

LEE & THOMPSON LLP
CANDIDATE PRIVACY NOTICE

1 Introduction

- 1.1 Lee & Thompson is a data controller, and gathers and uses certain personal information about you (referred to below as "Personal Data"). We are committed to protecting the privacy and security of your personal information.
- 1.2 You are being sent a copy of this Privacy Notice because you are applying for work with us. This Privacy Notice describes how we collect and use your Personal Data for the purposes of the recruitment process.
- 1.3 If at any time you have any questions about this Privacy Notice or the way we use your personal data, please contact our Privacy Manager.

2 Key terms used in this Privacy Notice

We, us, our	Lee & Thompson LLP, 80 Charlotte Street, London, W1T 4DF
Our Privacy Manager	Our Privacy Manager is responsible for this policy. You can contact our Privacy Manager using the following details if you have any questions about this privacy policy or the information we hold about you: Telephone: 020 3073 7600 Email: dataprotection@leeandthompson.com
Personal data	Any information relating to an identified or identifiable individual
Special Category Data	Personal Data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data Data concerning health, sex life or sexual orientation

3 What kind of information do we hold about you?

- 3.1 We may collect, store and use the following categories of Personal Data about you:
 - The information you have provided to us in your CV, and covering email/letter
 - Personal contact details such as name, title, addresses, telephone numbers, and email addresses
 - Date of birth
 - Gender
 - Employment history
 - Qualifications
 - Right to work documentation
 - References
 - Any information you provide to us during an interview
- 3.2 We may collect, store and use the following categories of Special Categories of Personal Data:

- Information about your race or ethnicity, religious beliefs, sexual orientations, and political opinions
- Information about your health, including any medical condition, health and sickness records

4 What principles do we follow when we process your Personal Data?

4.1 We will comply with the following data protection principles when processing your Personal Data:

- 4.1.1 We will process Personal Data lawfully, fairly and in a transparent manner.
- 4.1.2 We will collect Personal Data for specified, explicit and legitimate purposes only, and will not process it in a way that is incompatible with those legitimate purposes.
- 4.1.3 We will only process Personal Data that is adequate, relevant and necessary for the relevant purposes.
- 4.1.4 We will keep Personal Data accurate and up to date, and take reasonable steps to ensure that inaccurate Personal Data are deleted or corrected without delay.
- 4.1.5 We will keep Personal Data for no longer than is necessary for the purposes for which the data is processed; and
- 4.1.6 We will take appropriate technical and organisational measures to ensure that Personal Data are kept secure and protected against unauthorised or unlawful processing, and against accidental loss, destruction or damage.

4.2 In addition to complying with the principles set out at paragraph 4.1 above, we will only process your Special Category Data if one of the following special conditions applies:

- 4.2.1 You have given us explicit consent;
- 4.2.2 Where we need to carry out our legal obligations or exercise rights in connection with employment law;
- 4.2.3 Where the processing is necessary to protect your vital interests and you are not capable of giving your consent;
- 4.2.4 Where you have already made the information public;
- 4.2.5 Where the processing is necessary for the establishment, exercise or defence of legal claims; or
- 4.2.6 The processing is necessary for reasons of substantial public interest.

5 How do we collect your Personal Data?

We collect your Personal Data through the application and recruitment process, either directly from you, or where relevant via an employment agency. We may sometimes collect additional information from third parties including former employers or anyone with whom you have previously worked or who has recommended you, and/or online platforms to which you have uploaded your Personal Data (such as LinkedIn).

6 What is our lawful basis for processing your Personal Data

6.1 We will only use your Personal Data when we have a lawful basis for doing so, including:

- 6.1.1 Because it is in our legitimate interests to decide whether to appoint you to a role (since it would be beneficial to our business to appoint someone to that role).
- 6.1.2 Because we need to decide whether to enter into a contract with you.
- 6.1.3 Because we need to process your Personal Data to comply with our legal obligations.

7 Ways in which your Personal Data may be processed

7.1 Your Personal Data may be processed in one or more of the following ways:

- Assessing your skills, qualifications and suitability for the role.
- Carrying out background and reference checks, where applicable.
- Communicating with you about the recruitment process.
- Keeping records relating to our recruitment processes.
- Complying with our legal or regulatory requirements.

7.2 Your Special Category Data may be processed in the following ways:

- We may use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example, whether adjustments need to be made during an interview.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful diversity and equal opportunity monitoring and reporting.

7.3 We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reasons and that reason is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the lawful basis which allows us to do so.

8 Automated Decision Making

8.1 We do not envisage that any decisions will be taken about you using automated means.

9 How may we share your Personal Data?

9.1 We may share your Personal Data with third parties where required by law, where it is necessary for the purposes set out in this Privacy Notice or where we have another legitimate interest in doing so. "Third parties" includes third-party service providers (including contractors and designated agents).

9.2 All of our third-party service providers are required to take appropriate security measures to protect your Personal Data. 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.

9.3 We may share your Personal Data with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your Personal Data with a regulator or to otherwise comply with the law.

9.4 We may transfer the Personal Data we collect about you to countries outside of the EEA for example if one of our third-party service providers is based outside of the EEA. Where we transfer your Personal Data to countries to outside of the EEA we do so in accordance with model contracts approved by the European Commission to ensure that there is an adequate level of protection for your Personal Data, or otherwise in accordance with the law.

10 How secure is my Personal Data?

10.1 We have appropriate security measures in place to prevent your Personal Data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your Personal Data to those who have a genuine business need to know it. Those processing your Personal Data will do so only in an authorised manner and are subject to a duty of confidentiality.

10.2 We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

11 How long will you keep my Personal Data?

11.1 If you are unsuccessful in your application, we will retain your Personal Data for a period of 6 months after we have communicated to you our decision. We will retain your Personal Data 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 that period, we will securely destroy your Personal Data in line with our policies.

11.1 If you are successful in your application and come to work for us, then we will keep your Personal Data during and after the period you work for us for no longer than is necessary for the purposes for which the Personal Data is processed and in accordance with our policies. If you are employed by us you will be provided with a copy of our Employment Privacy Notice when you join which will explain how we deal with the Personal Data of those who work with us.

12 Keeping us informed

12.1 It is important that your Personal Data is accurate and up to date. Please keep us informed if your Personal Data changes.

13 Failure to provide Personal Data

13.1 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.

14 Your rights

14.1 Under certain circumstances, you have rights under data protection laws in relation to your Personal Data.

14.2 Those rights include:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
To be forgotten	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data—in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —At any time to your personal data being processed for direct marketing (including profiling); —In certain other situations to our continued processing of your

	personal data, eg processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

14.3 If you wish to exercise any of your rights under Clause 14.2 please contact our Privacy Manager.

14.4 You also have the right to make a complaint at any time to the Data Commissioner's Office (ICO, the UK supervisory authority for data protection issues (www.ico.org.uk)). We hope that we would be able to resolve any concerns that you may have before you approach the ICO so please do contact us in the first instance.

LAST UPDATED: September 2020