

RECRUITMENT PRIVACY NOTICE

As part of our recruitment process, Wake Smith collects and processes personal data relating to job applicants and work experience/work shadowing applicants. We are committed to being transparent about how we collect and use that data in compliance with our data protection obligations.

Data Protection Principles

The Company will comply with data protection law. This means that the personal information we hold about you must be:

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

What information will Wake Smith collect about you?

We will collect a range of information about you as part of our recruitment process including:

- Your name, address and contact details, including email address and telephone number;
- Details of your qualifications, skills, experience, employment history and interests;
- Information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability in relation to whether we may need to make reasonable adjustments during the recruitment process;
- Details of your referees;
- Regulatory and/or accreditation checks on suitability;
- Information about your entitlement to work in the UK.

We may also collect, store and use the following special categories of more sensitive personal information:

- Information about medical or health conditions, including whether or not you have a disability for which the Company needs to make reasonable adjustments;
- Information about any criminal record you may have;
- Details of trade union membership; and,
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief

We collect this information in a variety of ways, for example data might be contained in application forms, CVs or resumes, or collected through interviews or other forms of assessment. We seek to ensure that our information collection and processing is always proportionate.

We may also collect personal data about you from third parties, such as references supplied by former employers. We will seek information from third parties only once a job offer to you has been made and will inform you that we are doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

Why does Wake Smith process personal data?

- **To take steps to enter into a contract:** We need to process data to take steps at your request prior to entering into a contract with you.
- **To comply with a legal obligation:** In some cases, we need to process data to ensure compliance with our legal obligations for example we must check a successful applicant's eligibility to work in the UK before employment starts. We may also process health information if we need to make reasonable adjustments to our recruitment process for candidates who
- have a disability.
Where the Company has a legitimate interest: We have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.
- **For the performance of a task carried out in the public interest.**

Who has access to your data?

We take your privacy seriously and take precautions to keep it secure. Your information will be shared internally for the purposes of the recruitment exercise and this will include members of the People & Culture team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

We have internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is accessed only by employees in the proper performance of their duties as set out above.

We will not share your data with third parties unless your application for employment is successful and we make you an offer of employment. In these circumstances we will then share your data with former employers to obtain references for you.

We will not transfer your data to countries outside the European Economic Area. However, where data is shared with a third party, for example when requesting a reference from a former employer for a successful applicant, then data may be transferred outside of the European Economic Area by that third party.

For how long will we keep your data?

If your application for employment is unsuccessful, we will hold your data on file for one year after the end of the relevant recruitment process. We retain your personal information for that period so 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. At the end of that period your data will be securely destroyed. If there is a clear business reason for keeping recruitment records for longer than one year we may do so but will first consider whether the records can be anonymised and for how long they will be kept.

We may keep your personal data on file in case there are future employment opportunities for which you may be suited. You have the right to object to the processing of your personal data at any time and please let us know if you would prefer us not to keep your details on our files for this purpose.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. You will be provided with a Privacy Notice for Staff at the start of your employment.

Automated decision making

We will not make recruitment decisions that have a significant impact on you based solely on automated decision making.

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to us during the recruitment process. However, if you do not provide the information we may not be able to process your application properly or at all.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

Your rights

Please contact the People & Culture Team (details below) if you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask us for some, but not all, of the information we hold and process to be erased (the 'right to be forgotten') in certain circumstances.

Laura Bathgate, People & Culture Manager laura.bathgate@wake-smith.com

Alternatively you may direct your query to our Data Protection Officer on the details below:

Data Protection Officer: Elizabeth Shaw Email: Elizabeth.shaw@wake-smith.com or dataprotectionadmin@wake-smith.com

Further information on privacy can be obtained from www.ico.org.uk/concerns and concerns or complaints can be logged with the ICO or by contacting the Information Commissioner on tel: 0303 123 1113.