



## Applicant Privacy Policy

### General Principles

Newcastle United (the Club) is aware of its obligations under the General Data Protection Regulation (GDPR) and is committed to processing your data securely and transparently. This privacy notice sets out, in line with GDPR, the types of data that we hold on you as an applicant for employment with the Club. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

This notice applies to all applicants for employment at or with the Club, whether the application is direct, through a third party, our website or through any other means.

### Data controller details

The Club is a data controller which controls how your personal data is used.

Our contact details are as follows:

Data Protection Lead, St. James' Park, Newcastle upon Tyne, NE1 4ST

[dataprotection@nufc.co.uk](mailto:dataprotection@nufc.co.uk)

### Data protection principles

In relation to your personal data, we will:

- process it fairly, lawfully and in a transparent manner;
- collect your data only for reasons that we find necessary during the course of our contact with you;
- only use it in accordance with this policy;
- only ask for what we need;
- ensure it is correct and, where you have notified us otherwise, up to date;
- keep your data for only as long as we need it;
- process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate), or lost or destroyed;
- keep it safe.

### Types of data we process

The Club collects data about you, including, but not limited to:

- your personal details including your name, address, email addresses and phone numbers;



- where you have provided us with explicit consent to process special categories of your data, information used for equal opportunities monitoring about your sexual orientation, religion or belief, ethnic origin and nationality;
- information which you have included on your CV or your application for employment to the Club, including references, education history, qualifications and employment history;
- a record of documentation relating to your right to work in the UK (to include but not limited to passport / ID Card);
- details of any criminal record check (CRC) / history (where applicable);
- CCTV footage in accordance with the Club's CCTV Policy.

#### How we collect your data

The Club may collect data about you. This will usually take place during the recruitment process, and will usually begin with the information you provide to us with your application for employment (whether this is provided to us directly by you or via a recruitment agency with which you are registered and to whom you have consented to supply us with your application information).

In some cases, we will collect data about you from third parties, such as employment agencies, recruitment websites, former employers and when gathering references, CRC (where applicable), or credit reference agencies (where applicable).

#### Why we process your data

The law on data protection allows us to process your data on specific lawful bases. For example:

- in order to take steps at your request and as part of the role application process prior to entering a contract of employment with you;
- in order to carry out legally required duties;
- in order for us to carry out our legitimate interests;
- where we have your consent.

All of the processing carried out by the Club falls into one of the permitted reasons.

Where the Club processes Special Category Data (for example, any information concerning your ethnicity), it will process it on the following basis:

- where you have provided explicit consent for us to do so for the purposes of our equality and diversity monitoring programme.



The Club may ask for your consent to process certain particularly sensitive data, in which case the Club will tell you why. Consent, once given, may be withdrawn at any time. There will be no consequences where consent is withdrawn.

#### Criminal conviction data

We will only collect criminal conviction data where it is appropriate given the nature of your role and where the law permits us. This data will usually be collected at the recruitment stage.

#### If you do not provide your data to us

If you do not provide the Club with the data needed to fulfil its obligations, and/or to take the necessary steps prior to entering a contract of employment with you, and/or to carry on our legitimate interests in considering and processing your application for employment – then the Club may be prevented from confirming, or continuing with, your application for employment.

#### Sharing your data

Your data will be shared with colleagues within the Club where it is necessary for them to undertake their duties. This includes, for example, line management in the department associated with the job vacancy you are applying for, the HR department for administering your application for employment, and external agencies where necessary or appropriate (such as your recruitment agent).

The Club shares your data with third parties in order to obtain CRC and references, where necessary and appropriate.

The Club will not store or share your data with organisations based outside the European Economic Area, unless the appropriate safeguards are in place.

#### Protecting your data

The Club is aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. The Club has implemented processes to guard against this.

Where the Club shares your data with third parties, it will provide written instructions to them to ensure that your data are held securely and in line with GDPR requirements. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

#### How long the Club keeps your data

In line with data protection principles, the Club will only keep your data for as long as needed, or 12 months from the date your application is received in accordance with the Club data retention policy.



### Automated decision making

No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

### Your rights in relation to your data

You have the following rights in relation to data protection:

- the right to access your personal information;
- the right to have your information updated;
- the right (in certain circumstances) to have your information deleted;
- the right to object to or restrict processing of your information;
- the right to data portability;
- the right to withdraw your consent at any time;
- the right to complain to the Information Commissioner's Office.

If you wish to exercise any of the rights explained above with the Club, please contact [dataprotection@nufc.co.uk](mailto:dataprotection@nufc.co.uk).