
GB Railfreight

CANDIDATE RECRUITMEN T

PRIVACY NOTICE

**GB Railfreight Limited
5th Floor
62-64 Cornhill, London
EC3V 3NH**

GB Railfreight Limited (“**GB Railfreight**”, “**we**”, “**our**”) is providing you with a copy of our Candidate Recruitment privacy notice because you are applying for work as either an employee, consultant or contractor.

We may amend this notice at any time, so please review it frequently. The date at the top of this page will be amended each time this notice is updated.

1. What is the purpose of this document?

This privacy notice makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the UK General Data Protection Regulation (“**UK GDPR**”).

2. Who is responsible for the personal data collected?

GB Railfreight is a "Data Controller" in relation to personal data. This means that we are responsible for deciding how we hold and use personal information about you.

The data controller is:

GB Railfreight Limited 5th Floor
62-64 Cornhill London
EC3V 3NH

You can contact us at:

Data Compliance Team
data.compliance@gbailfreight.com

More information about data protection can be found on the Information Commissioner’s [website](#).

3. Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.

08 August 2025

- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

4. The kind of information we may collect from you or hold about you

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

- The information you have provided to us via third parties as part of the application process;
- The information you have provided to us in your curriculum vitae (CV) and/or covering letter.
- The information you have provided on our application form, including name, address, telephone number, personal email address, education history, skills, qualifications and employment history relevant to your application or employment.
- Any information you provide to us during your interview or the interview process.
- Any information you provide as part of any assessments or testing we ask you to carry out as part of a job application.

In accordance with Paragraph 8, this may also involve us collecting, storing and using the following types of more sensitive personal information, “Special Categories” about you:

- Information about your race or ethnicity, religious or philosophical beliefs, trade union membership, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences, particularly if required for the type of role you are applying for.

We will only collect, store and use the information listed above in the ways and for the purposes set out in this notice.

5. Who is your personal data collected from?

We collect personal information about candidates from the following sources:

- You, the candidate.
- Third-party recruitment and/or application software and/or services.
- Recruitment agencies we work with, from whom we may collect some or all of the categories of data listed above (please see Paragraph 4).

- Experian (our background and rights to work check provider), from which we collect the following categories of data: name, date of birth, address history, employment history, credit check data, national insurance number, right to work documents and other validation evidence.
- Data you have made publicly available, including but not limited to LinkedIn and other social media sites.
- Your named referees, from whom we may collect information relevant to your application, including your job history.
- Disclosure and Barring Service in respect of criminal convictions if required.

6. How will we use information about you?

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role you are applying for.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

Applicable laws allow us to use, or “process”, your personal information for a lawful reason. For the purposes of this notice, the lawful reasons we may rely on when processing your information include:

- Legitimate Interest – It is in our legitimate interests to decide whether to hire or appoint you to a role, since it would be beneficial to our business.
- Contract – We also need to process your personal information to decide whether to enter into a contract of employment with you at the end of the recruitment process; and
- Legal obligation – We must also ensure compliance with all relevant laws and regulations as an organisation.

If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. For certain roles, this may also include passing a medical assessment before an offer is made.

If we decide to offer you the role, we will then take up references and carry out any other employment checks applicable to the role that you have applied for before confirming your appointment.

7. If you fail to provide personal information

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

We may request additional information that is not necessary in considering the merits of your application, as it may be useful to GB Railfreight for other purposes. For example, we may request information on a candidate's ethnicity, gender, sexual orientation or religion, for our diversity and inclusion monitoring.

Failure to provide such information will not affect your application process. However, we ask that if you have any concerns regarding providing any information, please contact us and we can discuss this further as required.

8. How we use particularly sensitive personal information

Where appropriate, we will use your particularly sensitive personal information in the following ways:

- We use information about disability to consider whether we need to provide appropriate adjustments during the recruitment process, for example, whether adjustments need to be made during a test or interview.
- We may use information about racial or ethnic origin, religious or philosophical beliefs, disability or sexual orientation to ensure meaningful equal opportunity monitoring and reporting. Where we do this, we will anonymise the data to ensure no individual is personally identifiable.

9. Information about criminal convictions

We do not envisage that we will process information about criminal convictions.

10. Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

11. Sharing your information

We may share your personal information with third parties for the purposes of processing your application

All our third-party service providers 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.

12. 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, contractors and other 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.

13. Data retention

How long we keep your personal information

We will retain your personal information for a period of 12 months after we have communicated to you our decision about whether to hire or appoint you to a role.

If you have created an account via our recruitment portal but have not applied for a role, we will retain your personal information for a period of 12 months from the date of registration.

After a period of 12 months, we will write to you separately, seeking your explicit consent to continue holding your data within our system on the basis that we might be able to consider you for future roles. However, you can communicate your wish to opt out from us holding your information or request that it be removed at any point.

We also retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy or anonymise your personal information.

14. Your rights in relation to your personal information that we are holding

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as making a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request rectification** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

08 August 2025

- **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 to continue processing 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 review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our data compliance team at data.compliance@gbraillfreight.com.

15. Right to withdraw consent

When you applied for this role, you provided consent for us to process your personal information for the purposes of the recruitment exercise. You have the right to withdraw that consent at any time. You can withdraw your consent by either opting out through the GB Railfreight candidate portal or by contacting our data compliance team at data.compliance@gbraillfreight.com and our Talent Acquisition Team at talentacquisition@gbraillfreight.com.

Once we have received notification that you have withdrawn your consent, your personal details will be removed and, subject to any applicable laws or regulations, we will dispose of your personal data securely.

16. Questions or complaints

If you have any questions or concerns about this privacy notice or how we handle your personal information, please contact our data compliance team at data.compliance@gbraillfreight.com.

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), who is responsible for data protection issues in the UK. You can contact the ICO by calling their helpline on 0303 123 1113. Further information about reporting concerns to the ICO can be found at <https://ico.org.uk/make-a-complaint/>.

Last Modified: August 2025