



PENNINGTONS
MANCHES
COOPER

PENNINGTONS MANCHES COOPER LLP – GENERAL RECRUITMENT AND WORK PLACEMENT PRIVACY POLICY

Penningtons Manches Cooper LLP ("we" / "our" / "us") is committed to protecting and respecting your privacy. This policy, together with any other documents referred to in it, sets out the basis on which any personal information that we collect about you will be processed in relation to your recruitment application.

This policy applies to all personal information we collect when you apply for a job or placement with us. This includes personal information collected by third parties for the purposes of recruitment, such as recruitment agencies we engage with, and via our online recruitment portal supplied by Globe Business Publishing Ltd (trading as Apply4law and AllHires). In addition, information you provide via the recruitment portal will be used by Globe Business Publishing Ltd to provide help with queries relating to your application. Such use will be governed by Globe Business Publishing's privacy policy (<http://allhires.com/legal/privacyexperienced>)

We have a separate privacy policy <https://www.penningtonslaw.com/privacy-policy/> for personal information we collect when you engage our legal or other services, when we refer work to you or you refer work to us, when you make an enquiry or request information from us or as a result of your relationship with our clients or staff. That policy (<https://www.penningtonslaw.com/privacy-policy/>) also applies to information we collect through your use of our website (www.penningtonslaw.com).

TOPICS COVERED:

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Please read the following carefully to understand how we will treat your personal information.

1. ABOUT US

Penningtons Manches Cooper LLP is a limited liability partnership incorporated in England and Wales with registered number OC311575 whose registered office is at 125 Wood Street, London EC2V 7AW. Penningtons Manches Cooper LLP is the data controller in respect of your personal information. This means that we are responsible for deciding how we hold and use personal information about you. Where we process data supplied to us by a third party in relation to our recruitment activity, we do so as a data controller and we are not a joint controller in this respect.

2. WHAT INFORMATION WE COLLECT AND HOW WE WILL USE IT

We collect personal information so that we can effectively carry out recruitment activities. The information we collect (including from third parties) depends on how you interact with us, our recruitment portal and other third parties. You may choose not to provide certain information but if you do, and that information is necessary to progress a particular application, then we may not be able to continue with your application. We will only use your personal information where we have a lawful basis to do so.

The table below summarises what information is collected about you, explains how we intend to use it and what our legal basis is for using it. Click on the links below to take you to the section that is relevant to you:

- [Evaluation and recruitment of potential staff and work placement candidates](#)
- [Organisation of meetings, interviews and other hosted events](#)
- [Personal data of referees](#)

In the table below, the following types of information include:

- **Identity information** includes name, title, position, company or organisation and user log-ins.
- **Contact information** includes postal addresses, email addresses and telephone numbers.

3. EVALUATION AND RECRUITMENT

Why are we processing personal information about you?	What personal information will we collect about you?	How will we collect personal information from you?	Legal basis for processing
To evaluate, and recruit potential staff	<p>Identity information</p> <p>Contact information</p> <p>Other relevant information you provide in your application or during an interview including:</p> <ul style="list-style-type: none"> • employment history and experience • education and qualifications • SRA ID numbers • hobbies and interests • current and previous salary, and salary expectations • any other personal information which you may volunteer (including names of those you have worked with in the past) 	<p>Provided by you when applying for a position at the firm (including speculative applications and online applications made to the firm via Allhires and Apply4Law)</p> <p>Provided by a recruitment agency when submitting an application on your behalf</p>	To enable us to pursue our legitimate interest to evaluate and recruit potential staff

Why are we processing personal information about you?	What personal information will we collect about you?	How will we collect personal information from you?	Legal basis for processing
To evaluate candidates for the purposes of offering a work placement	Identity information Contact information Other relevant information including: <ul style="list-style-type: none"> • employment history and experience • education and qualifications • hobbies and interests • any other personal information you volunteer 	Provided by you when applying for a work placement Provided by a member of our staff when submitting an application on your behalf	To enable us to pursue our legitimate interest to evaluate and recruit potential staff
To verify information provided during the recruitment process	At the point an offer of employment is made we will collect the following information to verify details provided during the recruitment process including: <ul style="list-style-type: none"> • employment history and experience • education, qualifications and professional membership status • current and previous salary, and salary expectations 	Collected by us from your referee (details of whom you will have provided, see section 5 for more details) Collected by us from you at the time we make an offer of employment	To enable us to pursue our legitimate interest to make an informed decision to recruit and to comply with legal, regulatory, corporate governance obligations and good employment practice

Why are we processing personal information about you?	What personal information will we collect about you?	How will we collect personal information from you?	Legal basis for processing
	<p>ID documentation (including passport/visa)</p> <p>If relevant to your role we will also collect the following information:</p> <ul style="list-style-type: none"> • admittance to the Roll of Solicitors, practising certificate status, and disciplinary tribunal findings and order 	<p>Collected by us from the Solicitors Regulation Authority (SRA) based on the details you provided</p>	
	<p>We will also carry out background checks to collect the following information if relevant to your role:</p> <ul style="list-style-type: none"> • outcome of adverse financial history check • current and previous addresses 	<p>Collected by us from our pre-employment screening provider (Matthew James Consulting Limited)</p>	<p>To enable us to pursue our legitimate interest to make an informed decision to recruit and to comply with legal, regulatory, corporate governance obligations and good employment practice.</p>
	<p>Such background check, if carried out and relevant to your role, will also collect information regarding the outcome of a criminal record check from the Disclosure and Barring Service (DBS). We have in place an appropriate policy document</p>	<p>Collected by us from our pre-employment screening provider (Matthew James Consulting Limited)</p>	<p>Necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by</p>

Why are we processing personal information about you?	What personal information will we collect about you?	How will we collect personal information from you?	Legal basis for processing
	and safeguards, which we are required by law to maintain when processing such data.		law on the controller or the data subject in connection with employment, social security or social protection
To gather and analyse information about candidates for equality monitoring purposes	<p>In addition we collect the following special category information, if you choose to provide it:</p> <ul style="list-style-type: none"> • information about your race or ethnicity, religious beliefs, sexual orientation and political opinions; and • information about your health, including any medical condition, health and sickness records. <p>You are entirely free to decide whether or not to provide such information and there are no consequences of failing to do so.</p>	Provided by you	Necessary for the purpose of monitoring equality of opportunity or treatment between groups
To consider if we need to provide appropriate adjustments during the recruitment process	<p>In addition we collect the following special category information, if you choose to provide it:</p> <ul style="list-style-type: none"> • information about your health, including your disability status and any medical conditions 	Provided by you	Necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the

Why are we processing personal information about you?	What personal information will we collect about you?	How will we collect personal information from you?	Legal basis for processing
			data subject in connection with employment, social security or social protection

4. ORGANISATION OF MEETINGS, INTERVIEWS AND OTHER HOSTED EVENTS

To enable us to host an interview or other event	Identity information Contact information	Provided by you when you: <ul style="list-style-type: none"> • contact us (including by email, telephone, post, fax, SMS or other messaging service or in person) • complete an application for recruitment Received from third parties (including recruitment agencies or via an online recruitment portal when they refer you to us)	To enable us to pursue our legitimate interest to carry out recruitment activities
	Where you provide it to us, information about your dietary requirements and allergies	Provided by you	Your consent
	Where you provide it to us, information about your access requirements	Provided by you	Your consent

	Images captured by our offices' CCTV	Images captured when you visit our offices	To enable us to pursue our legitimate interest to maintain the safety and security of our premises
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5. PERSONAL DATA OF REFEREES

We may ask that you provide us with the details of referees for the purposes of judging your suitability for the role for which you have applied. We will normally do this at the time we make an offer of employment. Where you provide referee details we will assume that you have the consent of your referees to provide us with this information. We will treat their personal information in accordance with the provisions of this privacy policy.

Why are we processing personal information about you?	What personal information will we collect about you?	How will we collect personal information from you?	Legal basis for processing
To contact you and request details from you relating to the candidate who has nominated you as their referee	Identity information Contact information	Received from the candidate who has nominated you as their referee	To enable us to pursue our legitimate interest to access a candidates suitability for employment

To learn more about the information we collect and how we use it see below

More about the information we collect and why

We have a duty to process personal data fairly, lawfully and in a manner that you would expect given the nature of our relationship with you. Where we have a legal basis to use your personal information without consent (as set out in the table above), this policy fulfils that duty by giving you appropriate notice and explanation of the way in which your personal information will be used. Where consent is required for our use of your personal information we will ask you to positively opt-in. For example, we will only process certain data (such as allergy details) if you have given us consent and you may withdraw this consent at any time.

Where you accept an offer of employment from us, we will provide you with an appropriate privacy policy setting out how we process your personal data in an employment context. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

If you have any questions or require any further information regarding our use of your personal information please contact our Data Protection Officer at data@penningtonslaw.com / 01256 407100 / Matrix House, Basing View, Basingstoke, Hampshire, RG21 4DZ.

6. SHARING YOUR INFORMATION

6.1 We may, in carrying out recruitment activities share your personal information with other Penningtons Manches Cooper entities. We may also share your personal information with third parties where:

- you have consented to us sharing your personal information in this way;
- we are under a legal, professional or regulatory obligation to do so;

We use third party service providers to support us in the performance of the activities set out in the table above and including:

- our professional advisors;
- we use a third party service provider to provide services that involve data processing including Intelligent Office UK Limited to whom we outsource our personal assistant, document production, facilities and reception requirements, Calllitech Limited t/a Money Penny who provide telephony services, Saracen Datastore Limited and Iron Mountain (UK) Plc for archiving;
- suppliers and consultants to whom we outsource IT services and technical solutions including for network solutions (Exponential-e), document automation and client relationship management (Thomson Reuters), email management, network server monitoring, cloud hosting (Pulsant), password management., IT consultancy services, expense management (Chrome River) and email management (Mimecast); and
- Global Business Publishing Limited (trading as “AllHires” and “Apply4Law”) which hosts our recruitment portal on our behalf.
- TopScore Technologies Limited, our digital assessment and interview conferencing provider.

We have identified key third party service providers above; if you require further information regarding the identity of other third parties we use, please e-mail data@penningtons.co.uk.

6.2 We may also share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or otherwise to comply with the law.

6.3 We require all our third party service providers to take appropriate and stringent 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 information for

their own purposes and only permit them to process your personal information for specified purposes in accordance with our instructions.

6.4 In the course of providing our services and operating our business it may be necessary for us to share personal information with our office in San Francisco, USA. In addition, some of the third parties with whom we share personal information may need to transfer your personal information outside the jurisdiction in which you provide it or from which you access our website. This may involve a transfer of your information to a location outside the European Economic Area (EEA) including Chrome River, who transfer data to USA.

6.5 The level of protection in countries outside the EEA may be less than that offered within the EEA. To ensure that your personal information does receive an adequate level of protection we have put in place appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection. Where our third party service providers process personal data outside the EEA in the course of providing services to us our contractual arrangements with these will include appropriate measures to meet EU-approved data protection obligations, usually standard contractual clauses or, in case of USA having signed up to the EU-US Privacy Shield. If you require further information about these protective measures, please e-mail data@penningtonslaw.com.

7. **STORING YOUR PERSONAL INFORMATION**

7.1 We will only retain your personal information for as long as is necessary to fulfil the purposes we collected it for, or for as long as we have a lawful basis to retain it. After this period we will securely destroy your personal information.

7.2 The periods for which personal information collected by us for the purposes of recruitment are set out in the table below. In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. If you require further information regarding our data retention policy please e-mail Data Protection Officer at data@penningtonslaw.com.

Type of application		Retention period
Application for a trainee solicitor position (including applications made via Apply4law)	Submitted applications or applications in progress using Apply4law	12 months from: <ul style="list-style-type: none"> • starting an online application • updating an 'in progress' online application • submitting an application on line

		<ul style="list-style-type: none"> • our receipt of a paper or electronic application <p>save that where you are a work permit holder (or you are shortlisted for a position with a work permit holder) the retention period will be one year from the end of the period of employment of the sponsored migrant</p>
	<p>If we ask to keep hold of your personal information, for example to consider you for future roles.</p>	<p>If you agree then we will keep your personal information as long as is agreed with you</p>
<p>Application for a position other than as a trainee solicitor (including applications made via AllHires)</p>	<p>Submitted applications or applications in progress using AllHires</p>	<p>6 months from:</p> <ul style="list-style-type: none"> • starting an online application • updating an 'in progress' online application • submitting an application on line • our receipt of a paper or electronic application <p>save that where you are a work permit holder (or you are shortlisted for a position with a work permit holder) the retention period will be one year from the end of the period of employment of the sponsored migrant</p>
	<p>If we ask to keep hold of your personal information, for example to consider you for future roles.</p>	<p>If you agree then we will keep your personal information as long as is agreed with you.</p>

8. KEEPING YOUR INFORMATION SECURE

- 8.1 All information that you provide to us is stored on secure servers. We have put in place appropriate measures to protect the security of your information.
- 8.2 The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of the information transmitted to our site and you acknowledge that any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access or inadvertent disclosure.

To learn more about the security measures we put in place see below

We limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. If you require further information regarding these measures please e-mail data@penningtonslaw.com.

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

9. YOUR RIGHTS

- 9.1 You have the right under data protection laws to access information held about you, subject to certain conditions, and to request its rectification or deletion.
- 9.2 Alternatively, or if you would like to access, update or amend any other information which we hold about you or would like us to stop using your personal information please contact data@penningtonslaw.com.

To learn more about the rights you may have in relation to your personal information see below

Your rights in connection with your personal information

By law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. This right is subject to a number of exemptions which allow information to be withheld in certain circumstances. For example, subject access rights are excluded where compliance would involve disclosing: information relating to another individual; data which consists of information which is subject to legal professional privilege; negotiations or confidential references.*
- Request correction or erasure of your personal information (unless we have the legal right to retain it). You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).*

- *Object to processing of your personal information where we are relying on a legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.*
- *Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to check its accuracy or the reason for processing it.*
- *Request the transfer of your personal information to another party.*

You should be aware that if you ask us to stop processing your personal information in a certain way or erase your personal information, and this type of processing or data is needed to facilitate your recruitment application, we may not be able to progress your application which shall mean that we will be unable to make an employment offer to you.

If you want to exercise any of the above rights please contact us by email at data@penningtonslaw.com.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is an appropriate security measure to ensure that personal information is not disclosed to a person who has no right to receive it.

Right to withdraw consent

Where we are relying on consent as the legal basis to process your personal information for a particular purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email data@penningtonslaw.com. Once we know notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

10. OTHER WEBSITES

We use and provide links to websites which are controlled by third parties and these include Apply4law and AllHires which provide online recruitment. If you use or follow a link to any of these third party websites you should be aware that these websites have their own privacy policies and we cannot accept responsibility for their use of your information.

11. CHANGES TO THIS PRIVACY POLICY

We keep our privacy policy under regular review and will post any updates on this webpage. This privacy policy was last updated September 2019.

12. HOW TO CONTACT US AND COMPLAINTS

12.1 Penningtons Manches Cooper LLP (registered number OC311575) is the data controller in respect of your personal information. Penningtons Manches Cooper LLP's registered office is at 125 Wood Street, London EC2V 7AW.

12.2 We have appointed a Data Protection Officer to oversee compliance with this privacy policy. If you have any questions about this privacy policy or how we handle your personal information please contact our Data Protection Officer at data@penningtonslaw.com / 01256 407100 / Matrix House, Basing View, Basingstoke, Hampshire, RG21 4DZ.

12.3 If for any reason you are not happy with the way that we have handled your personal information, please contact us at data@penningtonslaw.com or at the address set out above. If you are still not happy, you have the right to make a complaint to the Information Commissioner's Office, see: <https://ico.org.uk/global/contact-us/>.