

EPIRIS LLP RECRUITMENT PRIVACY NOTICE

SCOPE OF PRIVACY NOTICE

1. Like most businesses, we hold and process a wide range of information, some of which relates to individuals who are applying to join us. This notice explains the type of information we process, why we are processing it and how that processing may affect you.

The notice focuses on individuals who are applying to join us and the data we process as part of that process. We have a separate Staff Privacy Notice that applies to our current and former partners, employees and other workers.

This notice is set out in this document (the Core Notice) and the Supplementary Information accompanying the Core Notice.

In the Supplementary Information, we explain what we mean by “personal data”, “processing”, “sensitive personal data” and other terms used in the notice.

2. In brief, this notice explains:
 - what personal data we hold and why we process it;
 - the legal grounds which allow us to process your personal data;
 - where the data comes from, who gets to see it and how long we keep it;
 - how to access your personal data and other rights;
 - how to contact us.

PERSONAL DATA – WHAT WE HOLD AND WHY WE PROCESS IT

3. We process data for the purposes of our business including recruitment, management, administrative, employment and legal purposes. The Supplementary Information provides more specific information on these purposes, on the type of data that may be processed and on the grounds on which we process data. See *Legal grounds for processing personal data* and *Further information on the data we process and our purposes*.

WHERE THE DATA COMES FROM AND WHO GETS TO SEE IT

4. Some of the personal data that we process about you comes from you. For example, you tell us your contact details and work history. If you are joining us, you may provide your banking details.

Other personal data may come from third parties such as recruiters acting on your behalf or from your references.

Your personal data will be seen internally by our Senior Partners, HR and, in some circumstances (if you join us) colleagues. We will where necessary and as set out in this privacy notice also pass your data outside the organisation, for example to people you are dealing with and payroll agencies.

Further information on this is provided in the Supplementary Information. See *Where the data comes from* and *Who gets to see your data?*

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

5. We do not keep your personal data for any specific period but will not keep it for longer than is necessary for our purposes. In general, if you join us we will keep your personal data for the duration of your engagement with us and for a period afterwards. If you are unsuccessful in joining us, we will likely keep your personal data for a short period after informing you that you were unsuccessful.

See *Retaining your personal data – more information* in the Supplementary Information.

TRANSFERS OF PERSONAL DATA OUTSIDE THE UK OR EEA

6. We will where necessary and as set out in this privacy notice transfer your personal data outside the UK or EEA to members of our group and processors in other jurisdictions in which we are established.

Further information on these transfers and the measures taken to safeguard your data are set out in the Supplementary Information under *Transfers of personal data outside the UK or EEA – more information*.

YOUR DATA RIGHTS

7. You have a right to make a subject access request to receive information about the data that we process about you. Further information on this and on other rights is in the Supplementary Information under *Access to your personal data and other rights*. We also explain how to make a complaint about our processing of your data.

CONTACT DETAILS

8. In processing your personal data, we act as a data controller. Our contact details are set out below:

- email at dataprotection@epiris.co.uk; or
- post, marked FAO: Compliance Manager, at Epiris LLP, Forum St Pauls, 33 Gutter Lane, London EC2V 8AS.

Please note that generally the data controller of your personal data will be your employing/engaging entity (or the employing/engaging entity that you apply to work for) but also entities within the Epiris group with which we share data for business administration purposes.

STATUS OF THIS NOTICE

9. This notice does not form part of any contract of employment or other contractual relationship you might enter and does not create contractual rights or obligations. It may be amended by us at any time. Nothing in this notice is intended to create an employment or other contractual relationship between Epiris and any non-partner or employee.

SUPPLEMENTARY INFORMATION

WHAT DO WE MEAN BY “PERSONAL DATA” AND “PROCESSING”?

1. “Personal data” is information relating to you (or from which you may be identified) which is processed by automatic means or which is (or is intended to be) part of a structured manual filing system. It includes not only facts about you, but also intentions and opinions about you.

Data “processed automatically” includes information held on, or relating to use of, a computer, laptop, mobile phone or similar device. It covers data derived from equipment such as access passes within a building, data on use of vehicles and sound and image data such as CCTV or photographs.

“Processing” means doing anything with the data. For example, it includes collecting it, holding it, disclosing it and deleting it.

Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sexual orientation, sex life, trade union membership and genetic and biometric data are subject to special protection and considered by EU and UK privacy law to be “sensitive personal data”.

References in this notice to employment, work (and similar expressions) include any arrangement we may have under which an individual provides us with work or services, or applies for such work or services. We use the word “you” to refer to anyone within the scope of the notice.

LEGAL GROUNDS FOR PROCESSING PERSONAL DATA

WHAT ARE THE GROUNDS FOR PROCESSING?

2. Under data protection law, there are various grounds on which we can rely when processing your personal data. In some contexts more than one ground applies. We have summarised these grounds as Contract, Legal obligation, Legitimate Interests and Consent and outline what those terms mean in the following table.

<i>Term</i>	<i>Ground for processing</i>	<i>Explanation</i>
Contract	Processing necessary for performance of a contract with you or to take steps at your request to enter a contract	This covers carrying out our contractual duties and exercising our contractual rights.
Legal obligation	Processing necessary to comply with our legal obligations	Ensuring we perform our legal and regulatory obligations. For example, providing a safe place of work and avoiding unlawful discrimination.
Legitimate Interests	Processing necessary for our or a third party's legitimate interests	We or a third party have legitimate interests in carrying on, managing and administering our respective businesses effectively and properly and in connection with those interests processing your data. Your data will not be processed on this basis if our or a third party's interests are

		overridden by your own interests, rights and freedoms.
Consent	You have given specific consent to processing your data	In general processing of your data in connection with employment or as a member of the partnership is not conditional on your consent. But there may be occasions where we do specific things such as provide a reference and rely on your consent to our doing so.

PROCESSING SENSITIVE PERSONAL DATA

3. If we process sensitive personal data about you (for example (but without limitation), storing your health records to assist us in ensuring that we provide you with a healthy and safe work workplace or processing personal data relating to diversity monitoring), as well as ensuring that one of the grounds for processing mentioned above applies, we will make sure that one or more of the grounds for processing sensitive personal data applies. In outline, these include:

- Processing being necessary for the purposes of your or our obligations and rights in relation to employment in so far as it is authorised by law or collective agreement;
- Processing relating to data about you that you have made public (e.g. if you tell colleagues that you are ill);
- Processing being necessary for the purpose of establishing, making or defending legal claims;
- Processing being necessary for provision of health care or treatment, medical diagnosis, and assessment of your working capacity;
- Processing for equality and diversity purposes to the extent permitted by law.

FURTHER INFORMATION ON THE DATA WE PROCESS AND OUR PURPOSES

4. The Core Notice outlines the purposes for which we process your personal data. More specific information on these, examples of the data and the grounds on which we process data are in the table below.

The examples in the table cannot, of course, be exhaustive and cover every situation.

<i>Purpose</i>	<i>Examples of personal data that may be processed</i>	<i>Grounds for processing</i>
Recruitment	Standard data related to your identity (e.g. your name, address, email address, ID information and documents, telephone numbers, place of birth, nationality, contact details, professional experience and education (including university degrees, academic records, professional licenses, memberships and certifications, awards and achievements, and current and previous employment details), financial information (including current salary information) language skills, and any other personal data that you	Contract Legal obligation Legitimate interests

<i>Purpose</i>	<i>Examples of personal data that may be processed</i>	<i>Grounds for processing</i>
	<p>present us with as part of your application related to the fulfilment of the role.</p> <p>Information concerning your application and our assessment of it, your references, any checks we may make to verify information provided and any information connected with your right to work.</p> <p>Background checks such as identity checks, adverse financial checks, criminal records checks and sanctions screening checks.</p> <p>If necessary, we will also process information concerning your health, any disability and in connection with any adjustments to working arrangements.</p>	
Administering our recruitment process	<p>Evaluating your experience and qualifications against the requirements of the position you are applying for.</p> <p>Communicating with you in respect of any offer of employment or for individuals who are becoming partners at Epiris your individual terms and providing you with information about our onboarding process.</p>	<p>Contract</p> <p>Legal obligation</p> <p>Legitimate interests</p>
Entering into a contract or individual terms with you (if you are made an offer by us)	<p>Information on your terms of employment from time to time including your hours and working patterns, your pay and benefits, such as your participation in pension arrangements, life and medical insurance; and any bonus or share schemes and for individuals who are becoming partners at Epiris your individual terms.</p>	<p>Contract</p> <p>Legal obligation</p> <p>Legitimate interests</p>
Contacting you or others on your behalf	<p>Your address and phone number, emergency contact information and information on your next of kin.</p>	<p>Contract</p> <p>Legitimate interests</p>
Payroll administration	<p>Information on your bank account, pension contributions and on tax and national insurance</p> <p>Your national insurance number or other government issued identifier.</p>	<p>Contract</p> <p>Legal obligation</p>
Financial planning and budgeting	<p>Information such as your proposed salary or drawings. and (if applicable) envisaged bonus levels.</p>	<p>Legitimate interests</p>
Physical and system security	<p>CCTV images upon attendance for interview at our premises.</p>	<p>Legal obligation</p> <p>Legitimate interests</p>

<i>Purpose</i>	<i>Examples of personal data that may be processed</i>	<i>Grounds for processing</i>
Providing information to third parties in connection with transactions that we contemplate or carry out	Information on any offer made to you and your proposed contract and other employment data that may be required by a party to a transaction such as a prospective purchaser, seller or outsourcer.	Legitimate interests
Disputes and legal proceedings	Any information relevant or potentially relevant to a dispute or legal proceeding affecting us.	Legitimate interests Legal obligation

Please note that if you accept an offer from us the business will process further information as part of the employment relationship or individual terms for persons who are becoming partners at Epiris. We will provide you with our full Staff Privacy Notice as part of the on-boarding process.

WHERE THE DATA COMES FROM

5. When you apply to join us the initial data about you that we process is likely to come from you: for example, contact details, bank details and information on your immigration status and whether you can lawfully work. Where necessary and in accordance with this privacy notice, we will require references and information to carry out background checks. If you have concerns about this in a particular context, you should speak to your recruiter and/or your Epiris contact.

Please note we may also receive data from third party recruiters, agents and similar organisations as a part of the recruitment process.

WHO GETS TO SEE YOUR DATA?

INTERNAL USE

6. Where necessary and as set out this privacy notice, your personal data will be disclosed to senior partners, and our staff engaged in the administration of your application as mentioned in this document. We may also disclose this to other members of our group where necessary for decision making regarding your application – this will depend on the type of role you are applying for.

EXTERNAL USE

7. We will only disclose your personal data outside the group if disclosure is consistent with a ground for processing on which we rely and doing so is lawful and fair to you.

We will disclose your data if it is necessary for our legitimate interests as an organisation or the interests of a third party (but we will not do this if these interests are over-ridden by your interests and rights to privacy). Where necessary, we will also disclose your personal data if you consent, where we are required to do so by law and in connection with criminal or regulatory investigations.

8. Specific circumstances in which your personal data may be disclosed include:
 - Disclosure to organisations that process data on our behalf such as our payroll service, insurers and other benefit providers, our bank and organisations that host our IT systems and data. This would normally occur if you accept an offer from us and would be carried out as part of the on-boarding process;

- To third party recruitment consultants and similar businesses as a part of the recruitment process;

RETAINING YOUR PERSONAL DATA – MORE INFORMATION

9. Although there is no specific period for which we will keep your personal data, we will not keep it for longer than is necessary for our purposes. In general, if you are successful in joining us, we will keep your personal data for the duration of your engagement with us and for a period afterwards. If you are unsuccessful in joining us, we will likely keep your personal data for a short period after informing you that you were unsuccessful. In considering how long to keep your data, we will take into account its relevance to our business and your potential engagement either as a record or in the event of a legal claim.

If your data is only useful for a short period (for example, CCTV footage data) we will delete it.

Personal data relating to applicants (other than the person who is successful) will normally be deleted at an appropriate time after the application has been received.

TRANSFERS OF PERSONAL DATA OUTSIDE THE UK OR EEA – MORE INFORMATION

10. In connection with our business and for partnership, employment, administrative, management and legal purposes, we may where necessary and as set out in this privacy notice transfer your personal data outside the UK or EEA if this is appropriate. We will ensure that any transfer is lawful and that there are appropriate security arrangements. Please contact us for further information about transfers of personal data outside the UK or EEA.

ACCESS TO YOUR PERSONAL DATA AND OTHER RIGHTS

11. We try to be as open as we reasonably can about personal data that we process. If you would like specific information, just ask us.

You also have a legal right to make a “subject access request”. If you exercise this right and we hold personal data about you, we are required to provide you with information on it, including:

- Giving you a description and copy of the personal data
- Telling you why we are processing it.

If you make a subject access request and there is any question about who you are, we may require you to provide information from which we can satisfy ourselves as to your identity.

As well as your subject access right, you may have a legal right to have your personal data rectified or erased, to object to its processing or to have its processing restricted. If you have provided us with data about yourself (for example your address or bank details), you have the right to be given the data in machine readable format for transmitting to another data controller. This only applies if the ground for processing is Consent or Contract.

If we have relied on consent as a ground for processing, you may withdraw consent at any time – though if you do so that will not affect the lawfulness of what we have done before you withdraw consent.

COMPLAINTS

12. If you have complaints relating to our processing of your personal data, you should raise these with your Epiris contact the first instance or you can get in touch by contacting us using the contact details in Section 8 of the Core Notice. You may also raise complaints with your statutory regulator. In the UK, the statutory regulator is the ICO <https://ico.org.uk>.

STATUS OF THIS NOTICE

13. This notice does not form part of any contract of employment or individual terms that you may enter with us and does not create contractual rights or obligations. It may be amended by us at any time. Nothing in this notice is intended to create an employment relationship or other contractual relationship between Epiris LLP and any non-employee or any other individual.