



Job Applicant Privacy Notice

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Document Revision History

Rev. No.	By	App'd	Description	Date
1.01	RT	BC	Document reformatted to C&C standard; New version numbering system implemented;	12/01/2022
1.02	AS	WL	Updated point of contact from Rebecca Taylor to Ashley Scott	02/12/2022
1.03	AS	WL	Annual review, no revisions;	30/11/2023
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Job applicant privacy notice

The wording in this document reflects the requirements of the General Data Protection Regulation (GDPR), which will come into effect in the UK on 25 May 2018. See Law relating to this document below for more information.

Any questions regarding this Policy and our privacy practices should be sent by email to info@cousinsandcousins.com or by writing to Ashley Scott, Cousins & Cousins, Primrose Hill Courtyard, 7 Erskine Road, London, NW3 3AJ.

As part of any recruitment process, the organisation collects and processes personal data relating to job applicants. The organisation is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does the organisation collect?

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
- equal opportunities monitoring information, including information about your health and religion or belief.

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.

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.

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).

Why does the organisation process personal data?

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.

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.

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.

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.

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.

Where the organisation processes other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes and your express consent will be requested.

If your application is unsuccessful, the organisation will keep your personal data on file for 12 months in case there are future employment opportunities for which you may be suited. If the organisation requires to keep your information for longer you will be asked for your consent. You are free to withdraw your consent at any time.

Who has access to data?

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.

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.

Your data may be transferred outside the European Economic Area (EEA) to back up data centres. Data is transferred outside the EEA on the basis of declaration and certification of GDPR compliance.

How does the organisation protect data?

The organisation takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by the relevant employees of the organisation in the proper performance of their duties.

Job applications received via email are held securely on our email server, and only made available to the appropriate employees to perform their duties, for example HR and/or the hiring manager. If an email is deleted it is held for 14 days on the server before it is purged from the system. We also backup the mailbox that received the application securely.

Applications are moved from email to a secure location on the network and a link made available to hiring managers so that applications are not emailed unnecessarily. All data access is strictly controlled using the least access privilege approach.

For how long does the organisation keep data?

If your application for employment is unsuccessful, the organisation will hold your data on file for twelve 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.

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 a new privacy notice.

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the organisation to change incorrect or incomplete data;
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing; and
- 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.

If you would like to exercise any of these rights, please contact Ashley Scott, Cousins & Cousins, Primrose Hill Courtyard, 7 Erskine Road, London, NW3 3AJ or email info@cousinsandcousins.com.

Data breaches and reporting

If it becomes apparent that a potential data breach has occurred, the Company will endeavour to report this to the ICO within 72 hours of becoming aware of the data breach. This will be the case if the data breach is likely to result in damage to a person's reputation, financial loss, loss of confidentiality, or major financial or social disadvantage. If the breach is likely to result in a high risk to the rights and freedoms of the data subject the Company will also contact the data subject without undue delay.

Data breaches will be reported to the Information Commissioner Office (ICO) by calling the dedicated personal data breach helpline on 0303 123 1113.

What if you do not provide personal data?

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.

Automated decision-making

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