



Midland Expressway Limited - Recruitment Applicant Privacy Notice

At Midland Expressway Limited (“MEL”), trading as M6toll (“we”, “us”, “our”), we are committed to protecting your privacy and personal data. This Recruitment Privacy Notice explains how we collect, use, store and share your personal data when you apply for a role with MEL, and outlines your rights under the UK General Data Protection Regulation (“UK GDPR”) and the Data Protection Act 2018.

This notice applies to job applicants, candidates, and prospective employees, including those applying directly or via recruitment agencies.

1. Who is the data controller?

A Data Controller is a natural or legal person that determines the purposes and means of processing personal data. In relation to the recruitment and selection of applicants, Midland Expressway Limited (MEL) is the Data Controller.

In certain circumstances, and in line with MEL’s governance structure, Midland Expressway Limited is part of the Aleatica Group, an international infrastructure operator. As a subsidiary of Aleatica, certain corporate governance, compliance, and oversight functions are carried out at group level. Aleatica S.A.U. and other Aleatica group companies may act as Joint Data Controllers, where they participate in or oversee senior recruitment decisions, group-wide HR governance, compliance, or internal audit processes. Aleatica group companies act as Joint Data Controllers only where they are directly involved in recruitment decision-making or group-level governance. In all other recruitment activities, MEL acts as the sole Data Controller.

Our Contact Information

Midland Expressway Limited Operations Centre, Express Way Weeford, Lichfield Staffordshire, WS14 0PQ

Email: dataprotection@m6toll.co.uk

Phone Number: 01543 267 000, 0330 660 0790

2. What personal data do we process about you?

During the recruitment process, MEL may collect and process personal data directly from you, from recruitment agencies, or from other lawful sources.

The types of personal data processed may include identity and contact details such as your name, title, date of birth, postal address, email address and telephone number. We also process recruitment-related information, including CVs, application forms, cover letters, interview notes, assessment results, correspondence, employment and education history, professional qualifications, references, and information you voluntarily provide as part of the recruitment process.

Where required to progress an application or make an offer, MEL may also process right-to-work and eligibility information, including nationality, immigration status and copies of identification documents.

If you attend MEL premises as part of the recruitment process, limited CCTV and access data may be processed, such as entry times and vehicle registration details, in line with MEL’s security arrangements.

Where required, MEL may also collect equality and diversity monitoring information. This data is processed separately from recruitment decision-making and is not used to assess suitability for roles.

MEL does not currently make recruitment-related decisions solely using automated processing. If this changes, this privacy notice will be updated accordingly, and you will be informed and provided with information about the logic involved, the significance, and potential consequences.

3. Special category and criminal conviction data

In limited and specific circumstances, MEL may process special category personal data during recruitment. This may include health or disability information where you request reasonable adjustments to enable a fair and non-discriminatory recruitment process, or where an occupational health assessment is required for a particular role.

Where a role requires it, MEL may also process criminal conviction data, such as Disclosure and Barring Service (DBS) information, strictly in accordance with legal requirements and only where appropriate to the role.

Special category and criminal data is processed only where necessary, with enhanced safeguards, restricted access, and an appropriate lawful condition in place. Specifically, criminal conviction data is processed in accordance with Article 10 of the UK GDPR and the Data Protection Act 2018, Schedule 1, where processing is necessary for employment-related purposes and subject to appropriate safeguards.

4. Why do we process your personal data?

MEL processes recruitment applicants' personal data to manage and operate its recruitment and selection activities. This includes receiving and assessing applications, communicating with candidates, evaluating suitability for roles, conducting interviews and assessments, verifying information provided, carrying out right-to-work and eligibility checks, and making informed recruitment decisions.

Where an offer of employment is made, recruitment data is also used to take steps prior to entering into an employment contract and to prepare for onboarding. MEL also processes recruitment data to meet legal, regulatory, audit and governance obligations, and to maintain appropriate records of recruitment decisions.

5. Lawful basis for processing your personal data

Under the UK GDPR, MEL relies on a number of lawful bases to process recruitment applicant personal data.

- Most commonly, processing is necessary to take steps at your request prior to entering into an employment contract, in accordance with Article 6(1)(b) of the UK GDPR.
- MEL also processes personal data where necessary to comply with legal obligations, such as right-to-work checks and equality legislation, under Article 6(1)(c).
- In addition, MEL has a legitimate interest in operating an effective, fair and secure recruitment process, and may process personal data under Article 6(1)(f) where those interests are not overridden by your rights and freedoms.

During the recruitment process, MEL processes applicants' personal data on the following lawful bases under Article 6 of the UK GDPR:

- Processing is primarily necessary to take steps at the request of the data subject prior to entering into a contract (Article 6(1)(b)). This applies when we review applications, assess suitability for a role, communicate with candidates, conduct interviews, and make recruitment decisions.
- In addition, certain processing is necessary for compliance with a legal obligation to which MEL is subject (Article 6(1)(c)). This includes, for example, right to work checks, health and safety obligations, equality monitoring where required by law, and record-keeping obligations under employment and immigration legislation.

Where neither a contractual necessity nor a legal obligation applies, personal data may be processed on the basis of MEL's legitimate interests (Article 6(1)(f)), such as managing and improving recruitment processes, ensuring fair and consistent hiring decisions, maintaining audit trails, and defending potential legal claims. These interests are balanced against the rights and freedoms of applicants.

- Consent (Article 6(1)(a)) is not relied upon as the primary lawful basis for recruitment processing, as recruitment activities are generally necessary for pre-contractual, legal, or legitimate interest purposes. Where consent is used (for example, for optional talent pooling beyond standard retention periods), it will be clearly requested, freely given, and capable of being withdrawn at any time.

6. Lawful conditions for processing special category data

During recruitment, MEL may process limited special category personal data, as defined under Article 9 of the UK GDPR. This processing is restricted to what is strictly necessary and typically includes:

- Health or medical information provided by applicants to request reasonable adjustments during the recruitment process;
- Information required to assess fitness for work where relevant to the role;
- Limited equality and diversity information, where applicable and processed separately from selection decisions.

Special category personal data is processed on the lawful basis set out in Article 9(2)(b) of the UK GDPR, where processing is necessary for the purposes of carrying out obligations and exercising specific rights of MEL or the data subject in the field of employment and health and safety.

This processing is supported by the relevant condition under the Data Protection Act 2018, Schedule 1, Part 1, including conditions relating to employment, health and safety, and workplace equality. An Appropriate Policy Document (APD) is in place, as required by law, setting out how such data is handled, retained, and safeguarded.

Special category data is not used for automated decision-making and is only accessible to authorised personnel or specialist providers on a strict need-to-know basis.

7. Children's data processing

MEL does not collect or process children's personal data as part of recruitment activities.

8. Who do we share your personal data with?

MEL may also share personal data with recruitment agencies, occupational health providers, professional advisers, background check providers, and regulatory authorities such as the Home Office. Where required, recruitment data may be accessed by Aleatica group companies in support of governance, compliance, audit or senior recruitment processes.

All third parties are required to process personal data securely and in accordance with data protection law.

9. Where is your personal data processed?

Recruitment data is primarily processed and stored within the UK and the European Economic Area. Where personal data is accessed or processed by Aleatica group entities or service providers outside the UK, appropriate safeguards are in place, including International Data Transfer Agreements, Standard Contractual Clauses, or other lawful transfer mechanisms, to ensure an equivalent level of protection.

You may request further information about international transfers by contacting dataprotection@m6toll.co.uk.

10. How long do we retain recruitment data?

MEL retains recruitment applicant personal data only for as long as necessary for the purposes for which it was collected.

Personal data relating to unsuccessful candidates is normally retained for **up to 12 months** following the conclusion of the recruitment process. This allows MEL to respond to queries, demonstrate fair recruitment practices, and consider candidates for future opportunities where appropriate.

For successful candidates, relevant recruitment data is transferred to the employee personnel file and retained in accordance with MEL's employment retention schedules.

11. How is your personal data kept secure?

MEL has implemented appropriate technical and organisational measures to protect recruitment applicant personal data from loss, misuse, unauthorised access or disclosure. Access to personal data is restricted to those with a legitimate business need, and systems are protected through access controls, authentication measures, and organisational policies and procedures.

MEL has procedures in place to manage and report personal data breaches in accordance with legal requirements.

12. Your rights

Under data protection law, you have rights in relation to your personal data, including:

- The right to be informed - you have the right to be informed about the collection and use of their personal data. Individuals are informed of how their personal data is processed via the privacy notice, which is provided at the data collection points.
- The right of access - you have the right to access and receive a copy of their personal data and other adjacent information.
- The right to rectification - Individuals have the right to have inaccurate data rectified, or completed if it is incomplete.
- The right to erasure - the right to have personal data erased (also known as the right to be forgotten).
- The right to restrict processing - the right to request the restriction or suppression of their personal data.
- The right to data portability - the right to obtain and reuse their personal data for their own purposes across different services. The right to data portability enables data subjects to move, copy or transfer their personal data easily from one IT environment to another in a safe, secure way, without affecting its usability.
- The right to object - Individuals have the right to object to the processing of their personal data if it is for direct marketing purposes.
- Rights in relation to automated decision making and profiling - Individuals have the right not to be subject to automated decision making or profiling where this activity produces legal effects on the data subject.
- The right to withdraw your consent at any time - individuals have the right to withdraw or revoke the consent they have issued at any moment.

You may exercise your rights by contacting dataprotection@m6toll.co.uk. MEL will respond to requests within the statutory timeframes.

13. How to complain

If you have concerns about how your personal data is processed, you may contact MEL using the details above. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO).

The ICO's details are Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

14. Updates to this Privacy Notice

This Recruitment Privacy Notice is reviewed at least annually and whenever there is a material change to MEL's processing activities, legal obligations, or Record of Processing Activities.

This Recruitment Privacy Notice was issued in April 2026.

Version	Date Published	Next Review Date
V.1	April 2026	April 2027