

**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 This Privacy Notice applies to individuals who are applying for work at Lee & Thompson. It 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**

<b>We, us, our</b>	Lee & Thompson LLP, 80 Charlotte Street , London, W1T 4DF.
<b>Our Privacy Manager</b>	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: <a href="mailto:dataprotection@leeandthompson.com">dataprotection@leeandthompson.com</a>
<b>Personal data</b>	Any information relating to an identified or identifiable individual
<b>Special Category Data</b>	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 About the Personal Data we collect and hold about you**

- 3.1 The table set out in the Schedule to this Privacy Notice summarises the categories of Personal Data we may collect about you and how/why we collect that Personal Data.

**4 What is our lawful basis for processing your Personal Data?**

- 4.1 We will only process your Personal Data when we have a 'lawful basis' for doing so.
- 4.2 Most commonly we will need to process your Personal Data:
  - To decide whether to enter into a contract with you
  - So that we can comply with a legal obligation
  - For the purposes of our legitimate interests or those of a third party, but only if these are not overridden by your interests, rights and freedoms
- 4.3 More rarely, we may also process your Personal Data when we need to protect your vital interests (or the vital interests of another person) or when such processing is necessary for reasons of substantial public interest.
- 4.4 In addition to the above, we will only process your Special Category Data if a further 'special condition' applies.

- 4.5 We may also process information about criminal convictions and offences where we are required to do so (as a regulated law firm), for reasons of substantial public interest (including the prevention or detection of unlawful acts, preventing fraud and protecting the public against dishonesty) or we are otherwise legally entitled to do so in the field of employment law. This information may be shared with law enforcement agencies and regulators.
- 4.6 The lawful bases and special conditions for processing your Personal Data (including any Special Category Data) are set out in detail in the attached [Schedule](#).
- 4.7 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 reason 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 (which may be by way of an update to this Privacy Notice).
- 4.8 Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law.

## **5 How may we share your Personal Data?**

- 5.1 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. Such third parties include our legal and other professional advisors together with third-party service providers (including contractors and designated agents). Activities that are carried out by third-party service providers include IT services (such as our cloud-based document management system NetDocuments), communication services and office security.
- 5.2 All 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.
- 5.3 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.
- 5.4 We may transfer the Personal Data we collect about you to countries outside of the UK for example if one of our third-party service providers is based outside of the UK. We will not transfer your personal data outside of the UK unless:
- 5.4.1 such transfer is to a country or jurisdiction which the UK has approved as having an adequate level of protection. This currently includes all countries within the EEA; or
  - 5.4.2 appropriate safeguards are in place in accordance with data protection laws. These safeguards include the use of standard contractual clauses or binding corporate rules; or
  - 5.4.3 the transfer is otherwise allowed under data protection laws.

## **6 How secure is my Personal Data?**

- 6.1 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.
- 6.2 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.

## **7 How long will you keep my Personal Data?**

7.1 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.

7.2 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 Internal Privacy Notice when you join which will explain how we deal with the Personal Data of those who work with us.

**8 Keeping us informed**

8.1 It is important that your Personal Data is accurate and up to date. Please keep us informed if your Personal Data changes during your working relationship with us.

**9 Failure to provide Personal Data**

9.1 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.

**10 Your rights**

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

10.2 Those rights include:

<b>Access</b>	The right to be provided with a copy of your personal data
<b>Rectification</b>	The right to require us to correct any mistakes in your personal data
<b>To be forgotten</b>	The right to require us to delete your personal data—in certain situations
<b>Restriction of processing</b>	The right to require us to restrict processing of your personal data—in certain circumstances, e.g. if you contest the accuracy of the data
<b>Data portability</b>	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
<b>To object</b>	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, e.g. processing carried out for the purpose of our legitimate interests.
<b>Not to be subject to automated individual decision-making</b>	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

- 10.3 If you wish to exercise your rights or have any questions about this Privacy Notice or the way we process your Personal Data, please contact our Privacy Manager.
- 10.4 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](http://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: November 2022

## SCHEDULE

Personal Data we may collect	How we collect your Personal Data	Purpose(s) for processing your Personal Data	Our lawful basis for processing your Personal Data
<p>Your name and contact details (including addresses, telephone numbers, and personal email addresses).</p>	<p>From you, former employers, anyone with whom you have previously worked or has recommended your services, online platforms to which you have uploaded your Personal Data (such as LinkedIn), and/or, where relevant, from recruitment agencies.</p>	<p>To communicate with you about the recruitment process.</p>	<p>Legitimate interests: to aid the recruitment process and to keep good records in relation to our recruitment process.</p>
<p>Recruitment information, including your employment history, qualifications, right to work documentation, information you provide us during an interview, copies of right to work documentation, and, any other information included in your CV, covering email/letter.</p>	<p>From you, former employers, anyone with whom you have previously worked or has recommended your services, online platforms to which you have uploaded your Personal Data (such as LinkedIn), and/or, where relevant, from recruitment agencies.</p>	<p>Assessing your skills, qualifications and suitability for a particular job or role.  Carrying out background and reference checks.</p>	<p>To decide whether to enter into a contract with you.  To comply with our legal obligations.  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); to keep good records in relation to our recruitment process; and to comply with legal, regulatory</p>

Personal Data we may collect	How we collect your Personal Data	Purpose(s) for processing your Personal Data	Our lawful basis for processing your Personal Data
			and corporate governance obligations.
CCTV footage of you if you attend our office	Via CCTV cameras in our office.	To monitor and manage access to our office and to ensure office security.	Legitimate interests: to monitor and manage access to our office and to ensure office security.
<b>Special Category Data</b>			
Diversity information, including Information about your race or ethnicity, religious beliefs, sexual orientation, political opinions and disability.	From you.	To ensure meaningful diversity and equal opportunity monitoring and reporting.	<p>To comply with our legal obligations.</p> <p><i>Special Conditions</i></p> <p>Because it is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on us or you in connection with employment, social security or social protection.</p>

Personal Data we may collect	How we collect your Personal Data	Purpose(s) for processing your Personal Data	Our lawful basis for processing your Personal Data
			<p>Because it is necessary for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained.</p>
Information about your disability status	From you.	To consider whether we need to provide appropriate adjustments during the recruitment process, for example, whether adjustments need to make for an interview.	<p>To comply with our legal obligations.</p> <p><i>Special Conditions</i></p> <p>Because it is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on us or you in connection with employment, social security or social protection.</p>
Your Covid 19 test results (if relevant)	From you.	To ensure health and safety in the workplace and reduce the spread of Covid 19.	<p>To comply with our legal obligations.</p> <p><i>Special Condition</i></p>

Personal Data we may collect	How we collect your Personal Data	Purpose(s) for processing your Personal Data	Our lawful basis for processing your Personal Data
			<p>Because it is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on us or you in connection with employment, social security or social protection.</p>
<b>Criminal Record Data</b>			
<p>Data about criminal convictions and offences</p>	<p>From you, from regulators, law enforcement, or any other third party who may provide it to us.</p>	<p>For reasons of substantial public interest (including the prevention or detection of unlawful acts, preventing fraud and protecting the public against dishonesty) or where we are otherwise legally entitled to process this information in the field of employment law.</p>	<p>To comply with our legal obligations.</p> <p><i>Special Condition</i></p> <p>Because it is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on us or you in connection with employment, social security or social protection.</p> <p>To comply with regulatory requirements relating to unlawful acts and dishonesty.</p> <p>To prevent or detect unlawful acts.</p>



<b>Personal Data we may collect</b>	<b>How we collect your Personal Data</b>	<b>Purpose(s) for processing your Personal Data</b>	<b>Our lawful basis for processing your Personal Data</b>
			To prevent fraud.