

## APPLICANT PRIVACY NOTICE

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

This document sets out:

- Why we collect your personal information;
- What information is collected and;
- How it is processed within the recruitment process.

### WHY DO WE COLLECT YOUR PERSONAL INFORMATION?

In order to manage your application, we need to process certain personal information about you. We do this to take the necessary steps prior to entering into any contract with you. We also need to process your data if we agree to enter into a contract with you.

In some cases, JTP needs to process data to ensure that it is complying with its legal obligations. For example, we are required to check a successful applicant's eligibility to work in the UK at interview and before employment starts.

JTP has a legitimate interest in processing your data during the recruitment process to ensure that we make and keep records of this process. These records allow us to manage the process effectively, assess a candidate's suitability for employment and decide who to offer roles to. We may also, from time to time, need to process data from job applicants to respond to and defend against legal claims.

We only process your information as necessary for the purposes of progressing your application or as required by law or regulatory requirements.

### WHAT PERSONAL INFORMATION MIGHT WE PROCESS?

As part of JTP's recruitment process we process a range of personal information at different stages of the recruitment process. The stages at which the information is collected and types of information collected is set out below:

#### Application

The following personal information is collected from your covering letter, CV and portfolio:

- Your name, contact details and address;
- Nationality Information which used for anonymised reporting
- Details of your skills, qualifications, academic and employment history;

#### Interview

The following personal information is collected at interview through JTP's Job Applicant Details form, Equal Opportunities Monitoring form (completion of which is optional) and at interview.

- Name, personal address, email address and contact details
- Date of Birth
- Qualification Certificates
- Education and work history including professional qualifications and skills;
- National Insurance Number
- Employment Eligibility Information (e.g. passport copy and Right to Work Share codes)
- Employer Reference details
- Disability
- Ethnic Origin Information
- Remuneration Information

During our interview process we will capture some sensitive personal data about you. This information can be volunteered pre-interview or through our Equal Opportunities Form (e.g. disability information). We do this in order to make reasonable adjustments to enable candidates to apply for

jobs with us, to attend interview, to prepare for starting at the JTP (if successful) and to ensure that we comply with regulatory obligations placed on us with regard to our hiring.

JTP also collect information relating to social mobility and ethnic origin, this is for equal opportunities monitoring purposes and your express consent will be requested.

We may also collect personal data about you from third parties, such as references obtained from former employers. We will seek information from third parties only once a job offer has been made to you and will inform you that we are doing so.

All candidates invited to interview are required to sign a consent form to allow us to obtain, process and store the data. Should consent not be provided it may affect our ability to effectively assess the suitability of a candidate for at position at the practice.

### **WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?**

JTP will need to share your information internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team and interviewers involved in the recruitment process.

JTP will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. With your permission JTP will then share your data with former employers to obtain references for you and academic institutions (Universities, colleges, etc.) in validating information you've provided.

JTP will not transfer your data outside the EEA.

### **HOW DO WE PROTECT YOUR INFORMATION?**

JTP takes the security of your data seriously. Our HR, Recruitment and IT systems are protected to ensure that unauthorised or unlawful processing of personal information, accidental loss or destruction of, or damage to, personal information does not occur. This is done in accordance with our Data Protection Policy, copies of which can be obtained upon request.

### **HOW LONG DO WE KEEP YOUR DATA?**

If your application for employment is unsuccessful then all personal information including application documents will be kept on file for 6 months to allow you to be considered for future suitable vacancies arising within this time period.

Unsuccessful interviewed candidates' personal data including application documents, interview forms and reference details will be kept on file for 1 year from the date of interview.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your employee file and retained during your employment.

The periods for which your data will be held is detailed in JTP's Record Retention Policy, a copy of which is available upon request.

You are free to withdraw your consent at any time.

### **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 JTP to change incorrect or incomplete data;
- require JTP to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where JTP is relying on its legitimate interests as the legal ground for processing
- ask the JTP to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override JTP's legitimate grounds for processing data.

If you would like to exercise any of these rights please contact Janet Lewis, HR & Operations Partner and Eve Denney, Practice Manager at [hr@jtp.co.uk](mailto:hr@jtp.co.uk).

#### **WHAT IF YOU DO NOT PROVIDE PERSONAL DATA?**

You are under no statutory or contractual obligation to provide data to JTP during the recruitment process. However, if you do not provide the information, it may affect our ability to process your application.

#### **DATA BREACHES AND REPORTING**

If it becomes apparent that a potential data breach has occurred, the JTP will 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.

#### **AUTOMATED DECISION-MAKING**

JTP's recruitment processes are not based on automated decision-making.

#### **HOW TO CONTACT US**

If you have any questions regarding this privacy notice, please do not hesitate to contact Janet Lewis and Eve Denney at [hr@jtp.co.uk](mailto:hr@jtp.co.uk).