

Privacy Statement - Recruitment

Updated: 22 May 2020

INTRODUCTION

Walkers is an international law firm and professional services business with offices in a number of countries, including an associated office in Bermuda, (known collectively as the "**Walkers Group**" and separately as "**Walkers**"). Walkers collects the personal information of anyone who applies for or who is offered a position at Walkers and as such is regarded as a "controller" under data protection laws. Walkers is committed to protecting the privacy and security of the personal information it collects about you and this Statement is designed to help you understand what personal information we collect, why we collect it and what we do with it. If you do not provide certain information when requested, we will not be able to progress your application.

If you have any questions about any aspect of this Statement please contact us at data.privacy@walkersglobal.com. This Statement is reviewed annually.

EQUAL OPPORTUNITIES

Walkers is committed to ensuring that job applicants are not subject to any form of unlawful discrimination, victimisation or harassment on the basis of race, gender, ethnic origin, disability, age, sexual orientation or other legally protected ground. Please refer to our Equal Opportunities Policy.

WHAT PERSONAL INFORMATION DO WE COLLECT AND FROM WHOM?

Type: Name, date of birth, age, gender, home address, personal email address, education, qualification and work experience details, references.

From: You or a third party (eg a Recruitment Agency) and included in your CV, application form, covering letter and during the interview process.

Type: Interview notes, test scores and correspondence between you and Walkers.

From: You or a third party, or created by us, during the recruitment process.

Type: Background checks on candidates who have been offered a position at Walkers.

From: A third party (eg screening agency or government body) about criminal convictions.

Type: Racial and ethnic origin, physical or mental health information, immigration / naturalisation records (if this discloses racial/ethnic origin).

From: You (special categories of personal data).

Type: Information in the public domain.

From: Search engines (eg Google) and social media sites.

WHY AND HOW DO WE USE YOUR PERSONAL INFORMATION?

We need your personal information before we can enter into a contract with you and we need to be able to process your information to comply with our legal and regulatory obligations. We have a legitimate interest to:

1. ensure the effective administration and management of the recruitment process;
2. ensure we hire a suitable individual for a role;
3. deal with disputes and accidents and take legal or other professional advice; and
4. ascertain your fitness to work.

Consequently, we will use your personal information to:

- progress the recruitment process
- verify the details provided to us
- carry out reference checks
- comply with our legal requirements
- communicate with you
- assess your general suitability for the role
- carry out Background Checks
- comply with our regulatory requirements

WHY AND HOW DO WE USE SPECIAL CATEGORY PERSONAL INFORMATION?

We use special category personal information because:

1. you have given your explicit written consent;
2. we need to carry out our legal obligations;
3. there is substantial public interest;
4. we need to establish, exercise, or defend legal claims or court cases; or
5. we need to protect your interests (or someone else's interests) and you are not capable of giving your consent.

Consequently, we may use your special category personal information to:

- monitor for equal opportunities
- comply with our legal obligations
- make appropriate adjustments during the recruitment process
- ensure your fitness for the role
- comply with our regulatory obligations

INFORMATION ABOUT CRIMINAL CONVICTIONS

As part of the recruitment process, we ask you for information in relation to criminal convictions and/or we carry out criminal background checks. We are allowed to use your personal information in this way where it is necessary to carry out our employment rights and obligations, eg (1) to assess your suitability for a regulated role; (2) because it is necessary in relation to legal claims; or (3) to protect your interests, our interests and third party interests.

BACKGROUND CHECKS	
<p>If you are shortlisted for a position or offered a position with Walkers, we will need to conduct background checks for the legitimate reasons set out in this Statement. All contracts of employment are contingent upon receipt of a satisfactory background check. The scope of those checks is listed below:</p>	
<p>Verification of Identity</p>	<p>Walkers may require that you provide an original government issued photo-ID such as a passport, drivers' licence and/or social security ID.</p>
<p>Verification of Eligibility to work in a particular jurisdiction</p>	<p>Walkers may require that you provide an original government issued photo-ID such as a passport or an original letter from Immigration to confirm your eligibility to work in a particular jurisdiction (if relevant to such jurisdiction). Additional forms may be completed as required.</p>
<p>Verification of Residential Address</p>	<p>Walkers may require that you provide an original recent utility bill or a bank statement showing your name and full residential address (if relevant to your jurisdiction and circumstances).</p>
<p>Reference Checks</p>	<p>Walkers may seek references from some or all of your current and former employers to verify your employment history as provided in this Form.</p>
<p>Qualifications & Skills</p>	<p>Walkers may contact the educational establishments you have attended to verify your qualifications, along with any relevant professional bodies.</p>
<p>Criminal Record Check</p>	<p>Walkers may conduct a criminal record check to the extent permitted by and in compliance with local laws where the record is held. The check will be obtained from local law enforcement agencies and/or any government or judicial department which deals with criminal records. You may be asked to complete a separate application form (and to provide identity documents) for this purpose or to submit the application directly and to provide us with the results.</p>
<p>Credit Reference Screening</p>	<p>Walkers may conduct checks with local credit reference agencies in relation to adverse credit incidents (such as court judgments) to the extent permitted by and in compliance with local laws where the record is held. Information relating to court judgments may also be sought from court records. You may be asked to complete a separate application for this purpose to submit the application directly and to provide us with the results.</p>
<p>Compliance Check</p>	<p>Walkers has an internal policy to conduct a compliance check through <i>WorldCheck</i>, <i>Accuity</i> or a similar service, which contains a list of individuals, entities and countries which are subject to sanctions, politically exposed persons (PEPs), or other potentially adverse information (eg allegations of corruption). The information provided in this Form will be used to conduct such a search.</p>

Information available in
the Public Domain

Walkers may conduct checks in the public domain to assess your suitability for the role and to identify potentially adverse media or other information which may pose a risk to the reputation of Walkers. Our checks may include the use of various search engines (eg Google) and social media sites.

INFORMATION THAT WE SHARE

Your information will be shared (subject to appropriate safeguards) within the Walkers' Group for the purposes of administration, accounting and reporting as well as with third parties in order to process your application eg:

- employment agencies
- background check & online test providers
- credit reference agencies
- regulators and competent authorities

This means that your personal data may be transferred to or accessed from countries whose laws provide a level of protection for personal data not always equivalent to the level of protection that may be provided in your own country. In particular, if you are located inside the European Economic Area ("EEA") your personal information may be transferred to a country outside of the EEA. We ensure that cross border transfers comply with all relevant laws and regulations and we choose to enforce the highest privacy and data management standards across all our offices through our global Data Protection Policy.

RETENTION AND SECURITY OF PERSONAL INFORMATION

We will retain your personal information for the duration of the recruitment process and for the length of any applicable limitation period for claims which might be brought against us later. If you are successful in applying for a position, your personal information will be retained for a further period, in accordance with our Record Retention Policy. We use a variety of security technologies and procedures to help protect your personal information from unauthorised access, use or disclosure.

YOUR RIGHTS

<p>Right of Access</p>	<p>You are entitled to obtain from us details concerning the processing of your personal information. This includes details of the data being processed, the purposes of the processing, any recipients of that information, the period for which the information is processed, the source of the information (if it is not provided by you), any international transfers of the information and the protections we put in place to protect your information. You are also entitled to details of any automated decision-making, including profiling, involving your information.</p> <p>You are entitled to a copy of the personal information we process about you (including in electronic form). Additional copies may be subject to a reasonable administrative fee.</p>
<p>Right to Rectification</p>	<p>You are entitled to have any incomplete and inaccurate personal information held by us rectified.</p>
<p>Right to Erasure ("be forgotten")</p>	<p>In certain circumstances you are entitled to have personal information erased, including: where this is no longer necessary for the purposes for which it was collected and/or processed; or you withdraw consent to our use of the information.</p> <p>We may continue processing the information in certain circumstances, including: if there are grounds other than consent for processing the information; where processing is in compliance with a legal obligation or for reasons of public interest; or for the exercise or defence of legal claims.</p>

	<p>If you request that we erase your personal information we shall advise you if we consider that there are on-going grounds permitting us to continue processing your information.</p>
<p>Right to Restrict Processing</p>	<p>You can ask us to restrict the processing of personal information Walkers holds about you if: you contest the accuracy of the personal information we process about you; you consider that the processing is unlawful but you do not want us to erase the information; we do not require to continue processing the information but you wish the information to be retained in connection with a legal claim; or you have objected to the grounds upon which we process the information.</p> <p>Where you have asked us to restrict processing the information we shall only hold, process and erase the information as permitted by you or as permitted by applicable data protection laws. We will advise you if we do not agree with your request to restrict processing and our reasons.</p>
<p>Right to Data Portability</p>	<p>Where you provide personal information to us and consent to us using it, and the processing is carried out by automatic means, you are entitled to receive a copy of that information in a machine-readable format and for that to be provided to another data controller, where technically possible.</p>
<p>Right to Object</p>	<p>You are entitled to object to Walkers collecting, using and otherwise processing your personal information where the basis for the processing is Walkers legitimate interests or the processing is in the public interest. In such circumstances, we shall cease processing your personal information unless: we are legitimately processing the information on a different basis; there are compelling legitimate grounds for continuing to process the personal information; or we are otherwise permitted to process the information under applicable data protection laws. If applicable, we will advise you of the basis upon which Walkers continues to process your personal information.</p> <p>If you are not clear of the ground(s) upon which we collect, use and process your personal information, you can ask us to confirm this to you, as part of the Right of Access outlined above.</p>
<p>Right to Withdraw Consent</p>	<p>Where you have given us consent to make use of your personal information for any of the purposes outlined in this Statement you shall be entitled to withdraw that consent. You may do this by emailing data.privacy@walkersglobal.com.</p>
<p>Right to Complain</p>	<p>In the event that you have any questions, concerns or complaints regarding this Statement or the manner in which Walkers collects, uses and otherwise processes your personal information we shall always seek to address the same promptly and to your satisfaction. However if you consider that we have not done so you are entitled to lodge a complaint to your local supervisory authority.</p> <p>If you are unclear who the appropriate supervisory authority is for you, please contact us at data.privacy@walkersglobal.com.</p>