



APPLICANTS FOR GRADUATE RECRUITMENT OPPORTUNITIES

HFW (the **firm**) collects and processes personal data relating to training contract and vacation scheme applicants to manage its graduate recruitment process. The firm is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

Who are we?

The controller of your personal data for this recruitment process is Holman Fenwick Willan LLP.

Your personal data may be shared between HFW's offices and associated entities as necessary or appropriate. Don't worry, we've put measures in place to keep your personal data safe whichever HFW entity processes it.

For a list of our offices and separate legal entities which may from time to time receive your personal data, please see [Who We Are](#).

What information does the firm collect?

The firm collects a range of information about you in a variety of ways. Most of this is obtained directly from you, for example through application forms, CVs or resumes. Data may be obtained from identity documents you provide (for example a passport or driving licence), your correspondence with the firm or through interviews, meetings and other assessments.

In some cases, the firm collects personal data about you from third parties. The firm will usually obtain personal references (for example from your former employers) and information from employment background check providers and credit reference agencies. It may also obtain criminal records checks as permitted by law.

Why does the firm process your personal data?

The firm processes your data during the recruitment process to:

- run recruitment processes;
- maintain accurate and up-to-date contact details;
- obtain occupational health advice, to ensure that it complies with duties towards individuals with disabilities, meet its obligations under health and safety law;
- ensure effective general HR and business administration;
- respond to and defend against legal claims; and
- maintain and promote equality in the workplace.

The firm relies on the following lawful grounds for the ways it processes your personal data:

- The firm needs to process your personal data during the recruitment process to achieve its legitimate interest to recruit and develop the next generation of lawyers for HFW to ensure continued excellent service for clients. Where the firm relies on this legitimate interest to process your data, it has considered whether or not those interests are overridden by the rights and freedoms of partners or staff and has concluded that they are not.
- In some cases, the firm needs to process personal data to ensure compliance with its legal obligations. For example, it is required to check a prospective employee's entitlement to work in the UK and to comply with health and safety laws.
- For certain positions, it is also necessary to carry out basic criminal records checks to ensure that individuals are permitted to undertake the role in question. Where criminal records information is returned to us, as a law firm we rely on a combination of our legitimate interest to recruit suitable staff for our business and the substantial public interest of protecting the public against dishonesty.
- Some 'special categories' of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to individuals with disabilities and for health and safety purposes) or because it is necessary for the substantial public interest of exercising a right or to comply with an obligation arising in connection with an insurance contract.
- Where the firm processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done on the grounds of both our legitimate interest, and a substantial public interest, to monitor equal opportunities. You are entirely free to decide whether to provide such data and there are no consequences of failing to do so.

Who has access to your personal data?

Your information may be shared internally, including with members of the HR team, partners, senior managers and employees (as appropriate) in the business area(s) in which you would work and IT staff if access to the data is necessary for performance of their roles.

The firm also shares your data with other third parties in order to obtain pre-employment references from other employers or colleagues, obtain employment background checks from third party providers and obtain necessary criminal records checks from the Disclosure and Barring Service. The firm also shares your data with third parties that process data on its behalf, including AllHires (which hosts our Apply4Law graduate recruitment portal), and providers of office facilities (for example security or post room services).

Given that HFW is an international law firm with offices across the world, your data may be transferred to countries outside the European Economic Area (EEA) to achieve the purposes set out in this notice. In these circumstances your data is transferred outside the EEA to HFW group entities and partners on the basis of Standard Contractual Clauses, which the European Commission has decided offer sufficient safeguards for your personal data.

How does the firm protect your personal data?

The firm takes the security of your data seriously. The firm has internal policies and controls in place to try to ensure that your personal data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its partners or staff in the performance of their duties. Special category data is usually restricted to relevant members of the HR team, although it may be shared with staff members outside of the HR team, if necessary, on a 'need to know' basis.

Where the firm engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data. You can read more about HFW's security measures [here](#).

For how long does the firm keep your personal data?

The firm will hold your personal data for the duration of the recruitment process. If your application is unsuccessful, the firm will hold your data in accordance with the Retention Schedule set out below in Annex 1. If your application is successful, your personal data will be held as part of your personnel file, and in accordance with our partner and employee privacy notice (which will be provided to you when you join us).

Your rights

Individuals applying for a position with Holman Fenwick Willan LLP have a number of rights. You can:

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

If you would like to exercise any of these rights, please contact Sarah Burson, HR Manager (sarah.burson@hfw.com).

If you believe that the firm has not complied with your data protection rights, you can complain to the UK's Information Commissioner's Office, who can be contacted [here](#) or on +44 (0)303 123 1113.

What if you do not provide your personal data?

Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable the firm to enter a contract of employment with you. If you do not provide other

information, this may hinder the firm's ability properly to administer the graduate recruitment process with respect to your application.

If you have any questions about the processing of personal data at the firm, please contact the firm's Privacy Officer, Justin Glenister (privacy@hfw.com).

ANNEX 1

Retention Schedule

When you create an account on AllHires, you can submit multiple applications. The firm operates its retention policy at the AllHires account level, which means that your full account is retained against the longest retention period as applied to any of the applications you have made. For the avoidance of doubt, this means that applications are not deleted as the retention period expires, rather your full account is deleted when the latest data retention period expires. If you fall into any of the following categories, the longest retention period will apply.

Accounts registered on AllHires with no submitted applications

Status	Reason for retention	Retention period
Acknowledged privacy policy – no application	You have acknowledged the privacy policy but have no applications.	One year from you acknowledging the privacy policy
In progress application	You have started or updated an in progress application.	One year from last update

Accounts registered on AllHires with submitted applications

Status	Reason for retention	Retention period
Successful application	You have a successful application.	Five years from submission of successful application
Unsuccessful application	You have an unsuccessful application or have withdrawn your application for consideration.	Three years from submission of unsuccessful or withdrawn application

Last updated: January 2019