



## Notice to Candidates for Employment with NPD - UK

### 1. Scope of Notice

This Notice is intended for each candidate (“you”) for employment with entities controlled by The NPD Group, Inc. (the “Group”, or “we” or “us”). This Notice provides information about the Group’s personal data processing practices, your data protection rights, and our legal obligations.

#### Summary of Key Information about our Personal Data Processing

*We use personal data that you provide, together with additional personal data we collect, as part of our recruitment process.*

*The personal data we collect is used solely to evaluate and administer your candidacy for employment with a Group member. Your personal data is stored and processed in the US, where our parent company is established and where there are third party service providers acting on our behalf.*

*With your consent, NPD will retain your Personal Data for one year following the close of the recruitment process for the position to which you are now applying, so that we may consider you for future job openings. See Section 11 below for more information.*

*In addition to your right to withdraw your candidacy at any time, you have certain rights in respect of your personal data, detailed in Section 9 below, which you can exercise by clicking [here](#).*

### 2. Your Personal Data

The controller of your personal data is The NPD Group, Inc. (hereinafter, “NPD”), The NPD Group Limited (UK Branch) and/or relevant Group members listed on our website at <https://www.npd.com/wps/portal/npd/us/about-npd/offices/>, each acting as an independent and autonomous controller of your personal data. This Notice sets out information regarding the privacy and protections accorded to your personal data by or on behalf of NPD and relevant Group members. When used in this Notice, the term “personal data” means any information relating to a directly or indirectly identified individual, such as a name, phone number or one or more factors specific to that individual’s physical, physiological, mental, economic, cultural or social identity.

### 3. Legal Basis and Purposes of Processing Your Personal Data

Your personal data will be processed by NPD and relevant Group members to evaluate and administer your candidacy for employment with a Group member.

NPD and relevant Group members may process your personal data on at least one of the following legal bases:

- where processing is necessary to comply with a legal obligation to which NPD or the relevant Group member is subject (for instance verifying eligibility for employment or complying with obligations regarding non-discrimination); in this case, failure to provide your personal data will prevent us from considering your candidacy; or
- where processing is necessary in order to take steps at your request prior to entering into an employment contract with you (notably verifying your qualifications and work history); or

- where processing is necessary for the legitimate interests pursued by NPD or the relevant Group member in hiring qualified and appropriate persons (notably by conducting interviews), except if in light of particular circumstances our interests are overridden by your interests or fundamental rights and freedoms that require protection of personal data

If you do not provide some or all of your personal data it may affect our ability to process your candidacy and therefore to enter into an employment agreement with you. In some cases, it may mean that we are unable to continue with your candidacy as NPD or the relevant Group member will not have the personal data we believe to be necessary to enter into an employment agreement with you.

#### **4. Types of Personal Data Processed**

NPD and the relevant Group members processes different types of your personal data, to the extent permitted under applicable laws, for the purposes described in this Notice:

- Contact information (such as your name, address, email address and phone number);
- Employment position(s) sought;
- CV and cover letter;
- Educational history and grades;
- Employment history;
- Additional experience information (such as summary of employment history and educational background, previous work for the Group, non-compete obligations, skills, records and appraisals, educational degrees and statements of opinion or intention);
- Work authorization information (including sponsorship information as applicable); and
- Availability.

You may give us the personal data described above during the recruitment process, whether through your application, further communications, on the telephone or at interviews.

We may also receive personal data about you from third parties; for example, recruiters; references from a previous employer; business partners; sub-contractors providing recruiting or technical services; analytics providers; background check providers; search information providers; and credit reference agencies, as well as from publicly available sources such as social media where such personal data is proportionate to the position for which you are applying. We may also retain that personal data after you have been employed (where this is relevant and to the extent permitted by applicable law).

We may also receive information which may include your personal data from our hiring manager, from Human Resources, from recruiters and, from time to time, from our other employees (for instance, in the course of conducting an interview).

#### **5. Processing Your Personal Data**

The Group is committed to ensuring that all candidate personal data is:

- Processed fairly and lawfully;
- Processed for specific purposes only, and not in any manner incompatible with those purposes;
- Adequate and relevant;
- Kept accurate;
- Retained no longer than necessary;
- Processed consistent with your rights; and
- Kept secure.

## 6. Sharing Your Personal Data with Third Parties

Where necessary for the purposes described in this Notice, your personal data will be shared among relevant Group entities, third party service providers who maintain reasonable security practices commensurate with applicable law, and government agencies. In some cases, third party service providers may be granted access to a specific Group database, but their access is restricted on a need-to-know basis via access limitations. Group entities and third parties with whom your data will be shared include Group HR and IT personnel responsible for recruitment or IT processing and security functions, third parties providing IT services and support for any of the purposes described in this Notice, and in-house and outside counsel.

Wherever required under applicable law, the relevant Group company will enter into with third party service providers data processing or similar agreements that require in particular that such third party service providers will maintain the same level of personal data protection as implemented by the Group. NPD expects all third parties to process any personal data disclosed to them in accordance with applicable law and contract terms, including with respect to personal data confidentiality and security. Where these third parties act as a "data processor" they carry out their tasks on our behalf and upon our instructions for the above mentioned purposes.

We may provide data to a third party if we believe in good faith that we are required to do so for legal reasons or that this is necessary to prevent harm or injury to us, our staff or members of the public or if we need to do so to defend our legal rights. For example, we may provide personal data if we are ordered by a court to do so.

## 7. Transfers of Personal Data Outside of Your Country

**When you provide your personal data on Workday Recruiting, that personal data (as described in Section 4. above) will be transferred to NPD and Workday in the U.S. and may also be transferred to other Group entities or to third parties described in Section 6. above, located outside your country of residence, for the purposes set forth in Section 3 above.**

The U.S. is not considered to offer adequate protection of personal data. Transfers of personal data from The NPD Group Limited (UK Branch) to NPD are made pursuant to standard contractual clauses approved by the European Commission. Transfers of personal data from The NPD Group Limited (UK Branch) to Workday are made pursuant to the EU-U.S. Privacy Shield, to which Workday has certified its adherence. Where applicable, you are entitled, upon request made [here](#), to receive information concerning the appropriate safeguards taken to protect your personal data in connection with such transfer.

Although highly unlikely, transfers may be made to respond to law enforcement requests or discovery procedures, or where required or permitted by applicable laws, court orders, government regulations, or government authorities (including tax and employment). Such transfers may entail access by courts or governmental authorities outside your country, after having ensured that only your minimal necessary data is disclosed and transferred, or that such data is de-identified or that, where possible, appropriate stipulative court orders have been issued.

## 8. Data Security

Your personal data will be secured by taking security measures that are commensurate with the sensitivity of the personal data processed. To this end, the Group maintains reasonable physical, technical, and administrative security measures (including IT system monitoring) with a view to protecting candidate personal data against theft; accidental loss; unauthorized alteration; unauthorized or accidental access, processing, erasure, use, disclosure or copying; and/or accidental or unlawful destruction.

Where we have given you (or where you have chosen) a password which enables you to access Workday Recruiting, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to Workday

Recruiting; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorized access.

## 9. Updating Your Personal Data and Your Rights

- **Right to Correct (Rectification)** - NPD and relevant Group members aim to ensure that all of your personal data is correct. You are entitled to have any inadequate, incomplete or incorrect personal data corrected (that is, rectified). - For as long as your candidacy is active, you have the responsibility to ensure that all your data is kept up to date on Workday Recruiting.
- **Right to Access** - You have the right to request access to any personal data concerning you, subject to limited exceptions that may be prescribed by applicable law.
- **Right to Withdraw Consent** - In the event your personal data is processed on the basis of your consent, you have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- **Right to Data Portability** - Where we rely upon your consent as the legal basis for processing, or the fact that the processing is necessary to perform a contract to which you are party or to take steps at your request prior to entering a contract, and the personal data is processed by automatic means, you have the right to receive all such personal data which you have provided to us in a structured, commonly used and machine-readable format, and also to require us to transmit it to another controller where this is technically feasible.
- **Right to Erasure** - You are entitled to have your personal data erased under specific circumstances, such as where you have withdrawn your consent, where you object to processing based on legitimate interests and we have no overriding legitimate grounds or where personal data is unlawfully processed.
- **Right to Restriction of Processing** - You have the right to restrict our processing of your personal data (that is, allow only its storage) where:
  - you contest the accuracy of the personal data, until we have taken sufficient steps to correct or verify its accuracy;
  - where the processing is unlawful but you do not want us to erase the personal data;
  - where we no longer need your personal data for the purposes of the processing, but you require such personal data for the establishment, exercise or defense of legal claims; or
  - where you have objected to processing justified on legitimate interest grounds (see below), pending verification as to whether we have compelling legitimate grounds to continue processing.

Where your personal data is subject to restriction we will only process it with your consent or for the establishment, exercise or defense of legal claims.

- **Right to object to processing justified on legitimate interest grounds - where we are relying upon legitimate interest to process personal data, you have the right to object to that processing. If you object, we must stop that processing unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or we need to process the personal data for the establishment, exercise or defense of legal claims. Where we rely upon legitimate interest as a basis for processing we believe that we can demonstrate such compelling legitimate grounds, but we will consider each case on an individual basis.**

- Right to Lodge a Complaint – You may lodge a complaint with the supervisory authority of your habitual residence, place of work or place of alleged infringement. The supervisory authority in the UK is the ICO.

#### **10. How to Contact Us**

Your rights may be exercised by clicking [here](#).

To obtain further information regarding your rights, to exercise any of your rights, or to ask any questions regarding the processing of your personal data, please click [here](#).

#### **11. Retaining Your Data**

With your consent, NPD will retain your Personal Data for one year following the close of the recruitment process for the position to which you are now applying, so that we may consider you for future job openings. In all cases, we will retain your Personal Data for exercising or defending legal claims, for a period of time corresponding to the applicable statute of limitations, or legal or regulatory obligations. Personal data of successful candidates will be retained in compliance with applicable laws and the Group's data protection policies and employee privacy notices, which is provided to all employees.

#### **12. Our Recruitment Methods**

NPD is committed to making reasonable adjustments for any disabled candidates. We may also consult (but will not record) any publicly available information concerning you that is published on the Internet.

#### **13. Changes to this Notice**

Any changes or updates we may make to this Notice will be posted [here](#).

**I ACKNOWLEDGE THAT I HAVE READ AND UNDERSTOOD THIS NOTICE.**

*Issued: May 2018*

*This Notice may be updated from time to time.*