

# TLT Policy

Candidate privacy notice

VERSION 1.0

15 January 2025

Final – Public



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# 1 Introduction

This privacy notice (**Notice**) sets out our responsibility and commitment to protecting the privacy and confidentiality of the personal data we (TLT LLP and TLT NI LLP (collectively referred to as **TLT**)), collect from you, or that you provide to us, as part of the candidate process. Please read it carefully to understand our practices regarding your personal data and how we will treat it. This Notice should be read in conjunction with our [Cookie Policy](#) and [Main Privacy Notice](#).

## 2 Important information and who we are

- 2.1 TLT LLP is a law firm and limited liability partnership registered in England under number OC308658 and regulated by the Solicitors Regulation Authority under number 406297. Our registered office is 1 Redcliff Street Bristol BS1 6TP. We are registered with the Regulator, the Information Commissioner's Office (**ICO**) under the registration number Z5378293.
- 2.2 TLT (NI) LLP is a law firm and limited liability partnership registered in Northern Ireland under number NC000856 and regulated by the Law Society of Northern Ireland. Its registered office is River House 48-60 High St Belfast BT1 2BE. We are registered with the Regulator, the Information Commissioner's Office (**ICO**) under the registration number Z3336501.

## 3 Controller

Both TLT LLP and TLT NI LLP are data controllers pursuant to the UK General Data Protection Regulation and Data Protection Act 2018 and are responsible for your personal data.

## 4 Data Protection Officer

We have appointed a data protection officer (**DPO**) who is responsible for overseeing questions in relation to this Notice. If you have any questions about this Notice, including any requests to exercise your legal rights, contact the DPO using the information set out in the contact details section.

## 5 What type of information will TLT collect from you?

- 5.1 Personal data means any information about an individual from which that person can be identified.
- 5.2 We may collect, use, store and transfer different kinds of personal data about you. This can include:
- 5.2.1 your name, address and contact details, including personal email address and telephone number, date of birth and gender;
  - 5.2.2 your CV which will include your employment and education history;
  - 5.2.3 details of your qualification, skills, experience and employment history, including start dates and end dates, with previous employers and with TLT;
  - 5.2.4 information about your remuneration, including entitlement to benefits such as pension or insurance cover;
  - 5.2.5 information about your nationality and eligibility to work in the UK;
  - 5.2.6 information about your criminal record (in specific job roles, please refer to TLT Vetting and Screening Policy);

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- 5.2.7 details of professional memberships, such as SRA number and date of admission, and accreditation under the Conveyancing Quality Scheme (in specific job roles);
  - 5.2.8 details of your jurisdiction of qualification and if you are qualified in any other jurisdiction (in specific job roles);
  - 5.2.9 details of any languages spoken and to what level;
  - 5.2.10 information about medical or health conditions, including whether or not you have a disability for which we might have to make reasonable adjustments in the recruitment process; and/or
  - 5.2.11 equal opportunity monitoring information, including information about your ethnic origin, sexual orientation, religion or belief.
- 5.3 If you are requested for interview or offered a role, then this may involve the processing of more detailed personal data including special category of personal data such as health information (including any disability or conditions you may have which are required for us to make reasonable adjustments) or any unspent criminal convictions that you or others provide about you. We will ask for your consent before undertaking such processing if we are required to do so.

## 6 If you fail to provide personal data

You have no statutory or contractual obligation to provide data to us during the recruitment process. However, if you fail to provide certain personal information when requested, we may not be able to process your application further or at all or be able to make reasonable adjustments should you be invited for interview or as part of a selection process, etc.

## 7 How is your personal data collected?

- 7.1 We use different methods to collect personal data from and about you including:
- 7.1.1 through the recruitment process via your CV, application and Diversity Monitoring form;
  - 7.1.2 by corresponding with you via post and email; and/or
  - 7.1.3 through interviews you take part in, meetings or other assessments.

## 8 How we use your personal data

- 8.1 The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:
- 8.1.1 **Legitimate interests:** We will use your personal data for our legitimate interests. These legitimate interests include:
    - (a) managing the recruitment and assessment process (for example, assessing your skill sets, level of qualification and any specific technical experience that might be relevant to a role with TLT);
    - (b) managing our relationship with you as a candidate;
    - (c) ensuring appropriate standards and compliance with our policies, practices or procedures, relevant laws and administrative purposes (including to maintain and promote equality in the workplace).

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- 8.1.2 **Performance of a contract with you:** To put in place pre-contractual arrangements and documentation at your request once a role has been secured.
- 8.1.3 **Compliance with legal obligation:** To carry out pre-employment screening and to establish whether you are entitled to work in the UK. Other special categories of personal information such as information about ethnic origin, sexual orientation, health or religion or belief, are collected for the purposes of equal opportunity monitoring and our legal obligation to report to the Equality Commission in Northern Ireland.

## 9 Automated decision making

We do not use your personal data for automated decision making.

## 10 How we store your personal data

Your personal data is stored in a range of different secure places. This includes your careers account held on our Applicant Tracking System (ATS) called HARBOUR ATS (managed by our third-party supplier 3D MarComms), and in other IT systems such as our email servers.

## 11 Who your personal data will be shared with

- 11.1 Your personal data may be shared internally, including with members of the HR team; the hiring manager, and other stakeholders in the business group in which you have applied to work.
- 11.2 If you are required to complete an assessment as part of the application for a vacancy, your personal data will be shared with our third party assessment provider, Test Reach for the purpose of administering assessments. You will be notified of this as part of the recruitment process.
- 11.3 If you are successful in your application, TLT will share your personal data with third parties in order to obtain pre-employment references from other employers, obtain background checks from third party providers and obtain necessary credit reference and criminal record checks as part of the pre-employment screening process should you be successful in your application.

## 12 International transfers of your personal data

- 12.1 We do not generally store or transfer your personal data outside the UK. However, we may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the UK to countries which have laws that do not provide the same level of data protection as the UK law.
- 12.2 Whenever we need to transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring that the following safeguards are in place:
  - 12.2.1 we will only transfer your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data; and/or
  - 12.2.2 we may use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, namely the International Data Transfer Agreement or The International Data Transfer Addendum to the European Commission's standard contractual clauses for international data transfers. To obtain a copy of these contractual safeguards, please contact us at [GDPR@tlt.com](mailto:GDPR@tlt.com).

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## 13 How long we keep your personal data for

- 13.1 We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory or reporting requirements.
- 13.2 Assessment results will be retained for a period of 12 months.
- 13.3 If your application for employment is successful, any relevant personal data collected during the recruitment process will form part of your personnel records and be retained during your employment, in accordance with our HR policies and our Retention Schedule.
- 13.4 If your application is unsuccessful, we will hold your personal information for up to 12 months from the date of our notification to you so that we can consider you for other suitable vacancies, unless you have not consented to this. You have the right to change your mind at any time.

## 14 Your legal rights

- 14.1 You have rights under data protection laws in relation to your personal data. If you wish to exercise any of the rights set out above, please contact [Recruitment.Operations@TLT.com](mailto:Recruitment.Operations@TLT.com).

Request <b>access</b> to your personal data (commonly known as a <b>subject access request</b> ).	This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. This can be done by contacting the <a href="#">recruitment team</a> .
Request <b>correction</b> of the personal data that we hold about you.	This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
Request <b>erasure</b> of your personal data in certain circumstances.	This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.  <b>Note</b> , however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
<b>Object</b> to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including	In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object. You also have the absolute right to object any time to the

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carrying out profiling based on our legitimate interests).	processing of your personal data for <b>direct marketing</b> purposes.
Request the <b>transfer</b> of your personal data to you or to a third party.	We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. <b>Note</b> that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
<b>Withdraw consent</b> at any time where we are relying on consent to process your personal data.	However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
Request <b>restriction</b> of processing of your personal data.	This enables you to ask us to suspend the processing of your personal data in one of the following scenarios: <ul style="list-style-type: none"> <li>• if you want us to establish the data's accuracy;</li> <li>• where our use of the data is unlawful but you do not want us to erase it;</li> <li>• where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or</li> <li>• you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.</li> </ul>

#### 14.2 No fee usually required

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

#### 14.3 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 your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

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#### 14.4 Time limit to respond

If you contact us to exercise any of these rights, we will check your entitlement. We try to respond to all legitimate requests within **one calendar month**. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 15 Security of your information

- 15.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
- 15.2 All personal data you provide in the application process is held on a dedicated system to which only members of staff involved in the hiring process of that specific role have access.
- 15.3 Your personal data will be held on secure servers within the UK with appropriate technological and operation measures put in place to prevent unauthorised disclosure.
- 15.4 Where TLT engages third parties to process personal information on its behalf, they will ensure there is a written contract in place to ensure the third party meets all the requirements of the relevant data protection laws. This will include only acting on our written instructions, the people processing the data being subject to a duty of confidence, and all appropriate measures being taken to guarantee the security of the processing.

## 16 Complaints about the use of your personal data

- 16.1 If you wish to raise a complaint on how we have handled your personal data, you can contact us to have the matter investigated by:
  - 16.1.1 writing to the Data Protection Officer TLT LLP 1 Redcliff Street Bristol BS1 6TP;
  - 16.1.2 emailing us at [GDPR@TLT.com](mailto:GDPR@TLT.com); and/or
  - 16.1.3 via our Complaints e-Form at <https://www.tlt.com/privacy/dpa-gdpr-complaints-form/>
- 16.2 You can read our Complaints Policy [here](#).
- 16.3 In addition, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues. You can find more details on their website at [www.ico.org.uk](http://www.ico.org.uk).

## 17 Changes to this privacy notice and your duty to inform us of changes

- 17.1 We keep our privacy notice under regular review. This version was last updated in **December 2024**.
- 17.2 It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

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**Document version control**

Version number	Date amended/created	Amended/created by	Details
1.0	15 January 2025	Heather Milton-Brooks	Created as a policy

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