage that any decisions will be taken about you using automated means. However, we will notify you in writing if that position changes
- To receive or ask us to transfer the information to a third party in a structured, commonly used and machine readable form (note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you)

You have a right to exercise these rights at any time and will not usually have to pay a fee to do so. Please contact us by using the details below to make a request. We will respond to all requests within one month although occasionally it may take us longer where your request is complex or you have made a number of requests, in which case we will notify you and keep you updated.

Where we are processing personal data relating to you for a particular purpose on the basis of consent you may withdraw your consent to that specific processing at any time. Please see the contact details below to withdraw your consent. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose you originally agreed to, unless we have another legitimate basis for doing so in law.

You also have the right to object to your data being used for direct marketing purposes, and you can be removed from our marketing database at any time by clicking 'unsubscribe' at the bottom of our e-bulletins or by writing to us by email or mail (see our contact details below). Please note, however, that if you do opt out, you will not be kept informed of new services, products, events or special information that may interest you.

Cookies

In common with many other website operators, we use standard technology called "cookies" on this site. "Cookies" are small text files a website can use to recognise repeat users and to allow us to observe behaviour and compile aggregate data in order to improve the site and to target its marketing efforts. Our cookies enable us to identify you and to store information about the services and information you select between visits. Cookies do not attach to your system nor damage your files. When using our website, you have the option to accept all cookies, or to click on the link to change the cookie settings, however, if you do turn cookies off, this may limit the functionality of the services that we are able to provide you with. Finally, please note that essential cookies cannot be rejected as they are necessary in order to provide you with information and services available through our website.

Your confirmation to NG Bailey

You confirm that all personal information you provide to us is accurate and current. Please keep us informed if your personal information changes during your engagement with us.

How long we hold this information

The personal information you provide to us will be retained only for as long as necessary to fulfil the purposes for which the information was collected or as required by law.

Details of retention periods for different aspects of your personal information are available in our Document Retention and Destruction Policy which is available on request to data@ngbailey.co.uk.

Who should you contact and where to make a complaint

If you have any questions about this privacy notice and how your information is handled or if you wish to exercise any of your rights in respect of your personal data you should, in the first instance, contact data@ngbailey.co.uk or alternatively write to Data, NG Bailey Limited, 7 Brown Lane West, Leeds, LS12 6EH.

If you prefer to speak directly to the Information Commissioners Office (ICO) then they can be reached at www.ico.org.uk and on the contact details below.

If you have a complaint regarding any aspect of your personal data or this privacy notice, please email data@ngbailey.co.uk or write to us at the above address. You also have a right at any time to make a complaint to the ICO. The ICO's contact details are:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Helpline number: 0303 123 1113
ico.org.uk/make-a-complaint/

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please do contact us in the first instance, and we shall endeavour to resolve your complaint. Concerns or complaints can be raised internally addressed to data@ngbailey.co.uk or alternatively write to Data, NG Bailey Limited, 7 Brown Lane West, Leeds, LS12 6EH.

Version Control

Version	Last amended	Author	Action taken
1.0	April 2018	Gary Hibberd	Document created
2.0	July 2020	Martin Jordan	Document review and update
3.0	August 2022	Emma Judge	Document review, reformat and update
4.0	December 2023	Emma Judge	External legal comment and internal update