

CANDIDATE PRIVACY NOTICE

1. SCOPE

- 1.1 This notice applies to Womble Bond Dickinson (UK) LLP (**WBD**) and Womble Bond Dickinson Wealth Limited (**WBDW**) (referred to as "the firm", "we", "us" or "our").
- 1.2 WBD will be the data controller for all job candidates who apply to work for WBD and WBDW. That means WBD is responsible for deciding how we collect, hold and use personal information about you and for how long we keep that information.
- 1.3 This notice applies to all job applicants

2. INTRODUCTION

- 2.1 This notice provides information about the data we collect from you during our job application process, how we hold that information, how it is used and for how long we keep it.
- 2.2 This notice will be reviewed regularly to ensure that our approach to data processing is in line with the General Data Protection Regulation (**GDPR**) and any other applicable UK data protection legislation.

3. ABOUT THE INFORMATION WE COLLECT AND HOLD

- 3.1 The table set out in Part A of the Schedule below summarises the information we collect and hold, up to and including the shortlisting stage of the recruitment process, how and why we do so, how we use it and with whom we may share it.
- 3.2 The table in Part B of the Schedule below summarises the additional information we collect before making a final decision to recruit, i.e. before making an offer of employment unconditional, how and why we do so, how we use it and with whom we may share it.
- 3.3 We aim to ensure that our information collection and processing is always proportionate. We will update this notice to record any changes to information we collect or to the purposes for which we collect and process it and notify you where appropriate.

4. SENSITIVE PERSONAL DATA

- 4.1 We will use your sensitive personal data only in so far as we are permitted by Law to do so :
- 4.2 We will use data 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 a test or interview.
- 4.3 We will use data about your nationality or ethnicity, to assess whether a work permit and a visa will be necessary for the role.

5. WHERE INFORMATION MAY BE HELD

- 5.1 Information may be held, in hard copy at our offices or electronically.
- 5.2 Information held electronically will be held in our IT systems and on the systems of third party service providers who process personal data on our behalf in the course of providing services to support our recruitment process or our IT systems generally. Where third parties are processing data on our behalf, we require those third parties to keep your information confidential and to use it only for the purpose of the processing we have instructed them to carry out.

6. HOW LONG WE KEEP YOUR INFORMATION

- 6.1 We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful and you become employed by us, the nature of the information concerned and the purposes for which it is processed.
- 6.2 If you are unsuccessful in your application, we will keep recruitment information (including interview notes) for a period of 12 months following the completion of the recruitment process.
- 6.3 If you are signed up to our job alerts, we will contact you prior to the expiry of this period to gain your consent to retain your personal data for a further 12 months.
- 6.4 If you are successful in your application, your personal data will be stored for the duration of your employment with the firm and for a period of **six years** from the date your employment or engagement ends. However, we will regularly review this (annually) to ensure that the information we hold is relevant and up to date during this time.

7. YOUR RIGHTS

- 7.1 You have a number of rights in relation to your personal data. The rights may only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights

	Summary of your rights
Right of access to your personal information	You have the right to receive a copy of the personal information that we hold about you, subject to certain exemptions. Any access request is free of charge. We may require further information in order to respond to your request (for instance, evidence of your identity and information to enable us to locate the specific personal information you require).
Right to rectify your personal information	You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.
Right to erasure of your personal information:	You have the right to ask that your personal information be deleted in certain circumstances. For example (i) where your personal information is no longer necessary in relation to the purposes for which they were collected or otherwise used; (ii) if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information; (iii) if you object to the use of your personal information (as set out below); (iv) if we have used your personal information unlawfully; or (v) if your personal information needs to be erased to comply with a legal obligation.
Right to restrict the use of your personal information	You have the right to suspend our use of your personal information in certain circumstances. For example (i) where you think your personal information is inaccurate and only for such period to enable us to verify the accuracy of your personal information; (ii) the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; (iii) we no longer need your personal information, but your personal information is required by you for the establishment, exercise or defence of legal claims; or (iv) you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection.

	Summary of your rights
Right to data portability	You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible. The right only applies where the use of your personal information is based on your consent or for the performance of a contract, and when the use of your personal information is carried out by automated (i.e. electronic) means.
Right to object to the use of your personal information	You have the right to object to the use of your personal information in certain circumstances. For example (i) where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party); and (ii) if you object to the use of your personal information for direct marketing purposes.
Right to withdraw consent	You have the right to withdraw your consent at any time where we rely on consent to use your personal information.
Right to complain to the relevant data protection authority	You have the right to complain to the relevant data protection authority, which is in the case of us, the Information Commissioner's Office, where you think we have not used your personal information in accordance with data protection law.

7.2 If you wish to exercise your rights as set out above please contact a member of the Recruitment team or our data protection officer (details below).

8. KEEPING YOUR PERSONAL INFORMATION SECURE AND WHERE WE MAY TRANSFER IT TO

8.1 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.

8.2 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.

8.3 We may transfer personal information outside the European Economic Area but will implement appropriate and suitable safeguards to ensure that such personal information will be protected as required by applicable data protection law.

9. CHANGES TO OUR PRIVACY NOTICE

This notice may change from time to time and in response to guidance and best practice advice issued by the Information Commissioner's Office. The updated notice will take effect as soon as it has been updated or otherwise communicated to you.

10. OUR DATA PROTECTION OFFICER

Our Data Protection Officer is Nicki Shepherd. Please contact her by post, email or telephone if you have any questions about this notice or the information we hold about you.

Nicki Shepherd, General Counsel

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Our helpdesk - +44 (0)191 2799468

Approved by: Sam Lee, Head of Recruitment - March 2020

SCHEDULE 1

About the information we collect and hold

Part A: Up to and including the shortlisting stage

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name and contact details (i.e. address, home and mobile phone numbers, email address)	From you	<p>Legitimate interest: to carry out a fair recruitment process.</p> <p>Legitimate interest: to progress your application, arrange interviews and inform you of the outcome of all stages.</p>	<p>To enable the recruitment team to contact you to progress your application, arrange interviews and inform you of the outcome.</p> <p>To inform the relevant hiring manager of your application.</p>
Details of your qualifications, experience, employment history (including job titles, salary, working hours) and interests	From you, in the completed application form, CV and interview notes (if relevant). From third parties, such as recruitment agencies. From online sources where you made your personal information publicly available for recruitment purposes such as jobs boards and LinkedIn.	<p>Legitimate interest: to carry out a fair recruitment process.</p> <p>Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit.</p>	To make an informed recruitment decision.
Test and assessment results (including psychometric assessment results, results from gamification and video and telephone assessment).	From you or from a third party provider contracted to provide testing or assessment on our behalf.	Legitimate interest: to make an informed decision to recruit.	To make an informed recruitment decision.
Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs	From you, in a completed anonymised equal opportunities monitoring form	To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)	<p>To comply with our equal opportunities monitoring obligations and to follow our diversity and inclusion and other policies</p> <p>For further information, see * below</p>

Part B: Before making a final decision to recruit

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers *	From your referees (details of whom you will have provided to our background checking company, Vero)	Legitimate interest: to make an informed decision to recruit To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To obtain the relevant reference about you To comply with legal/regulatory obligations Information shared with relevant managers and HR personnel
Information regarding your academic and professional qualifications*	From you, from your education provider, from the relevant professional body	Legitimate interest: to verify the qualifications information provided by you	To make an informed recruitment decision
For all fee earning, finance and client facing roles in the firm given the importance of clients having trust in us as a professional services firm, and where we are legally able to do so information regarding your criminal record, in criminal records certificates (CRCs)*	From you and from the Disclosure and Barring Service (DBS)	To perform the employment contract To comply with our legal obligations Legitimate interest: to verify the criminal records information provided by you	To make an informed recruitment decision To carry out statutory checks Information shared with DBS and other regulatory authorities as required
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information *	From you and, where necessary, the Home Office	To enter into/perform the employment contract To comply with our legal obligations Legitimate interest: to maintain employment records	To carry out right to work checks Information may be shared with the Home Office
A copy of your driving licence *	From you	To enter into/perform the employment contract To comply with our legal obligations	To make an informed recruitment decision. To carry out background checking (in particular relating to the DBS)

You are required (by law or in order to enter into your contract of employment) to provide the categories of information marked * above to us to enable us to verify your right to work and suitability for the position.