

## **DATA PROTECTION PRIVACY NOTICE (WORK EXPERIENCE)**

This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you during the application process. We are required to notify you of this information, under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

### **1. WHO COLLECTS THE INFORMATION**

Lanyon Bowdler LLP is a 'data controller' and gathers and uses certain information about you.

### **2. DATA PROTECTION PRINCIPLES**

We will comply with the data protection principles when gathering and using personal information, as set out in our data protection policy, a copy of which is available on request.

### **3. ABOUT THE INFORMATION WE COLLECT AND HOLD**

The table set out in schedule 1 summarises the information we collect and hold, how and why we do so, how we use it and with whom it may be shared.

We may also share information with external service providers that we use to make our business more efficient, or to help us provide our services e.g. cloud storage providers, archive storage providers, and self-employed consultants and agencies engaged by us to provide recruitment advice or services.

Some of these third parties may be based outside the UK. For more information, including on how we safeguard your personal data when this occurs, see below: **'Transferring your personal data out of the UK'**.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

### **4. WHERE INFORMATION MAY BE HELD**

Information may be held at our offices and third party agencies, service providers, representatives and agents as described above.

## **5. HOW LONG WE KEEP YOUR INFORMATION**

We keep your information before, during and after your work experience placement, for no longer than is necessary for the purposes for which the personal information is processed.

Further details on our approach to information retention and destruction are available in our Data Retention Schedule.

## **6. YOUR RIGHTS TO CORRECT AND ACCESS YOUR INFORMATION AND TO ASK FOR IT TO BE ERASED**

Please contact our HR Manager at Kendal Court, Ironmasters Way, Telford, TF3 4DT (telephone 01952 211066) if (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask our HR Manager for some but not all of the information we hold and process to be erased (the 'right to be forgotten') in certain circumstances. Our HR Manager will provide you with further information about the right to be forgotten, if you ask for it.

## **7. KEEPING YOUR PERSONAL INFORMATION SECURE**

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## **8. TRANSFERRING YOUR PERSONAL DATA OUT OF THE UK**

It may sometimes be necessary for us to share your personal data outside the UK, e.g. our service providers located outside the UK;

Under data protection law, we can only transfer your personal data to a country or international organisation outside the UK where:

1. the UK government has decided the particular country or international organisation ensures an adequate level of protection of personal data (known as an 'adequacy decision');
2. there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for data subjects; or
3. a specific exception applies under data protection law

These are explained below.

### 1.1 **Adequacy decision**

We may transfer your personal data to certain countries, on the basis of an adequacy decision. These include:

1. all European Union countries, plus Iceland, Liechtenstein and Norway (collectively known as the 'EEA');
2. Gibraltar; and
3. Andorra, Argentina, Canada, Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey, New Zealand, Switzerland and Uruguay.

The list of countries that benefit from adequacy decisions will change from time to time. We will always seek to rely on an adequacy decision, where one exists.

Other countries or international organisations we are likely to transfer personal data to do not have the benefit of an adequacy decision. This does not necessarily mean they provide poor protection for personal data, but we must look at alternative grounds for transferring the personal data, such as ensuring appropriate safeguards are in place or relying on an exception, as explained below.

### 1.2 **Transfers with appropriate safeguards**

Where there is no adequacy decision, we may transfer your personal data to another country or international organisation if we are satisfied the transfer complies with data protection law, appropriate safeguards are in place, and enforceable rights and effective legal remedies are available for data subjects. The safeguards will usually include using legally-approved standard data protection contract clauses. In relation to transfers between offices or other companies within a group, the safeguards may instead include legally binding rules and policies (known as binding corporate rules), which have been approved by the UK data protection regulator.

### 1.3 **Transfers under an exception**

In the absence of an adequacy decision or appropriate safeguards, we may transfer personal data to a third country or international organisation where an exception applies under data protection law, e.g.:

1. you have explicitly consented to the proposed transfer after having been informed of the possible risks;
2. the transfer is necessary for the performance of a contract between us or to take pre-contract measures at your request;
3. the transfer is necessary for a contract in your interests, between us and another person; or

4. the transfer is necessary to establish, exercise or defend legal claims

We may also transfer information for the purpose of our compelling legitimate interests, so long as those interests are not overridden by your interests, rights and freedoms. Specific conditions apply to such transfers and we will provide relevant information if and when we seek to transfer your personal data on this ground.

#### 9. **HOW TO COMPLAIN**

We hope that our HR Manager can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

## Schedule 1

### About the information we collect and hold

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name and contact details (ie address, home and mobile phone numbers, email address)	From you	Legitimate interest: to carry out an efficient work experience programme	<p>To enable HR personnel or other staff involved in our work experience programme to contact you to progress your application, arrange interviews if appropriate and inform you of the outcome, and of arrangements for your placement</p> <p>To inform the relevant managers or departments about your placement</p> <p>To cross check against subsequent applications for training contracts or other employment</p>
Details of your qualifications, experience, employment history (including job titles) and interests	From you	Legitimate interest: to carry out an efficient work experience programme	<p>To make an informed decision about offering you a placement</p> <p>To inform the relevant managers or departments about your placement</p> <p>To cross check against subsequent applications for training contracts or other employment</p>
Details of any disabilities you have	From you	<p>To comply with our legal obligations</p> <p>Legitimate interests: to comply with legal, regulatory and corporate governance obligations and good practice, to ensure safe working practices</p>	<p>To maintain employment records, to follow our policies</p> <p>To inform the relevant managers or departments</p> <p>For further information, see * below</p>

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your nationality and immigration status and information from related documents (such as your passport or other immigration information) and other identification documentation <input type="checkbox"/>	From you and, where necessary, the Home Office	To comply with our legal obligations  Legitimate interest to maintain employment or other records and to comply with regulatory and corporate governance obligations and good practice	To carry out right to work checks  Information may be shared with the Home Office

You are required (by law or in order to enter into a work placement with us) to provide the categories of information marked '' above to us to enable us to verify your right to work and suitability for the position.

\* Further details on how we handle sensitive personal information and information relating to criminal convictions and offences are set out in our Data Protection Policy, available on request.