

Privacy Notice for candidates for employment or work

November 2021



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Landell Mills, we, us, refers to: Landell Mills International Ltd (Ireland) and Landell Mills Ltd (UK).

This privacy notice will explain we use the personal data we collect from you when you apply to us for employment or work (including to provide services).

This Privacy Notice does not form part of any contract of employment or other contract to provide services.

What data do we collect?

Landell Mills will only collect data where this is reasonably necessary for a function or activity of ours. In connection with your application for work with us, the types of data we may collect, store, process and use includes the following:

- Personal identification information:
 - Name,
 - Email address,
 - Phone number,
 - Postal address,
 - Information provided by you through our website, Facebook, LinkedIn, Twitter or YouTube accounts;
- Other information you have provided to us in your curriculum vitae and any covering letter or application including date of birth, gender, employment history, qualifications, reference information. This list is not exhaustive;
- Any information you provide to us during an interview or any discussion about a role that we may have;
- Any information you provide to us or the results of any pre-employment testing or screening process.

We may also collect, store and use the following special categories of more sensitive data where specifically relevant to the position of employment under consideration, including:

- Information about your health, including any medical condition, health and sickness records;
- Information about criminal convictions and offences.

How do we collect your data?

You directly provide Landell Mills with most of the data we collect. Data may be collected and processed in a variety of ways, including from or when:

- You apply to work or be employed by us;
- The recruitment agency, from which we collect the personal data;
- A background check provider, from which we collect the personal data;
- Published social media accounts e.g LinkedIn;
- Referrals (including from clients, partners, sub-contractors and other individuals,) who may refer your personal data to us;
- Open sources, such as internet listings or other published data;

- Former employers, contractors, clients and/or educational establishments;
- Security clearance agencies, in respect of criminal convictions and/or security threats (where relevant to the position);
- Your named referees, from whom we may collect data including employment history, qualifications, attendance record and salary information.

How will we use your data?

The way that Landell Mills uses your data will depend on the reason why we have collected your data. In connection with your application for work with us, we collect your data for purposes including to:

- Assess your skills, qualifications, and suitability for the work or advertised role;
- Carry out any required background and reference checks, where applicable;
- Assess your right to work in the UK, Ireland or any other country in which we may work in compliance with relevant immigration rules (where applicable);
- Communicate with you about the recruitment process;
- Keep records related to our hiring or recruitment processes;
- Carry out data analytics including the profiles of those applying for roles with us;
- Comply with legal or regulatory requirements.

The Lawful Basis relevant for processing data about you in a recruitment context is that:

- It is necessary for the purposes of legitimate interests pursued by us or by a third party. It is in our legitimate interests to decide whether to appoint you to the role or offer you work since it would be beneficial to our business to appoint someone to that role or provide such services.
- It is necessary for entering into or performing a contract with a Data Subject. We need to process your Data to decide whether to enter into a contract of employment or services with you.

For employed roles, having received your CV and covering letter/email OR your application form (and/or the results from any test that you may have taken), we may then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. 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 or work. If we decide to offer you the role or work, we may then take up references, carry out a criminal record check and/or carry out any other relevant checks before confirming your appointment; please note that reference requests prior to the offer stage may be undertaken, subject to communication with you to confirm your consent.

For independent contractor roles, having received your CV and covering letter/email OR your application form, including from a referral, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If we decide to offer you a project position, this may be subject to confirmation of your full employment/work engagement history, and client approval. Please note that positions may be subject to a criminal record check and/or other relevant checks before confirming your appointment.

If you fail to provide data 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 security 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.

How we use special categories of data

We will use your particularly sensitive data (special categories of data) in the following ways:

- We will 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 the interview process or during a test.
- We may use sensitive data (which may include information about your gender; race, national or ethnic origin; sexual orientation; age, health or religious beliefs - where known to us) to ensure that relevant Duty of Care precautions are in place.

Information about criminal convictions

We envisage that we may need to process information about criminal convictions in specific circumstances.

We may collect and process information about any history of criminal convictions only if relevant to a specific role and where we would like to offer you the work or role (conditional on checks and any other conditions, such as references, being satisfactory). We are entitled to carry out a criminal record check in order to satisfy ourselves and the relevant client that there is nothing in your criminal convictions' history that makes you unsuitable for the role.

Why might we share your Data with third parties?

We may as part of the recruitment or selection processes share your Data with the following third parties:

- Associated employers, consortium partners or Group companies;
- Client organisations – where relevant to the position being recruited or services to be provided;
- Legal representatives;
- Regulators and professional bodies;
- Recruiters or reference checking agencies;
- Government or statutory bodies in our operational jurisdiction;
- Revenue and customs authorities of the United Kingdom (HMRC) and Republic of Ireland (ROS);
- Insurers, insurance brokers;
- Occupational health providers;
- Medical practitioners, clinicians, doctors, other health providers and consultants;
- Marketing or PR agencies;
- Cloud and IT service providers;
- The UK Driving Licence and Vehicle Authority (DVLA) or Irish Road Standards Agency (RSA);
- Security checking services;
- Consultants or contractors working on our behalf.

All our third-party service providers and other entities in the Group are required to take appropriate security measures to protect your Data in line with our policies. We only permit third party service providers to process your Data for specified purposes and in accordance with our instructions.

How do we store your data?

Landell Mills securely stores all data that you provide to us, or that we collect about you, on our secure servers. We understand that this includes confidential information and we have put in place a range of suitable security procedures, both electronic and managerial, to safeguard and secure your information.

If you send us your CV for employment or independent contractor positions, then we will assume that you have no objection to us including your CV on our CV database. Should you not wish this to happen please inform us at cvarchive@landell-mills.com or in the email content when sending us your CV.

How long will we use your information for?

The periods for which Data will be stored and the criteria used to determine retention periods or whether Data can be removed will depend on the information in question, its relevance or sensitivity. Generally, Data will be removed if it has been superseded by other relevant or up to date information, if it is out of date, irrelevant or no longer necessary. Generally, for third party, consultancy roles, this will be for a period of 10 years after we have received your information, although we reserve the right to delete your information sooner should we so wish; for internal vacancies, unless otherwise stated, this will generally be for a period of up to 36 months.

What are your data protection rights?

Landell Mills would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to access – you have the right to request copies of your personal data from Landell Mills.

The right to rectification – you have the right to request that Landell Mills correct any information you believe is inaccurate. you also have the right to request Landell Mills to complete the information you believe is incomplete.

The right to erasure – you have the right to request that Landell Mills erase your personal data, under certain conditions.

The right to restrict processing – you have the right to request that Landell Mills restrict the processing of your personal data, under certain conditions.

The right to object to processing – you have the right to object to Landell Mills' processing of your personal data, under certain conditions.

The right to data portability – you have the right to request that Landell Mills transfer the data that we have collected to another organisation, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us by email.

Changes to our privacy policy

Landell Mills keeps its privacy policies under regular review and places any updates on this web page. This privacy policy was last updated on 17 November 2021.

How can you contact us?

If you have any questions about Landell Mills' privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Email us at: lm@landell-mills.com

How can you contact the appropriate authority?

Should you wish to make a complaint or if you feel that Landell Mills has not addressed your concern in a satisfactory manner, please contact us and we will try to resolve your concerns.

You also have the right to complain to the Information Commissioner's Office in the UK or The Data Protection Commission in Ireland.