

Recruitment Privacy Notice

Applying to Bristows: Your personal data

This Privacy Notice explains how Bristows (“we” or “us”) handles personal data about you when you apply to work for us, whether as a permanent or temporary employee or as a contractor or consultant. It also provides details of the rights that you have under data protection law. Such laws, for the avoidance of doubt, include the General Data Protection Regulation (“GDPR”) and its implementing legislation in the UK. In this Notice, we refer to the personal data Bristows handles about you in a recruitment context as “Recruitment Data”.

This Notice also applies to applications submitted via our website and third parties, such as recruitment agencies and job boards.

The data controllers in respect of your Recruitment Data are, independently, Bristows LLP and Bristows (Services) Limited.

What recruitment data do we collect?

We collect information that is necessary to assess you for the position you have applied for and which enables us to understand and improve our recruitment process. This will generally include the following information:

- **Application information:** Your name, contact information, current employer, information contained in your CV/resume (e.g. professional qualifications, previous employment history, place of residence, salary, additional bonuses and personal interests and experiences), information about your professional life contained in your social media accounts (e.g. LinkedIn or Twitter) and any other information you may wish to provide to us as part of your application.
- **Recruitment process information:** Your performance at interviews and information provided by your referees.
- **Future opportunities information:** This is information collected in order to keep in touch with you about future job opportunities at Bristows, such as your name, email, LinkedIn profile, field of expertise and the kind of role you are interested in.
- **Website information:** If you submit your application via our website (www.bristows.com) we may collect information related to your use of the website using cookies or similar technologies, for example your IP address and which pages you visited.
- **Equal Opportunities Monitoring Information:** Only where you chose to provide it, information about your gender, religion, sexual orientation, socio-economic background, ethnicity and/or any disabilities that you may have.

In certain situations and where we are permitted to do so by law, we may also collect information about any criminal convictions you have. In limited cases, we may also collect details of any health conditions or disabilities you have, for instance, if you require assistance or adjustments to be made in order to attend an interview.



We generally receive Recruitment Data either: (a) directly from you (for instance when you provide information as part of your application or during the recruitment process) or (b) from third parties (for instance from recruitment agencies). If we ask you for specific information we will indicate whether providing this information is mandatory or optional. We will also explain the consequences of not providing mandatory information, which in some cases may mean we are unable to process your application.

What will we do with your recruitment data?

Bristows will use your Recruitment Data for the following purposes:

- Supporting and Processing your 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 you.
- Improving our Application Process, for example, to ensure that the careers section of our website is user-friendly and contains appropriate and helpful information.
- Legal and Regulatory Compliance, for example to ensure our compliance with health & safety requirements and other legal or fiscal obligations, or in connection with litigation or an internal investigation or audit and to ensure compliance with our policies regarding anti-money laundering, bribery and corruption, as well as equal opportunities monitoring.
- We may verify the Recruitment Data you provide during the recruitment process and/or collect personal data about you from third party sources to assist with our "Pre-Employment Checks". If this occurs:
- You will be told in advance which aspects of your Recruitment Data will be verified including an explanation of how the Pre-Employment Checks will be carried out; and
- Information about criminal convictions (if collected) will only be collected through official authorised sources and in accordance with applicable law.

We will only process your Recruitment Data where we have a legal basis for doing so. Generally, we will process your information because it is necessary to help us to decide whether to enter into a contract of employment with you. At other times, we will be processing your Recruitment Data because you have consented to us doing so, in which case you can withdraw such consent at any point (for example, if you ask us to keep in touch with you about future job opportunities at Bristows).

We may also process your Recruitment Data to comply with our legal obligations or because it is in our legitimate business interests as a recruiter to do so, provided that such processing does not result in a negative impact on your privacy and other rights (for example, where it is necessary for us to understand our applicants in sufficient detail so we can operate an effective recruitment process).

Who is your recruitment data disclosed to?

We will only share Recruitment Data with third parties in the following circumstances:

- Where we use a third party service provider which will process Recruitment Data on our behalf. For example, we may share your Recruitment Data with such service providers in order to conduct screening and verification of your application and the information you

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have provided to us. Where this takes place, the third party service providers will be under contractual conditions to handle Recruitment Data appropriately.

- Where we are under a duty to do so in order to comply with any legal or regulatory requirement, or to protect the rights, property, or safety of our firm or others.
- Where our firm, or substantially all our firm's assets are merged or acquired by a third party, in which case Recruitment Data may form part of the transferred or merged assets.
- To provide anonymous statistical information about the recruitment process and related usage information to reputable third parties.
- To seek legal advice from our external advisers or in connection with litigation with a third party.

How long will we retain your recruitment data?

We keep your Recruitment Data for as long as is necessary in connection with your application to work for us. Typically, if you are unsuccessful in your application with us (or if you reject the position), we will keep your Recruitment Data for 12 months unless we have your permission to keep your Recruitment Data on file so that we may contact you again if another suitable position arises – in this situation we will retain such Recruitment Data for 2 years. If your application is successful then we will retain your Recruitment Data as part of your employment record.

Where do we store your recruitment data?

We may transfer Recruitment Data to a country outside the European Economic Area ("EEA") or the UK, which have less strict, or no data protection laws than we do in the UK (for example, if we use a service provider based in the USA).

Whenever we transfer your Recruitment Data outside of the EEA or the UK, we will take legally required steps to ensure that appropriate safeguards are in place to protect your information 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 Recruitment Data and privacy rights in these circumstances.

Exercising your rights

You may have the right to request access to, rectification or erasure of, the Recruitment Data we hold about you. You may also have the right to object to or restrict certain types of processing of your Recruitment Data and request to receive a machine-readable copy of the Recruitment Data you have provided to us.

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

You can request to exercise these rights mentioned above by using the contact details below. Please note, however, that any request to exercise one of these rights will be assessed by us on a case-by-case basis. There may be circumstances in which we are not legally required to comply with your request because of relevant legal exemptions provided for in applicable data protection legislation.

Contact us

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

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If you have concerns about the way in which we have handled your Recruitment Data you should contact us at human.resources@bristows.com in the first instance. If you are still dissatisfied, you have the right to complain to the relevant Data Protection Authority (in the UK this is the Information Commissioner's Office).

This Notice was last updated on **22 May 2018**

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