

UCLC: Recruitment Privacy Notice

1. Introduction

The purpose of this Notice is to explain how we, UCLC, handle Personal Data about our job applicants and to explain the rights that applicants have under data protection law. In this Notice, we refer to this type of information as “Application Data”.

This Notice applies to applications submitted via the UCLC website, email, LinkedIn and via third parties, such as recruitment agencies and job boards. It also applies to applications submitted via other means, such as by post.

Please refer to the Glossary below for an explanation of the defined terms in this Policy.

2. Overview: the UCLC 10 Data Protection Principles

UCLC observes the UCLC 10 Data Protection Principles in relation to Application Data:

- (i) **Fairness and Transparency:** Give people information about how UCLC processes their Application Data.
- (ii) **Lawful Processing:** Make sure we always have a good, lawful reason to process Application Data.
- (iii) **Purpose Limitation:** Only collect Application Data for a specific business need of UCLC. If we want to reuse the Application Data for a new purpose, we must make sure the two are compatible.
- (iv) **Data Minimisation:** Only process as much Application Data as we need, and no more.
- (v) **Accuracy:** Keep Application Data accurate, complete, and up-to-date.
- (vi) **Retention:** Only keep Application Data for as long as we need it. If we don't need the Application Data anymore, we must delete it or anonymise it.
- (vii) **Security:** Protect UCLC's Application Data from getting lost or stolen. Make sure our service providers protect our Application Data as well.
- (viii) **Individual Rights:** Allow individuals the right to access, correct or erase their Application Data, or object to it being used for certain purposes.
- (ix) **Application Data Transfers:** Put in place safeguards before sending Application Data outside Europe.
- (x) **Accountability:** Take steps to make sure our processing of Application Data complies with these 10 Data Protection Principles.

3. What Application Data does UCLC collect?

UCLC will generally only collect Application Data in the recruitment process that is necessary to assess you for the post applied for. This may include the following categories:

- Information you provide in order to apply for a job vacancy with UCLC to tell us who you are and to build a picture of your capabilities and suitability for certain positions, such as

your name, contact information, nationality, professional qualifications, previous employment history, personal interests, experiences and a copy of your résumé; and

- Information collected by UCLC as a result of the recruitment process, such as your performance at interview and information provided by your referees.

Personal Data about criminal convictions or medical information will only be sought where permitted by local law.

We will indicate where the information we have requested is mandatory or optional.

4. What will UCLC do with your Application Data?

The main purposes for which we use Application Data include:

- **Supporting and Processing your job application**, for example, so we can assess your ability to meet the job specification, in order to shortlist applicants and to verify references and professional qualifications provided by those applicants; and
- **Improving our application process**, for example to ensure that the careers section of our website is user-friendly and contains appropriate and helpful information.

We may verify the Application Data you provide during the recruitment process and/or collect Personal Data about you from sources other than you to assist with our 'Pre-Employment Checks'. This may include checking your qualifications, directorships, financial history (e.g. bankruptcy) and if you have a criminal record. If this occurs:

- You will be told in advance which aspects of your Application Data will be verified including an explanation of how the Pre-Employment Checks will be carried out; and
- Information about criminal convictions (if collected) or medical information will only be collected through official authorised sources and in accordance with applicable law.

UCLC will only process your Application Data where we have a legal basis for doing so. UCLC's processing of Application Data is generally carried out because it is necessary for us to decide whether to enter into a contract of employment with you. In addition, certain data processing may be based on your consent (which you have the right to withdraw at any time) or because it is necessary to comply with a legal obligation or to enable us to pursue our legitimate business interests (for example where it is necessary to understand our applicants in sufficient detail so we can deliver an effective recruitment service).

5. Who is your Application Data disclosed to?

(a) Within UCLC

UCLC restricts access to Application Data to people within UCLC who have a "need to know" that information. For example, certain individuals throughout UCLC will have access to your Application Data in order to process your job application and manage the recruitment cycle.

(b) Outside UCLC

UCLC shares Application Data with authorised third party service providers, in order to conduct and manage recruitment. For example, we may share your personal information with these service providers in order to conduct screening and verification of your application and

the information you have provided to UCLC. This includes verifying academic and professional qualifications.

UCLC may also disclose your Application Data to third parties outside UCLC:

- when required to do so by law;
- in response to a legitimate request for assistance by the police or other law enforcement agency; and
- to seek legal advice from UCLC's external lawyers or in connection with litigation with a third party.

6. How long will UCLC retain your Application data?

We keep your Application Data in accordance with our internal retention policies and procedures. Typically, if you are unsuccessful in your job application with us (or if you reject the position) your Application Data will be destroyed within 7 months. We may, with your consent, keep your Application Data for a reasonable further period (no more than 18 months) so that we may contact you again if another suitable position arises. Any hard copy Application Data will be deleted no more than 12 months after your interview with us.

7. Where does UCLC store your Application Data?

Applicants should be aware that their Application Data may be transferred to, and stored in a country outside of the UK, which may have less strict, or no data protection laws, when compared to those of their country of residence. It may also be processed by staff operating outside of their country of residence, who work for us or for one of our suppliers, for example in the provision of support services.

Whenever we transfer your Application Data outside of the UK, we will take legally required steps to ensure that adequate safeguards are in place to protect your Application Data and to make sure it is treated securely and in accordance with this Notice. You may contact us for a copy of the safeguards which we have put in place to protect your Application Data and privacy rights in these circumstances.

8. Exercising your rights

You may have the right to request access to, rectification or erasure of, the Application Data UCLC holds about you. You may also have the right to object to or restrict certain types of processing of your Application Data.

If you notice an error in your application that you would like to correct, please contact us using the contact information in paragraph 9 below.

Any request to exercise one of these rights will be assessed by UCLC on a case by case basis. There may be circumstances in which we are not legally required to comply with your request because of the laws in your jurisdiction or because of relevant legal exemptions provided for in data protection legislation.

9. Contact us

Please contact us at dataprotection@uclconsultants.com if you would like to find out more about any matters relating to this Notice.

If you have concerns about the way in which UCLC has handled your Application Data, you have the right to complain to the Information Commissioner's Office (<https://ico.org.uk/>). However, if you have concerns we strongly encourage you to raise this with UCLC in the first instance.

Glossary

Application Data	Personal Data relating to job applicants.
Personal Data	Information which relates to an identified or identifiable individual (i.e. data about UCLC employees, contractors, applicants, employees of vendors and suppliers, contractors and individuals who use our website). It includes names, addresses, email addresses, job applications and correspondence. Personal Data can also include web browsing information (e.g. data associated with a particular cookie) and IP addresses, when such information can be linked to an individual.
Pre-Employment Checks	Personal Data relating to a potential UCLC Employee collected from sources other than the candidate. For example, directorships, financial history, qualifications and criminal record.
Processing	<i>Doing anything</i> with Personal Data; this includes collecting it, storing it, accessing it, combining it with other data, sharing it with a third party, or even deleting it.

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