

VENN PARTNERS LLP (“VENN” OR THE “FIRM”)

JOB APPLICANT PRIVACY NOTICE – NOVEMBER 2024

The Firm is aware of its obligations under the General Data Protection Regulation (the “GDPR”) and is committed to processing your data securely and transparently. This privacy notice sets out, in line with GDPR, the types of data that the Firm will collect and hold on you as a job applicant. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

DATA CONTROLLER DETAILS:

The Firm is a data controller, meaning that it determines the processes to be used when using your personal data. Our contact details are as follows:

Venn

Third Floor

30 Golden Square

London

W1F 9LD

privacy@venn-partners.com

DATA PROTECTION PRINCIPLES:

In relation to your personal data, the Firm will:

- process it fairly, lawfully and in a clear, transparent way;
- collect your data only for reasons that we find proper for the course of your employment in ways that have been explained to you;
- only use it in the way that we have told you about;
- ensure it is correct and up to date;
- keep your data for only as long as we need it; and
- process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate), lost or destroyed

TYPES OF DATA THE FIRM PROCESSES:

The Firm may hold many types of data about you, including:

- your personal details including your name, address, date of birth, email address, telephone numbers;

- gender;
- marital status;
- whether or not you have a disability;
- information included on your CV including references, education history and employment history; and
- documentation relating to your right to work in the UK

HOW THE FIRM COLLECTS YOUR DATA:

The Firm collects data about you in a variety of ways including the information you would normally include in a CV or a job application cover letter, or notes made by our recruitment team during a recruitment interview. Further information will be collected directly from you when completing forms at the start of your employment, for example, your bank and next of kin details. Other details may be collected directly from you in the form of official documentation such as your driving licence, passport or other right to work evidence.

In some cases, the Firm will collect data about you from third parties, such as employment agencies and former employers when gathering references or credit reference agencies.

Personal data is kept in personnel files and within the Firm's IT systems.

WHY THE FIRM PROCESSES YOUR DATA:

The law on data protection allows the Firm to process your data for certain reasons only:

- in order to perform the employment contract that we are party to;
- in order to carry out legally required duties;
- in order for us to carry out our legitimate interests;
- to protect your interests; and
- where something is done in the public interest.

All of the processing carried out by the Firm falls into one of the permitted reasons. Generally, we will rely on the first three reasons set out above to process your data.

The Firm needs to collect your data to ensure we are complying with legal requirements such as:

- carrying out checks in relation to your right to work in the UK; and
- making reasonable adjustments for disabled employees.

The Firm also collects data so that we can carry out activities which are in the legitimate interests of the Firm, such as:

- making decisions about who to offer employment to;
- making decisions about salary and other benefits;
- assessing training needs; and
- dealing with legal claims made against us.

If you are unsuccessful in obtaining employment, the Firm will seek your consent to retaining your data in case other suitable job vacancies arise in the Firm, for which we think you may wish to apply. You are free to withhold your consent to this and there will be no consequences for withholding consent.

SPECIAL CATEGORIES OF DATA:

Special categories of data are data relating to your:

- health;
- race;
- ethnic origin;
- political opinion;
- religion;
- sex life;
- sexual orientation;
- trade union membership; and
- genetic and biometric data.

The Firm must process special categories of data in accordance with more stringent guidelines. Most commonly, the Firm will process special categories of data when the following applies:

- you have given explicit consent to the processing;
- we must process the data in order to carry out our legal obligations;
- we must process data for reasons of substantial public interest; or
- you have already made the data public.

The Firm will use your special category data for the purposes of equal opportunities monitoring.

The Firm does not need your consent if we use special categories of personal data in order to carry out our legal obligations or exercise specific rights under employment law. However, the Firm may ask for your consent to allow us to process certain particularly sensitive data. If this occurs, you will be

made fully aware of the reasons for the processing. As with all cases of seeking consent from you, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time. There will be no consequences where consent is withdrawn.

CRIMINAL CONVICTION DATA:

The Firm will only collect criminal conviction data where it is appropriate given the nature of your role and where the law permits us. This data will usually be collected at the recruitment stage, however, may also be collected during your employment should you be successful in obtaining employment. Where the Firm seeks this information, we do so because it is necessary for us to carry out our obligations and exercise specific rights in relation to employment. The Firm uses criminal conviction data in order to assess the suitability of a candidate, to make informed recruitment decisions, and to minimise any undue risk to the Firm.

IF YOU DO NOT PROVIDE YOUR DATA TO THE FIRM:

One of the reasons for processing your data is to allow the Firm to carry out an effective recruitment process. Whilst you are under no obligation to provide the Firm with your data, we may not be able to process, or continue with (as appropriate), your application.

SHARING YOUR DATA:

Your data will be shared with colleagues within the Firm where it is necessary for them to undertake their duties with regard to recruitment. This includes, for example, those dealing with HR, those in the department where the vacancy is who are responsible for screening your application and interviewing you, and those dealing with IT where you require access to the Firm's systems to undertake any assessments requiring IT equipment.

In some cases, the Firm will collect data about you from third parties, such as employment agencies. Your data will also be shared with third parties if you are successful in your job application. In these circumstances, the Firm will share your data in order to obtain references and complete appropriate background checks as part of the recruitment process.

The Firm does not share your data with bodies outside of the European Economic Area.

PROTECTING YOUR DATA:

The Firm is aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such. Details of these can be found in the Firm's Data Protection and Data Security policies.

Where the Firm shares your data with third parties, we provide written instructions to them to ensure that your data is held securely and in line with GDPR requirements. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

HOW LONG THE FIRM KEEPS YOUR DATA FOR:

In line with data protection principles, the Firm only keeps your data for as long as we need it for and this will depend on whether or not you are successful in obtaining employment with us.

If your application is not successful and the Firm has not sought consent, or you have not provided consent upon the Firm's request to keep your data for the purpose of future suitable job vacancies, we will keep your data for 6 months once the recruitment exercise ends.

If the Firm has sought your consent to keep your data on file for future job vacancies, and you have provided consent, the Firm will keep your data for 12 months once the recruitment exercise ends. At the end of this period, the Firm will delete or destroy your data, unless you have already withdrawn your consent to our processing of your data in which case it will be deleted or destroyed upon your withdrawal of consent.

If your application is successful, your data will be kept and transferred to the systems the Firm administers for employees. The Firm has a separate privacy notice for employees, which will be provided to you.

AUTOMATED DECISION MAKING:

No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

YOUR RIGHTS IN RELATION TO YOUR DATA:

The law on data protection gives you certain rights in relation to the data that the Firm holds on you. These are:

- the right to be informed. This means that we must tell you how we use your data, and this is the purpose of this privacy notice;
- the right of access. You have the right to access the data that we hold on you. To do so, you should make a subject access request;
- the right for any inaccuracies to be corrected. If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it;
- the right to have information deleted. If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it;
- the right to restrict the processing of the data. For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct.
- the right to portability. You may transfer the data that we hold on you for your own purposes;

- the right to object to the inclusion of any information. You have the right to object to the way we use your data where we are using it for our legitimate interests; and
- the right to regulate any automated decision-making and profiling of personal data. You have a right not to be subject to automated decision making in a way that adversely affects your legal rights.

Where you have provided consent to the Firm's use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that the Firm will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, the Firm may continue to use the data where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the rights explained above, please contact Luke Venables, COO.

MAKING A COMPLAINT:

The supervisory authority in the UK for data protection matters is the Information Commissioner (ICO). If you think your data protection rights have been breached in any way by the Firm, you are able to make a complaint to the ICO.

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

For reference, the Firm Data Protection No is Z1862023.