

## JOB APPLICANT & EMPLOYEE PRIVACY NOTICE

**Data Controller:** The Thurlow Nunn Group of Companies (collectively, “the Company”) comprises:

Thurlow Nunn (Holdings) Limited  
Thurlow Nunn Standen Limited  
Thurlow Nunn Limited

The Company collects and processes personal data relating to its employees to manage the employment relationship and to job applicants. The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

### What information does the Company collect?

The Company collects a range of information about you. When applying to work for us this includes This includes:

- your name, address, title and contact details, including email address and telephone numbers,
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which the Company needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK; and
- equal opportunities monitoring information, including information about your ethnic origin and health

Once you have joined the company and become an employee the company collects, in addition to the above the following information:

- the terms and conditions of your employment;
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the Company;
- recruitment information, including information contained in a CV, application form or cover letter as part of the application process;
- information about your remuneration, including entitlement to benefits such as pensions or insurance cover, expenses and tax status information;
- details of your bank account, tax code, national insurance number and P60;
- information about your marital status, next of kin, dependents and emergency contacts;
- information about your nationality and entitlement to work in the UK; including your passport, birth certificate, ID cards, documentation from HMRC
- information about your criminal record, including criminal convictions and offences;
- information about your adverse financial status;
- details of your schedule (days of work and working hours) and attendance at work;
- details of periods of leave taken by you, including holiday, sickness absence, family leave, general absence, and the reasons for the leave;
- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;

- assessments of your performance, including appraisals, performance reviews and ratings, training you have participated in, performance improvement plans and related correspondence;
- psychometric assessments and skills tests;
- information about medical or health conditions, including whether or not you have a disability for which the Company needs to make reasonable adjustments;
- details of trade union membership;
- details of your driving record, including a copy of your driving licence;
- equal opportunities monitoring information, including information about your ethnic origin, gender, health and any disability;
- CCTV footage and any other information obtained through electronic means (such as vehicle tracker systems, call recording and mystery shops);
- photographs;
- your use of our information and communications systems; and
- leaving date, reason for leaving and P45.

### **How the information is collected**

The Company collects this information in a variety of ways. Initially, upon applying for a role with the Company, it is likely that your data would have been collected via our Applicant Tracking System. The software is provided by Hireful Limited, who will protect your data in accordance with their own privacy policy: <https://hireful.co.uk/privacy-policy/>

Following on from your application and upon the commencement of employment, your data is collected through application forms, CVs; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during employment (such as New Starter Form, Driver's Questionnaire, Expression of Wish Form); from correspondence with you; or through interviews, meetings or other assessments.

The Company will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. information from credit reference agencies, information from DVLA checks and information from criminal records checks permitted by law.

We may also collect additional personal information in the course of job-related activities through the period of you working for us.

Data is stored in a range of different places, including in the Applicant Tracking System, your personnel file, in the Company's HR and Payroll management systems and in other IT systems (including the Company's email system and cloud-based document storage system).

### **Why does the Company process personal data?**

The Company needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.

In some cases, the Company needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts. It also needs to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer benefits and entitlements, e.g. pension, insurance and statutory payments.

The Company has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the Company

to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The Company may also need to process data from job applicants to respond to and defend against legal claims.

Where the Company relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

The Company processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment law.

Where the Company processes other special categories of data, such as information about ethnic origin, this is done for the purposes of equal opportunities monitoring with the explicit consent of job applicants, which can be withdrawn at any time by contacting: [hr@tngroup.co.uk](mailto:hr@tngroup.co.uk).

For some roles, the Company is obliged to seek information about criminal convictions and offences. Where the Company seeks this information, it does so as part of the Company's responsibility to perform adequate due diligence of those staff engaged in activities regulated by the FCA. A basic check from the Disclosure and Barring Service (DBS) will contain details of convictions and conditional cautions that are considered to be unspent under the terms of the Rehabilitation of Offenders Act (ROA) 1974. The report is stored on Experian's secure online portal which is only accessible by the HR department.

The Company will only use your data for the purpose of the recruitment exercise for which you have applied, or for another role that we may be recruiting for at the same time for which you may be suited.

#### **Who has access to data?**

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

The Company uses an Applicant Tracking System; the software is provided by Hireful Limited, who will protect your data in accordance with their own privacy policy: <https://hireful.co.uk/privacy-policy/>

The Company will not share your data with other third parties, unless your application for employment is successful and it makes you an offer of employment. The Company will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

On occasion, your data may be transferred to countries outside the UK when using third party software for data collection. When data is transferred outside the UK, we take steps to identify risks and in so far as is reasonably practicable, ensure that appropriate safeguards are in place, such as adequate privacy policies and assurance of secure servers.

#### **How does the Company protect data?**

The Company takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

Some key security measures include:

- Secure document storage, including locking filing cabinets, desks and cupboards; and cloud storage secured by restricted access;
- Password protected, encrypted security systems, including firewalls and antivirus protection
- A clear desk policy which ensures personal documentation is never left unattended;
- Internal data retention policy and secure disposal of documents via an approved shredding contractor;
- A policy of locking computer screens whenever they are left unattended;
- Internal data privacy audits; and
- Data Protection training for current employees and new recruits

### **For how long does the Company keep data?**

If your application for employment is unsuccessful, the Company will hold your data on file for up to 6 months after the end of the relevant recruitment process. If you agree to allow the Company to keep your personal data on file, the Company will hold your data on file for a further 6 months for consideration for future employment opportunities. At the end of that period, or once you withdraw your consent, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and the Employee Privacy Notice will apply. Former employee data is retained for no less than 6 years after you have left the business. Some data may be retained for longer if it relates to occupational health monitoring, health and safety reporting or where there is a statutory requirement for us to retain it.

### **Your rights**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the Company to change incorrect or incomplete data;
- require the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing; and
- ask the Company to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the Company's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact [hr@tngroup.co.uk](mailto:hr@tngroup.co.uk).

If you believe that the Company has not complied with your data protection rights, you can complain to the Information Commissioner at the ICO [www.ico.org.uk/make-a-complaint](http://www.ico.org.uk/make-a-complaint)

### **What if you do not provide personal data?**

You are under no statutory or contractual obligation to provide data to the Company during the recruitment process. However, if you do not provide the information, the Company may not be able to process your application properly or at all. If your application is successful, it will be a condition of any job offer that you provide evidence of your right to work in the UK and satisfactory references.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

**Automated decision-making**

Some of the Company's recruitment processes are based solely on automated decision-making. The circumstances in which this occurs is at the initial stages of the application process when there may be critical criteria to meet in order to progress your application further. For example, if an essential requirement is to hold a full, valid driving licence for a role where driving is necessary, such as a delivery driver role, and someone is unable to meet that criterion, then the Applicant Tracking System would prevent the application from progressing further.

**Changes to this privacy notice**

We reserve the right to update this privacy notice at any time.