

Privacy Notice Recruitment

1. Introduction

- 1.1 Wilkin Chapman is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during the recruitment process. We process this information for a range of purposes and this may include your application, assessment, pre-employment screening and your worker permissions.
- 1.2 Wilkin Chapman is a 'data controller'. This means that we are responsible for deciding how we hold and use personal information about you. We are required under the General Data Protection Regulation to notify you of the information contained in this privacy notice.
- 1.3 Throughout this privacy notice we use the term 'processing' to cover all activities involving your personal information, including collecting, handling, storing, sharing, accessing, using, transferring and disposing of the information.
- 1.4 Any personal information that is collected and processed about you is strictly confidential and restricted to limited personnel. It is only accessible or shared, where appropriate and necessary, for the purpose of carrying out the recruitment process.

2. Data protection principles

- 2.1 We will comply with data protection law and principles which means that your data will be:
 - Used lawfully, fairly and in a transparent way.
 - Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
 - Relevant to the purposes we have told you about and limited only to those purposes.
 - Accurate and kept up to date.
 - Kept only as long as necessary for the purposes we have told you about.
 - Kept securely.

3. The kind of information we hold about you

- 3.1 To manage your application we need to process certain personal information about you. We only process your information as necessary for the purposes of progressing your application, or as required by law or regulatory requirements, so not all of the points set out below will apply to you all of the time:
 - Application: CV, name, address, employment history, academic and professional qualifications, age, diversity, marital status, date of birth, current salary, gender, ethnicity, disability, nationality, previous disciplinary matters.
 - Assessment: CV, psychometric tests (such as a situational judgement test, ability or personality test), interview (face to face, telephone), behavioural assessments (such as a role play, or presentation), technical assessments.
 - Pre-employment screening (PES): county court judgments or credit history and disclosure barring service (DBS).
 - Any other information you provide to us during an interview.

4. How is your personal information collected?

4.1 We collect personal information about candidates from the following sources:

- You, the candidate.
- A recruitment agency (if applicable).
- Disclosure and Barring Service in respect of criminal convictions.
- Your named referees from whom we collect the following data: employment dates, position(s) held, comments on general work performance, main responsibilities, working relationship with colleagues, parental leave taken and any reason(s) to doubt honest and integrity.

5. What personal information might we process?

5.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

5.2 There are 'special categories of more sensitive personal data which require a higher level of protection.

5.3 We will collect, store and use the following categories of personal information about you:

- Personal details such as name, address, date and place of birth.
- Work history/job data; previous employers, positions, dates, etc.
- Compensation; basic salary, benefits, bonuses, etc.
- Education and work history including professional qualifications and skills.
- Employer feedback / references to include regulated references where necessary.
- Nationality / visa / right to work permit information; (e.g. passport, driving licence, National Insurance numbers).
- Results of pre employment screening checks (e.g. credit history, DBS where permitted under law).
- Assessment results e.g. psychometric assessment results.

5.4 During the process we may also capture some sensitive personal data about you (e.g. disability information). We do this to make any reasonable adjustments to enable our candidates to apply for jobs with us, to be able to take online/telephone assessments, to attend interviews, to prepare for starting at Wilkin Chapman (if successful) and to ensure that we comply with regulatory obligations placed on us with regard to our recruitment process.

6 How we use particularly sensitive personal information

6.1 We will use your particularly sensitive personal information in the following ways:

- We will use information 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 an assessment or interview.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs to ensure meaningful equal opportunity monitoring and reporting can be carried out.

7 Who do we share your personal information with?

7.1 Wilkin Chapman will need to share your personal information internally in the recruitment process.

The recruitment process will involve:

- Assessing and progressing your application.
- Assessing your suitability (skills, qualifications, strengths and behaviours for the role).
- Activities needed to complete the on-boarding and screening process should your application be successful.

Your personal information may be shared internally with the following people:

- Those employees who would have managerial responsibility for you or are acting on their behalf.
- Employees in HR who have responsibility for certain HR processes (for example recruitment, assessment, pre-employment screening).
- Employees in Legal, Conduct, Risk, HR, Marketing, Regulatory and Fraud with responsibility for investigating issues of non-compliance with laws and regulations, policies and contractual requirements.
- Employees in IT and system owners who manage user access.
- Employees in Finance.

8. How do we protect your information?

8.1 Our HR and Recruitment 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 the Wilkin Chapman Security Policy.

9. Rights of access, correction, erasure and restriction

Your rights in connection with personal information

9.1 Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to ask for a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to ask that any incomplete or inaccurate information we hold about you is corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your

particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

9.2 If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Jonathan West, Head of Risk, in writing.

10. Disclosure Barring Service (Criminal records checks)

10.1 Given the nature of our business, we have legal and regulatory obligations to ensure that the people we employ can be relied upon to handle client money and information responsibly. We therefore ask questions about any prior civil or criminal proceedings you may have been subject to and may also conduct DBS checks.

11. Credit reference agencies

11.1 We will undertake searches about you at credit reference agencies who will supply us with information, including from the electoral register, in support of our recruitment decision. The agencies will record details of the search but will not make them available for use by lenders to assess your ability to obtain credit. We may use scoring methods to assess this application and to verify your identity.

11.2 You have the right of access to your personal records held by credit reference agencies. We will supply their names and addresses upon request.

12. Processing Conditions

12.1 Wilkin Chapman's entitlement to process your personal information is governed by a number of processing conditions. This means that we may rely on more than one of these conditions in order to process elements of your personal information throughout the recruitment process.

- Wilkin Chapman will process your personal information in the administration of your application.
- Wilkin Chapman will also process your personal information where it is required by law or regulation or it is in the legitimate interests of the applicant or the Firm. This processing will always be fair and lawful and will at all times comply with the principles of applicable privacy laws.

Schedule 1: Full list of information we may process

- Name, work and home contact details
- Date and place of birth
- Education and work history

- * Individual demographic information in compliance with legal requirements (such as marital status, national identifier, passport/visa information, nationality, citizenship, military service, disability, work permit, date and place of birth or gender).
- * Health issues requiring adaptations to working environment or health information that our First Aiders need to be aware of.
- Job title, grade and job history.
- Employment contract related information (including compensation, location, hours of work and so on).
- Reporting and managerial relationships.
- * Leaves of absence (such as maternity leave, sickness absence).
- Photograph(s).
- Disciplinary / grievance records.
- Time and attendance details.
- * Bank account details for salary payment purposes.
- Skills and qualifications.
- Results of original and ongoing employee screening, where relevant.
- Details provided in relation to Conduct policies (such as conflicts of interest, personal account dealing, trade body membership and so on).
- * Health & safety incidents, accidents at work and associated records.
- Audio recordings of telephone interviews.
- Notes from face to face interviews.
- Psychometric test results and associated reports.
- Results from technical assessments.

** These categories of information might potentially include some sensitive personal information. Sensitive personal information is not routinely collected about all applicants; it may be collected where Wilkin Chapman has a legal obligation to do so, or if you choose to disclose it to us during the course of your relationship with the Firm.*

13. Retention Periods

- 13.1 We will retain your personal information for a period of six months after we have communicated to you our decision about whether to appoint you to the position. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.
- 13.2 If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.
- 13.3 In the event of your application resulting in an offer of employment and your acceptance of a position at Wilkin Chapman, your personal information will be held in-line with the Firm's Privacy Notice.