

D&D London – Recruitment Privacy Notice

1. What is the purpose of this Privacy Notice?

Your ‘personal data’ or ‘personal information’ is any piece of information that would allow us to identify you as an individual. The processing of personal data in the European Union is governed by the General Data Protection Regulation (“**GDPR**”) and national laws that implement the GDPR in each European Economic Area (“**EEA**”) country, including the UK Data Protection Act 2018.

We take your privacy very seriously, and this document sets out what personal information we collect from you, how we intend to use it and what your rights in respect of that personal information are.

Our products and/or services are not intended for children and we do not knowingly collect data relating to children. We encourage you to keep a copy of this Privacy Notice for your records.

2. Who controls your personal information, and how do you get in touch?

The controller of your personal information is **D&D London Limited** (“**we**”, “**us**”, “**our**”). Should you have any query in respect of your personal information, you can contact us at the following:

Data controller	D&D London Limited
Website	https://www.danddlondon.com
Address	16 Kirby Street, London EC1N 8TS, United Kingdom
Telephone	020 7716 0716
Email	dataofficer@danddlondon.com

You also have the right to lodge a complaint with our supervisory authority, the **Information Commissioner’s Office**, which can be contacted at the following:

Supervisory Authority	UK Information Commissioner
Website	https://ico.org.uk/make-a-complaint/
Address	Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, United Kingdom
Telephone	0303 123 1113
Email	https://ico.org.uk/global/contact-us/email/

3. What information do we collect about you?

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- name;
- address;
- date of birth;
- email address;
- telephone and/or mobile telephone number;
- gender;
- marital status;
- employment history;

- qualifications and training records;
- photographs;
- recruitment information (copies of right to work documentation, immigration status, interview notes, references and other information included in a CV or cover letter or as part of the application process);
- racial or ethnic origin; and
- information about your health, including any medical condition, health and sickness records; and other personal information that you share as part of your application.

4. How do we collect your personal information?

We collect your personal information as follows:

- **Information you give us.** You may give us information about your identity, contact details, work history and other related information about you as part of our recruitment process.
- **Information we automatically collect about you.** We may automatically collect information about you from our website, social media sites or other platforms that you interact with to make a job application. For more information, see our Cookies Policy.
- **Information we receive from other sources.** We may receive personal data about you from various third parties and public sources, including:
 - recruitment agencies;
 - CV aggregation websites;
 - background check providers;
 - your named referees;
 - friends and family of staff at D&D London to consider you for employment;
 - information from other agencies with whom you may be involved, such as temp agencies or other providers of transitory staffing services;
 - information from other providers or agencies if you transfer to us for employment; and
 - identity and contact data from selected business partners, data brokers or aggregators.

Please be aware that our websites may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements – you should ensure you have reviewed these statements and are happy with their terms.

What is our legal basis for collecting and using your personal information?

Generally, we do not rely on consent as a legal basis for processing your personal information other than in relation to sending direct marketing communications to you by electronic means or permitting our selected third parties to do so. Where we obtain your consent for the processing of personal information (including in relation to direct marketing), you have the right to withdraw your consent at any time, but without affecting the lawfulness of processing carried out prior to the withdrawal, by contacting us using the details inserted in Section 2 above.

We will use your personal information in the following ways and for the following purposes:

Your information	Purpose	Legal basis
<p>If you seek employment with us:</p> <ul style="list-style-type: none"> • name; • address; • date of birth; • email address; • telephone and/or mobile telephone number; • gender; • marital status; • employment history; • qualifications and training records; • photographs; • recruitment information (copies of right to work documentation, immigration status, interview notes, references and other information included in a CV or cover letter or as part of the application process); • racial or ethnic origin; and • information about your health, including any medical condition, health and sickness records; and other personal information that you share as part of your application. 	<p>For the purposes of processing your job application.</p> <p>To assess your skills, qualifications, and suitability for the position you are seeking.</p> <p>To be able to interview you for the position you are seeking.</p> <p>To check your background, claims of employment, references, experience and capabilities.</p> <p>To communicate with you about the recruitment process.</p> <p>To keep our records of hiring processes up to date.</p> <p>To keep your information on file (if you agree) to allow us to contact you in the future.</p> <p>To comply with legal or regulatory requirements.</p> <p>For our People team to process your data if you become an employee.</p>	<p>We need this information for you to be able to enter into a contract with us, or for us to fulfil the contract between us.</p> <p>It is also necessary for our legitimate interests (e.g. to be able to identify you, to be able to discuss employment options with you prior to entering into a contract with us, to manage our relationship with you and keep our records updated).</p> <p>Information on the balancing tests undertaken by us in respect of the above legitimate business interests can be provided upon request.</p>

If you do become an employee of D&D London, then you would be subject to the internal data privacy notice. This will be provided to successful candidates if we enter into a contract with you. This will provide all additional processing and data privacy practices that D&D London will undertake for your employment.

5. What is our legal basis for collecting and using your special category personal information?

We will process all information under one of the legal bases shown in Section 0 above. If you provide special categories of data detailed below, then this will be stored as part of your application. If this data is not required then we will redact (or delete where practicable) this information and will not conduct any further processing on it:

Your information	Purpose	Legal basis
<ul style="list-style-type: none"> • Racial or ethnic origin 	<p>To ensure meaningful equal opportunity monitoring and reporting.</p>	<p>For the purposes of carrying out obligations and/or exercising specific rights of</p>

		yourself or ours related to employment.
<ul style="list-style-type: none"> Health data relating to disability details 	<p>To be able to assess your working capacity</p> <p>To provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.</p> <p>To ensure that facilities, locations and site safety can be observed</p> <p>To ensure that occupational medical services can be provided</p>	<p>For the purposes of carrying out obligations and/or exercising specific rights of yourself or ours related to employment.</p> <p>To protect your vital interests or the vital interests of another person, if you or they are incapable of providing consent.</p> <p>For the establishment, exercise or defence of legal claims.</p> <p>For the purposes of preventive or occupational medicine, or for the assessment of the working capacity of the employee.</p>

6. What if you do not want to provide your personal information?

You do not have to provide your personal information to us. However, should you choose not to provide it, you will be unable to be considered for employment with us. Where we need to collect personal data by law or under the terms of a contract we have with you (e.g. you seek employment with us) and you fail to provide it when requested, we may either not be able to provide employment or fulfil the contract you are trying to enter into with us (but we will notify you at the time if this is the case).

7. How is your personal information protected?

We maintain strong physical, electronic and procedural safeguards to protect the confidentiality, integrity and availability of your personal information. We have taken appropriate security measures against illegal and/or unauthorised access to your personal information, and against the accidental loss of, or damage to it.

8. Do we share your personal information with anyone?

We will only share your personal information with the third parties in the table below for the purposes of processing your application. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Microsoft	Microsoft provide our email service and when you send us information, this will be subject to their privacy notice which can be found at: https://products.office.com/en-us/business/office-365-trust-center-privacy
Caterer	For job adverts that are placed on Caterer you will be subject to their privacy policy that can be found at: https://www.caterer.com/privacy-policy
Indeed	For job adverts that are placed on Indeed you will be subject to their privacy policy that can be found at: https://www.indeed.co.uk/legal

LinkedIn	For job adverts that are placed on LinkedIn you will be subject to their privacy policy that can be found at: https://www.linkedin.com/legal/privacy-policy
Harri	For job adverts that are placed on Harri, you will be subject to their privacy policy. Additionally, we aggregate all our job responses through the Harri management system and this is subject to their data privacy notice as well as ours. Harri's data privacy notice can be found at: https://harri.com/privacy
Hosting providers	These provide the physical devices that we use to host the website and provide the connectivity so that you can access it.

We may also need to share your personal information with the following in limited circumstances:

- IT security providers;
- Insurers;
- External advisors (for example solicitors or auditors); and
- Public authorities or law enforcement.

If we sell or buy (or plan to sell or buy) any business or assets or seek investment from a third-party investor, we may disclose your personal data to the investor or prospective seller or buyer of such business or assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Notice.

9. Will your personal information be transferred outside of the EEA?

If you are a resident of a country in the EEA, we may need to transfer your personal information outside of the EEA, for example where our data storage facilities or processing locations are in another country.

Whenever we transfer your personal data outside of the EEA, we ensure a similar degree of protection is afforded to it by putting adequate, legally-approved safeguards in place, including at least one of the following:

- we will only transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission;
- where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe; and/or
- where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

If you would like more information about our safeguards, please contact us using the details inserted in Section 2 above.

10. How long do we keep your personal information?

We will only retain your personal data for as long as necessary to fulfil the purposes we hold it for, including for the purposes of satisfying any legal, accounting or reporting requirements. In general, we will need to keep the information that we collect from you for the following periods of time:

Your information	Retention Period
<ul style="list-style-type: none"> • Name; • Address; • Date of birth; • Email address; • Telephone and/or mobile telephone number; • Gender; • Marital status; • Employment history; • Qualifications and training records; • Photographs; • Recruitment information (copies of right to work documentation, immigration status, interview notes, references and other information included in a CV or cover letter or as part of the application process); • Racial or ethnic origin; and • Information about your health, including any medical condition, health and sickness records; and other personal information that you share as part of your application. 	<p>Successful candidate: lifetime of the contract between us plus six (6) years in line with standard business records and to be able to defend any insurance claims that are brought against us</p>
	<p>Unsuccessful candidate: data is retained for eight (8) months post application rejection in line with the ACAS code of conduct to be able to defend any discrimination claims brought against us</p>

We may sometimes need to keep a copy of your personal information for a longer period, for example in the event of an incident, to investigate a data breach or to comply with legal requirements. We will never keep your personal information for longer than necessary.

In all cases, your personal information will be securely destroyed once the retention periods described above expire.

11. What are your rights in respect of your personal information?

Under certain circumstances, you have rights in respect of the personal information we hold on you:

- **right to be informed** – you have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights (this is why we are providing you with this privacy notice);
- **right of access** – you can request access to your personal information;
- **correcting or erasing your information** – where we hold information about you that is inaccurate or incomplete, you have the right to ask us to rectify or complete it, and in certain circumstances you may ask us to erase it;
- **right to restrict processing** – you have the right to restrict some processing of your personal data, which means that you can ask us to limit what we do with it;
- **right to object to processing** – you can object to us processing your personal data in certain circumstances, including where we are using it for the purpose of our legitimate business interests as set out above;
- **right to data portability** – you have the right in some circumstances to obtain from us and re-use your personal data for your own purposes;

Should you want to exercise any of these rights, please contact us using the details set out in Section 2 above.

12. Changes to this Privacy Notice and your duty to inform us of changes

We may need to make changes to this Privacy Notice in the future (for example, to comply with new legal requirements). Please check our website regularly for any updates.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

If you have any questions about anything in this Privacy Notice, please contact us using the details inserted in Section 2 above.

**This privacy notice was last updated on 26th September 2018.*