

## PRIVACY NOTICE FOR JOB APPLICANTS

### 1. Introduction

- 1.1 We are committed to protecting the privacy and security of your personal information.
- 1.2 This privacy notice (including the Appendix) details how we collect and use personal information about you during the recruitment process, in accordance with the General Data Protection Regulation (GDPR).
- 1.3 We will comply with data protection law when collecting and using your personal information. This means that the personal information we hold about you will be:
  - Used lawfully, fairly and in a transparent way.
  - Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
  - Relevant to the purposes we have told you about and limited only to those purposes.
  - Accurate and kept up to date.
  - Kept only as long as necessary for the purposes we have told you about.
  - Kept securely.

### 2. The kind of information we hold about you

- 2.1 The different types of personal information that we will collect about you during the recruitment process are detailed in the Appendix. Personal information is any information about you from which you can be identified.
- 2.2 There are “special categories” of more sensitive personal information which require a higher level of protection. Details of any special categories of personal information are set out in the Appendix.

### 3. How we use your personal information

- 3.1 The reasons for us using your personal information are set out in the Appendix. Where the legitimate interests of the company is given as the legal reason for processing your data, those legitimate interests are the need to process your personal data to assess and record information about your qualifications and experience as part of the selection process, and to manage the recruitment exercise effectively to decide to whom to offer the job.
- 3.2 If you fail to provide certain information when requested, we may not be able to comply with our legal obligations (such as safeguarding checks or to make any reasonable adjustments needed for job applicants during the recruitment process).
- 3.3 We will only use your personal information 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 information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- 3.4 This privacy notice applies to the recruitment process only. In the event that you are successful and become an employee, your personal data will be processed in accordance with our privacy notice applicable to employees. In the event that you are not successful or reject an offer of employment, processing under this notice will cease as set out in the Appendix. However we may ask for your consent to retain certain personal data for a longer period and, if you choose to give such consent, a different privacy notice will apply to you.

### 4. How will we use sensitive personal information?

- 4.1 The reasons for us using your sensitive personal information are set out in the Appendix.
- 4.2 We do not need your consent to use sensitive personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may ask you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that you are not obliged to give consent, it will not be a condition of any job offer with us, and it will not count against you if you choose not to give consent or if you withdraw any consent at a later date.

## 5. Do we collect information about criminal convictions?

- 5.1 We may occasionally use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy.
- 5.2 We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.

## 6. How do we share your data?

- 6.1 We may have to share your data with third parties, including third-party service providers and other entities in the group.
- 6.2 We require third parties to respect the security of your data and to treat it in accordance with the law.
- 6.3 We may transfer your personal information outside the EU if it is necessary to do so, for example if the job that you are applying for involves any work overseas or where the server on which we store personal data is hosted outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information. Details of any information we may transfer outside the EU are set out in the Appendix.
- 6.4 We may share your personal information with other third parties, for example when making reference requests. We may also need to share your personal information to comply with the law.
- 6.5 We have put in place measures to protect the security of your information and procedures to deal with any suspected data security breach. Details of these measures are available upon request. We will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## 7. How long will we use your information for?

- 7.1 We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are set out in the Appendix.
- 7.2 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## 8. What are your responsibilities?

8.1 It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the recruitment process.

## 9. What are your rights?

9.1 Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. We may charge a reasonable fee if your request for access is clearly unfounded or excessive, alternatively we may refuse to comply with the request in such circumstances.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below). We will not be required to delete or remove personal information if your objection is not upheld.
- Object to processing of your personal information where we are relying on a legitimate interest as the reason for processing (as identified in the Appendix) and there is something about your particular situation which makes you want to object to processing on this ground. We are not obliged to uphold your objection where the legitimate interest relied on outweighs the reason for your objection.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it or while we are considering your objection to processing.
- Request the transfer of your personal information to another party.
- If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us in writing.

9.2 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

- 9.3 In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## 10. Complaints

- 10.1 If you have any questions about this privacy notice or how we handle your personal information, please contact [dataprotection@accordancevat.com](mailto:dataprotection@accordancevat.com). You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

## 11. Changes to this privacy notice

- 11.1 We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

## 12. Appendix

Type of data	Reason for processing	Legal basis for processing	Source of data	Transfers to other parties	Retention period
Identity (name, job title, workplace details)	Determining the terms on which you work for us	The legitimate interests of the company	Data subject	Dropbox* Office365	6 months following the end of the recruitment process.
Nationality, work permits or similar	To verify your right to work in the UK	To comply with a legal obligation	Data subject	Dropbox* Office365	6 months following the end of the recruitment process.
Contact (personal email, telephone, address)	Making a decision about your recruitment or appointment	The legitimate interests of the company	Data subject	Dropbox* Office365	6 months following the end of the recruitment process.
CV content (employment history, school details, image)	Making a decision about your recruitment or appointment	The legitimate interests of the company	Data subject	Dropbox* Office365	6 months following the end of the recruitment process.
Disabilities and associated special requirements	Making reasonable adjustments during the recruitment process	To comply with a legal obligation, specifically complying with employment law obligations	Data subject	Dropbox Office365	6 months following the end of the recruitment process.
Responses to interview questions/feedback on interview performance	Making a decision about your recruitment or appointment	The legitimate interests of the company	Data subject Interviewers	Dropbox* Office365	6 months following the end of the recruitment process.
References	Making a decision about your recruitment or appointment	The legitimate interests of the company	Data subject (CV) Reference provider	Dropbox*	6 months following the end of the recruitment process.

\*Data may be transferred outside of the EEA subject to Appropriate Safeguards (for example, EU-US Privacy Shield).