

1 The Purpose of this Document

- 1.1 We are committed to processing your data securely and transparently. This Privacy Notice sets out your privacy rights and how we gather, use and share personal data about you during the job application and recruitment process, in accordance with the General Data Protection Regulation (EU) 2016/679 (**GDPR**) and the Data Protection Act 2018.

2 About us

- 2.1 We are what is known as the 'controller' of personal data we gather and use. When we say 'we', 'our' or 'us' in this notice, we mean Bell & Clements Ltd and Bell & Clements (London) Ltd.

- 2.2 Our Data Protection Officer (DPO) is Tony Dumycz and his contact details are:

Mr. Tony Dumycz
Munich Re UK Life Branch
Plantation Place
30 Fenchurch Street
London
EC3M 3AJ
Tel: 020 3650 7530
Email: dataprotecton@bellandclements.co.uk

3 Your Privacy Rights

- 3.1 You have various rights in respect of the personal data we hold about you – these are set out in more detail below. If you wish to exercise any of these rights, please contact our DPO.

4 What information does the organisation collect?

- 4.1 The organisation collects a range of information about you. This includes:

- Your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK; and

- 4.2 The organisation collects this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

- 4.3 The organisation will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. The organisation will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

- 4.4 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).

5 Why does the organisation process personal data?

- 5.1 The organisation needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.
- 5.2 In some cases, the organisation needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.
- 5.3 The organisation has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the organisation to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The organisation may also need to process data from job applicants to respond to and defend against legal claims.
- 5.4 Where the organisation relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.
- 5.5 The organisation processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

6 Who has access to data?

- 6.1 Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment 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.
- 6.2 The organisation will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The organisation will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.
- 6.3 The organisation will not transfer your data outside the European Economic Area.

7 How does the organisation protect data?

- 7.1 We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.
- 7.2 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.

8 For how long does the organisation keep data?

- 8.1 If your application for employment is unsuccessful, the organisation will hold your data on file for 6 months after the end of the relevant recruitment process. At the end of that period or once you withdraw your consent, your data is deleted or destroyed.
- 8.2 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. The periods for which your data will be held will be provided to you in the staff privacy notice.

9 Your Rights

- 9.1 As a data subject, you have a number of rights. You can:
- a) access and obtain a copy of your data on request;
 - b) require the organisation to change incorrect or incomplete data;
 - c) require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
 - d) object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing; and
 - e) ask the organisation to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data.
- 9.2 If you would like to exercise any of these rights, please contact the organisation's DPO on the details provided at 2.2 of this notice.

10 What if you do not provide personal data?

- 10.1 You are under no statutory or contractual obligation to provide data to the organisation during the recruitment process. However, if you do not provide the information, the organisation may not be able to process your application properly or at all.
- 10.2 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.

11 Automated decision-making

- 11.1 Recruitment processes are not based solely on automated decision-making.

12 Right to Complain

Please contact our DPO if you have any questions or concerns about the way in which we are processing your data. If you are unhappy with our response or have a complaint then you can or contact the UK's supervisory authority, the Information Commissioner's Office, at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF
Tel: 0303 123 1113
Website: <https://ico.org.uk/>