

Recruitment Privacy Notice

LSL Property Services plc and its subsidiaries (LSL Group) are committed to protecting your privacy.

INTRODUCTION

The primary data controller for your personal data is the LSL Group company which you apply to work for. LSL Property Services plc, your-move.co.uk Limited and (where you have a connection in applying for a role to them) First Complete Limited and/or LSLi Limited are also data controllers for your personal data. This Privacy Notice applies to and is provided by and on behalf of each of these LSL Group entities and references to 'we', 'us' and 'our' are references to those LSL Group entities.

Our contact details are as follows:

Address: Newcastle House, Albany Court, Newcastle Business Park, Newcastle upon Tyne NE4 7YB

Email: HRAccess@lspls.co.uk

Telephone: 0191 233 4000

We hold and process data on all those who apply to work with us ("applicants" or "you" or "your").

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. Your privacy is important to us, and we are committed to keeping your information secure and managing it in accordance with our legal responsibilities under applicable data protection laws.

This Privacy Notice sets out the categories of personal data we may process, how your personal data may be processed and how your privacy is safeguarded in the course of the recruitment and selection process. It is intended to comply with our obligations to provide you with information about our processing of your personal data under privacy laws.

Purely for the purpose of this Privacy Notice, references to applications in this Privacy Notice do not include applications for engagement as a contractor.

We reserve the right to change the contents of this Privacy Notice at any time, by posting such changes on the LSL Group company websites. It is your responsibility to familiarise yourself with the Privacy Notice regularly to ensure that you are aware of any changes.

PROCESSING OF PERSONAL DATA

We collect and processes your personal data for the purposes described in this Privacy Notice. Personal data means any information describing or relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

INFORMATION COLLECTION

Personal data

We collect personal data about you for the purposes of recruitment and selection as described in this Privacy Notice including:

- **Personal details:** your title, name(s), gender, nationality, disability, date of birth, home contact details (e.g. address, telephone number, e-mail), identity and immigration and eligibility to work data (e.g. photographic identification, passport, signature), languages spoken, driving licence; and
- **Recruitment data:** skills and experience, qualifications, training, job history, LinkedIn contact and profile, references, CV and application, interview and assessment data, vetting and verification information (e.g. results of credit reference check, financial sanction check and a basic disclosure criminal record check relating to unspent convictions where carried out for relevant roles where permitted by law, regulated referencing), information related to the outcome of your application, details of any offer made to you.

To the extent permitted by applicable laws some of the personal data falls into special categories, sometimes called “sensitive personal data”. This term includes information relating to such matters as racial or ethnic origin, religious beliefs, physical or mental health (including details of accommodations or adjustments), certain maternity/adoption information, trade union membership, sexual orientation, information regarding sexual life, biometric data, genetic data, criminal records and information regarding criminal offences or proceedings.

How do we collect data?

We collect and record your personal data from a variety of sources, but mainly directly from you. Personal data will also be collected through our managers and Human Resource team involved in the recruitment process. We will also obtain limited information from third parties, for example, references from a previous employer or where we employ a third party to carry out a background check (where permitted by applicable law). Where necessary and relevant, your consent will be sought.

USE OF THE INFORMATION WE COLLECT

Your personal data is collected and processed for various business purposes, in accordance with applicable laws.

As applicable to the relevant position for which you may be applying, we collect and process your personal data for various purposes relating only to recruitment and selection, which will be specified further during the recruitment process and may include:

- To assess your suitability to work for us including short listing, assessments and interviews;
- To conduct pre-employment checks including verification of your identity, checking your legal right to work and obtaining references;
- For the relevant network roles and where required by our regulators, to conduct a pre-employment credit reference check, financial sanction check, and a check in relation to unspent criminal convictions in order to prevent crime and other unlawful acts and to protect the business and customers from the risk of dishonesty, malpractice or improper conduct and to fulfil specifications from regulated clients to confirm your eligibility to practice;
- To compare you with other applicants and make a decision whether to offer you employment;
- To consider any reasonable adjustments either for the recruitment process or if you were to commence employment with us in the event that you have a disability;
- To make a job offer and provide a contract of employment;
- To prepare to bring you on board as an employee where you accept an offer of employment from us. In this case we will continue to use some of the information

gathered during recruitment for the purpose of your employment and will transfer some of this to our employment systems and files;

- To contact you if you are not successful should another potentially suitable vacancy arise during the six months following the completion of the recruitment process for the role you applied for; and
- To deal with any query or request for feedback received in relation to our recruitment decision.

LEGAL BASIS FOR PROCESSING

Processing personal data

We generally process your personal data under one of the following grounds:

- the processing is necessary for compliance with a legal obligation to which we are subject (e.g. checking your right to work); or
- the processing is necessary or in order to take steps at your request prior to entering into a contract; or
- if neither of the first two grounds are applicable, the processing is necessary for the legitimate interests pursued by us (being those purposes described in the section above), except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data.

We will on occasion process your personal data for the purpose of the legitimate interests pursued by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data. For example, a legitimate interest of another LSL Group company or a regulator.

Processing special categories of personal data or sensitive data

The sensitive or special categories of personal data that will be processed by us are set out in this Privacy Notice.

We process special category or sensitive personal data under one of the following grounds:

- the processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or us in the field of employment law, social security and social protection law, to the extent permissible under applicable laws; or
- the processing is necessary for reasons of substantial public interest, on the basis of legislation (for example equal opportunity monitoring, the prevention or detection of crime or other unlawful acts, or to protect members of the public from dishonesty or malpractice or seriously improper conduct or incompetence where permitted by applicable data protection laws).

This includes the following, although this is not an exhaustive list:

- your racial or ethnic origin, religion, philosophical or political belief, sexual orientation or disability status will be used for the collection of statistical data subject to legal requirements, or to keep our commitment to equal opportunity under review; and
- health and medical information will be used to make reasonable adjustments and avoid unlawful discrimination or to deal with complaints arising in this regard.

Processing data relating to criminal convictions and offences

Personal data relating to criminal convictions and offences will only be processed where authorised by applicable laws. A criminal record check may be carried out on recruitment or transfer where authorised by applicable laws and only with respect to relevant roles in the LSL Group. If such a check is to be conducted, you will be clearly notified and advised as to why this is applicable.

Data Retention

If you apply to work with us we will keep the information we receive about you throughout the recruitment process and for a period of six months after completion of the process, excepting for roles in our Financial Services network where unsuccessful applications will be kept for a period of twelve months after completion of the process. If you have not commenced employment with us we will then remove your information (or de-identify or reduce it in the case of Financial Services) where we have not received any query or challenge which is outstanding. We will retain it if needed to deal with any outstanding query or challenge to the process. Where you become our employee we will keep your information where relevant to your employment and this will become part of your employment records.

DISCLOSURE OF INFORMATION

Within the LSL Group, your personal data can be accessed by or may be disclosed internally on a need-to-know basis to:

- Human Resources, including managers and team members;
- local, regional and executive management responsible for managing or making decisions in connection with your recruitment with us or the terms of our offer to you; or
- system administrators.

Your personal data will be shared with third parties to allow them to provide us with services, such as hosting, supporting and maintaining the framework of our recruitment and HR information systems. Data contained in such systems may be accessible by providers of those systems, their associated companies and sub-contractors.

Examples of other third parties with whom your data may be shared include Creditsafe, Experian, Veriphy, Staff Vetting, Disclosure Scotland, England or Wales, HMRC, Unicorn, regulatory authorities, national authorities and professional advisors. We expect such third parties to process any data disclosed to them in accordance with applicable law, including with respect to data confidentiality and security.

Where third parties act as a "data processor" (for example, a credit check provider), they carry out their tasks on our behalf and upon our instructions for the above mentioned purposes. In this case your personal data will only be disclosed to these parties to the extent necessary to provide the required services under a written agreement in place containing terms to protect your data.

SECURITY

We employ security measures which aim to protect the information provided by you from access by unauthorised persons and against unlawful processing, accidental loss, destruction or damage.

INTERNATIONAL TRANSFER OF PERSONAL DATA

From time to time your personal data (including special categories of personal data) will be transferred to third parties such as our learning system provider Cornerstone who are located outside the European Union.

As a result, the relevant personal data will be transferred to countries such as the United States whose data protection laws may be less stringent than those in the European Union.

We will ensure that appropriate or suitable safeguards are in place to protect your personal information and that transfer of your personal information is in compliance with applicable data protection laws. Where required by applicable data protection laws, we have ensured that relevant third parties sign standard contractual clauses as approved by the European Commission. You can obtain a copy of any standard contractual clauses in place which relate to transfers of your personal data by contacting HRAccess@lsips.co.uk.

YOUR RIGHTS

We aim to ensure that all personal data are correct. If you supply or have asked a third party such as a recruitment agency to supply your personal data to us you have a responsibility to check that the information provided is correct.

You also have a responsibility to ensure that changes in personal circumstances (for example, change of contact information) are notified to us so that we can ensure that your data is up-to-date.

You have a number of rights in relation to your personal data:

- **Right of access** - you have the right to request access to any of your personal data that we may hold;
- **Right to correct inaccurate data** - you have the right to request us to correct any inaccurate data relating to you or to complete any incomplete data relating to you;
- **Data portability** - where we are relying upon your consent or the fact that the processing is necessary for the performance of a contract to which you are party as the legal basis for processing, and that personal data is processed by automatic means, you have the right to receive all such personal data which you have provided to us in a structured, commonly used and machine-readable format, and also to require us to transmit it to another controller where this is technically feasible;
- **Right to restriction of processing** - you have the right to restrict our processing of your personal data where:
 - you contest the accuracy of the personal data until we have taken sufficient steps to correct or verify its accuracy;
 - where the processing is unlawful but you do not want us to erase the data;
 - where we no longer need the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims; or
 - where you have objected to processing justified on legitimate interest grounds (see below) pending verification as to whether we have compelling legitimate grounds to continue processing.

Where personal data is subjected to restriction in this way we will only process it with your consent or for the establishment, exercise or defence of legal claims;

- **Right to ask us to delete data** - You have the right to ask us to erase certain of your personal data in the event that processing is unlawful; there is no longer any need for us to retain the data; or you have objected to processing justified on legitimate interest grounds and we do not have compelling grounds to continue and have no other need to retain the data;

- **Right to withdraw consent** - where we are relying on consent which you have provided to us to process data, you have the right to withdraw such consent at any time. You can do this by (i) in some cases deleting the relevant data from the relevant HR system (although note that in this case it may remain in back-ups and linked systems until it is deleted in accordance with our data retention policy) or (ii) contacting your local Human Resources contact; and
- **Right to object to processing justified on legitimate interest grounds** - where we are relying upon legitimate interest to process data, then you have the right to object to that processing. If you object, we must stop that processing unless we can either demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or where we need to process the data for the establishment, exercise or defence of legal claims. Where we rely upon legitimate interest as a basis for processing we believe that we can demonstrate such compelling legitimate grounds, but we will consider each case on an individual basis.

CONTACT

If you have questions or comments about our Privacy Notice or if you wish to exercise your rights mentioned above, please contact HRAccess@lspls.co.uk.

If you are aware of an unauthorised disclosure of data, please email HRAccess@lspls.co.uk for guidance as to the applicable reporting requirements.

COMPLAINTS

If you have any concerns or complaints as to how we have handled your personal data you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at <https://ico.org.uk/global/contact-us/> or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.